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Arcadia Town Center Project

Initial Study/Mitigated Negative Declaration

Submitted to City of Arcadia
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SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), this Initial Study (IS) has been prepared as documentation for a Mitigated Negative Declaration (MND) for the Arcadia Town Center Project (Project). This Initial Study and Mitigated Negative Declaration (IS/MND) includes a description of the Project; the location of the Project site; and an evaluation of the potential environmental impacts that would result from Project implementation. It includes significance determinations from the environmental analyses; identifies regulatory requirements (RRs) that must be implemented; and sets forth mitigation measures (MMs) that will lessen or avoid potentially significant Project impacts on the environment. RRs are based on local, State, and/or federal regulations or laws that are required independent of CEQA review, yet also serve to offset or prevent certain impacts.

Pursuant to Section 15367 of the State CEQA Guidelines, the City of Arcadia (City) is the lead agency for the Project. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment. The City, as lead agency, has the authority for Project approval and certification of the accompanying environmental documentation.

1.2 PROJECT OVERVIEW

New World International Investment, LLC (Project Applicant/Property Owner) proposes to consolidate and redevelop an approximate 2.27-acre site with a mixed-use development consisting of a 440,938 square foot (sf), five story (above ground) building with one level of subterranean parking and one level of ground level parking. The Project includes 181 residential units; 3,890 sf of residential amenities; 38,713 sf of public and private open space; 13,130 sf of ground-floor commercial uses facing toward Huntington Drive and Santa Anita Avenue; and 378 parking spaces. More detailed information on the Project is provided in Section 2.2, Project Description, of this IS/MND.

1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

The analysis in Section 3, Environmental Checklist Form, of this IS/MND finds that implementation of the Project would have no impact or less than significant impacts for the following environmental topics:

- Aesthetics;
- Air Quality;
- Agriculture and Forestry Resources;
- Biological Resources;
- Energy;
- Greenhouse Gas Emissions;
- Geology and Soils;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation; and
- Wildfire.

As described in Section 3, Environmental Checklist Form, of this IS/MND, construction and operation of the Project would have significant impacts related to the following environmental topics unless the recommended mitigation measures (MMs) described below in Table 1, Summary of Regulatory Requirements and Mitigation Measures, are implemented:

- Cultural Resources;
- Hazards and Hazardous Materials;
- Noise and Vibration;
- Transportation;
- Tribal Cultural Resources; and
- Utilities and Service Systems.

With implementation of the identified MMs, the Project would have less than significant impacts for each of these environmental topics. Therefore, no significant and unavoidable impacts would result due to Project implementation.

According to the Section 15070 to 15075 of the State CEQA Guidelines, an IS/MND is the appropriate environmental document for the Project because, after incorporation of the recommended MMs, potentially significant environmental impacts would be eliminated or reduced to a level considered less than significant. Table 1, Summary of Regulatory Requirements and Mitigation Measures, presents all actions that would be part of the Project that would reduce or avoid environmental impacts.

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS
AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
Aesthetics	
RR AES-1	The Project Applicant/Property Owner shall prepare a Lighting Plan that provides the type and location of proposed exterior lighting and signage, subject to the review and approval of the City's Development Services Department. All new lighting will be shielded and down-cast, such that the light is not cast onto adjacent properties or visible from above, and all new lighting would be reviewed to ensure compliance with the standards codified in Section 9103.01 of the City of Arcadia Development Code.
Air Quality	
RR AQ-1	The Project shall be conducted in compliance with all applicable South Coast Air Quality Management District (SCAQMD) rules and permitting requirements, including but not limited to: • SCAQMD Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Compliance with this rule will reduce short-term particulate pollutant emissions. • SCAQMD Rule 402, Nuisance, which states that a Project will not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property". • SCAQMD Rule 1113, Architectural Coatings, which limits the volatile organic content (VOC) of architectural coatings used for the Project.

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
Biological Resources	
RR BIO-1	Prior to approval of grading plans, the Development Services Department shall verify that the following note is included on the contractor specifications to ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code: To avoid impacts on nesting birds, vegetation on the Project site should be cleared between September 1 and January 31. If vegetation clearing occurs during the peak nesting season (between February 1 and August 31), a pre-construction survey shall be conducted by a qualified biologist to identify if there are any active nesting locations. If the biologist does not find any active nests within the impact area, the vegetation clearing/construction work will be allowed. If the biologist finds an active nest within the construction area and determines that the nest may be impacted by construction activities, the biologist will delineate an appropriate buffer zone around the nest depending on the species and the type of construction activity. Construction activities shall be prohibited in the buffer zone until a qualified biologist determines the nest is abandoned.
RR BIO-2	As required by the City's Tree Preservation Ordinance (Section 9110.01 et. seq. of the Development Code) and Comprehensive Tree Management Program (Section 9800 et. seq. of the Arcadia Municipal Code), the Project Applicant/Property Owner shall obtain permits from the Arcadia Public Works Services Department for the removal and planting of Protected trees and street trees in the public right-of-way associated with the Project. The Project Applicant/Property Owner will abide by the standards set forth in the permit, as well as standards contained in the Tree Preservation Ordinance, Comprehensive Tree Management Program, and other applicable sections of the Arcadia Development and Municipal Codes.
RR BIO-3	The Project Applicant/Property Owner shall submit the Project's landscape plans, which will include the proposed locations and species of replacement street trees, to the Arcadia Public Works Services Department for review. Street tree species will consist of those set forth in the City's Street Tree Master Plan.
Cultural Resources	
RR CUL-1	If human remains are encountered during excavation activities, all work shall halt in the immediate vicinity of the discovery and the Los Angeles County Coroner shall be notified (California Public Resources Code Section 5097.98). The Coroner shall determine whether the remains are of forensic interest. If the Coroner determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code Section 7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code Section 5097.98).
MM CUL-1	Prior to the issuance of a demolition permit, the Project Applicant/Property Owner shall submit the name and qualifications of a qualified archaeologist to the City of Arcadia Development Services Department for review and approval. Once approved, the qualified archaeologist shall be retained by the Project Applicant/Property Owner. If suspected cultural (archaeological) resources or tribal cultural resources are inadvertently unearthed during excavation activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The Project contractor or Project Applicant/Property Owner shall contact the qualified archaeologist to request an evaluation of the significance of the find and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State California Environmental Quality Act Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
Energy	
RR ENR-1	The Project shall be consistent with the Title 24 energy efficiency standards and the mandatory requirements of the CALGreen code. Construction activities shall comply with idling requirements and maintenance requirements for on- and off-road vehicles.
Geology and Soils	
RR GEO-1	Geotechnical design considerations for Project implementation are governed by the Arcadia Building Code, as set forth in Article VIII of the Arcadia Municipal Code, which incorporates by reference the California Building Code (CBC), including the California Building, Plumbing, Mechanical, Electrical and Existing Building Codes (CBSC 2022). Future buildings and structures shall be designed in accordance with applicable requirements of the CBC, the Arcadia Municipal Code, and any applicable building and seismic codes in effect at the time the grading plans are approved.
RR GEO-2	The Project building design specifications shall include recommendations from the *Geotechnical Investigation, Proposed Huntington Park View Mixed-Use Development, 25 North Santa Anita, Arcadia, California* (Geocon West, Inc. 2021, Appendix D). These recommendations include, but are not limited to, specifications for the following: • Demolition and site preparation • Fill placement • Remedial grading and over excavation • Foundation recommendations • Building Floor Slabs and reinforcement The Project building design specifications shall be verified by the City of Arcadia Building Official prior to issuance of a demolition permit.
Hazards and Hazardous Materials	
RR HAZ-1	Activities at the Project site shall comply with existing federal, State, and local regulations regarding hazardous material use, storage, disposal, and transport to prevent Project-related risks to public health and safety. All on-site generated waste that meets hazardous waste criteria shall be stored, manifested, transported, and disposed of in accordance with the California Code of Regulations (Title 22) and in a manner to the satisfaction of the local Certified Unified Program Agency (CUPA), as applicable. Any hazardous materials removed from the Project site shall be transported only by a Licensed Hazardous Waste Hauler, who shall be in compliance with all applicable State and federal requirements, including U.S. Department of Transportation regulations under Title 49 (Hazardous Materials Transportation Act) and Title 40, Section 263 (Subtitle C of the Resource Conservation and Recovery Act) of the Code of Federal Regulations; California Department of Transportation (Caltrans) standards; and Division of Occupational Safety and Health (Cal/OSHA) standards.
MM TRANS-1, provided below, is also applicable to hazards and hazardous materials.	
Hydrology and Water Quality	
RR HWQ-1	Prior to the City's issuance of a demolition permit, the Project Applicant/Property Owner shall obtain coverage under the General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2022-0057-DWQ, NPDES No. CAS000002), which will require the development and implementation of a project-specific Storm Water Pollution Prevention Plan (SWPPP).

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
Noise	
MM NOI-1	The Project Applicant/Property Owner shall require that all construction contractors restrict the operation of the following construction equipment to beyond the following distances from off-site buildings: (1) vibratory rollers – 25 feet, and (2) Caisson drilling, large bulldozers, loaded trucks, and other large equipment (vehicle weight greater than 25,000 lbs.) – 15 feet. Any activities occurring within 5 feet of existing property line shall use non-vibration intensive methods such as use of concrete saws, universal processors, and/or expansive agents for demolition.
Public Services	
RR PUB-1	The Project Applicant/Property Owner shall comply with all applicable codes, ordinances, and regulations, including the most current edition of the California Fire Code and the Arcadia Municipal and Development Codes, regarding fire prevention and suppression measures; fire hydrants; fire access; water availability; and other, similar requirements. Prior to issuance of building permits, the City of Arcadia Development Services Department and the Arcadia Fire Department shall verify compliance with applicable codes and that appropriate fire safety measures are included in the Project design. All such codes and measures shall be implemented prior to occupancy.
RR PUB-2	In accordance with the City's Ordinance 7492, prior to the issuance of the building permit, the Project Applicant/Property Owner shall remit the most current fire protection facilities impact fee to the City. All money collected as fees imposed shall be used against the capital and infrastructure costs required to maintain acceptable life safety and fire protection in the City. The Development Services Department shall confirm compliance with this requirement prior to issuance of a building permit.
RR PUB-3	Prior to issuance of the building permit, the Project Applicant/Property Owner shall pay new development fees to the AUSD pursuant to Section 65995 of the California Government Code. As an option to the payment of developer fees, the AUSD and the Property Owner can enter into a facility and funding agreement, if approved by both parties. Evidence that agreements have been executed shall be submitted to the Development Services Department, or fees shall be paid with each building permit.
RR PUB-4	In accordance with the City's Ordinance 2237 and Section 9105.15 of the City's Development Code, prior to the issuance of the building permit, the Project Applicant/Property Owner shall remit the most current park facilities impact fee and/or other negotiated park fees to the City. All money collected as fees imposed shall be deposited in the Park Facilities Impact Fee Program and shall be used for the acquisition, development, and improvement of public parks and recreational facilities in the City, as proposed by the City's Parks and Recreation Master Plan. The Development Services Department shall confirm compliance with this requirement prior to issuance of a building permit.
Transportation	
RR TRANS-1	Require the Applicant/Property Owner to contribute, on a cost-share basis, to the City's Transportation Impact Fee program, for any intersections affected by the Project, based on the net new PM Peak House vehicle trips generated, per the City's Transportation Impact Fee Program Update adopted on October 18, 2016.
MM TRANS-1	Prior to the issuance of a grading permit, a Construction Management Plan shall be prepared by the Project Applicant/Property Owner for the review and approval of the City of Arcadia and any other affected jurisdictions in accordance with the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved plan to the satisfaction of the City of Arcadia. The Applicant/Property Owner will coordinate begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate construction impacts to parking and circulation within the City of Arcadia downtown. At a minimum, the Construction Management Plan shall: • Describe the duration and location of lane closures (if any).

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
	• Address traffic control for any partial street closures, detours, or other disruption to traffic circulation during project construction, including as-needed use of flagpersons and signage. • Identify the routes that construction vehicles would utilize for the delivery of construction materials to access the project site. Haul routes would follow the City's approved truck routes and avoid residential streets. • Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers would be provided on-site or at additional off-site locations that are not on public streets. • Identify of emergency access points/routes. • Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets. • Require the contractor to keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The contractor shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer), of any material, which may have been spilled, tracked, or blown onto adjacent streets or areas. • All hauling or transport of oversize loads would occur between the hours of 7:00 AM and 5:00 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays. • Include details on the maintenance of bicycle and pedestrian facilities and connectivity through the Project to the satisfaction of the City Engineer. • Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users. • Provisions for the contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be altered during project construction. The repairs shall be completed in consultation with and to the satisfaction of the City Engineer. • Require that all construction-related parking and staging of vehicles will be kept out of the adjacent public roadways and will occur either on-site or on designated off-site parcels that would not adversely affect access to or parking within the downtown.
Tribal Cultural Resources	
MM TCR-1	**Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities** A. The Project Applicant/Property Owner shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any

TABLE 1
SUMMARY OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES

ID	Applicable Regulatory Requirements (RR) and Mitigation Measures (MM)
	discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant/City upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.
MM TCR-2	**Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)** Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
MM TCR-3	**Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects** A. Native American human remains are defined in Public Resources Code section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.
Utilities and Service Systems	
RR UTIL-1	The Project Applicant/Property Owner shall comply with all applicable regulations and restrictions set forth in the Arcadia Municipal Code, including Section 7472 regarding restrictions on discharges into the sewer and Section 5130 regarding achievement of annual waste diversion rates and other applicable requirements in compliance with but not limited to Assembly Bill 939, Assembly Bill 341, and Assembly Bill 1826.
MM UTIL-1	**Sewer Upsizing Fair Share Payment.** Prior to issuance of a Certificate of Occupancy permit for the Project, the Applicant/Property Owner shall make a fair share contribution of 9 percent of the total Santa Anita Avenue sewer upsizing project cost to the City's Development Services Department. This payment shall help fund replacing the existing sewer line in Santa Anita Avenue between Huntington Drive and Camino Real Avenue with 12-inch diameter pipelines. The Santa Anita Avenue sewer upsizing project shall be split into three phases and included in the City's 2024-25, 2025-26, and 2026-27 Capital Improvement Plan budgets, respectively. The sewer work will be completed by the City's Public Works Department by approximately the end of the 2026-27 Fiscal Year. A Certificate of Occupancy shall not be issued until all phases of the Santa Anita Avenue sewer upsizing project are fully implemented. This measure shall be implemented to the satisfaction of the City Public Works Services Department as appropriate.

1.4 PROJECT REVIEW AND APPROVAL PROCESS

Pursuant to Section 15072 of the State CEQA Guidelines, a Notice of the Intent (NOI) to adopt an MND for the Project was sent on November 19, 2024, by the City to the public, applicable responsible and trustee agencies, and other agencies and organizations. The NOI and associated public review period has been filed by the County of Los Angeles Recorder's Office in Norwalk, published in the Arcadia Weekly, and mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing.

The Initial Study and Draft Mitigated Negative Declaration may be accessed on the City's website at www.arcadiaca.gov/projects. You may also review a copy in-person by visiting the following two locations during regular business hours: Arcadia City Hall - Planning Division (240 West Huntington Drive) and Arcadia Public Library (20 West Duarte Road).

In accordance with the requirements set forth in Sections 15073 and 15105 of the State CEQA Guidelines, this IS/MND will be available for public review and comment for 30 days from Thursday, November 21, 2024, through Friday, December 20, 2024. In reviewing the IS/MND, affected public agencies and the interested public should focus on the adequacy of the document in identifying and analyzing the Project's environmental impacts and the ways in which the potentially significant effects of the Project can be reduced or avoided.

Written comments must be received by 5:30 pm on Friday, December 20, 2024. Comments on the IS/MND must be sent in writing to Edwin Arreola, Senior Planner, ATTN: Arcadia Town Center Project, via email at EArreola@arcadiaca.gov or via by mail to the address listed below.

City of Arcadia Development Services Department
Edwin Arreola, Senior Planner
P.O. Box 60021, Arcadia, California 91066

Following receipt and evaluation of comments from agencies, organizations, and/or individuals that are received during the public review period, the City will determine whether any substantial new environmental issues have been raised that necessitate changes to the IS/MND in accordance with CEQA requirements. If so, further documentation, such as an environmental impact report (EIR) or recirculation of the IS/MND may be required. If not, the Project and the environmental documentation would be submitted to the City's Planning Commission and would subsequently be submitted to the City Council for consideration. In accordance with Section 15074 of the State CEQA Guidelines, prior to approving the Project, the City Council may consider the MND together with any comments received during the public review process. The City Council will adopt the proposed MND only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the City Council's independent judgment and analysis.

1.5 ORGANIZATION OF THIS INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

The IS/MND is organized into the following sections:

- **Section 1 – Introduction.** This section provides an overview of the purpose and conclusions of the IS/MND, as well as a discussion of the public review and approval process for the Project.
- **Section 2 – Environmental Setting and Project Description.** This section provides a description of the Project location; a discussion of the existing environmental setting of the Project site and vicinity; a description of the Project; and a list of discretionary approvals required for the Project.
- **Section 3 – Environmental Checklist Form.** This section contains a summary checklist with Project information and environmental factors potentially affected, as well as a signature block for the Lead Agency. This section also contains an analysis of the Project's environmental setting and environmental impacts. This section describes applicable RRs that the Project would comply with, which would minimize environmental impacts. This section also includes MMs that would be implemented to eliminate potentially significant effects or reduce potentially significant effects to a level considered less than significant. The environmental checklist form also includes "mandatory findings of significance" required by CEQA.
- **Section 4 – Report Preparers and Contributors.** This section identifies the individuals prepared and contributed to the preparation of the IS/MND.
- **Section 5 – References.** This section identifies references used in preparation of the IS/MND.

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SECTION 2.0 ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 ENVIRONMENTAL SETTING

2.1.1 PROJECT LOCATION

The approximate 2.27-acre Project site is located at the northwest corner of Santa Anita Avenue and Huntington Drive in the downtown area of the City of Arcadia in Los Angeles County, California. Exhibit 1, Regional Location and Local Vicinity, depicts the Project site in the context of the local and regional roadway system. The southern portion of the Project site fronts Huntington Drive, a principal east-west travel corridor[1], and the eastern portion of the site fronts Santa Anita Avenue, a principal north-south travel corridor. The Project is located at 5-19 West Huntington Drive and 25-75 North Santa Anita Avenue. The Los Angeles County Metropolitan Transportation Authority (Metro) A Line (formerly L Line and Gold Line) alignment and the Arcadia Station are both located approximately 950 feet (ft) northeast of the Project site, near the intersection of North First Avenue and Santa Clara Street. The Project site can be regionally accessed from the eastbound/westbound Interstate 210 (I-210; Foothill Freeway), located approximately 0.4 mile north and northwest of the Project site, with freeway access ramps via the Santa Anita Avenue interchange to the north and the Huntington Drive interchange to the east.

The City is surrounded by other municipalities, including City of Sierra Madre to the north; City of Monrovia to the east; City of Temple City and El Monte to the south; and City of Pasadena and the unincorporated communities of East Pasadena and East San Gabriel to the west.

2.1.2 EXISTING PROJECT SITE CONDITIONS

The Project site consists of five contiguous parcels (Assessor Parcel Numbers [APNs] 5775-025-032, -033, -034, -037, and -038). Exhibit 2, Aerial Photograph, depicts the existing on-site and surrounding land uses. The Project site contains a total of 11 existing commercial buildings and associated surface parking lots. The existing structures within the Project site are all one story high except for the building in the northeastern corner, which is two stories in height. There are eight vehicular access points to the existing uses including four on Huntington Drive to the south, two on Santa Anita Avenue to the east, and two on Morlan Place to the north. There are existing 5-foot-wide to 10-foot-wide sidewalks along Huntington Drive, Santa Anita Avenue, and Morlan Place adjacent to the Project site. Table 2, Summary of Existing Land Uses, on the following page, provides the address, APN, and size of the 11 existing buildings on the site.

The Project site contains limited ornamental landscaping and trees located along the site perimeters and adjacent to some of the existing structures. A total of 26 trees are present on the Project site (23 trees) or the adjacent public right-of-way (ROW) (3 trees) along Huntington Drive and Santa Anita Avenue. Of these, there are a total of 3 trees along the eastern frontage of the site that meet the City's requirements for consideration as a Protected Tree under the City's Tree Preservation Ordinance (Section 9110.01.030 of the Development Code). These trees include two evergreen pears (*Pyrus kawakamii*) and one sour gum (*Nyssa sylvatica*). There are 3 London plane trees (*Platanus* × *hispanica*) within the public ROW of Huntington Drive. These are not subject to the Tree Preservation Ordinance, being on public property, and are protected pursuant to the City's Comprehensive Tree Management Program (Section 9800 et. seq. of the AMC).

[1] A principal travel corridor is a term used for roadways with a capacity to carry the highest volumes of vehicles (in the range of 22,000 to 35,000 vehicles daily) that generally connect adjacent cities and are typically four-lane streets.

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Regional Location and Local Vicinity

Exhibit 1

Arcadia Town Center

N W E S

1,000 500 0 1,000 Feet

PSOMAS

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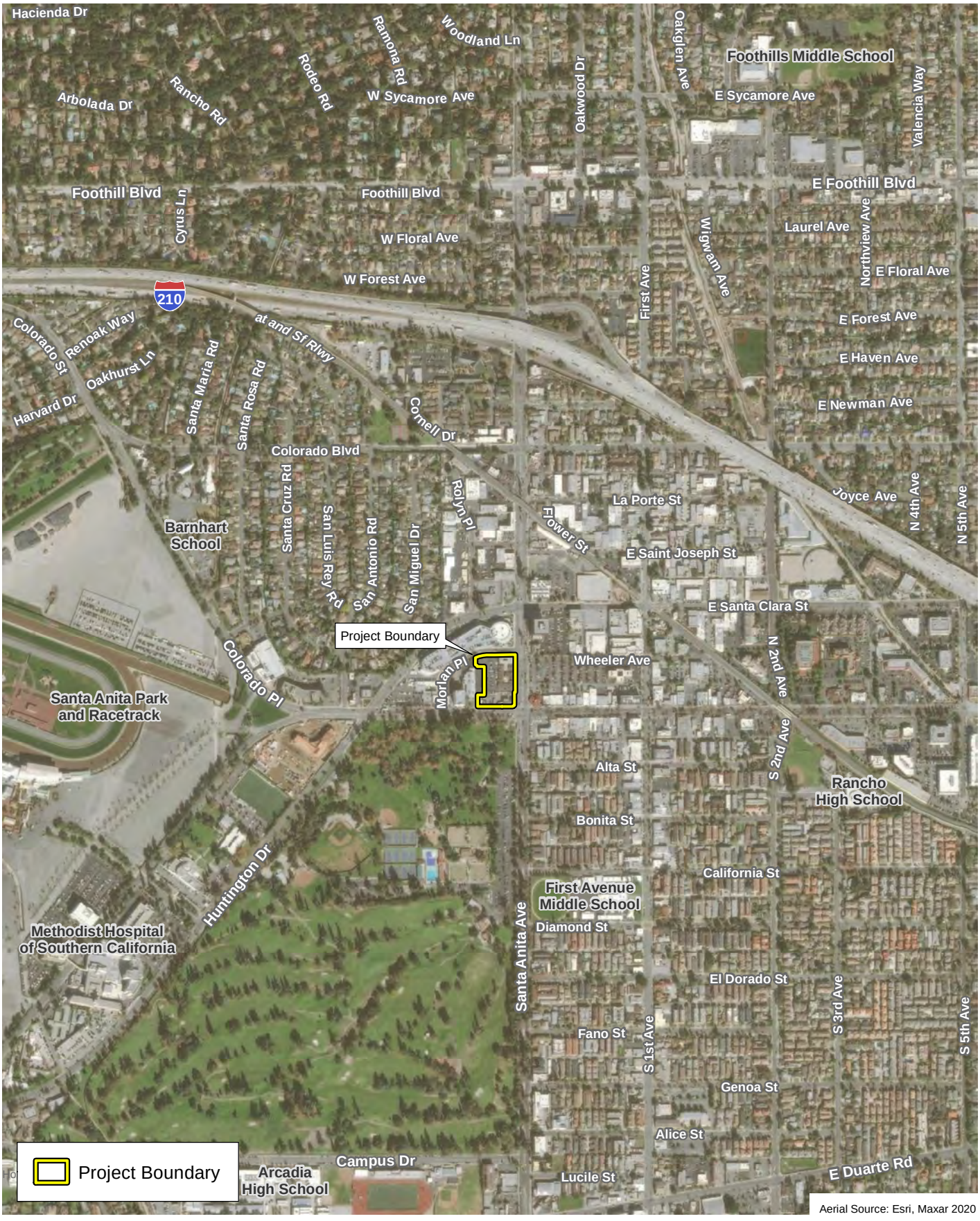

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Aerial Photograph

Exhibit 2

Arcadia Town Center

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PSOMAS

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TABLE 2
SUMMARY OF EXISTING LAND USES

Building No. and Address	Assessor Parcel Number	Building Size (sf)
1. (25-75 Santa Anita Avenue)	5775-025-037	4,278
2. (25-75 Santa Anita Avenue)		1,903
3. (25-75 Santa Anita Avenue)		1,005
4. (25-75 Santa Anita Avenue)		836
5. (25-75 Santa Anita Avenue)		3,929
6. (25-75 Santa Anita Avenue)		2,755
7. (25-75 Santa Anita Avenue)		3,843
8. (11 Huntington Drive)	5775-025-034	889
9. (15 Huntington Drive)	5775-025-033	780
10. (19 Huntington Drive)	5775-025-032	3,188
11. (5 Huntington Drive)	5775-025-038	1,575
	Total Existing Building Area	**24,981**
sf: square feet		

The Project site is relatively flat with a gentle slope that trends to the south. Elevations within the Project site range from approximately 483 feet above mean sea level (msl) along the northern boundary of the Project site to approximately 473 feet above msl along the southwest corner of the Project site.

2.1.3 SURROUNDING AREA CONDITIONS

As shown on Exhibit 2, the Project site is located within a fully developed portion of the City and is surrounded to the north, east, and west by existing urban development, consisting of retail, a restaurant, a donut shop, coffeehouse, offices, an Elks Lodge, the Rusnak Mercedez-Benz of Arcadia dealership, and associated surface parking. Single-family residential uses are located approximately 410 feet or more to the northwest of the Project site across Santa Clara Street and the car dealership, and multi-family residential uses are located approximately 280 feet or more to the southeast of the Project site along Santa Anita Avenue. Arcadia County Park is located immediately to the south of the Project site across Huntington Drive.

Most of the structures that are adjacent to the Project site are one to two stories in height with heights ranging from 14 feet to 37 feet, with some taller structures interspersed. Within the immediate viewshed of the Project site, there is a 5-story storage building on Huntington Drive approximately 120 feet west of the Project site at 35 West Huntington Drive, and an 8-story office building on Santa Anita Avenue approximately 200 feet northeast of the site at 150 North Santa Anita Avenue. The former Van de Kamp's Bakery building, which is now a Denny's restaurant, is located east of the Project site at the northeast corner of Huntington Drive and Santa Anita Avenue. The Denny's restaurant exhibits variable heights with a single-story main building topped by a 40-foot-tall stylized, operational, windmill.

In the Project site vicinity, Huntington Drive is a four-lane divided road with dedicated turn lanes; Santa Anita Avenue is a four-lane divided road with dedicated turn lanes; Morlan Place is a two-lane road connecting Huntington Drive and Santa Anita Avenue; and Santa Clara Street is a four-lane undivided road with dedicated turn lanes. Street parking is permitted on the north side of Huntington Drive, on the west side of Santa Anita Avenue, and on either side of Morlan Place. There is no street parking permitted on the south side of Santa Clara Street.

2.1.4 RELEVANT PLANNING CONSIDERATIONS

City of Arcadia

All parcels within the Project site (APNs 5775-025-032, -033, -034, -037, and -038) have a land use designation of Downtown Mixed-Use (DMU) and are zoned as Downtown Mixed-Use (DMU). According to applicable design standards, all parcels within the Project site are permitted a maximum building height of 60 feet with an additional 10-foot height allowance for mechanical equipment (e.g., elevators, stairways, tanks, ventilating fans, heating, cooling and air conditioning equipment) provided no area above the maximum height is used to provide additional floor space (Sections 9102.05.030 and 9103.01.060 of the Arcadia Development Code). The Project site permits a maximum residential density of 80 units per acre, and maximum Floor Area Ratio (FAR) of 1.0 applicable only to the non-residential component of a development. The Project would advance the City's goal as embodied in the General Plan of providing the residential uses necessary to support and complement the existing and proposed businesses in the downtown area as well as the nearby Metro A Line Station. A goal of the Project is to transform the Project site within the City's downtown into a more vibrant, dynamic, transit- and pedestrian-oriented mixed-use development consistent with the Arcadia General Plan (General Plan) and related development standards and requirements.

Southern California Association of Governments

Because of its proximity to the Metro A Line Station, the Project site is within both a Transit Priority Area (TPA) as defined under Senate Bill (SB) 743 (Section 21099 of the Public Resources Code), as the geographic area within 0.5-mile of a major transit stop included in a regional transportation plan; and a High Quality Transit Area (HQTA) as defined under SB 375 and codified in the Public Resources Code, as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. For the City of Arcadia, these areas are identified by the Southern California Association of Governments (SCAG)[2] and its *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020 RTP/SCS), adopted by SCAG's Regional Board on September 3, 2020.

Additionally, the Project qualifies as a Transit Priority Project (TPP), defined under SB 375 (Section 21155 of the Public Resources Code) as a development (1) that is consistent with land use regulations (e.g., land use designations, zoning); (2) contains at least 50 percent residential use based on the total building square footage or, if between 26 and 50 percent non-residential uses, an FAR of at least 0.75; (3) a minimum net density of at least 20 dwelling units per acre (du/ac); and (4) is located within ½-mile of a local transit stop or a high quality transit corridor. The Project is consistent with the land use designations and zoning for the site, has approximately 79 percent residential and residential-related amenities, and a density of 79.7 du/ac.

[2] SCAG is the Metropolitan Planning Organization (MPO) serving six of the ten southern California counties of Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura.

2.2 PROJECT DESCRIPTION

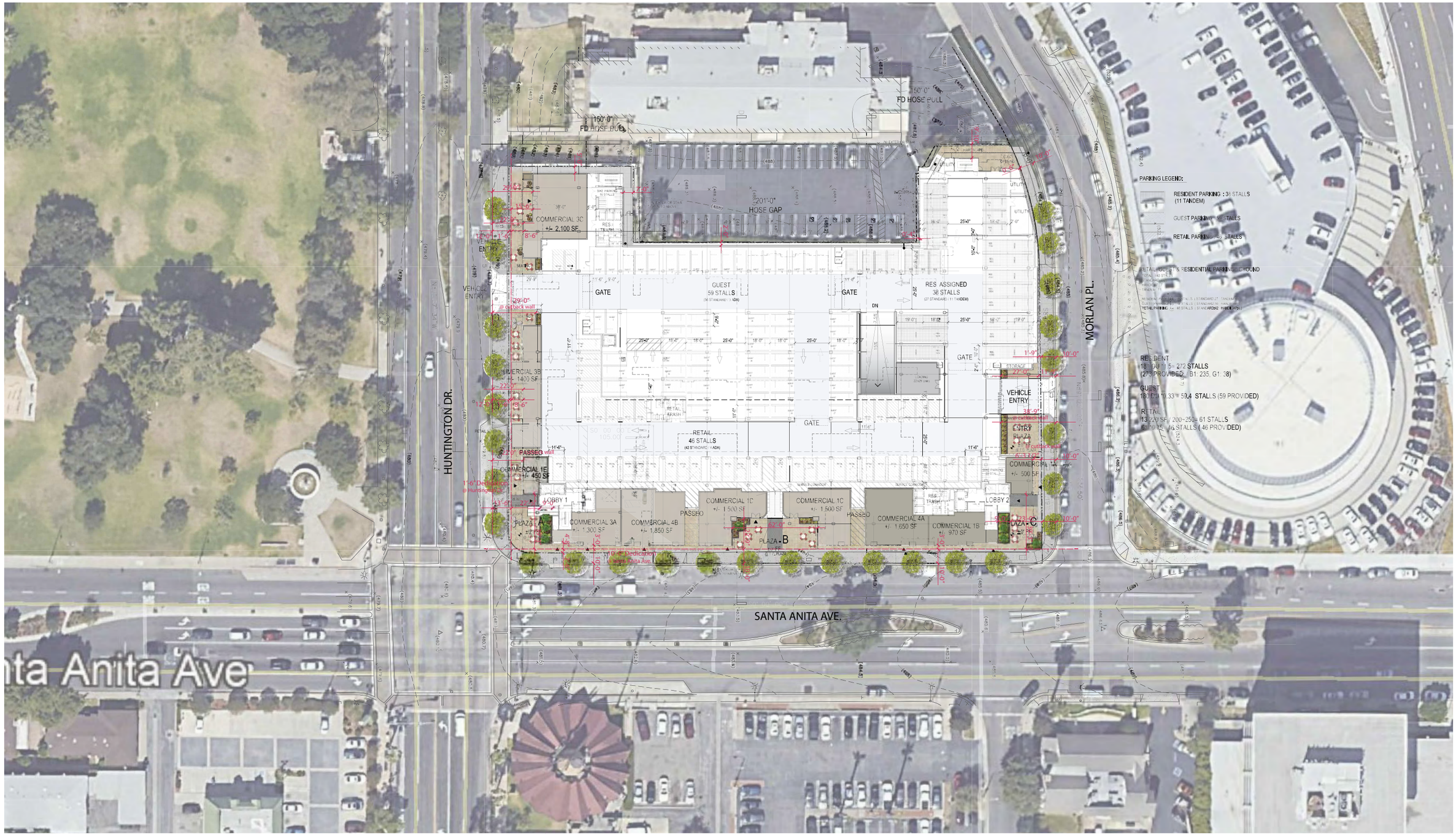
2.2.1 OVERVIEW

The Project includes preparation of a tract map to consolidate the five separate parcels encompassing 2.27 acres into a single legal lot of 2.19 net acres, after ROW dedications on Santa Anita Avenue and Huntington Drive; and subdivide the airspace for the residential condo units. The Applicant/Property Owner proposes construction of a mixed-use development consisting of one 440,938 sf, five story (above ground) building with one level of subterranean parking and one level of ground level parking. The Project includes 181 residential units; 3,890 sf of residential amenities; 38,713 sf of public and private open space; 13,130 sf of ground-floor commercial uses facing toward Huntington Drive and Santa Anita Avenue; and 378 parking spaces.

The Project would include four public plazas and additional outdoor seating on the ground level near commercial uses; residential amenities on Levels 2 through 4 including a swimming pool, recreation center, fitness center, and two clubhouses; private landscape and hardscape features on Levels 2, 4, and 5; and connections to off-site utilities. The Project would provide a total of 378 parking spaces on Level 1 (ground level) and Level B1 (subterranean), including 273 resident spaces, 59 guest spaces, and 46 commercial spaces; and a total of 43 bicycle parking stalls, with 40 resident/long-term stalls and 3 retail/short-term stalls. All existing development and ancillary uses (e.g., surface parking, dividing walls, landscaping) would be demolished with Project implementation. The Project site plan and floor plans are presented on Exhibit 3, Illustrative Site Plan; Exhibit 4, Level B1 Plan; Exhibit 5, Level 1 (Ground Level) Plan; Exhibit 6, Level 2 Plan; Exhibit 7, Level 3 Plan; Exhibit 8, Level 4 Plan; Exhibit 9, Level 5 Plan; and Exhibit 10, Roof Plan. The Project elevations, sections, and perspective views, respectively, are presented on Exhibits 11a and 11b, Proposed Project Elevations; Exhibits 12a and 12b, Proposed Project Sections; and Exhibits 13a through 13d, Proposed Project Perspective Views.

2.2.2 PROJECT COMPONENTS

The Project would include 181 multifamily residential units, including 41 one-bedroom units, 108 two-bedroom units, and 32 three-bedroom units. Six of the two-bedroom units will be two-stories and the remaining residential units would be one story. A breakdown of the mix of units is summarized in Table 3, Project Residential Unit Summary. Exhibits 6 through 9 depict that layout of residential units on Levels 2 through 5.



Source: New World International Investment LLC 2022

Illustrative Site Plan

Exhibit 3

Arcadia Town Center Project

PSOMAS

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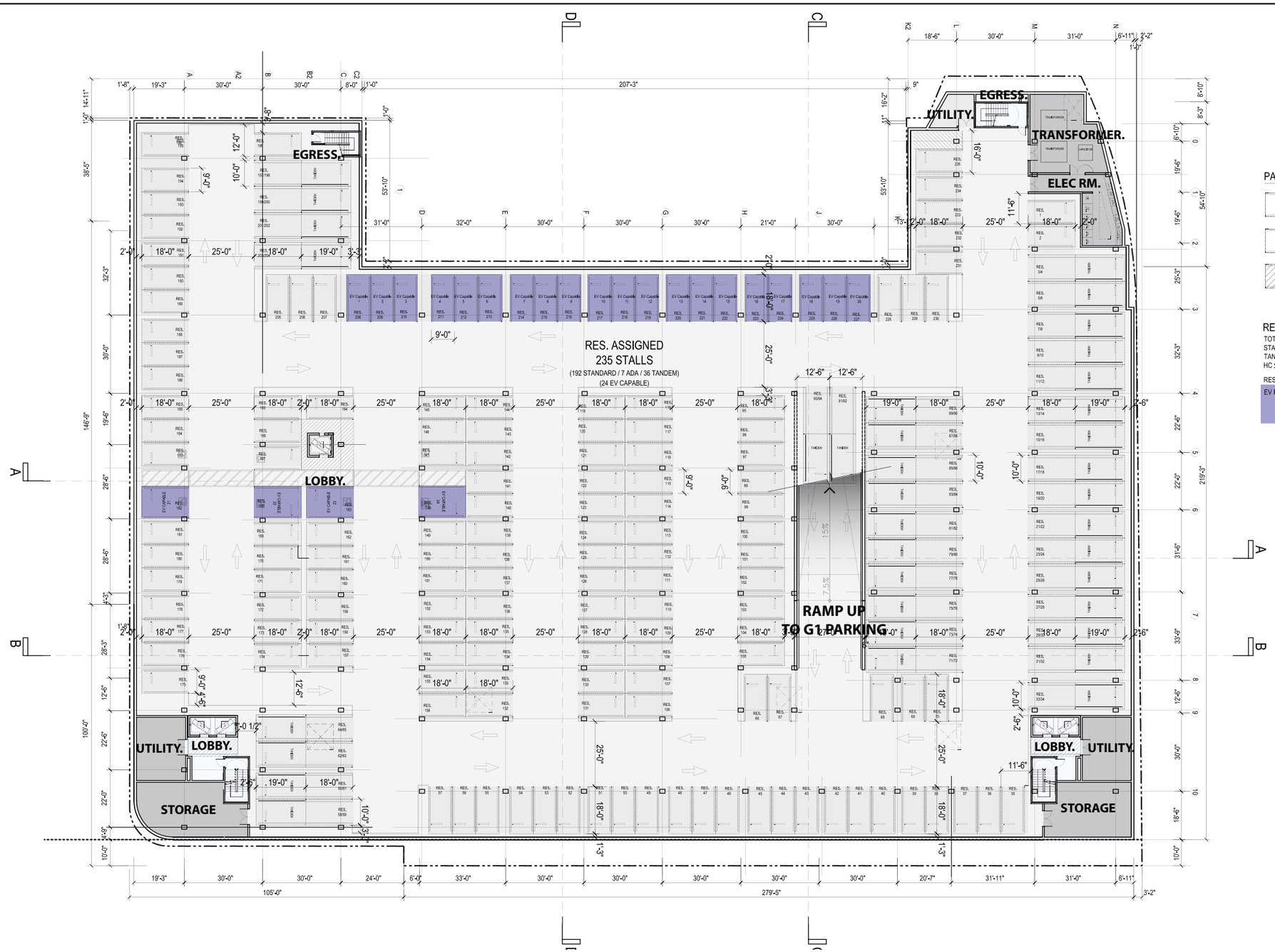

PARKING LEGEND:

- RESIDENT PARKING : 235 STALLS
- GUEST PARKING
- RETAIL PARKING

RESIDENTIAL PARKING - BASEMENT 1

TOTAL : 235 STALLS
STANDARD : 192
TANDEM : 36
HC : 7

RESIDENTIAL PARKING : 235 STALLS (STANDARD: 192, TANDEM: 36 HANDICAP: 7)

EV READINESS (EV CAPABLE): 24 STALLS

LEVEL B1		
BUILDING AREA:	92,497	SF
MVP:	1,160	SF
MEP:	2,702	SF
LOADING/ TRASH/ STORAGE:	1,564	SF
PARKING	87,071	SF
GRSF:	-	SF
NRSF:	-	SF
TOTAL PARKING:	235	SPACES

Source: New World International Investment and Humphreys & Partners Architects 2022

Level B1 Plan

Exhibit 4

Arcadia Town Center Project

PSOMAS

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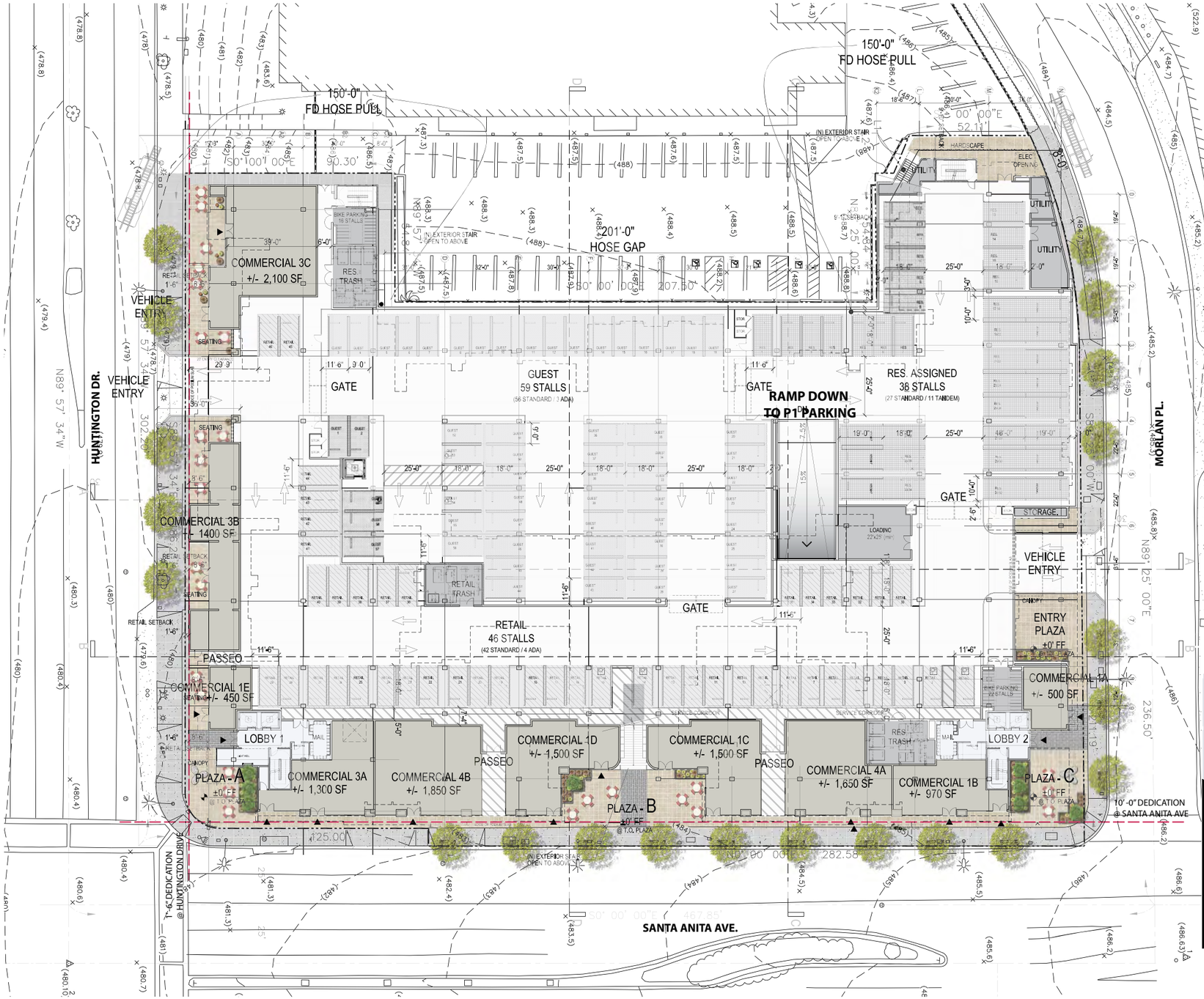

PARKING LEGEND:

- RESIDENT PARKING : 38 STALLS (11 TANDEM)
- GUEST PARKING : 59 STALLS
- RETAIL PARKING : 46 STALLS

RETAIL, GUEST & RESIDENTIAL PARKING - GROUND
TOTAL : 143 STALLS
STANDARD : 125
HANDICAP : 7
TANDEM : 11
RESIDENT PARKING : 38 STALLS (STANDARD:27 TANDEM:11)
GUEST PARKING : 59 STALLS (STANDARD:56 HANDICAP:3)
RETAIL PARKING : 46 STALLS (STANDARD:42 HANDICAP:4)

RESIDENT :
181 DU *1.5= 272 STALLS
(273 PROVIDED, B3:7 / B1: 235, G1: 38)

GUEST :
180 DU *0.33 = 59.4 STALLS (59 PROVIDED)

RETAIL :
13,220 SF / 200~250= 61 STALLS
61 *0.75= 46 STALLS (46 PROVIDED)

RESIDENTIAL TRASH		Food	Green	Recycle	Trash
Total Generation	(yd3/week)	0.0	0.0	56.3	56.3
	(gallons)	0	0	11375	11361
Container Size		65 gallon cart		4 yd3 dumpster	4 yd3 dumpster
Quantity		2		4	4
Frequency (pickups per week)		0		4	4

RETAIL TRASH ENCLOSURE		Food	Green	Recycle	Trash
Total Generation	(yd3/week)	6.4	0.0	23.2	21.0
	(gallons)	1301	0	4676	4241
Container Size		65 gallon cart		4 yd3 dumpster	4 yd3 dumpster
Quantity		6		2	2
Frequency (pickups per week)		4		3	3

Ground LEVEL

BUILDING AREA:	83,983	SF
MVP:	1,133	SF
MEP:	806	SF
DECK:	-	SF
LOADING/ TRASH/ STORAGE:	3,200	SF
LOBBY:	1,214	SF
RETAIL:	13,437	SF
PARKING	64,193	SF
GRSF:	-	SF
NRSF:	-	SF
TOTAL PARKING:	143	SPACES

SCALE : 1/20" = 1'-0"
NOT TO SCALE @ 11X17

Source: New World International Investment 2022

Level 1 (Ground Level) Plan

Exhibit 5

Arcadia Town Center Project

PSOMAS

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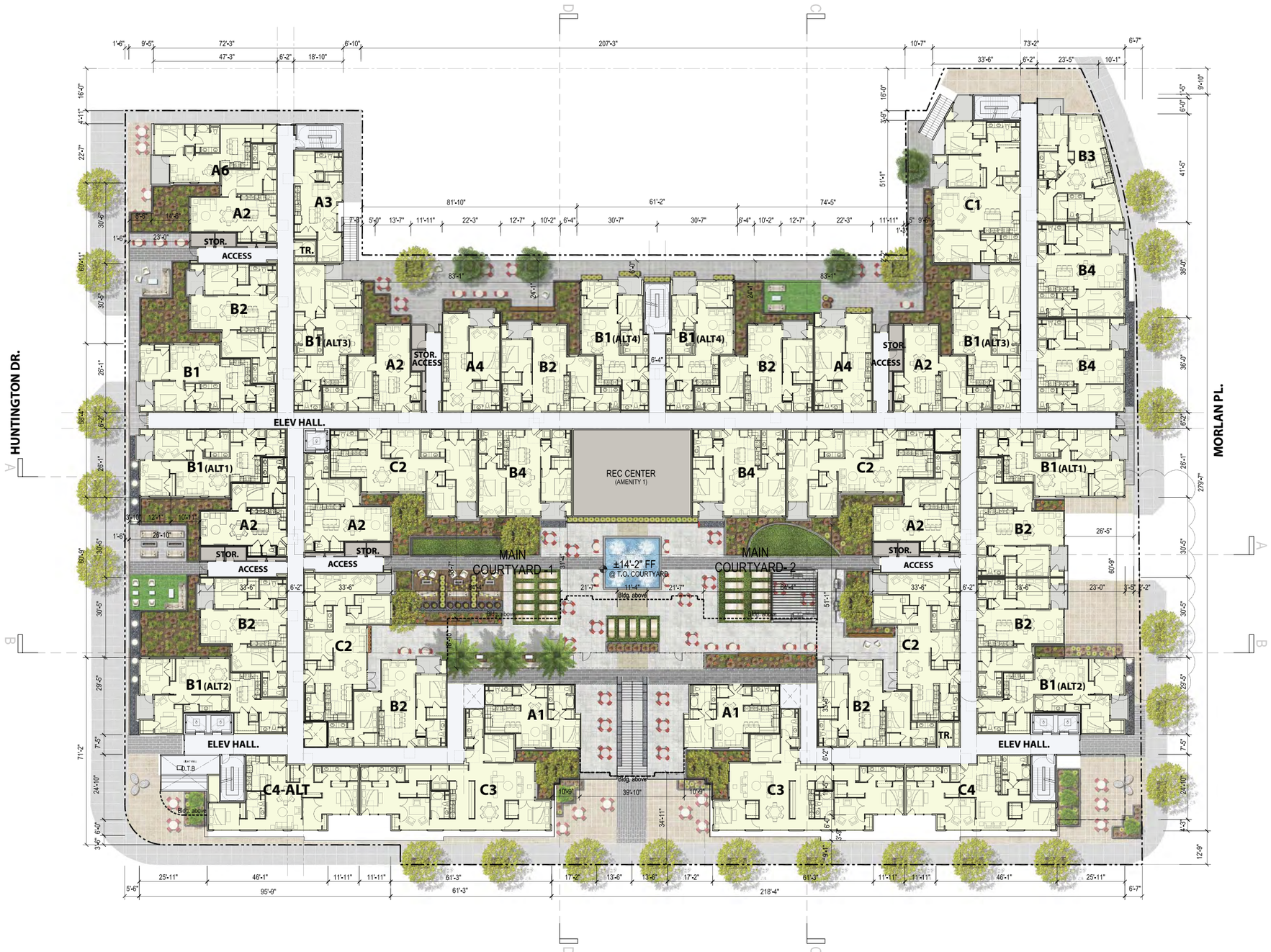

LEVEL 2		
BUILDING AREA:	63,938	SF
MVP:	1,317	SF
MEP:	324	SF
DECK:	1,903	SF
AMENITY:	1,524	SF
TRASH/ STORAGE:	955	SF
GRSF:	57,915	SF
CIRCULATION:	8,768	SF
NRSF (FOR SALE):	49,147	SF
EFFICIENCY:	84.9%	
TOTAL CONDO UNITS:	43	UNIITS

Source: New World International Investment 2022

Level 2 Plan

Exhibit 6

Arcadia Town Center Project

PSOMAS

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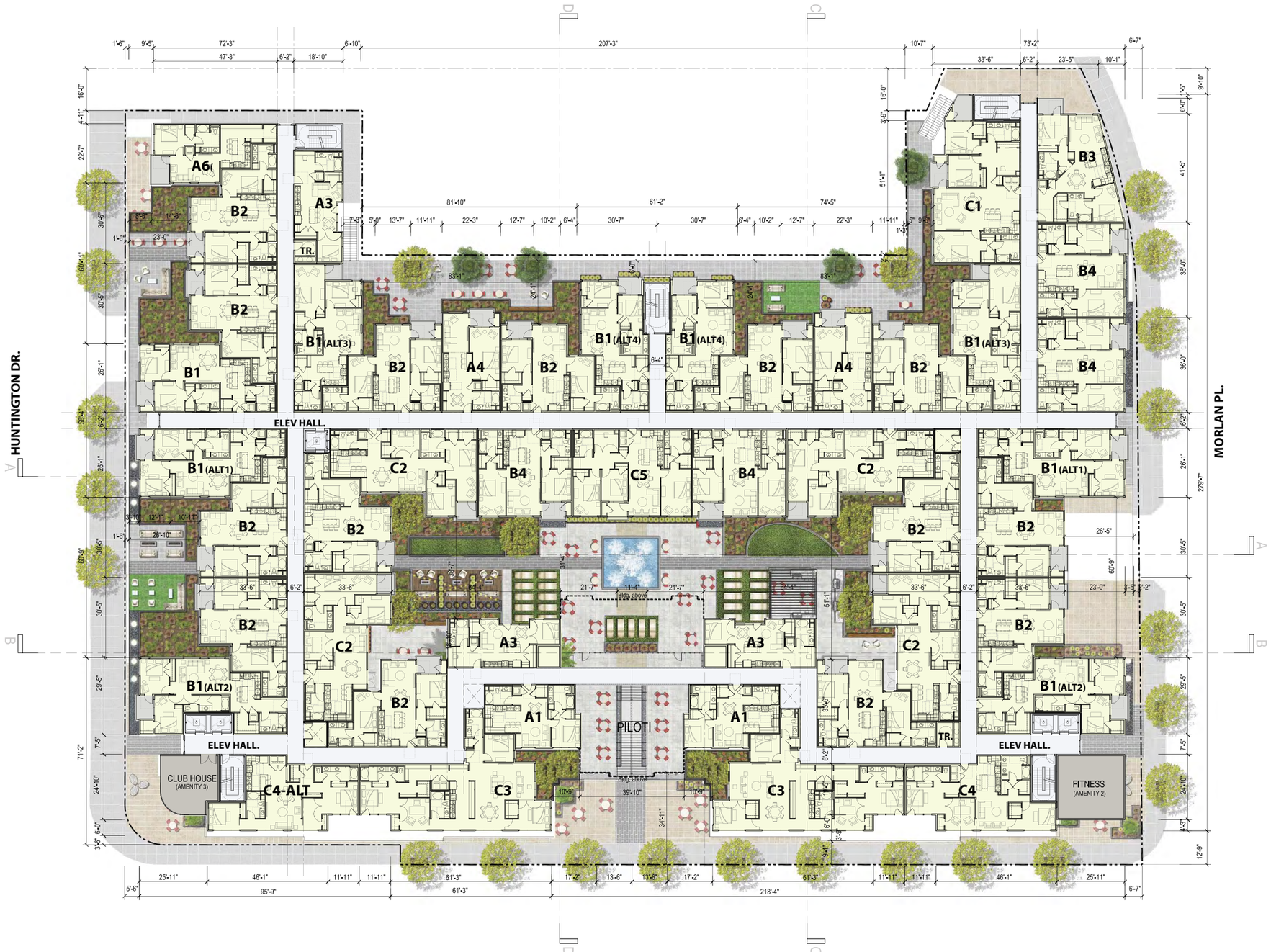

LEVEL 3		
BUILDING AREA:	67,080	SF
MVP:	1,317	SF
MEP:	324	SF
DECK:	2,337	SF
AMENITY:	1,118	SF
TRASH/ STORAGE:	169	SF
GRSF:	61,815	SF
CIRCULATION:	7,933	SF
NRSF (FOR SALE):	53,882	SF
EFFICIENCY:	87.2%	
TOTAL CONDO UNITS:	46	UNITS

Source: New World International Investment 2022

Level 3 Plan

Exhibit 7

Arcadia Town Center Project

PSOMAS

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LEVEL 4		
BUILDING AREA:	68,642	SF
MVP:	1,317	SF
MEP:	324	SF
DECK:	4,277	SF
AMENITY:	1,030	SF
TRASH/ STORAGE:	169	SF
GRSF:	61,525	SF
CIRCULATION:	8,065	SF
NRSF (FOR SALE):	53,460	SF
EFFICIENCY:	86.9%	
TOTAL TOWN UNITS:	6	UNIITS
TOTAL CONDO UNITS:	43	UNIITS

Source: New World International Investment 2022

Level 4 Plan

Exhibit 8

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Level_4.pdf

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LEVEL 5		
BUILDING AREA:	67,633	SF
MVP:	1,317	SF
MEP:	324	SF
DECK:	4,510	SF
AMENITY:	248	SF
TRASH/ STORAGE:	169	SF
GRSF:	61,313	SF
CIRCULATION:	8,049	SF
NRSF (FOR SALE):	53,264	SF
EFFICIENCY:	86.9%	
TOTAL TOWN UNITS:	-	UNIITS
TOTAL CONDO UNITS:	43	UNIITS

Source: New World International Investment 2022

Level 5 Plan

Exhibit 9

Arcadia Town Center Project

PSOMAS

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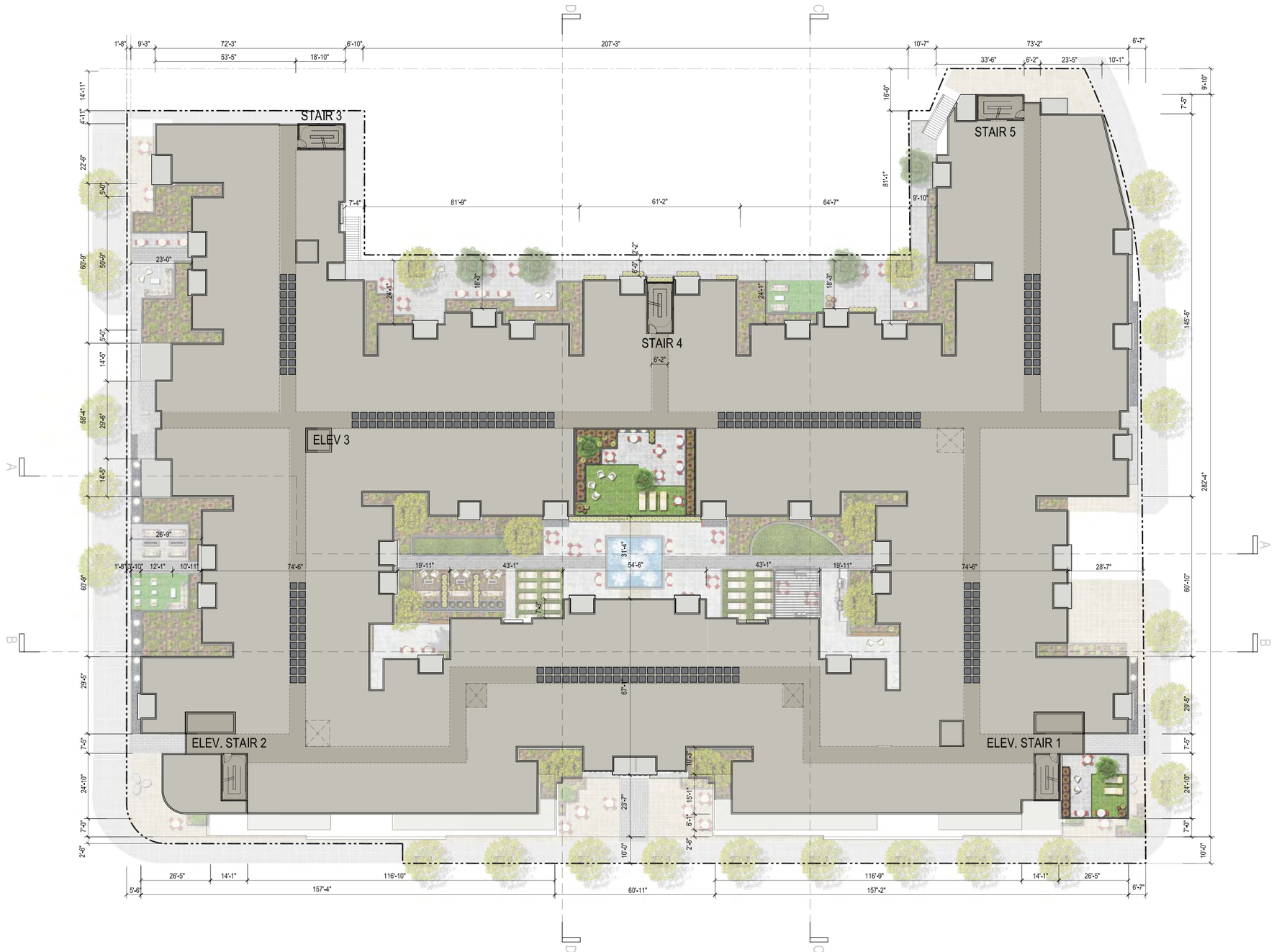

Source: New World International Investment 2022

Roof Plan

Exhibit 10

Arcadia Town Center Project

PSOMAS

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1. EAST ELEVATION : VIEW SANTA ANITA AVE.

2. NORTH ELEVATION : VIEW FROM MORLAN PL.

Source: New World International Investment 2022

Proposed Project Elevations

Exhibit 11a

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Elev.pdf

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3. SOUTH ELEVATION : VIEW HUNTINGTON DRIVE.

4. WEST ELEVATION : FACING NEIGHBOR RESTAURANT

Source: New World International Investment 2022

Proposed Project Elevations

Exhibit 11b

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Elev.pdf

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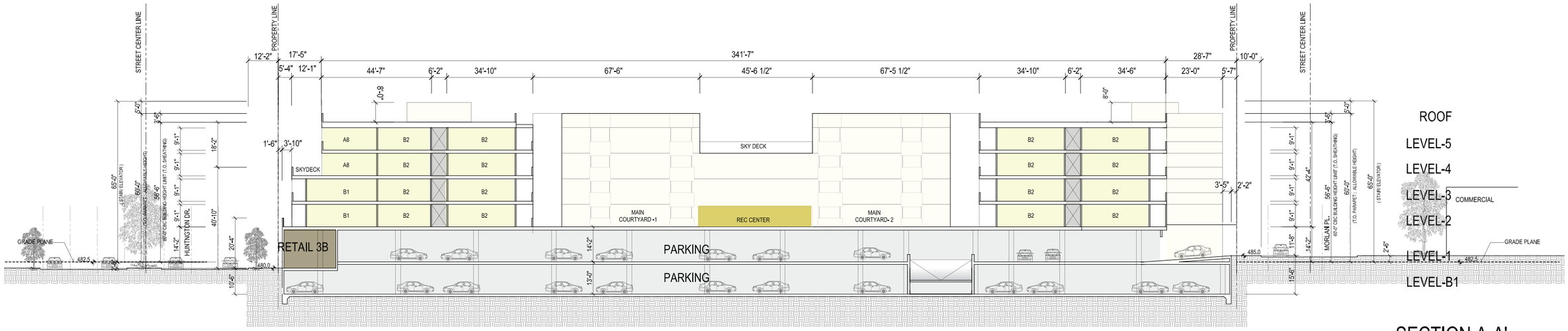
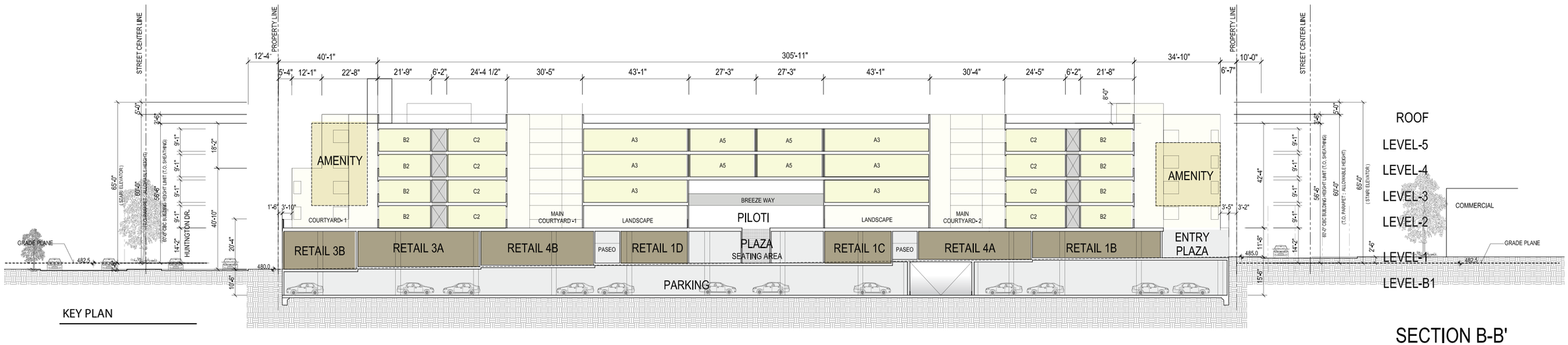
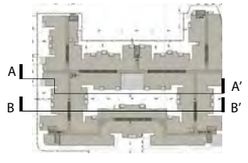


SECTION A-A'



SECTION B-B'

KEY PLAN



Source: New World International Investment 2022

Proposed Project Sections

Exhibit 12a

Arcadia Town Center Project

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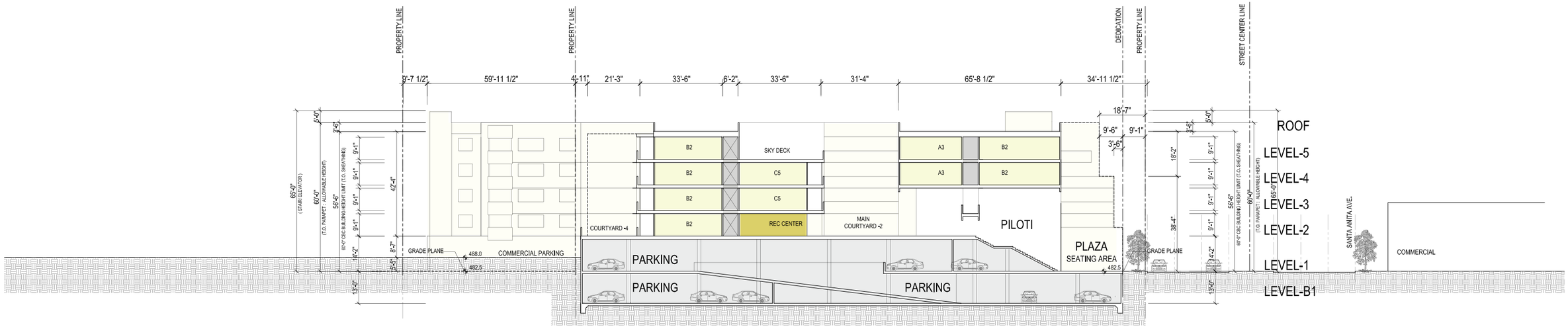
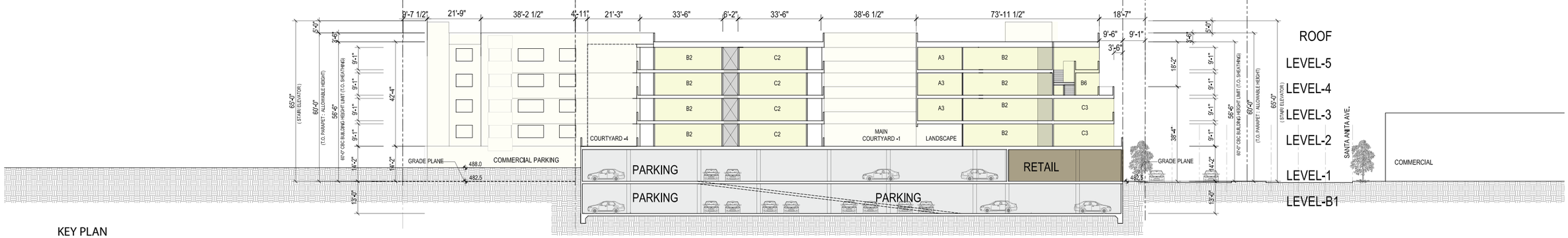
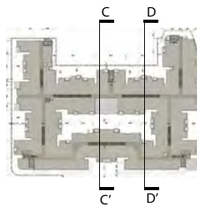


SECTION C-C'



SECTION D-D'

KEY PLAN



Source: New World International Investment 2022

Proposed Project Sections

Exhibit 12b

Arcadia Town Center Project

PSOMAS

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1 : AERIAL PERSPECTIVE VIEW

2 : AERIAL PERSPECTIVE VIEW

3 : CORNER AERIAL PERSPECTIVE VIEW

4 : VIEW FROM ARCADIA COUNTY PARK

Source: New World International Investment 2022

Proposed Project Perspective Views

Exhibit 13a

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Perspective.pdf

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1 : MAIN CORNER VIEW FROM SANTA ANITA AVE. & MORLAN PL.

2 : CORNER VIEW FROM SANTA ANITA AVE. & HUNTINGTON DR.

Source: New World International Investment 2022

Proposed Project Perspective Views

Exhibit 13b

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Perspective.pdf

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1 : VIEW OF SANTA ANITA AVE. CENTRAL PLAZA AND STREET SCAPE

2 : LOOKING WEST FROM SANTA ANITA / MID-BLOCK PODIUM CONNECTION

3 : LOOKING NORTH FROM SANTA ANITA AVE. RETAIL & STREET SCAPE

Source: New World International Investment 2022

Proposed Project Perspective Views

Exhibit 13c

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Perspective.pdf

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1 : LOOKING EAST FROM HUNTINGTON DR.

2 : LOOKING WEST FROM HUNTINGTON DR. MAIN ENTRY

3 : VIEW OF HUNTNGTON DR. FROM ARCADIA COUNTY PARK

Source: New World International Investment 2022

Proposed Project Perspective Views

Exhibit 13d

Arcadia Town Center Project

PSOMAS

(10/31/2022 JVR) R:\Projects\ARD\3ARD012200\Graphics\MND\ex_Proposed_Perspective.pdf

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TABLE 3
PROJECT RESIDENTIAL UNIT SUMMARY

Unit Type	Net Space per Unit (sf)	Number of Units	Total Area by Unit (sf)	Deck Area per Unit (sf)
A1	808	4	3,232	0
A2	842	6	5,052	0
A3	709	4	2,836	0
A3-alt1	788	6	4,728	0
A4	796	8	6,368	58
A5	713	6	4,278	58
A6	791	4	3,164	76
A7	930	2	1,860	0
A8	1,030	1	1,030	0
Unit A (One Bedroom) Subtotals		***41***	***32,548***	***N/A***
B1	1,108	2	2,216	58
B1-alt1	1,207	6	7,242	58
B1-alt2	1,236	8	9,888	58
B1-alt3	1,170	8	9,360	36
B1-alt4	999	8	7,992	58
B2	1,128	50	56,400	58
B3	1,180	4	4,720	61
B4	1,157	16	18,512	58
B5 TH1	1,398	2	2,796	267
B6 TH1	1,529	4	6,116	188
Unit B (Two Bedroom) Subtotals		***108***	***125,242***	***N/A***
C1	1,724	4	6,896	130
C2	1,443	20	28,860	52
C3	2,014	4	8,056	0
C4	1,329	2	2,658	0
C4-alt1	1,246	2	2,492	0
Unit C (Three Bedroom) Subtotals		***32***	***48,962***	***N/A***
Project Totals		**181**	**206,752**	**9,714**

sf: square feet
Source: New World International Investment, LLC 2022.

The Project would include 13,130 sf of ground-level commercial space that would be divided amongst 10 separate units ranging in size from approximately 500 sf to 2,100 sf, as depicted on Exhibits 3 and 5. The commercial spaces are anticipated to be developed with retail, restaurant, and/or office professional uses. As noted previously, in conjunction with the commercial uses, four public plazas and additional ground-level seating areas would be constructed, as discussed further below.

2.2.3 DEVELOPMENT CHARACTERISTICS

Building Design

Views of the Project design from various vantage points showing the size, scale, appearance, and key features are presented on Exhibits 11a and 11b, Exhibits 12a and 12b, and Exhibits 13a through 13e, above. The height of the proposed building is depicted on Exhibits 11a, 11b, 12a, and 12b. As shown, when measured from the grade plan (482.5 feet above msl), the Project would be constructed to a height of 60 feet to the top of the parapet and up to 65 feet when including stair well and elevator overruns. The five-story building would be constructed above one level of subterranean parking. As shown on Exhibits 14a through 14d, Material Finishes, the exterior of the building would include sand finish plaster walls in a coordinating mix of tans; stamped concrete; crown molding; fiber cement pattern veneer; fiber cement facade panel in two shades; painted metal tube steel railing with glass insert or painted metal tube steel railing with vertical pickets; bronze finish vinyl window casings; extruded metal openings; painted metal awnings, some with louvers and signage; painted awnings; anodized aluminum storefront windows; single-glazed vertical and horizontal glass facade system; and high performance garage doors. The Project is designed to activate the street-level conditions by orienting the Project's commercial uses as well as three of the public plazas and additional seating toward the Huntington Drive and Santa Anita Avenue streetscapes.

The Land Use and Community Design Element of the City's General Plan identifies Arcadia County Park and the nearby Metro A Line Station as Activity Nodes, which are defined as "places of pedestrian activity and excitement. These are places where people congregate, socialize, and shop. Activity Nodes are also places where residents can leisurely stroll, participate in a recreational activity, or relax and experience the outdoors". Additionally, the General Plan identifies the Huntington Drive and Santa Anita Avenue intersection as a Focal Intersection, which occurs at junctions of Major Corridors. Focal Intersections are important focal points of the community, which provide visual anchors, points of interest, and enhanced pedestrian connections (Arcadia 2010a). The City's General Plan states the following standards should be applied at all Focal Intersections:

- Buildings at Focal Intersections should be of the highest architectural quality to make them memorable and recognizable.
- Buildings should be oriented toward public streets and spaces to make the public space vibrant and pedestrian friendly.
- Activities that attract or generate pedestrian traffic such as cafés, retail functions, and public art are highly desirable at Focal Intersections. Define prominent intersections by locating new buildings or other structures closer to the street and defining the intersection space.
- Main building entrances of corner buildings should be close to the corner.
- Intersections should include raised crosswalks with textured materials to help improve pedestrian visibility and reduce pedestrian/vehicle conflicts.

Of the above standards, all but one is related to design. The last standard is related to City infrastructure and is outside of a developer's authority to implement.

Consistent with the Project site's proximity to two Activity Nodes and a Focal Intersection, the Project would include ground level commercial uses on Huntington Drive and Santa Anita Avenue; four pedestrian-scaled outdoor plazas that open the Project to the Huntington Drive, Santa Anita Avenue, and Morlan Place streetscapes; additional outdoor seating associated with the

NUMBERS DENOTE MATERIALS

1. EXT. PLASTER SAND FINISH

2. STAMPED CONCRETE

3. CROWN MOULDING

4. PAINTED METAL TUBE STEEL RAILING VERTICAL PICKET

5. PAINTED METAL TUBE STEEL RAILING W/ GLASS INSERT

6. PAINTED METAL AWNING W/ LOUVERS AND SIGNAGE

7. PAINTED AWNING

8. VINYL WINDOW
COLOR: BRONZE
COLOR: WHITE INTERIOR

9. ALUMINUM STOREFRONT ANODIZED

10. FIBER CEMENT PATTERN VENEER

11. METAL EXTRUDED OPENING

12. FIBER CEMENT FACADE PANEL

13. FIBER CEMENT FACADE PANEL

14. HIGH PERFORMANCE GARAGE DOOR

15. SINGLE-GLAZED VERTICAL& HORIZONTAL FACADE SYSTEM (U-GLASS)

ALL MATERIALS AS SHOWN OR APPROVED EQUAL

LETTERS DENOTE COLORS

A. DUNN EDWARDS CRYSTAL WHITE

B. DUNN EDWARDS ASPEN

C. DUNN EDWARDS MISTY

D. DUNN EDWARDS SANTA FE

F. STANDARD DARK BRONZE

ALL MATERIALS AS SHOWN OR APPROVED EQUAL

VIEW OF HUNTINGTON DRIVE.

Source: New World International Investment 2022

Material Finishes

Exhibit 14a

Arcadia Town Center Project

PSOMAS

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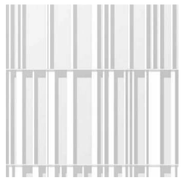

2. STAMPED CONCRETE

3. CROWN MOULDING

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5. PAINTED METAL TUBE STEEL RAILING W/ GLASS INSERT

6. PAINTED METAL AWNING W/ LOUVERS AND SIGNAGE

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D. DUNN EDWARDS SANTA FE

F. STANDARD DARK BRONZE

ALL MATERIALS AS SHOWN OR APPROVED EQUAL

6 10 2 15 1B 6 7 1E 3 2 5 10 9 13 1C 12 6 9 5 1B 13 12 7 6 8 9 13 12 1A 2 5 9 3 8 1C 1B 6 9 2

VIEW OF SANTA ANITA AVE.

Source: New World International Investment 2022

Material Finishes

Exhibit 14b

Arcadia Town Center Project

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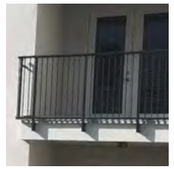
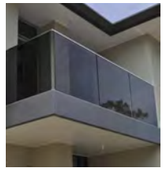
3. CROWN MOULDING



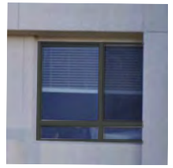
4. PAINTED METAL TUBE STEEL RAILING VERTICAL PICKET



5. PAINTED METAL TUBE STEEL RAILING W/ GLASS INSERT

6. PAINTED METAL AWNING W/ LOUVERS AND SIGNAGE

7. PAINTED AWNING



8. VINYL WINDOW
COLOR: BRONZE
COLOR: WHITE INTERIOR

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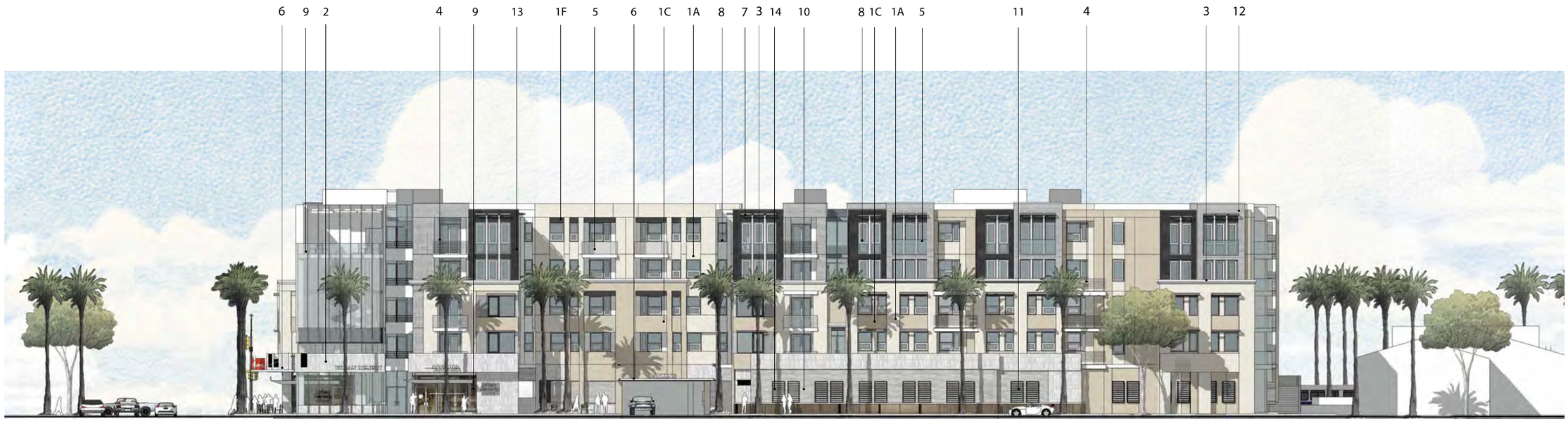
C. DUNN EDWARDS MISTY

D. DUNN EDWARDS SANTA FE

F. STANDARD DARK BRONZE

ALL MATERIALS AS SHOWN OR APPROVED EQUAL



VIEW OF MORLAN PL.
NUMBERS DENOTE MATERIALS
LETTERS DENOTE COLORS

Source: New World International Investment 2022

Material Finishes

Arcadia Town Center Project

Exhibit 14c

PSOMAS

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NUMBERS DENOTE MATERIALS

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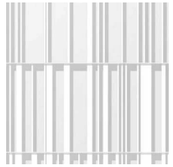
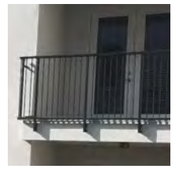


2. STAMPED CONCRETE

3. CROWN MOULDING



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6. PAINTED METAL AWNING W/ LOUVERS AND SIGNAGE

7. PAINTED AWNING

8. VINYL WINDOW
COLOR: BRONZE
COLOR: WHITE INTERIOR

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10. FIBER CEMENT PATTERN VENEER

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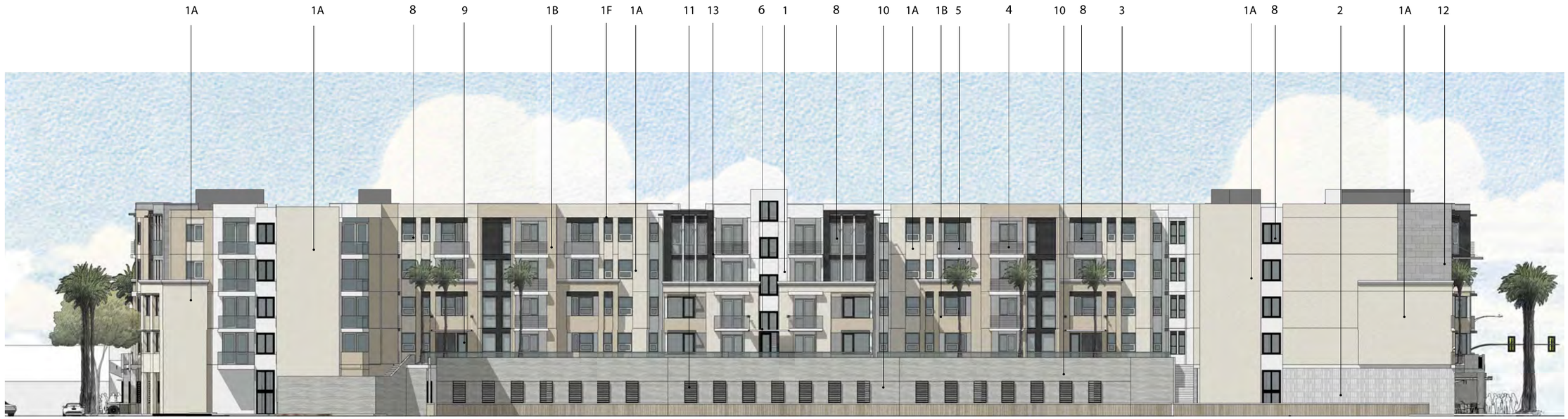
B. DUNN EDWARDS ASPEN

C. DUNN EDWARDS MISTY

D. DUNN EDWARDS SANTA FE

F. STANDARD DARK BRONZE

ALL MATERIALS AS SHOWN OR APPROVED EQUAL



VIEW OF NORTH COURTYARD
NUMBERS DENOTE MATERIALS
LETTERS DENOTE COLORS

Source: Humphreys & Partners Architects, L.P. 2022

Material Finishes

Exhibit 14d

Arcadia Town Center Project

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commercial uses on Huntington Drive; a single vehicle ingress/egress point on Huntington Drive with a secondary access on Morlan Place to minimize disruption of pedestrian traffic; use of high-quality building materials and finishes with a cohesive color palette and a variety of complementary textures; and use of high-quality hardscape materials, such as pavers, lighting, and furniture.

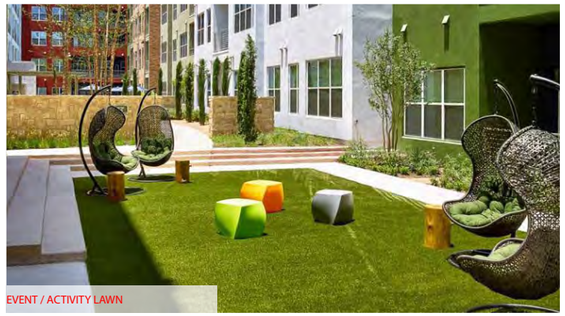
The Project design has been developed to comply with the development standards defined in Section 9102.05, Downtown Zones, of the City's Development Code; the Commercial and Mixed Use Design Guidelines (Design Guidelines) (Arcadia 2019); and the City Center Design Plan (Onyx Architects 2018) to ensure a high standard of design and architectural quality. The General Plan stresses the importance of quality in design and the impact that site design and building form has on enhancing the visual image of Arcadia and establishing places that people enjoy. The Design Guidelines have been written to reinforce these goals and objectives and provide general guidelines for any addition, remodel, or construction requiring a building permit within any commercial or mixed-use land use district (Arcadia 2019). As part of the City's development standards, pursuant to Section 9102.05.060 of the City's Development Code, the Project is subject to Site Plan and Design Review. Further, Section 9107.19.030 of the Development Code states that, where required, Site Plan and Design Review approval shall be required before the issuance of a Building or Grading Permit, Business License, or Certificate of Occupancy.

Open Space, Landscape, and Hardscape

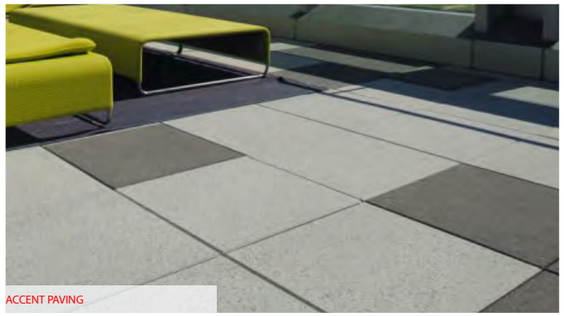
The City requires 100 sf per unit minimum open space for residential uses in the DMU zone, which results in a required minimum of 18,100 sf of open space for the 181 proposed residential units. Per the City's Development Code, open space may be in the form of private or common open space via balconies, courtyards, at-grade patios, rooftop gardens, and/or terraces. The Project includes 38,713 sf of open space, including 9,714 sf of private open space, which is approximately 2.1 times more than the amount of open space that is required for the Project. Exhibit 15, Typical Project Landscape/Hardscape Elements and Conceptual Plant Palette; and Exhibits 16a through 16h, Proposed Landscape Plan, illustrate the public and private open spaces that would be provided as part of the Project.

As shown on Exhibits 16a and 16b, there would be 6,211 sf of plazas and other outdoor areas situated at the Morlan Place entry, the northeast corner of the site, in the central portion of the east side, in the southeast corner, and associated with the commercial uses on Huntington Drive that would provide tables and seating, decorative paving, and/or ornamental plantings. The plazas would be open to the public but would be owned and maintained by the Project Applicant/Property Owner.

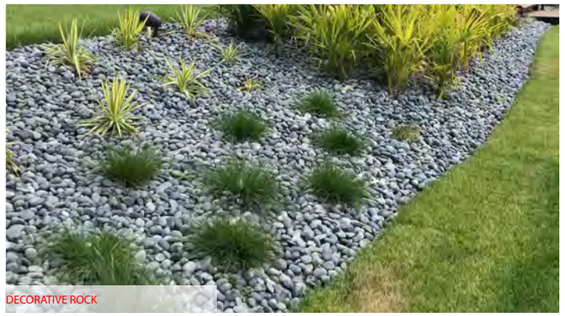
Open spaces on Levels 2 through 5 would be for residents and guest use only. As shown on Exhibits 16c through 16f, Level 2 would provide 21,825 sf of open space distributed across several courtyards. The two larger "main courtyards" would be connected by a paved walkway with seating areas and include a swimming pool, spa, large artificial turf area, barbeque grills with counter space, additional seating areas, decorative paving, and landscaping. The remaining 4 courtyards throughout Level 2 would vary in size and include seating of various types and configurations, decorative paving, and landscaping. As shown on Exhibits 16a through 16h, Levels 4 and 5 would provide 963 sf of open space distributed across a total of 2 skydecks and roof decks as gathering spaces and include seating, umbrellas, decorative paving, and landscaping. All proposed landscaping and related irrigation systems would comply with the City's Water Efficient Landscaping Ordinance.



EVENT / ACTIVITY LAWN



ACCENT PAVING



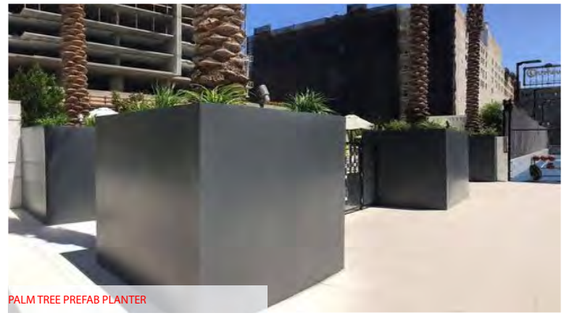
DECORATIVE ROCK

OUTDOOR BBQ

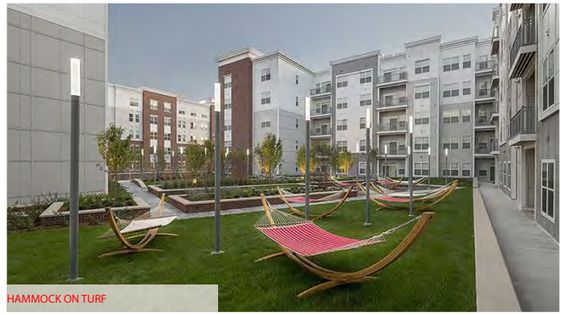
ORNAMENTAL PLANTING

OUTDOOR FURNITURE

CUSTOM CAST IN PLACE CONCRETE BENCH



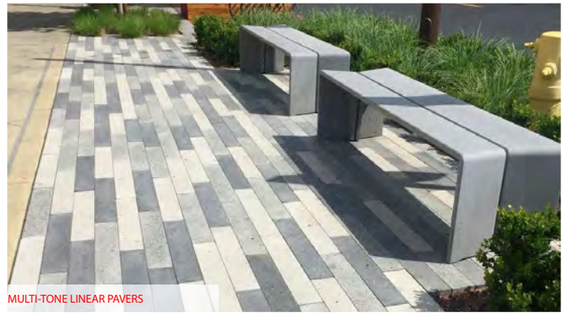
PALM TREE PREFAB PLANTER



HAMMOCK ON TURF

CAVE

PREFAB FIRE FEATURE



MULTI-TONE LINEAR PAVERS

CONCEPTUAL PLANT PALETTE

TREES:	SIZE:
ARBUTUS UNEDO STRAWBERRY TREE	36"
LAGERSTROEMIA INDICA CRAPE MYRTLE	36"
OLEA EUROPAEA OLIVE TREE	36"
PARKINSONIA FLORIDA PALO VERDE	36"
TRISTANIA CONFERTA BRISBANE BOX	36"

SHRUBS AND GROUNDCOVERS:	
ASCLEPIAS CURA. ' RED BUTTERFLIES' RED BUTTERFLIES MILKWEED	5 GAL.
BUDDLEJA 'BLUE CHIP' DWARF SUMMER LILAC	5 GAL.
CARISSA MACROCARPA NATAL PLUM	3 GAL.
CEANOTHUS GRIS. HORIZ. 'YANKEE POINT' YANKEE POINT CEANOTHUS	5 GAL.
DIANELLA REVOLUTA 'CLARITY BLUE' CLARITY BLUE FLAXLILY	3 GAL.
ECHINOCACTUS GRUSONII BARREL CACTUS	3 GAL.
LANTANA CAMARA 'MISS HUFF' MISS HUFF HARDY LANTANA	5 GAL.
LEUCOPHYLLUM SPP. TEXAS RANGER	5 GAL.
RHAPHIOLEPIS INDICA INDIAN HAWTHORNE	5 GAL.
ROSMARINUS OFF. 'LOCKWOOD DE FOREST' PROSTRATE ROSMARY	1 GAL.
SALVIA SPP. SAGE	5 GAL.

HEDGES:	
LIGUSTRUM JAPONICUM JAPANESE PRIVET	5 GAL.
PITTOSPORUM TOBIRA 'MOJO' MOJO PITTOSPORUM	3 GAL.
PODOCARPUS ELONGATUS 'MONMAL' ICEE BLUE YELLOWWOOD	5 GAL.
PRUNUS CAROLINIANA CAROLINA CHERRY LAUREL	5 GAL.

SUCCULENTS:	
AGAVE AMERI. VAR. MEDIO-PICTA 'ALBA' WHITE STRIPED CENTURY PLANT	3 GAL.
AGAVE 'BLUE GLOW' BLUE GLOW AGAVE	1 GAL.
AGAVE DESMETTIANA SMOOTH AGAVE	5 GAL.
AGAVE WEBERI WEBER'S AGAVE	5 GAL.
ALOE STRIATA CORAL ALOE	1 GAL
ECHEVERIA SPP. HEN AND CHICKS	1 GAL.
SEDUM SPP. STONECROP	1 GAL.
SENECIO MANDRALISCAE BLUE CHALKSTICKS	1 GAL.

GRASSES:	
MUHLENBERGIA LINDHEIMERI AUTUMN GLOW MUHLY	3 GAL.
PENNISETUM ALOPECUROIDES 'HAMELN' DWARF FOUNTAIN GRASS	3 GAL.
VINES:	
BOUGAINVILLEA SPP. BOUGAINVILLEA	5 GAL.
CLYTOSTOMA CALLISTEGIODES VIOLET TRUMPET VINE	5 GAL.

Source: New World International Investment 2022

Typical Project Landscape/Hardscape Elements and Conceptual Plant Palette

Exhibit 15

Arcadia Town Center Project

PSOMAS

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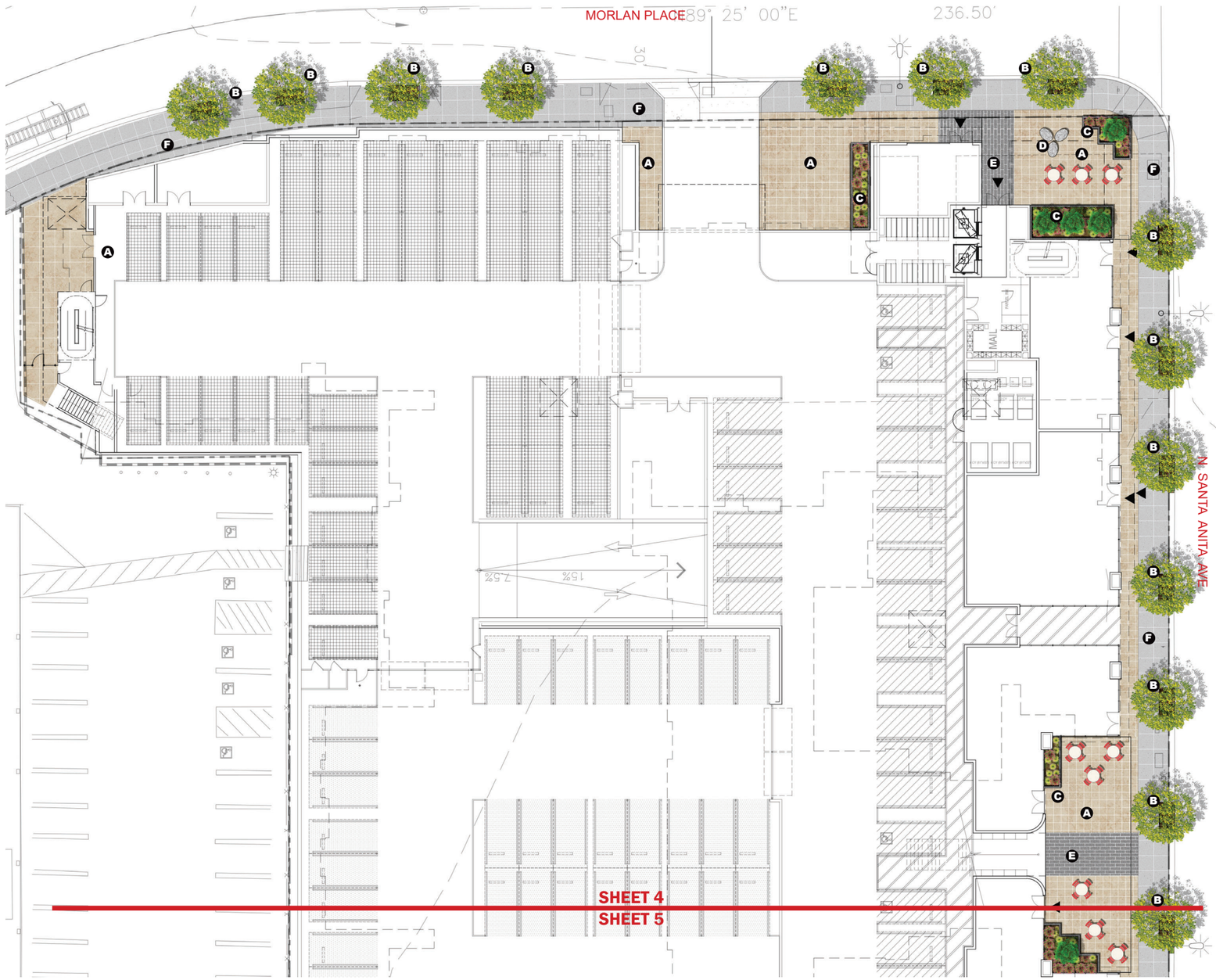
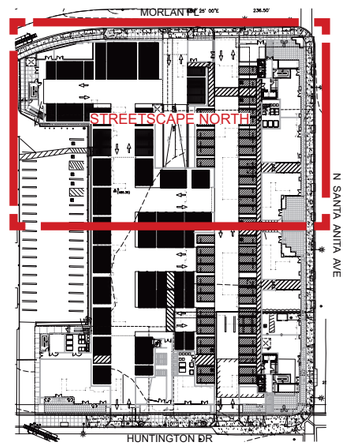


STREETSCAPE NORTH

Legend

- A 2' x 2' Concrete Pavers
- B 4' x 8' Tree Well w/ Shade Tree
- C Ornamental Planting
- D Pebble Seating
- E Accent Linear Pavers
- F Existing Sidewalk

GROUND LEVEL KEY MAP



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Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Exhibit 16a

Arcadia Town Center Project

PSOMAS

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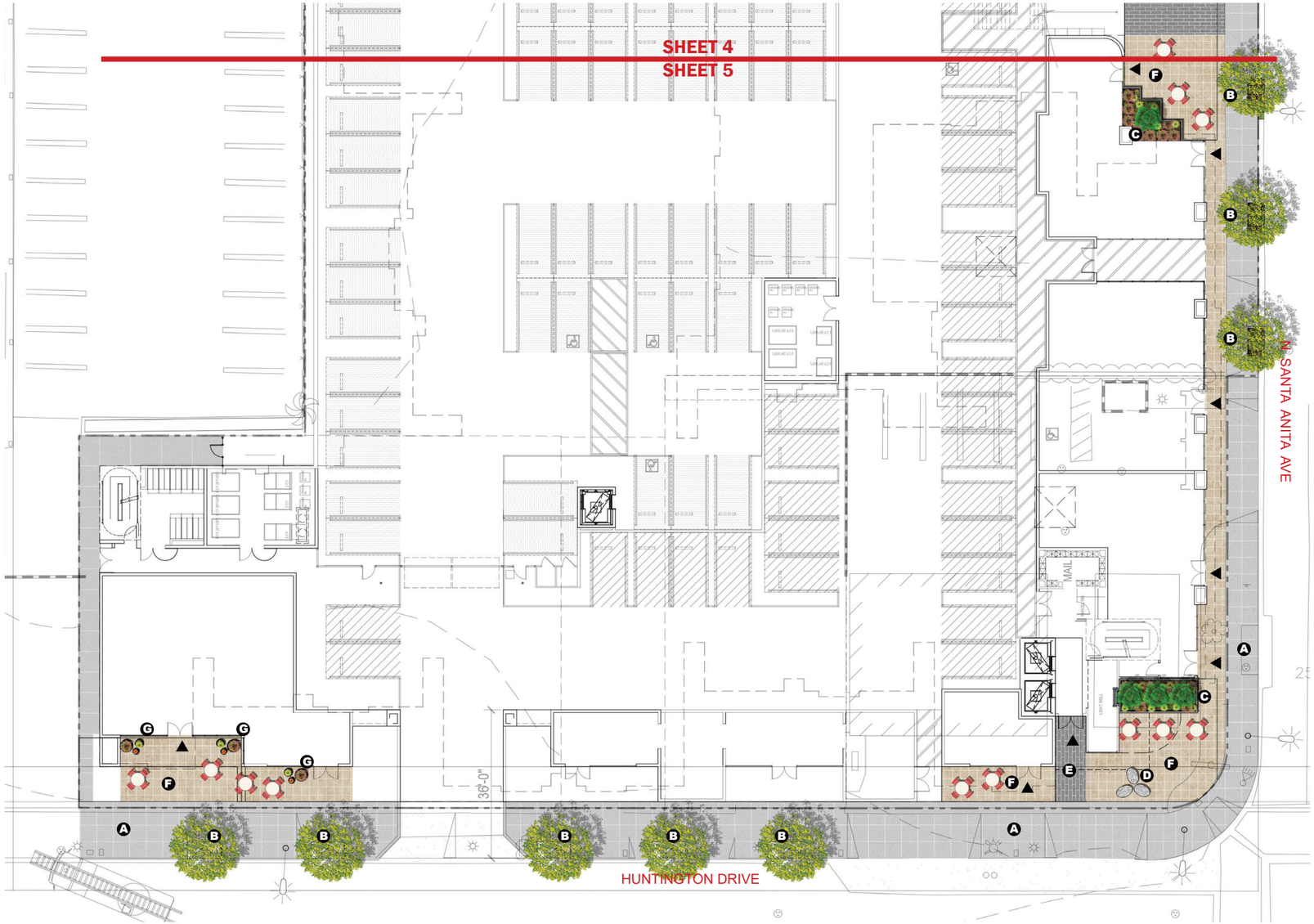
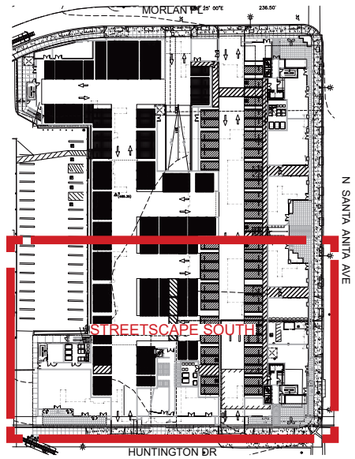


STREETSCAPE SOUTH

Legend

- A Existing Sidewalk
- B 4' x 8' Tree Well w/ Shade Tree
- C Ornamental Planting
- D Pebble Seating
- E Accent Linear Pavers
- F 2' x 2' Concrete Pavers
- G Circular Planting Pots

GROUND LEVEL KEY MAP



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Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Exhibit 16b

Arcadia Town Center Project

PSOMAS

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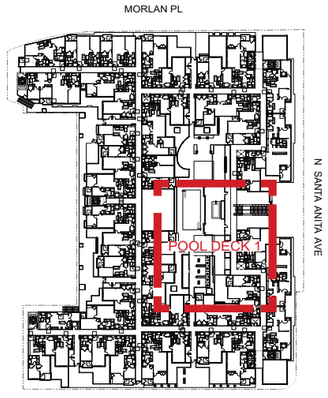
AMENITY DECK 1

Legend

- A Swimming Pool
- B Lounge Seating without Artificial Turf
- C Artificial Turf w/ Lounge Seating
- D Pre-Fab Planter w/ Shade/Palm Tree
- E 12” Tall Built-In Planter
- F Circular Ornamental Planting Pot
- G Rectangular Pre-Fab Planter
- H Accent Linear Pavers
- I 2’ x 2’ Concrete Pavers
- J Pool Fence & Gate
- K Decorative Rock
- L Wood Decking
- M Pre-Fab Fire Trough
- N Bocce Ball Court
- O String Lighting

2ND LEVEL KEY MAP



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Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Exhibit 16c

Arcadia Town Center Project

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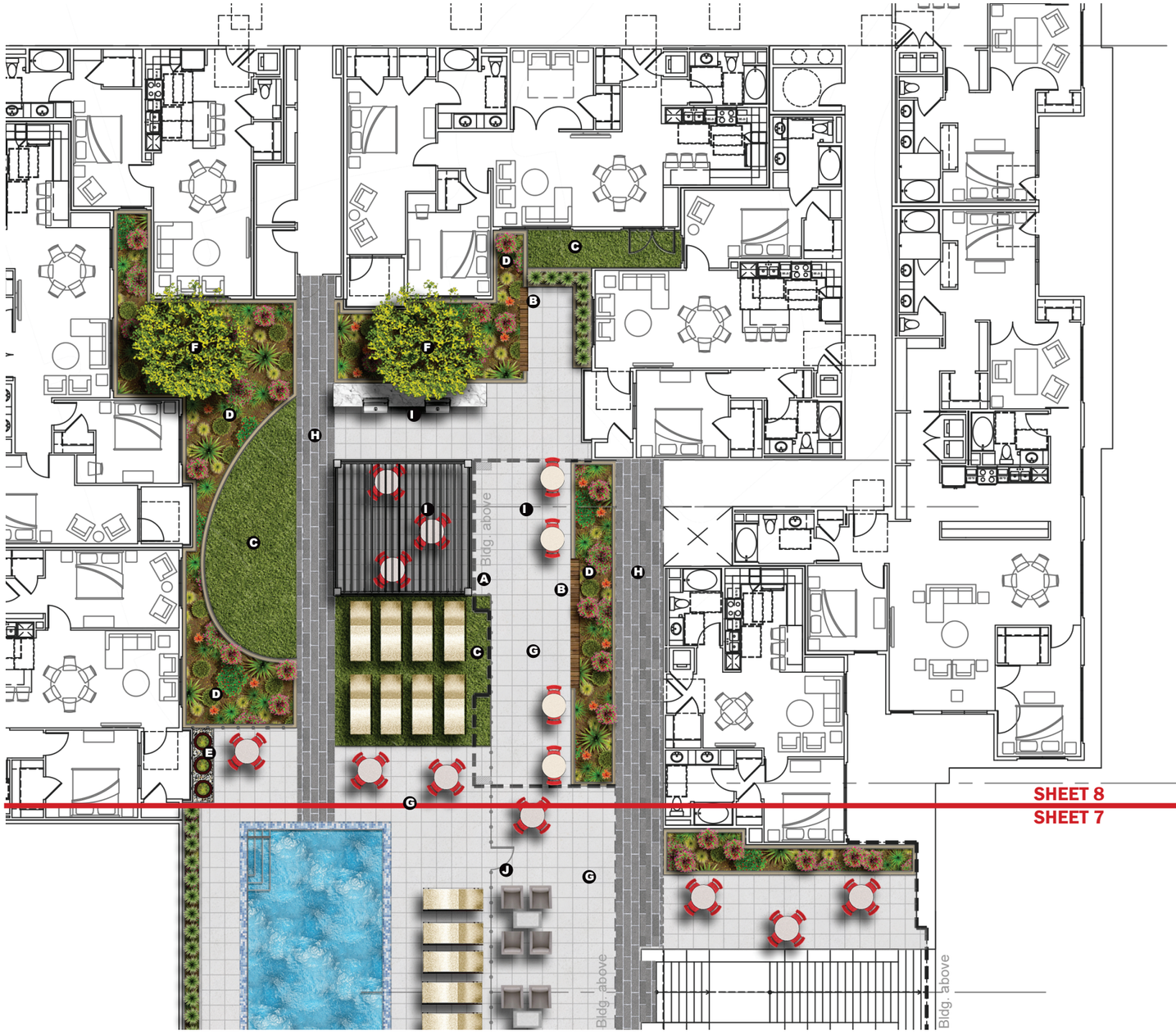
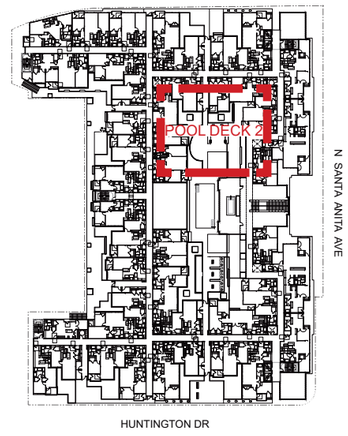


AMENITY DECK 2

Legend

- A Custom Steel Shade Structure
- B Wood-Cap Planter Bench
- C Artificial Turf Area
- D Raised Planter w/ Ornamental Planting
- E Circular Ornamental Planting Pot
- F 4' x 4' Pre-Fab Planter w/ Shade Tree
- G 2' x 2' Concrete Pavers
- H Accent Linear Pavers
- I Barbeque Grill & Counter
- J Pool Fence & Gate

2ND LEVEL KEY MAP



GENERAL NOTES:

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Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Exhibit 16d

Arcadia Town Center Project

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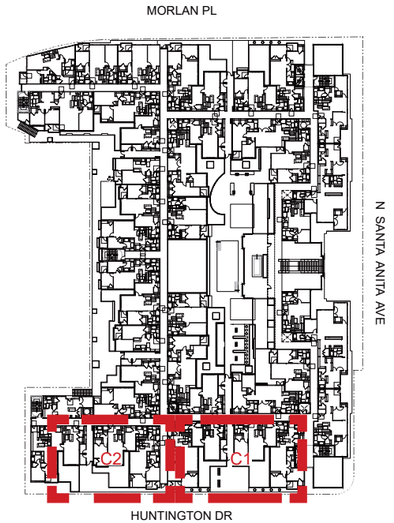
COURTYARD 1

Legend

- A Contemporary Fire Trough
- B Decorative Rock
- C Accent Linear Pavers
- D Raised Planter w/ Ornamental Planting
- E Artificial Turf
- F 2’ x 2’ Two-Tone Accent Pavers
- G Decorative Light Spheres

2ND LEVEL KEY MAP



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COURTYARD 2

Legend

- Raised Planter w/ Ornamental Planting A
- 2’ x 2’ Concrete Pavers B
- Accent Linear Pavers C

Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan — Exhibit 16e

Arcadia Town Center Project

PSOMAS

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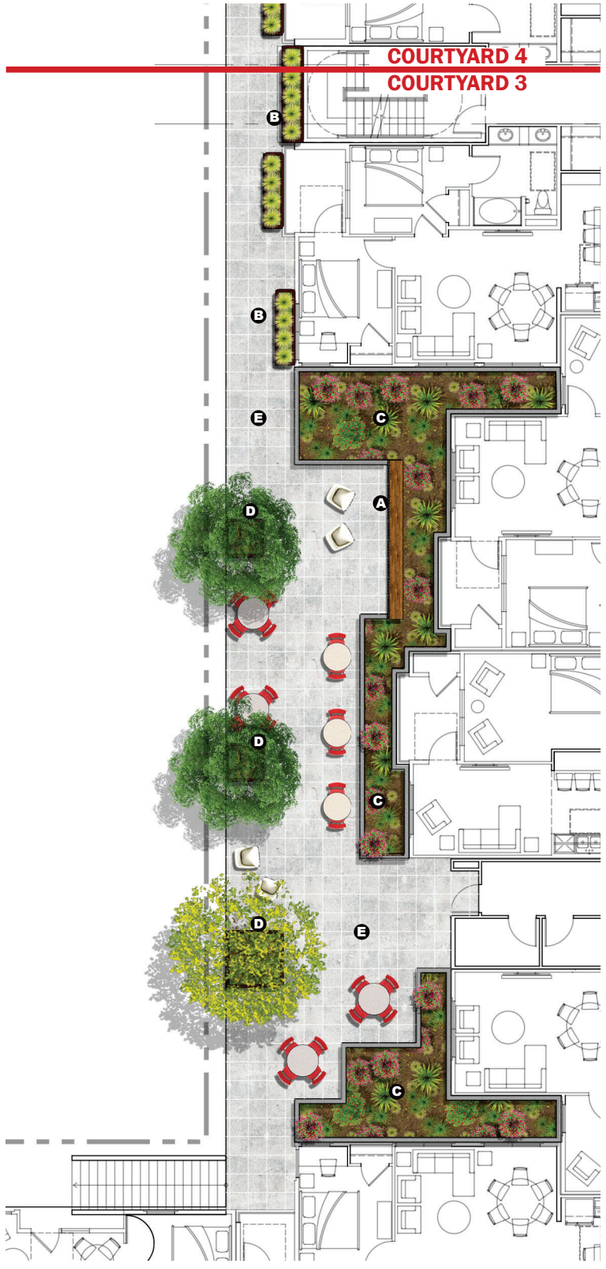
COURTYARD 3

Legend

- A Built-In Wood Bench
- B Rectangular Pre-Fab Planter
- C Raised Planter w/ Ornamental Planting
- D 4’ x 4’ Pre-Fab Planter w/ Shade Tree
- E 2’ x 2’ Two-Tone Accent Pavers



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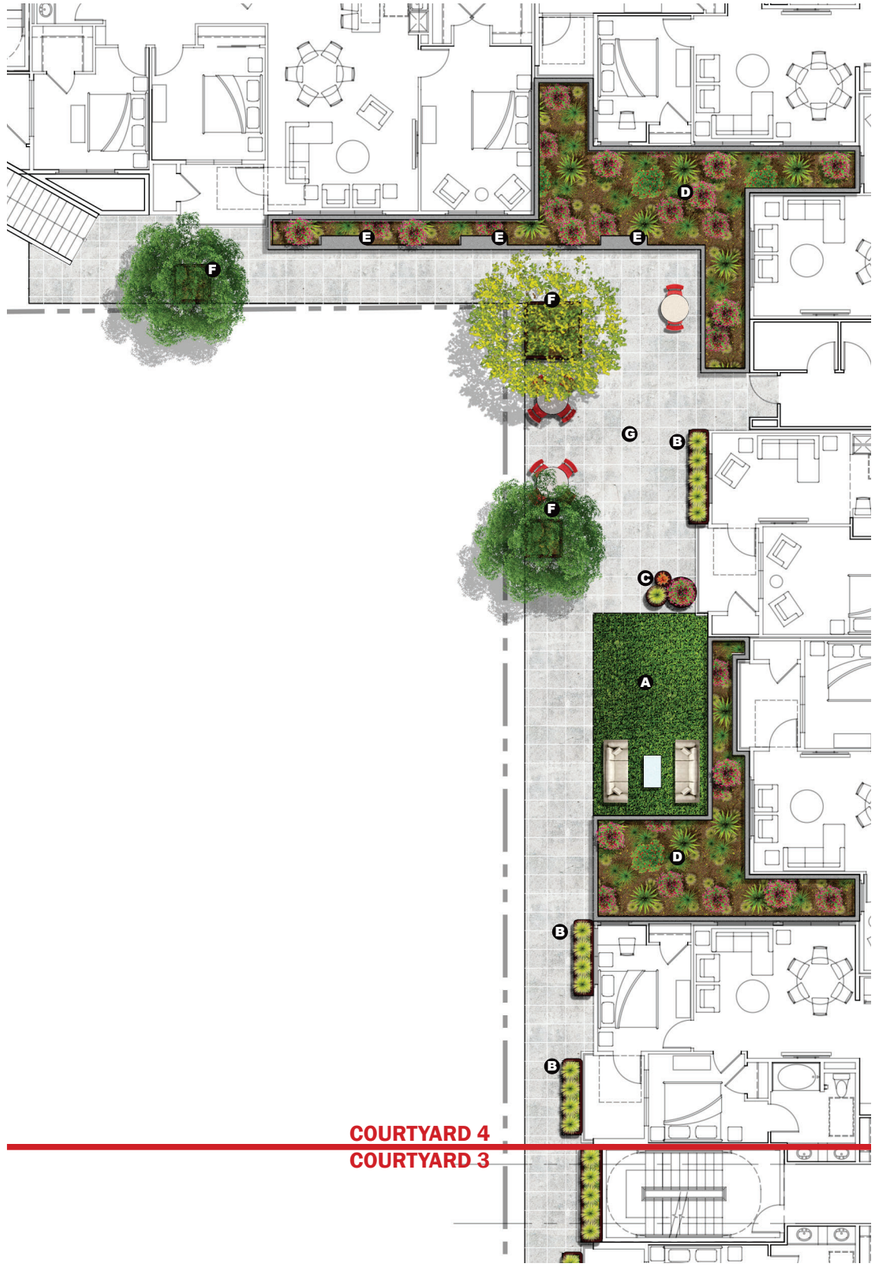
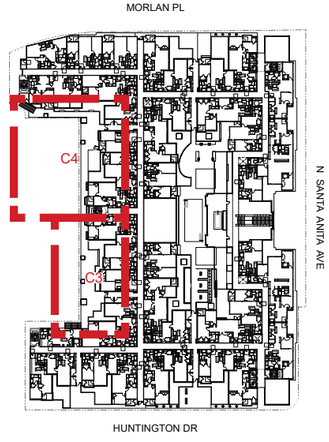


COURTYARD 4

Legend

- A Artificial Turf Area
- B Rectangular Pre-Fab Planter
- C Ornamental Planting Pots
- D Raised Planter w/ Ornamental Planting
- E Built-In Concrete Bench Seating
- F 4’ x 4’ Pre-Fab Planter w/ Shade Tree
- G 2’ x 2’ Two-Tone Accent Pavers

2ND LEVEL KEY MAP



Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Arcadia Town Center Project

Exhibit 16f

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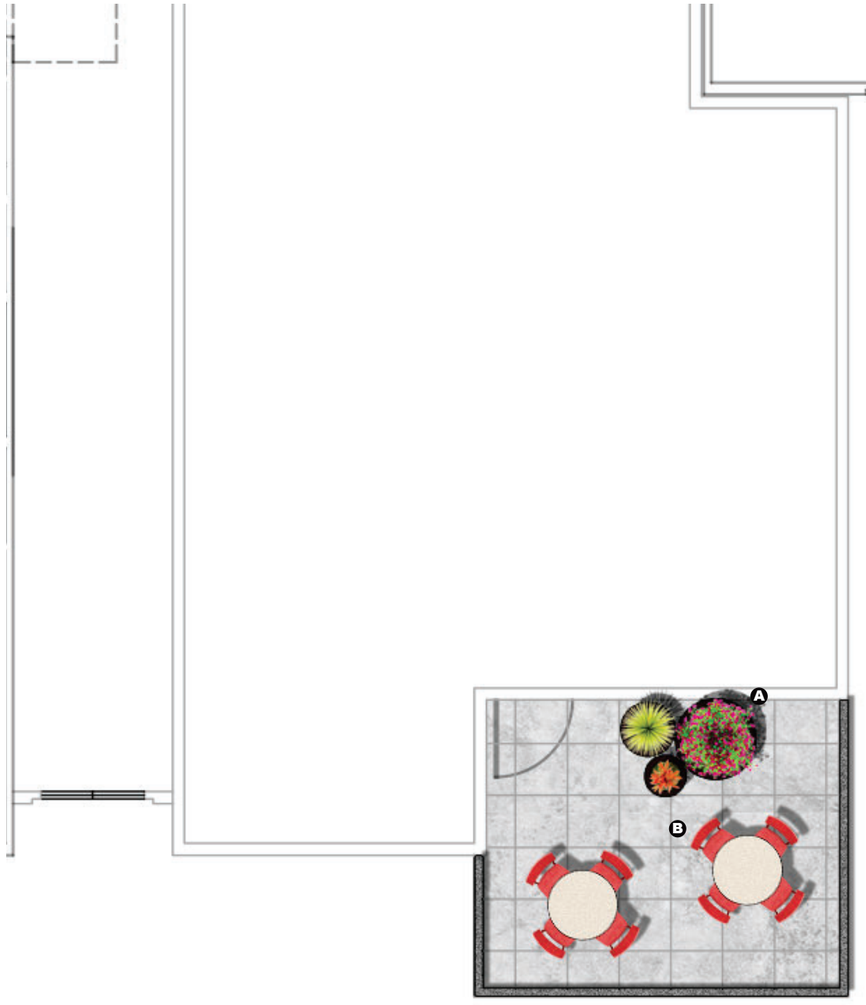
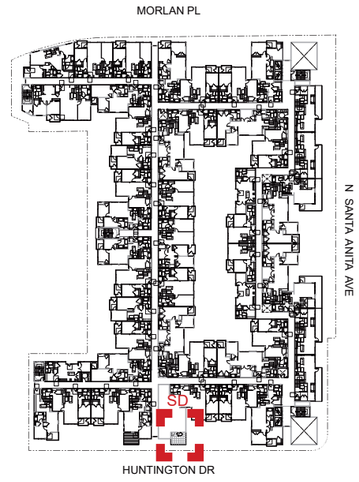


SKY DECK (4TH LEVEL)

Legend

- A Ornamental Planting Pots
- B 2' x 2' Concrete Pavers

4TH LEVEL KEY MAP



Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan

Exhibit 16g

Arcadia Town Center Project

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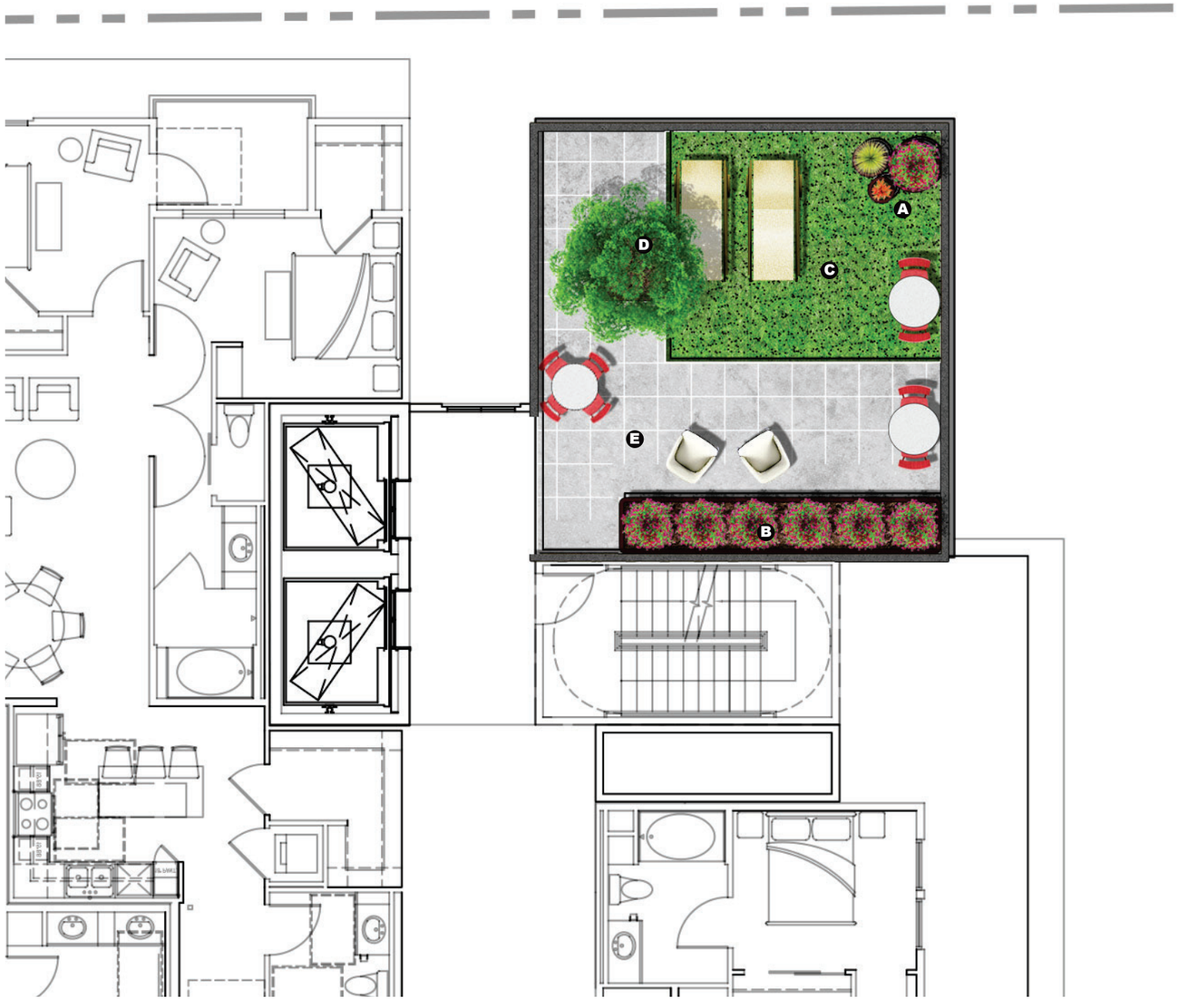
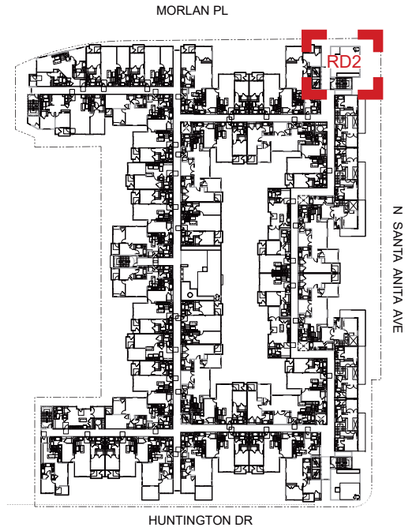
ROOF DECK (5TH LEVEL)

Legend

- **A** Ornamental Planting Pots
- **B** Raised Planter w/ Ornamental Planting
- **C** Artificial Turf Area
- **D** 4’ x 4’ Pre-Fab Planter w/ Shade Tree
- **E** 2’ x 2’ Two-Tone Accent Pavers



5TH LEVEL KEY MAP



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Source: New World International Investment and Humphreys & Partners Architects 2022

Proposed Landscape Plan — Exhibit 16h

Arcadia Town Center Project

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The Project would include removal of the 26 existing trees on the site and adjacent ROW. This would include 11 street trees along the frontages of Huntington Drive and Santa Anita Avenue (both within and outside the existing ROW). There are 3 trees along the frontage of Santa Anita Avenue that are Protected Trees under the City's Tree Preservation Ordinance (Section (9110.01 et. seq. of the Development Code) and 3 trees in the ROW of Huntington Drive that are protected under City's Comprehensive Tree Management Program (Section 9800 et. seq. of the AMC) would be removed as part of Project implementation. The Applicant/Property Owner would be required obtain a permit from the Arcadia Public Works Services Department for the removal of street trees in the public ROW and removal of Protected Trees on private property. The Project's on-site landscaping would include a total of 46 new trees. Among these would be 21 trees along the frontages of Morlan Place, Santa Anita Avenue, and Huntington Drive, planted in a 4-foot by 8-foot tree well consistent with City standards. Tree removals and replacements are discussed further in Section 3.4, Biological Resources, of this IS/MND.

Circulation and Parking

Vehicular Circulation

As shown on Exhibits 3 and 5, primary vehicular access to the Project's parking structure is proposed via entries accessible from Huntington Drive and Morlan Place. All vehicular access from the street leads to parking for visitors to the commercial areas and for residents and guests on the ground level. As shown on Exhibit 3, there is a through path on Level 1 between the Huntington Drive to Morlan Place entrances for commercial visitors. Vehicles would be able to leave the site via these same two driveways. There is one ramp to and from Level B1, the subterranean level with resident parking only.

Non-Vehicular Circulation

Secured/keyed residential access to the Project would be provided at the entry lobbies, staircases, and elevators. All residential units would be accessible from interior walkways that connect to the three elevators and four stairwells. The elevators would provide access to the basement parking garage, the ground floor, and all four levels of residential units.

Automobile Parking

The City's off-street parking requirements are set forth in Section 9103.07.070 of the Development Code, which covers Mixed-Use (Nonresidential and Residential Combined) Parking Standards. The following minimum parking requirements apply to the Project:

- **Mixed-Use Residential.** 1.5 parking spaces for every dwelling unit, plus 1.0 guest parking space for every 3 units.
- **Commercial.** 1.0 parking space per 100 sf to 250 sf of gross floor area (GFA), depending on the type of commercial use proposed. For large restaurants that are greater than 2,000 sf, the ratio is 1.0 space per 100 sf of GFA. For retail and small restaurants that is 2,000 sf or less, the ratio is 1.0 space per 200 sf of GFA. For office professional, the ratio is 1.0 space per 250 sf of GFA.

For commercial uses located within 1,320 feet (¼-mile) of a light rail station, which includes the Project site, the Development Code permits a reduction of 25 percent to be applied to the off-street parking requirement for non-residential uses. Based on the requirements noted above, a total of 377 spaces are required for the Project as summarized below:

- **Mixed-Use Residential:** 272 spaces (181 units x 1.5 spaces/unit)

- **Mixed-Use Residential Guest:** 59 spaces (181 units x 0.3)
- **Commercial:** 46 spaces (after 25 percent reduction) (assuming 8,330 sf of small restaurant or general retail and 4,800 of office professional)

In compliance with these requirements, the Project proposes 378 parking spaces, which are located as shown on Exhibits 4 and 5.

Bicycle Parking

As required by Section 9103.07.150 of the Development Code, the Project would include long-term (for residents) and short-term (for visitors and guests) bicycle parking. For multi-family uses, 0.2 space per unit is required. For non-residential uses such as retail, both short-term and long-term bicycle parking must be provided equivalent to 5 percent of the vehicle parking spaces, with a minimum of a two-bicycle capacity rack. The Development Code requires that long-term bicycle parking include one of the following:

- Covered, lockable enclosures with permanently anchored racks for bicycles;
- Lockable bike rooms with permanently anchored racks; or
- Lockable, permanently anchored bicycle lockers.

Based on these requirements, the Project proposes installation of 40 long-term bicycle parking stalls; of these, 37 stalls are for residents and 3 are for retail uses. The Project also includes 3 short-term bicycle parking stalls.

Infrastructure

The Project would include the installation of and connection to storm drain, sewer, and potable water infrastructure systems; and on- and off-site dry utility connections to accommodate the needs of the Project. The necessary on- and off-site infrastructure would be constructed and/or relocated by the Applicant/Property Owner according to specifications set by the City and utility providers. The following is a brief description of the proposed infrastructure and utility systems.

Drainage and Water Quality Treatment

In the existing condition, storm water runoff from the Project site is conveyed as surface flow and flows into existing 42-inch-diameter storm drain pipelines located in both Huntington Drive and Santa Anita Avenue. Over four miles of City-maintained storm water management facilities are present in Arcadia, which connect to regional flood control and runoff conveyance facilities (Arcadia 2010b). The City's storm water generally flows in a southerly direction through the Eaton Wash, Arcadia Wash, Santa Anita Wash, Sierra Madre Wash, and Sawpit Wash toward the Rio Hondo, which runs southwest into Whittier Narrows and continues southwest to join the Los Angeles River in Downey (Arcadia 2010a).

As discussed in more detail in Section 3.10, Hydrology and Water Quality, a low impact development (LID) Plan would be prepared for the Project to further analyze and specify appropriate source-control best management practices (BMPs), site-design BMPs, and hydraulic source-control BMPs that would be incorporated into the Project consistent with Section 7800 et. seq., Stormwater Management and Discharge Control, of the Arcadia Municipal Code (AMC). The BMPs would be required to control pollutants, pollutant loads, and runoff volumes to the maximum extent feasible by minimizing impervious surface area and controlling runoff through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use.

Potable Water

The City of Arcadia Public Works Services Department is responsible for producing, storing, and distributing potable water to the City and maintaining the City's water system infrastructure. The existing water infrastructure adjacent to the Project site includes a 30-inch-diameter welded steel water main in Santa Anita Avenue, a 16-inch-diameter welded steel water main in Huntington Drive, and a six-inch-diameter water main is available in Morlan Place.

The Project's proposed water infrastructure would include domestic, irrigation, and fire water service lines, meters, and backflow preventers. The Project would connect to the existing water lines in Santa Anita Avenue, Huntington Drive and Morlan Place via several proposed 2-inch-diameter lateral pipes. Additionally, a proposed 8-inch-diameter fire water line would be connected to the existing water line in Santa Anita Avenue for use by the existing fire hydrant and a 2-inch-diameter irrigation lateral would be connected to the existing water line in Morlan Place. Any portions of Huntington Drive, Santa Anita Drive, or Morlan Place that are disturbed during Project construction would be repaved in-kind, as described in MM TRANS-1.

The City of Arcadia has confirmed that the Project's anticipated potable water demands can be accommodated with the existing potable water infrastructure, as described in more detail in Section 3.19, Utilities and Service Systems.

Sewer

In the existing condition, sewage from the Project site is conveyed via 8-inch-diameter and 10-inch-diameter sewer lines located in Huntington Drive, Santa Anita Avenue, and Morlan Place. These pipelines flow towards an existing 18-inch-diameter Los Angeles County Sanitation Districts (LACSD) trunk line located at the intersection of Camino Real Avenue and First Avenue (LACSD 2024).

Local sewer main lines adjacent to the Project site are maintained by the City, and they convey wastewater into trunk lines that are maintained by the LACSD. The City's sewer system has approximately 138 miles of sewer pipes, six siphons, and one pump station. There are also 15 miles of County-owner pipelines within the City limits into which the City's system discharges. The City's sewer system serves existing developments in the City, with connections to the sewer systems of the cities of Sierra Madre, Temple City, and Monrovia and in unincorporated County areas that allow for sewage conveyance through the City's system to the LACSD sewer trunk lines (Arcadia 2010b). The Project proposes to connect to the existing lines located in Santa Anita Avenue via several proposed six-inch-diameter sewer lateral pipes.

Dry Utilities

Southern California Edison (SCE) would provide electricity service and Southern California Gas Company (SoCal Gas) would provide natural gas service to the Project site. The Project would require the removal and replacement of the existing dry utility lines within the Project site. The Project would connect to the existing electric lines located in Morlan Place; and existing gas infrastructure located in Huntington Drive, Santa Anita Avenue and Morlan Place. There are existing telephone, telecommunication, and cable television lines and facilities associated with private providers such as AT&T, Spectrum, EarthLink, and Frontier throughout the City. Existing utility service to adjacent and nearby parcels would be maintained throughout Project construction.

2.2.4 OFF-SITE IMPROVEMENTS

The following off-site improvements are anticipated:

- The Project would require the removal of 11 street trees along the frontages of Huntington Drive and Santa Anita Avenue (both within and outside the existing ROW).
- In addition to on-site landscaping, an anticipated 5 street trees would be planted along the Huntington Drive ROW; 9 street trees would be planted along the Santa Anita ROW; and 7 street trees would be planted along the Morlan Place ROW, although the ultimate number will be determined by the Public Works Services department.
- The Project would require off-site connections to existing utilities within the ROW of Huntington Drive, Santa Anita Avenue, and Morlan Place.

All the items noted above would be designed and constructed in accordance with City requirements and standards and would require City approval.

Additionally, the Project would dedicate the following areas to the City to become a public ROW:

- On Santa Anita Avenue: 2.5 feet of sidewalk alongside the Jiffy Lube parcel and the 10-foot-wide sidewalk for the remaining frontage to Morlan Place, and
- On Huntington Drive: 18 inches of sidewalk along the entire frontage.

Finally, to accommodate the wastewater generation of the Project plus other projected growth, the City would replace approximately 1.3 miles (6,685 linear feet) of existing 8- and 10-inch diameter sewer lines with 12-inch diameter sewer lines along Santa Anita Avenue between Huntington Drive and Camino Real Avenue. It was determined this additional capacity must be available before residents and businesses occupy the Project. Therefore, construction of this off-site sewer upsizing is addressed in this IS/MND (see Section 3.19, Utilities and Service Systems). This infrastructure work would be split into three smaller phases and included in future City capital improvement plans (CIPs) for the years prior to occupancy of the Project. While required for the Project to open to the public, the off-site sewer upsizing would be implemented by the City and is not as part of the Project's construction scope.

2.3 CONSTRUCTION ACTIVITIES

Construction of the Project would occur in a single phase and is anticipated to require approximately 29 months beginning in 2026, as outlined in Table 4, Estimated Project Construction Schedule. Although the City of Arcadia permits construction activities Monday through Saturday, the Project is expected to have construction activities Monday through Friday from 7:00 AM to 6:00 PM, consistent with the allowable hours of construction defined in Section 4261 of the AMC. Saturday construction activity within the allowable hours of 8:00 AM to 5:00 PM may sometimes occur if needed due to unforeseen circumstances. However, for purposes of this IS/MND the analysis assumes Monday through Friday construction activities and the resulting schedule shown below. In the unlikely event construction were to occur on a Saturday, all applicable mitigation measures and local and State regulations discussed further in Section 3.0 would apply. However, this is not the intent of the Applicant/Property Owner and such activity would be considered speculative for purposes of this analysis pursuant to Section 15145 of the State CEQA Guidelines. There would be no construction activity on Sundays, federal holidays that occur on weekdays, or at nighttime.

TABLE 4
ESTIMATED PROJECT CONSTRUCTION SCHEDULE

Construction Activity	Duration or Timing
Construction Begins	2026
Demolition	3 weeks
Site Preparation, Grading, Excavation	4 months & 1 week
Building Construction	24 months
Paving	2 months (would occur during building construction)
Architectural Coating	3 months (would occur during building construction)
Project Opens to the Public	2028
Source: New World International Investment LLC 2022.	

During the demolition, grading, and excavation phases, trucks are expected to enter and leave the Project site on a regular basis during working hours. The number of truck trips traveling along the City-designated truck routes would vary daily depending on the nature of the construction activity at the site. Trucks are anticipated to access the Project site primarily via I-210 and larger arterials (e.g., Santa Anita Avenue and Huntington Drive) and would follow City-designated haul routes avoiding residential streets. For purposes of this IS/MND, all hauling of debris or soil is assumed to be via 14 cubic yard (cy) size trucks and over an 8-hour workday, as a conservative assumption. These assumptions result in a greater number of total and daily truck trips.

Project construction would begin with the demolition of the existing structures and removal of the existing vegetation on the site, resulting in an estimated 4,970 cy of demolition debris and green waste to be exported. Debris removal from the Project site would generate an estimated 320 one-way truck trips over a four-week demolition and site preparation phases. On average, it is anticipated that 16 1-way trips per day or approximately 2 trips per work hour would occur.

During the grading and excavation phase, an estimated 44,870 cy of soil would be exported. Excavation is anticipated to generate a total of 4,487 one-way truck trips over a three-month period. On average, it is anticipated that 75 one-way trips per day or nine trips per work hour would occur. No pile driving would be required to install the Project's shoring or for any other construction activities. Building construction would occur for approximately 24 months, including paving and application of architectural coatings (e.g., stucco, exterior paints).

Construction staging and worker parking would be accommodated within the Project site, to be detailed in a Construction Management Plan that would be submitted to the City for approval prior to issuance of the grading permit. As discussed further in Section 3.17, Transportation, the Construction Management Plan would identify the equipment and vehicle staging areas, stockpiling of materials, fencing (e.g., temporary fencing with opaque material), and haul routes.

2.4 DISCRETIONARY APPROVALS

This IS/MND is intended to serve as the primary environmental document for all actions associated with the Project, including all discretionary approvals requested or required to implement the Project. In addition, this is the primary reference document for the formulation and implementation of a mitigation monitoring and reporting program for the Project.

The actions and/or approvals that the City needs to consider for the Project include, but are not limited to, the following:

- Adoption of the Arcadia Town Center Project IS/MND,
- Architectural Design Review No. ADR 19-09,
- Tentative Tract Map No. TTM 21-02 (83325),
- Minor Use Permit No. MUP 19-11
- Certificate of Demolition No. COD 22-25
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to grading permit, excavation permit, and building permits.

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SECTION 3.0 ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Arcadia Town Center Project

2. **Lead Agency Name and Address:** City of Arcadia
240 West Huntington Drive
Arcadia, California 91066

3. **Contact Person and Phone Number:** Edwin Arreola, Senior Planner
Development Services Department
(626) 821-4334

4. **Project Location:** 25-75 North Santa Anita Avenue and
5, 11, 15, and 19 West Huntington Drive
Arcadia, California 91006

5. **Project Sponsor's Name and Address:** Arcadia Town Center, LLC
23341 Golden Springs, Suite 200
Diamond Bar, California 91765

6. **General Plan Designation:** Downtown Mixed Use (DMU)

7. **Zoning:** Downtown Mixed Use (DMU)

8. **Description of Project:** The Project proposes to consolidate and redevelop an approximate 2.27-acre site with a mixed-use development consisting of one 440,938 sf, five story (above ground) building with one level of subterranean parking and one level of ground level parking in the City of Arcadia within Los Angeles County. The Project includes 181 residential units; 3,890 sf of residential amenities; 38,713 sf of public and private open space; 13,130 sf of ground-floor commercial uses facing toward Huntington Drive and Santa Anita Avenue; and 378 parking spaces.

9. **Surrounding Land Uses and Setting:** The Project site is located within a fully developed portion of the City and is surrounded to the north, east, and west by existing urban development, consisting of retail, restaurants, and office businesses, an Elks Lodge, the Mercedez-Benz of Arcadia car dealership, and associated surface parking. Single-family residential uses are located approximately 410 feet or more to the northwest of the Project site across Santa Clara Street and the car dealership, and multi-family residential uses are located approximately 280 feet or more to the southeast of the Project site across Santa Anita Avenue. Arcadia County Park is located immediately to the south of the Project site across Huntington Drive. Most of the structures that are adjacent to the Project site are one to two stories in height with heights ranging from 14 feet to 37 feet, with some taller structures interspersed. Within the immediate viewshed of the Project site, there is a 5-story storage building on Huntington Drive approximately 120 feet west of the Project site at 35 West Huntington Drive, and an 8-story office building on Santa Anita Avenue approximately 200 feet northeast of the site at 150 North Santa Anita Avenue. The former Van de Kamp's Bakery building, which is now a Denny's restaurant, is located east of the Project site at the northeast corner of Huntington Drive and Santa Anita Avenue. The Denny's restaurant exhibits variable heights with a single-story main building topped by a 40-foot-tall stylized, operational, windmill.

10. Other Public Agencies Whose Approval May Be Required:

- Los Angeles County Sanitation Districts (Sewer Connection Permit);
- Los Angeles Regional Water Quality Control Board (National Pollutant Discharge Elimination System [NPDES] permitting); and
- California Department of Fish and Wildlife (CDFW) (Trustee Agency).

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? Yes. The tribal consultation requirements of AB 52 have been implemented for this Project, as described in more detail in Section 3.18 of this document.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" without implementation of MM's, as indicated in Section 3.0 of this IS/MND.

- ☐ Aesthetics
- ☐ Air Quality
- ☒ Cultural Resources
- ☐ Geology and Soils
- ☒ Hazards and Hazardous Materials
- ☐ Land Use and Planning
- ☒ Noise
- ☐ Public Services
- ☒ Transportation
- ☒ Utilities and Service Systems
- ☐ Agriculture and Forest Resources
- ☐ Biological Resources
- ☐ Energy
- ☐ Greenhouse Gas Emissions
- ☐ Hydrology and Water Quality
- ☐ Mineral Resources
- ☐ Population and Housing
- ☐ Recreation
- ☒ Tribal Cultural Resources
- ☐ Wildfire

☒ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the 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.

☐ I find that although the 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 Project, nothing further is required.

Signature of Lead Agency Representative — Date: 11/18/24

Edwin Arreola — Printed name

City of Arcadia — Agency

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

3.1.1 ENVIRONMENTAL SETTING

The Project site is within the downtown area of the City north of Huntington Drive and west of Santa Anita Avenue. All five parcels within the Project site (APNs 5775-025-032, -033, -034, -037, and -038) have a land use designation of DMU and are zoned as DMU.

The Project site is located within a fully developed portion of the City and is surrounded to the north, east, and west by existing urban development consisting of retail, restaurants, and office businesses, an Elks Lodge, and associated surface parking. Single-family residential uses are located approximately 410 feet or more to the northwest of the Project site across Santa Clara Street and the car dealership, and multi-family residential uses are located approximately 280 feet or more to the southeast of the Project site across Santa Anita Avenue. Arcadia County Park is located immediately to the south of the Project site across Huntington Drive. Most of the structures that are adjacent to the Project site are one to two stories in height with heights ranging from 14 feet to 37 feet, with some taller structures interspersed. Within the immediate viewshed of the Project site, there is a 5-story storage building on Huntington Drive approximately 120 feet west of the Project site at 35 West Huntington Drive, and an 8-story office building on Santa Anita Avenue approximately 200 feet northeast of the site at 150 North Santa Anita Avenue. The former Van de Kamp's Bakery building, which is now a Denny's restaurant, is located east of the Project site at the northeast corner of Huntington Drive and Santa Anita Avenue. The Denny's restaurant exhibits variable heights with a single-story main building topped by a 40-foot-tall stylized, operational, windmill.

As described in Section 21099 of the Public Resources Code, TTPAs are defined as areas within one-half mile of a major transit stop, which includes the Project site. Pursuant to Section 21099(d)(1) of the Public Resources Code, aesthetic impacts of a mixed-use residential project on an infill site within a TPA shall not be considered significant impacts on the environment. Because the Project meets the qualifications of a TPA, this section primarily focuses on considering aesthetic impacts pursuant to the local design review ordinances applicable to the Project.

3.1.2 PROJECT IMPACTS

Regulatory Requirements

RR AES-1 The Project Applicant/Property Owner shall prepare a Lighting Plan that provides the type and location of proposed exterior lighting and signage, subject to the review and approval of the City's Development Services Department. All new lighting will be shielded and down-cast, such that the light is not cast onto adjacent properties or visible from above, and all new lighting would be reviewed to ensure compliance with the standards codified in Section 9103.01 of the City of Arcadia Development Code.

Impact Discussion

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

Less than Significant Impact. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A substantial adverse effect to a scenic vista is one that degrades the view from a designated viewing location. The City of Arcadia General Plan (Arcadia 2010a) provides no mention of scenic vistas explicitly; however, the General Plan Resource Sustainability Element mentions the undeveloped hillsides to the north of the Project site within the San Gabriel Mountains as creating a scenic backdrop to the City (Arcadia 2010a). Although the Project would potentially obstruct views of the hillsides for a limited number of viewers from Huntington Drive or properties to the south, the Project would not substantially damage any scenic resources. Therefore, the Project would have a less than significant impact, and no mitigation is required.

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

No Impact. The Project is not located along or near a State scenic highway. The nearest designated State scenic highways are State Route (SR) 110 (Arroyo Seco Parkway) and SR-2 (Angeles Crest Highway), located seven and nine miles, respectively, from the Project site (Caltrans 2019). Given the distance and the presence of intervening structures, no damage to scenic resources within a State scenic highway would result from the Project and no mitigation is required.

c) Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project site is located within the City's downtown and is immediately surrounded by existing urban development, including commercial retail, office, and associated parking. Given that the Project site is located in an urbanized area, the analysis for this threshold focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project would adhere to the applicable development standards for the DMU zone, as well as other citywide policies and requirements including but not limited to Sections 7554.2-7554.9 of the AMC covering the City's Water Efficient Landscaping Ordinance; and Development Code Section 9103.09 of the covering landscaping, Section 9103.01.080 regarding mechanical and

electrical equipment screening, Section 9103.01.130 regarding trash enclosures, and Section 9103.11 regarding signage. Also, the Project is located within the City Center Design Plan (Onyx Architects 2018). Project consistency with the City's Development Code, including development standards for the DMU zone and the City Center Design Plan, is discussed in more detail in Section 3.11, Land Use and Planning, of this IS/MND.

As part of the Project's design review process, the Project Applicant/Property Owner has prepared a landscape plan that provides the proposed plant palette and location of proposed landscaping, hardscaping, and other related features, which have been submitted to the City for review and approval as well as renderings and colors and materials boards, which have undergone the City's Design Review process, which is in place to ensure consistency with the applicable zoning and other applicable regulations, including those that govern scenic quality. More information related to Project consistency with plans, policies, and regulations is provided in Section 3.11. Given that the Project would not conflict with applicable zoning and other regulations governing scenic quality, the Project would result in less than significant impacts, and no mitigation is required.

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

Less Than Significant Impact. The Project site is in an area already subject to nighttime lighting from existing uses on and in the surrounding area. The Project site currently contains on-site lighting associated with existing buildings. In addition, there is existing street lighting on adjacent roadways.

The Project would introduce exterior light sources into the Project site suitable for the proposed mixed-use (residential/commercial) development, including lighting at Project site entrances, storefronts, and building exteriors. All lighting fixtures shall be appropriate in scale, intensity, and height for the Project. The Project's lighting would be consistent with other light generated by existing and surrounding land uses and roadways and would comply with the City's restrictions on exterior lighting (see RR AES-1) including Section 9103.07.060 of the Development Code for Parking Lot Lighting and Section 9103.01.120 of the Development Code for Exterior Lighting, which primarily focus on preventing spillage of lighting and glare onto adjacent properties. Consistent with City requirements, exterior lighting would be hooded and oriented to reflect away from adjoining properties and streets. Due to the urban nature of the Project site and surrounding areas, existing lighting, and lack of sensitive receptors for lighting (e.g., single-family residential) in the immediate vicinity, impacts associated with lighting the Project would be less than significant and no mitigation is required.

Glare is caused by light reflections from pavement, vehicles, and building materials (e.g., reflective glass and polished surfaces). During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and nuisances for pedestrians and other viewers. The Project would be constructed with materials and finishes that are common for infill development and are not highly reflective. Furthermore, as discussed above, Project light fixtures would be directed downward and shielded or recessed in such a manner so that light trespass is minimized and light from the project is not perceptible at or beyond the property line. The Project does not include any uses that would have the potential to create noticeable glare from sunlight, vehicle lights, or outdoor lighting which have the potential to pose a hazard to motorists traveling in the Project vicinity or that would affect surrounding uses. Therefore, less than significant impacts would occur related to glare, and no mitigation is required.

3.1.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to aesthetics; therefore, no mitigation measures are required.

3.2 AGRICULTURE AND FORESTRY RESOURCES	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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?	☐	☐	☐	☒

3.2.1 ENVIRONMENTAL SETTING

The Project site does not currently support any agricultural uses or activities or forestry resources. Therefore, no impact would occur, and no mitigation is required.

3.2.2 PROJECT IMPACTS

Regulatory Requirements

None required.

Impact Discussion

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

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

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code, Section 12220[g]), timberland (as defined by Public Resources Code, Section 4526), or timberland zoned Timberland Production (as defined by Government Code, Section 51104[g])?

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

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

No Impact. The Project site is in an urbanized area and would not convert farmland to a non-agricultural use. The site is zoned as DMU and is developed with commercial land uses and surface parking lots (Arcadia 2010a). No portion of the Project site is covered by a Williamson Act Contract or located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the 2016 California Department of Conservation, Farmland Mapping and Monitoring Program (DOC 2018a and 2018b). The City of Arcadia General Plan's Land Use and Community Design Element does not identify any agricultural production areas within the City's corporate boundaries (Arcadia 2010a). In addition, the Project site does not contain designated forest land or timberland as defined in the California Public Resources Code (Sections 12220[g] and 4526, respectively). Therefore, no impacts to agricultural resources, forest land, or timberland would result from Project implementation, and no mitigation is required.

3.2.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to agriculture and forestry resources; therefore, no mitigation measures are required.

3.3 AIR QUALITY	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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 in 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?	☐	☐	☒	☐

3.3.1 ENVIRONMENTAL SETTING

The Project site is in the Los Angeles County portion of the South Coast Air Basin (SoCAB) and, for air quality regulation and permitting, is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SoCAB is a 6,600-square-mile area bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego County line to the south. The SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area of Riverside County. The SoCAB's terrain and geographical location (e.g., a coastal plain with connecting broad valleys and low hills) determine its distinctive semi-arid climate, which is characterized by moderate temperatures, oceanic influence, and precipitation that is limited to a few storms during the winter (November through April).

Attainment Status

Regional air quality is defined by whether the area has attained State and federal air quality standards, as determined by air quality data from various monitoring stations. Areas that are considered "nonattainment" are required to prepare plans and implement measures that will bring the region into "attainment". When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance", and there must be a plan and measures established that will keep the region in attainment for the next ten years.

For the California Air Resources Board (CARB), an "unclassified" designation indicates that the air quality data for the area are incomplete and there are no standards to support a designation of attainment or nonattainment. Table 5, Attainment Status of Criteria Pollutants in the South Coast Air Basin, summarizes the attainment status of the SoCAB for the criteria pollutants.

TABLE 5
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1-hour)	Nonattainment	No Standards
O_3 (8-hour)	Nonattainment	Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	No Standard	Attainment/Nonattainment*
All others	Attainment/Unclassified	No Standards

O_3: ozone; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide.

* Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

Sources: SCAQMD 2016, USEPA 2022

Sensitive Air Quality Receptors

Sensitive receptors include, but are not limited to, children, the elderly, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. The nearest sensitive receptors to the Project site are residences located approximately 280 feet to the southeast and 410 feet to the northwest. Commercial and office uses are located proximate to the Project site to the north, west, and east. Arcadia County Park is located to the south of the Project site.

Regulatory Framework

Air Pollutants

Criteria Pollutants

Air quality regulations were first promulgated with the Federal Clean Air Act (CAA) of 1970. Air quality is defined by ambient air concentrations of seven "criteria air pollutants", which are a group of common air pollutants identified by the U.S. Environmental Protection Agency (USEPA) to be of concern with respect to the health and welfare of the general public. Federal and State governments regulate criteria air pollutants by using ambient standards based on criteria regarding the health and/or environmental effects of each pollutant. The criteria pollutants are defined as nitrogen dioxide (NO_2), ozone (O_3), particulate matter (including both respirable particulate matter with a diameter of 10 microns or less [PM10] and fine particulate matter with a diameter of 2.5 microns or less [PM2.5]), carbon monoxide (CO), sulfur dioxide (SO_2), and lead. A description of each criteria air pollutant, including source types and health effects, is provided below.

Nitrogen Dioxide

Nitrogen gas, normally relatively inert (nonreactive), comprises about 80 percent of the air. At high temperatures (e.g., in a combustion process) and under certain other conditions, nitrogen can

combine with oxygen to form several different gaseous compounds collectively called nitrogen oxides (NOx). Nitric oxide (NO), NO_2, and nitrous oxide (N_2O) are important constituents of NOx. NO is converted to NO_2 in the atmosphere. Motor vehicle emissions are the main source of NOx in urban areas. NO_2 is a red-brown pungent gas and is toxic to various animals and to humans because of its ability to form nitric acid with water in the eyes, lungs, mucus membranes, and skin. In animals, long-term exposure to NOx increases susceptibility to respiratory infections, lowering resistance to such diseases as pneumonia and influenza. Laboratory studies show that susceptible humans, such as asthmatics, who are exposed to high concentrations of NO_2 can suffer lung irritation and, potentially, lung damage. Epidemiological studies have also shown associations between NO_2 concentrations and daily mortality from respiratory and cardiovascular causes and with hospital admissions for respiratory conditions.

While the NAAQS only address NO_2, NO and NO_2 are both precursors in the formation of O_3 and PM2.5, as discussed below. Because of this, and the fact that NO emissions largely convert to NO_2, NOx emissions are typically examined when assessing potential air quality impacts.

Ozone

O_3 is a secondary pollutant, meaning that it is not directly emitted. It is a gas that is formed when volatile organic compounds (VOCs) (also referred to as reactive organic gases) and NO_x undergo photochemical reactions that occur only in the presence of sunlight. The primary source of VOC emissions is unburned hydrocarbons in motor vehicle and other internal combustion engine exhaust. NO_x forms as a result of the combustion process, most notably due to the operation of motor vehicles. Sunlight and hot weather cause ground-level O_3 to form;[3] as a result, ozone is known as a summertime air pollutant. Ground-level O_3 is the primary constituent of smog. Because O_3 formation occurs over extended periods of time, both O_3 and its precursors are transported by wind and high O_3 concentrations can occur in areas well away from sources of its constituent pollutants.

People with lung disease, children, older adults, and people who are active can be affected when O_3 levels exceed ambient air quality standards. Numerous scientific studies have linked ground-level O_3 exposure to a variety of problems, including:

- lung irritation that can cause inflammation much like a sunburn;
- wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities;
- permanent lung damage to those with repeated exposure to O_3 pollution; and
- aggravated asthma, reduced lung capacity, and increased susceptibility to respiratory illnesses like pneumonia and bronchitis.

Ground-level O_3 can have detrimental effects on plants and ecosystems. These effects include:

- interfering with the ability of sensitive plants to produce and store food, making them more susceptible to certain diseases, insects, other pollutants, competition, and harsh weather;
- damaging the leaves of trees and other plants; and
- reducing crop yields and forest growth, potentially impacting species diversity in ecosystems.

[3] Ground-level O_3 is not to be confused with atmospheric O_3 or the “ozone layer”, which occurs very high in the atmosphere and shields the planet from some ultraviolet rays.

Particulate Matter

Particulate matter includes both aerosols and solid particles of a wide range of size and composition. Of particular concern are those particles smaller than or equal to 10 microns in diameter (PM10) and smaller than or equal to 2.5 microns in diameter (PM2.5). Particulate matter size refers to the aerodynamic diameter of the particle. Smaller particles are of greater concern because they can penetrate deeper into the lungs than large particles.

PM10 is generally emitted directly as a result of mechanical processes that crush or grind larger particles or from the resuspension of dust, most typically through construction activities and vehicular travel. PM10 generally settles out of the atmosphere rapidly and is not readily transported over large distances.

PM2.5 is directly emitted in combustion exhaust and is formed in atmospheric reactions between various gaseous pollutants, including NO_x, sulfur oxides (SO_x), and VOCs. PM2.5 can remain suspended in the atmosphere for days and/or weeks and can be transported long distances.

The principal health effects of airborne particulate matter are on the respiratory system. Short-term exposure to high PM2.5 and PM10 levels are associated with premature mortality and increased hospital admissions and emergency room visits; a decline in respiratory function is also associated with short-term exposure to high PM10 levels. Long-term exposure to high PM2.5 levels is associated with premature mortality and development of chronic respiratory disease. According to the USEPA, some people are much more sensitive than others to breathing PM10 and PM2.5. People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worse illnesses; people with bronchitis can expect aggravated symptoms; and children may experience decline in lung function due to breathing in PM10 and PM2.5. Other groups considered sensitive include smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive because many breathe through their mouths.

Particulate matter tends to occur primarily in the form of fugitive dust. This dust appears to be generated by both local sources and by region-wide dust during moderate- to high-wind episodes. These regional episodes tend to be multidistrict and sometimes interstate in scope. The principal sources of dust in urban areas are from grading, construction, disturbed areas of soil, and dust entrained by vehicles on roadways.

Carbon Monoxide

CO is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can cause headaches, aggravate cardiovascular disease, and impair central nervous system functions. CO concentrations can vary greatly over comparatively short distances. Relatively high CO concentrations are typically found near crowded intersections; along heavily used roadways carrying slow-moving traffic; and at or near ground level. Even under the most severe meteorological and traffic conditions, concentrations of CO are limited to locations within a relatively short distance (i.e., up to 600 feet or 185 meters) of heavily traveled roadways. Overall, CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO levels in the SoCAB are in compliance with the State and federal one-hour and eight-hour standards.

Sulfur Dioxide

SO_x is a class of compounds of which SO_2 and sulfur trioxide (SO_3) are of greatest importance. Ninety-five percent of pollution-related SO_x emissions are in the form of SO_2. SO_x emissions are typically examined when assessing potential air quality impacts of SO_2. The primary contributor of SO_x emissions is fossil fuel combustion for generating electric power. Industrial processes, such as nonferrous metal smelting, also contribute to SO_x emissions. SO_x is also formed during combustion of motor fuels; however, most of the sulfur has been removed from fuels, greatly reducing SO_x emissions from vehicles.

SO_2 combines easily with water vapor, forming aerosols of sulfurous acid (H_2SO_3), a colorless, mildly corrosive liquid. This liquid may then combine with oxygen in the air, forming the even more irritating and corrosive sulfuric acid (H_2SO_4). Peak levels of SO_2 in the air can cause temporary breathing difficulty for people with asthma who are active outdoors. Longer-term exposures to high levels of SO_2 gas and particles cause respiratory illness and aggravate existing heart disease. SO_2 reacts with other chemicals in the air to form tiny sulfate particles that are measured as PM2.5.

Lead

Lead is a stable compound, which persists and accumulates both in the environment and in animals. In humans, it affects the body's blood-forming (or hematopoletic), nervous, and renal systems. In addition, lead has been shown to affect the normal functions of the reproductive, endocrine, hepatic, cardiovascular, immunological and gastrointestinal systems, although there is significant individual variability in response to lead exposure. Since 1975, lead emissions have been in decline due, in part, to the introduction of catalyst-equipped vehicles and the decline in the production of leaded gasoline. In general, an analysis of lead is limited to projects that emit significant quantities of the pollutant (i.e., lead smelters) and are not applied to transportation sources of emissions.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or in serious illness or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including motor vehicles, gasoline stations, dry cleaners, industrial operations, painting operations, and research and teaching facilities.

TACs are different than the "criteria" pollutants previously discussed in that ambient air quality standards have not been established for them. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Diesel engines emit a complex mixture of air pollutants composed of gaseous and solid material. The solid emissions in diesel exhaust are known as diesel particulate matter (diesel PM). In 1998, California identified diesel PM as a TAC based on its potential to cause cancer, premature death, and other health problems (e.g., asthma attacks and other respiratory symptoms). Those most vulnerable are children (whose lungs are still developing) and the elderly (who may have other serious health problems). Overall, diesel engine emissions are responsible for the majority of California's known cancer risk from outdoor air pollutants. Diesel engines also contribute to California's PM2.5 air quality problems.

Carcinogenic risks (i.e., cancer risks) are estimated as the incremental probability that an individual will develop cancer over his/her lifetime as a direct result of exposure to potential carcinogens. The estimated risk is expressed as a probability (e.g., 10 in 1 million). A risk level of 1 in 1 million implies a likelihood that up to 1 person out of 1 million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the specific concentration over 70 years (an assumed lifetime). This would be in addition to those cancer cases that would normally occur in an unexposed population of 1 million people. The Hazard Index (HI) expresses the potential for chemicals to result in non-cancer-related health impacts. HIs are expressed using decimal notation (e.g., 0.001). A calculated HI exposure of less than 1.0 will likely not result in adverse non-cancer-related health effects over a lifetime of exposure. Although a value of 1.0 is a commonly accepted California Environmental Quality Act (CEQA) significance threshold, an HI greater than 1.0 does not necessarily mean that adverse effects will occur.

The Project site is located in the SoCAB. The SoCAB comprises all of Orange County and parts of San Bernardino, Los Angeles, and Riverside Counties. Air quality in the SoCAB is regulated by the USEPA, CARB, and the SCAQMD. Each of these agencies develops rules, regulations, policies, and/or goals to comply with applicable legislation. Although USEPA regulations may not be superseded, both State and local regulations may be more stringent. The Southern California Association of Governments (SCAG) is an important partner to the SCAQMD and produces estimates of anticipated future growth and vehicular travel in the basin that are used for air quality planning. The federal, State, regional, and local regulations for criteria air pollutants and TACs are discussed below.

Federal

United States Environmental Protection Agency

The USEPA is responsible for implementing the CAA, which was first enacted in 1955[4] and amended numerous times thereafter. The CAA established federal air quality standards known as the NAAQS. These standards identify levels of air quality for criteria pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe (with an adequate margin of safety) to protect the public's health and welfare. The USEPA is responsible for setting and enforcing the NAAQS for criteria pollutants. The NAAQS are shown in Table 6. The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP). The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution and thereby attain or maintain federal standards by using a combination of performance standards and market-based programs within the SIP identified time frame.

[4] The Air Pollution Control Act, the predecessor to the Clean Air Act, was enacted in 1955.

TABLE 6
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary[a]	Secondary[b]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM10	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	–
PM2.5	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
NO_2	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
SO_2	24 Hour	0.04 ppm (105 µg/m^3)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles	**No Federal Standards**	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)		

O_3: ozone, ppm: parts per million, µg/m^3: micrograms per cubic meter, –: No Standard; PM10: respirable particulate matter with a diameter of 10 microns or less, AAM: Annual Arithmetic Mean, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, CO: carbon monoxide, mg/m^3: milligrams per cubic meter, NO_2: nitrogen dioxide, SO_2: sulfur dioxide, km: kilometer.

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

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

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016.

State

California Air Resources Board

CARB, as part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB establishes the California Ambient Air Quality Standards (CAAQS), as shown in Table 6, which are generally more stringent and apply to more pollutants than the National Ambient Air Quality Standards (NAAQS). In addition to the criteria pollutants, CAAQS have been established for visibility-reducing particulates, sulfates, hydrogen sulfide, and vinyl chloride.

In addition, CARB conducts research, compiles emissions inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. CARB requires the air districts in regions that do not attain the CAAQS to prepare plans for attaining the standards. These plans are then integrated into the State SIP. CARB establishes emissions standards for motor vehicles sold in California, consumer products (e.g., hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. The AQMP for the SoCAB is discussed below.

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current applicable standards are the 2022 Standards, effective January 1, 2023. The 2022 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Since using natural gas produces criteria pollutant emissions, a reduction in natural gas consumption results in a related reduction in air quality emissions. Additional discussion of the Title 24 energy efficiency standards is included in Sections 3.6, Energy and 3.8, Greenhouse Gas Emissions. The 2022 Energy Efficiency Standards are being developed and would improve upon the 2019 Energy Code for new construction of, and additions and alterations to, residential and non-residential buildings. The California Energy Commission (CEC) updates the standards typically every three years.

Title 24 Green Building Standards

The 2022 California Green Building Standards Code (CCR, Title 24, Part 11), also known as the "CALGreen Code," contains mandatory requirements and voluntary measures for new residential and non-residential buildings (including buildings for retail uses, office uses, public schools, and hospitals) throughout California (CBSC 2022). Development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The CALGreen Code was established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The City has adopted the CALGreen Code in Article 8 of the AMC.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy-efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles which, in turn, reduces pollutant emissions. Additional discussion of the CALGreen Code is included in Sections 5.4, Energy, and 5.7, Greenhouse Gas Emissions.

Regional

South Coast Air Quality Management District

In the SoCAB, the SCAQMD is the agency responsible for protecting public health and welfare through the administration of federal and State air quality laws, regulations, and policies. Included in the SCAQMD's tasks are the monitoring of air pollution, the preparation of the AQMP for the SoCAB, and the promulgation of rules and regulations.

SCAG is the federally designated Metropolitan Planning Organization and the State-designated transportation planning agency for six counties: Riverside, San Bernardino, Los Angeles, Ventura, Imperial, and Orange.

The SCAQMD and SCAG are jointly responsible for formulating and implementing the AQMP for the SoCAB. SCAG's Regional Mobility Plan and Growth Management Plan form the basis for the land use and transportation control portion of the AQMP.

Air Quality Management Plan

The current regional plan applicable to the Project is the SCAQMD's 2022 AQMP. The SCAQMD is responsible for ensuring that the SoCAB meets the NAAQS and CAAQS by reducing emissions from stationary (area and point), mobile, and indirect sources. To accomplish this goal, the SCAQMD prepares AQMPs in conjunction with the SCAG, County transportation commissions, and local governments; develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

The 2022 AQMP was adopted on December 2, 2022, by the SCAQMD Governing Board. The 2022 AQMP evaluates integrated strategies and measures to meet the following NAAQS (SCAQMD 2022):

- 8-hour O_3 target of 80 parts per billion (ppb) by 2024, 75 ppb by 2032, 70 ppb by 2038;
- Annual PM2.5 (12 micrograms per cubic meter [$\mu g/m^3$]) by 2025;
- 1-hour O_3 (120 ppb) by 2023; and
- 24-hour PM2.5 (35 $\mu g/m^3$) by 2023.

South Coast Air Quality Management District Rules

The Project would be required to comply with existing SCAQMD rules for the reduction of fugitive dust and criteria pollutant emissions. The following rules are most relevant to the Project.

SCAQMD Rule 201 requires a "Permit to Construct" prior to the installation of any equipment "the use of which may cause the issuance of air contaminants . . ." and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate. Rule 219, Equipment not Requiring a Written Permit Pursuant to Regulation II, identifies "equipment, processes, or operations that emit small amounts of contaminants that shall not require written permits . . .".

SCAQMD Rule 402, Nuisance states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

SCAQMD Rule 403, Fugitive Dust requires actions to prevent, reduce, or mitigate fugitive particulate matter emissions. These actions include applying water or chemical stabilizers to disturbed soils; managing haul road dust by applying water; covering all haul vehicles before transporting materials; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, Rule 403 requires that vegetative ground cover be established on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

SCAQMD Rule 445 has been adopted to reduce the emissions of particulate matter from wood-burning devices and prohibits the installation of such devices in any new development.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the VOC content in paints and paint solvents. Although this rule does not directly apply to the Project, it does dictate the VOC content of paints available for use during building construction and ongoing maintenance.

SCAQMD Rule 1401 under Regulation XIV requires new source review of any new, relocated, or modified permit units that emit TACs. The rule establishes allowable risks for permit units requiring permits pursuant to Rules 201 and 203 discussed above.

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

Southern California Association of Governments

SCAG is the regional planning agency for Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated MPO for the Southern California region. On June 5, 2020, SCAG's Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

(Connect Socal). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources in order to improve public health, to meet the NAAQS as set forth by the CAA.

3.3.2 PROJECT IMPACTS

Regulatory Requirements

RR AQ-1 The Project will be conducted in compliance with all applicable South Coast Air Quality Management District (SCAQMD) rules and permitting requirements, including but not limited to:

- SCAQMD Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. Compliance with this rule will reduce short-term particulate pollutant emissions.
- SCAQMD Rule 402, Nuisance, which states that a Project will not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property".
- SCAQMD Rule 1113, Architectural Coatings, which limits the volatile organic content (VOC) of architectural coatings used for the Project.

Impact Discussion

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

Less than Significant Impact. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. It is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources and has prepared an AQMP that establishes a program of rules and regulations directed at attaining the NAAQS and CAAQS.

The 2022 AQMP was adopted on December 2, 2022, by the SCAQMD Governing Board. The 2022 AQMP evaluates integrated strategies and measures to meet the following NAAQS (SCAQMD 2022):

- 8-hour O_3 target of 80 parts per billion (ppb) by 2024, 75 ppb by 2032, 70 ppb by 2038;
- Annual PM2.5 (12 micrograms per cubic meter [µg/m^3]) by 2025;
- 1-hour O_3 (120 ppb) by 2023; and
- 24-hour PM2.5 (35 µg/m^3) by 2023.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP". While the Project is consistent with the General Plan land use designation and zoning for the site, an AQMP consistency analysis was conducted. Strict consistency with all aspects of the plan is usually not required. A project should be considered consistent with the AQMP if it furthers one or more policies and does not obstruct other policies.

The SCAQMD CEQA Handbook identifies two key indicators of consistency, as discussed above:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
2. Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both criteria are evaluated for the Project, as shown below.

With respect to the first criterion, based on the air quality modeling analysis conducted for the Project [thresholds 3.3(b) and 3.3(c), below)], construction and operation of the Project would not exceed the SCAQMD's CEQA thresholds of significance and consequently would not result in an increase in the frequency or severity of existing air quality violations nor cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP. Therefore, the Project is consistent with the first criterion.

With respect to the second criterion, the Project was assessed as to whether it would exceed the assumptions in the AQMP. The SCAQMD's current air quality planning document is the 2022 Air Quality Management Plan (2022 AQMP). The Project parcels have a land use designation of DMU. The Project would advance the City's goal as embodied in the General Plan of providing the residential uses necessary to support and complement the existing and proposed businesses in downtown as well as the nearby Metro A Line Station. The goal of the Project is to transform the Project site within the City's downtown into a more vibrant, dynamic, transit- and pedestrian-oriented mixed-use development consistent with the Arcadia General Plan (General Plan) and related development standards and requirements. Because of its proximity to the Metro A Line Station, the Project site is within both a Transit Priority Area as defined under Senate Bill (SB) 743 (Section 21099 of the Public Resources Code), as the geographic area within 0.5-mile of a major transit stop included in a regional transportation plan; and a High Quality Transit Area as defined under SB 375 and codified in Section 21155 of the Public Resources Code, as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. For the City of Arcadia, these areas are identified by the Southern California Association of Governments (SCAG) and its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), adopted by SCAG's Regional Board on September 3, 2020. Additionally, the Project qualifies as a Transit Priority Project (TPP), defined under SB 375 (Section 21155 of the Public Resources Code)

The Project site is zoned as DMU. As discussed further in Section 3.11, Land Use and Planning, the Project would be consistent with the zoning and General Plan designations of the Project site with issuance of a Conditional Use Permit for multifamily dwellings which are permitted as part of mixed-use development. The development of the Project would support the air pollutant emissions reduction goals detailed in the AQMP and RTP/SCS by developing residential uses in a TPA, HQTA, and TPP area which provides mass transit options which leads to less air quality and greenhouse gas emissions as compared to transportation with single-occupant vehicles. In addition, the amount of emissions generated by the Project is below the SCAQMD's significance

thresholds. The Project is located within a half-mile of the Metro A Line Station. The proximity of the Project site to the station would encourage the use of mass transit which is consistent with the AQMP's goal of using non-single occupancy vehicles. As such, the Project would not conflict with the 2022 AQMP. Therefore, the Project would result in a less than significant impact related to this threshold, and no mitigation is required.

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

Less than Significant Impact. As identified in Table 6 above, Los Angeles County is a nonattainment area for O_3, PM10, and PM2.5. The Project would generate PM10, PM2.5, NO_2, and O_3 precursors (NO_x and VOC) during short-term construction and long-term operations.

A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The SCAQMD has developed construction and operations thresholds to determine whether projects would potentially result in contributing toward a violation of ambient air quality standards. The SCAQMD recommends that projects be evaluated in terms of the quantitative thresholds established to assess both the regional and localized impacts of project-related air pollutant emissions. The City uses the current SCAQMD thresholds to determine whether a project would have a significant impact. These regional emission thresholds cannot be used to correlate whether a specific health impact would occur to an individual receptor. These significance thresholds were developed to assist lead agencies with a consistent threshold that could be used to determine whether a project's emissions could significantly contribute to the total emissions occurring within an air basin. The totality of the air basin's emissions would determine whether it would be in attainment of the CAAQS and NAAQS. These SCAQMD thresholds are identified in Table 7, South Coast Air Quality Management District Air Quality Significance Thresholds.

TABLE 7
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds (lbs/day)		
Pollutant	**Construction**	**Operation**
VOC	75	55
NO_x	100	55
CO	550	550
PM10	150	150
PM2.5	55	55
SO_x	150	150
Lead	3	3

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SOx: sulfur oxides.

Source: SCAQMD 2019

Air pollutant emissions for the Project were estimated using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.4 (CAPCOA 2022). CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of

project- and county-specific information. For air quality modeling purposes, construction of the Project was based on the Project's construction assumptions and default assumptions derived from CalEEMod. The input for operational emissions of the existing and proposed uses was based on the vehicle trip generation rates provided in the Traffic Study prepared for the Project (Psomas 2024, Appendix H) and the proposed building area. Additional input details are included in Appendix A, Air Quality and Greenhouse Gas Emissions Calculations.

It is noted that when the following air quality analysis was conducted, construction of the Project was anticipated to require approximately 29 months beginning in 2024 and ending in 2026. As detailed above in Section 2.3, Construction Activities, at this time Project construction is expected to require 29 months beginning in 2026 and ending in 2028. This air quality analysis remains applicable for use in this IS/MND because over time vehicle emissions generally improve because of regulatory efforts and market changes. The improved tailpipe emissions are captured in CalEEMod through periodic updates to CARB's Emissions Factor model. Therefore, the following is expected to represent a more conservative analysis of criteria pollutant emissions during construction and operation of the Project.

Construction Emissions

Air pollutant emissions would occur from: construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling demolition and construction debris, soil, and building materials to and from the Project site; from automobiles and light trucks driven to and from the Project site by construction workers; and VOCs from painting and asphalt paving operations. The Project would comply with applicable SCAQMD rules and regulations as described in RR AQ-1, including Rule 402 for nuisance, Rule 403 for fugitive dust control, and Rule 1113 for architectural coatings. Rule 403 measures include regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions (SCAQMD 1976). Watering of active grading areas is included in the CalEEMod emissions analysis and results in reduced PM10 and PM2.5 emissions. It should be noted that some Project requirements and features (such as watering grading areas), although required Project elements, are shown in the CalEEMod format as mitigation measures. SCAQMD Rule 1113 limits the VOC content of architectural coatings (SCAQMD 1977). The emission reductions associated with compliance with this rule have been included in the emissions calculations.

Regional Emissions Thresholds – Maximum Daily Regional Emissions

Table 8, Estimated Maximum Daily Regional Construction Emissions, presents the estimated maximum daily emissions during construction of the Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown in Table 8, Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants.

TABLE 8
ESTIMATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Year[a]Year[a]	Emissions (lbs/day)					
	VOC	**NO_x**	**CO**	**SOx**	**PM10**	**PM2.5**
2024	3	27	23	<1	5	2
2025	2	13	22	<1	3	1
2026	23	20	35	<1	3	1
Maximum	23	27	36	<1	5	2
SCAQMD Thresholds (Table 7)	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.
[a] When this analysis was conducted, construction of the Project was anticipated to begin in 2024. As vehicle emissions generally improve over time, this analysis remains applicable.
Source: SCAQMD 2019 (thresholds); see Appendix A for CalEEMod model outputs.

Construction Activities

Construction activities associated with the Project would result in less than significant construction-related regional and localized air quality impacts, as quantified above in Tables 7 and 8, respectively.

SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant would also be cumulatively less than significant. As discussed under Threshold 3.3(a), short-term construction emissions associated with the Project would occur at less than significant levels. Therefore, consistent with SCAQMD policy, the cumulative construction impact of criteria pollutants would also be less than significant.

Operational Emissions

The ongoing operation of the Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from Project-generated vehicle trips and through operational emissions from the ongoing use of the Project. Existing development occurring at the Project site currently generates air pollutant emissions. The Project would replace these existing uses. To determine the net change in air pollutant emissions associated with the Project, existing emissions would be subtracted from emissions occurring with the Project to determine the net change in air pollution that would occur.

Existing development on the Project site includes five buildings which would be demolished to allow for construction of the Project. Existing operations generate air pollutant emissions from a variety of sources including vehicle trips associated with the commercial and office buildings; natural gas used for heating and hot water; landscape and building maintenance equipment; and consumer products. Emissions from the existing uses of the Project site were estimated using CalEEMod, and are shown in Table 9, Existing Daily Operational Emissions. The CalEEMod model input was based on the vehicle trip generation rate provided in the traffic impact analysis and the building area for the existing on-site uses (Appendix A).

TABLE 9
EXISTING DAILY OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Mobile sources	2	1	15	<1	1	<1
Area sources	1	<1	1	<1	<1	<1
Energy sources	<1	<1	<1	<1	<1	<1
Total Existing Operational Emissions*	**3**	**1**	**16**	**<1**	**1**	**<1**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

* Some totals do not add due to rounding.

Source CalEEMod model data sheets are included in Appendix A.

The following section provides an analysis of potential air quality impacts to regional and local air quality with operation of the Project. The net change in emissions associated with the Project was calculated by deducting the emissions that are currently occurring under existing conditions. The potential operations-related air emissions have been analyzed, as discussed below, for the regional and local criteria pollutant emissions and cumulative impacts.

The primary sources of emissions during the operations phase of the Project are comprised of area, energy, and mobile source emissions. Area based emissions are associated with hearths, consumer products, architectural coatings, and landscaping. Energy related emissions are associated with the combustion of natural gas for space heating or cooking. Mobile sources of emissions are from vehicles accessing the Project site. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. Mobile source emissions are based on estimated Project-related trip generation forecasts, as contained in the Project traffic impact analysis. The Project would generate 1,366 total daily trips (i.e., not deducting trips from existing uses) including reduction of trips from pass-by and internal capture credits (Psomas 2024, Appendix H). Estimated peak daily net operational emissions are shown in Table 10, Peak Daily Net Operational Emissions, on the following page.

TABLE 10
PEAK DAILY NET OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Mobile sources	5	4	43	<1	9	2
Area sources	4	<1	<1	<1	<1	<1
Energy sources	<1	1	1	<1	<1	<1
Total Operational Emissions*	**9**	**5**	**44**	**<1**	**10**	**3**
Less: Existing Emissions (Table 9)	**3**	**1**	**16**	**<1**	**1**	**<1**
Net Increase in Emissions	**6**	**4**	**28**	**<1**	**9**	**3**
SCAQMD Significance Thresholds (Table 7)	***55***	***55***	***550***	***150***	***150***	***55***
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

* Some totals do not add due to rounding.

Source: CalEEMod model data sheets are included in Appendix A.

As shown in Table 10, Peak Daily Net Operational Emissions, net operational emissions for all analyzed pollutants would be below the SCAQMD CEQA significance thresholds. Therefore, the Project would not contribute individually or to a cumulatively considerable net increase of a pollutant for which the SoCAB is in nonattainment. Emissions of nonattainment pollutants or their precursors would not be cumulatively considerable. Therefore, the Project would result in a less than significant impact related to this threshold, and no mitigation is required.

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

Less than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: CO hotspots; criteria pollutants and toxic air contaminants (TACs), specifically diesel particulate matter (DPM) from on-site construction; exposure to off-site TAC emissions; and asbestos and lead-based paint during demolition. Operational, long-term TACs may be generated by some industrial land uses; commercial land uses (e.g., gas stations and dry cleaners); and diesel trucks on freeways. Residential land uses do not generate substantial quantities of TACs and are therefore not addressed in this report.

Construction-Phase Localized Significance Thresholds

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 are examined based on SCAQMD's localized significance threshold (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts. The LST method was developed to provide a conservative estimate of the level of project-generated air pollutants that have the potential to exceed the NAAQS or CAAQS, which could consequently result in adverse health impacts. Exceedance of the LST does not describe the prevalence or

magnitude of health effects, but rather assesses the potential for a project-related health effect to occur. The LST method cannot provide an estimate of health effects related to ozone. Reactive organic gases (ROGs) and NO_x are pollutants that contribute to the formation of ozone, otherwise known as ozone precursors. It would be too speculative to determine how an individual project could affect the formation of ozone, and how it could affect the health for a specific receptor: ozone does not fully form within the proximity of a project site, and the formation of ozone is affected by solar irradiance, meteorological conditions, presence of ozone precursors from other sources, and other factors. As such, modeling of ozone concentrations is conducted on the "macro" scale of an air basin for all pollutant sources within the basin, and not for an individual project. Consequently, the LST analysis focuses on a project-level analysis of the four criteria pollutants of greatest concern (CO, NO_x, PM10, and PM2.5).

The LST method is recommended to be limited to projects that are five acres or less. For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could remain for 1 hour for NO_2 and CO exposure and 24 hours for PM10 and PM2.5 exposure. The emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards (SCAQMD 2022). The closest receptors that may remain for 1 hour are commercial uses adjacent to the Project's boundaries, and the closest receptor that may remain for 24 hours are residential uses to the southeast and northwest of the Project site.

Table 11, Construction-Phase Localized Significance Threshold Emissions, shows the maximum daily on-site emissions for construction activities compared with the SCAQMD LST thresholds. The Project's maximum daily on-site emissions would occur during the demolition phase (for NOx and CO), and during the grading/excavation phase (for PM10 and PM2.5). As shown in Table 11, localized emissions for all criteria pollutants would be less than their respective thresholds. Therefore, localized air quality impacts at receptors proximate to construction activities would be exposed to less than significant air quality impacts.

TABLE 11
CONSTRUCTION-PHASE
LOCALIZED SIGNIFICANCE THRESHOLD EMISSIONS

Emissions and Thresholds	Emissions (lbs/day)			
	NOx	**CO**	**PM10**	**PM2.5**
Project maximum daily on-site emissions	23	26	4	2
Localized Significance Threshold*	***89***	***623***	***5***	***3***
Exceed threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

Note: Data is for SCAQMD Source Receptor Area 9, East San Gabriel Valley

* NOx, CO, PM10 and PM2.5 thresholds are based on a distance of 25 meters (82 feet) of the Project site.

Source: SCAQMD 2009 (thresholds); see Appendix A for CalEEMod model outputs.

Carbon Monoxide Hotspot

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations generally are found close to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. The SoCAB is currently in a state of attainment for CO. The East San Gabriel Valley 2 region for which the project area is located was recorded to have 1.4 parts per million 1-hour concentration and 0.9 parts per million 8-hour concentration (SCAQMD 2021). The California ambient air quality standard for a 1-hour concentration is 20 ppm and the

8-hour concentration is 9 ppm. As such, the East San Gabriel Valley 2 region is exposed to CO concentrations that are 7 percent and 10 percent of the 1-hour and 8-hour ambient quality standards, respectively. Based on the Project's Traffic Study (Psomas 2024, Appendix H), the Project would result in 123 total AM peak hour trips and 112 total PM peak hour trips. The increase in vehicle trips is relatively low and is not of sufficient magnitude to contribute toward a CO hotspot. As such, Project-related traffic would result in less than significant CO impacts, and no mitigation is required.

Toxic Air Contaminant Emissions from On-Site Construction

Construction activities would result in short-term, Project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading); paving; building construction; and other miscellaneous activities. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 40-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

There would be relatively few pieces of off-road, heavy-duty diesel equipment in operation, and the total construction period would be relatively short when compared to a 30-year exposure period. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations as well as the relatively large distance between the Project site and the nearest sensitive land uses, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Potential operational odors could be created by cooking activities and solid waste storage (trash) associated with residential and commercial uses. These odors would be similar to existing residential and commercial uses surrounding the Project site and throughout the City. Odors would be confined to the immediate vicinity of the proposed uses and are not considered to be objectionable and of such magnitude to constitute a public nuisance.

Furthermore, according to the SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce emissions which would lead to odors. The Project uses are also regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402 (RR AQ-1). Rule 402 prohibits any the discharge from any source of air contaminants or other material which would cause injury, detriment, nuisance, or annoyance to people or the public. As such, the Project would have a less than significant impact regarding other emissions and no mitigation is required.

3.3.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to air quality; therefore, no mitigation measures are required.

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

3.4.1 ENVIRONMENTAL SETTING

The Project site is within an urban area and is surrounded entirely by development that consists primarily of commercial uses. The site is fully developed with commercial uses. On-site vegetation includes ornamental street trees, landscaping shrubs, and groundcover along the Huntington Drive and Santa Anita Avenue frontages, as well as some ornamental trees in the parking lot medians.

The City's Tree Preservation Ordinance (Section 9110.01 et. seq. of the Development Code) recognizes oaks, sycamores, and mature trees on private property as significant aesthetic and ecological resources and establishes policies for their protection, removal, and replacement. Protected trees include:

1. Engelmann Oak *(Quercus engelmannii)* or Coast Live Oak *(Quercus agrifolia)* with a trunk diameter larger than four (4) inches measured at a point four and one-half (4½) feet above

the root crown, or two (2) or more trunks measuring three (3) inches each or greater in diameter, measured at a point four and one-half (4½) feet above the root crown.

2. Any other living California native or non-California native Oak tree with a trunk diameter larger than twelve (12) inches measured at a point four and one-half (4½) feet above the root crown, or two (2) or more trunks measuring ten (10) inches each or greater in diameter, measured at a point four and one-half (4½) feet above the root crown.
3. California, or western, Sycamore *(Platanus racemosa*) with a trunk diameter larger than six (6) inches measured at a point four and one-half (4½) feet above the root crown, or two (2) or more trunks measuring four (4) inches each or greater in diameter, measured at a point four and one-half (4½) feet above the root crown.
4. Mature Tree. Any tree, with the exception of the trees listed as Unprotected Trees, that have a trunk diameter larger than twelve (12) inches measured at a point four and one-half (4½) feet above the root crown, or two (2) or more trunks measuring ten (10) inches each or greater in diameter, measured at a point of four and one-half (4½) feet above the root crown and the tree is located within a required front, side, street-side, or rear yard setback.

A total of 26 trees are present on the Project site (23 trees) and adjoining public ROW (3 trees). This would include 11 street trees along the frontages of Huntington Drive and Santa Anita Avenue (both within and outside the existing ROW). There are a total of 3 trees, located along the eastern frontage of the site on Santa Anita Avenue, that meet the City's requirements for consideration as a Protected Tree pursuant to Section 9110.01.030 of the Development Code. These trees include 2 evergreen pears and 1 sour gum. The remaining 20 trees on the Project site are not classified as Protected Trees. There are 3 London plane trees within the public ROW of Huntington Drive. These are not subject to the City's Tree Preservation Ordinance, being on public property, and are protected pursuant to the City's Comprehensive Tree Management Program (Section 9800 et. seq. of the AMC). The Comprehensive Tree Management Program establishes additional policies for the regulation of the planting, maintenance, removal, and replacement of City-owned trees on public property, including street trees. No street tree may be planted, removed, cut, or otherwise damaged without first obtaining a permit from the Arcadia Public Works Services Department.

3.4.2 PROJECT IMPACTS

Regulatory Requirements

RR BIO-1 Prior to approval of grading plans, the Development Services Department shall verify that the following note is included on the contractor specifications to ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code:

> To avoid impacts on nesting birds, vegetation on the Project site should be cleared between September 1 and January 31. If vegetation clearing occurs during the peak nesting season (between February 1 and August 31), a pre-construction survey shall be conducted by a qualified biologist to identify if there are any active nesting locations. If the biologist does not find any active nests within the impact area, the vegetation clearing/construction work will be allowed. If the biologist finds an active nest within the construction area and determines that the nest may be impacted by construction activities, the biologist will delineate an appropriate buffer zone around the nest depending on the

species and the type of construction activity. Construction activities shall be prohibited in the buffer zone until a qualified biologist determines the nest is abandoned.

RR BIO-2 As required by the City's Tree Preservation Ordinance (Section 9110.01 et. seq. of the Development Code) and Comprehensive Tree Management Program (Section 9800 et. seq. of the Arcadia Municipal Code), the Project Applicant/Property Owner shall obtain permits from the Arcadia Public Works Services Department for the removal and planting of Protected trees and street trees in the public right-of-way associated with the Project. The Project Applicant/Property Owner will abide by the standards set forth in the permit, as well as standards contained in the Tree Preservation Ordinance, Comprehensive Tree Management Program, and other applicable sections of the Arcadia Development and Municipal Codes.

RR BIO-3 The Project Applicant/Property Owner shall submit the Project's landscape plans, which will include the proposed locations and species of replacement street trees, to the Arcadia Public Works Services Department for review. Street tree species will consist of those set forth in the City's Street Tree Master Plan.

Impact Discussion

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

No Impact. The Project site is within an urban area and surrounded entirely by development, which consists primarily of commercial uses. As discussed above, on-site vegetation includes ornamental street trees, landscaping shrubs, trees, and groundcover. No Critical Habitat occurs on the site or in the nearby vicinity, and on relevant records of candidate, sensitive, or special-status species at or near the Project site are identified in the California Natural Diversity Database (USFWS 2019, CDFW 2019). The Project would have no impact, and no mitigation is required.

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

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project site does not contain riparian habitat, wetlands, or any other sensitive natural vegetation community. The Project site is mostly paved and within a developed, urban area. No impacts to riparian habitats, wetlands, or sensitive natural vegetation communities would result from Project implementation. There would be no impact, and no mitigation is required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. Due to the presence of ornamental trees on site, there is the potential for nesting birds subject to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. The MBTA prohibits activities that result in the direct take (defined as killing or possession) of birds covered by the MBTA. Through compliance with the provisions of the MBTA and California Fish and Game Code, including implementation of RR BIO-1, there would be a less than significant impact and no mitigation is required.

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

Less Than Significant Impact. As described above, the City regulates the removal of certain trees on private property through the Tree Preservation Ordinance and the removal and planting of street trees through the Comprehensive Tree Management Program. As discussed above, the Project would include removal of the 26 existing trees on the site and adjacent ROW. This would include the 3 trees along Santa Anita Avenue that are considered Protected Trees under the Tree Preservation Ordinance (two evergreen pears and one sour gum) and 3 street trees in the ROW of Huntington Drive that are protected under City's Comprehensive Tree Management Program (London plane trees).

Accordingly, the Applicant/Property Owner would be required obtain a permit from the Arcadia Public Works Services Department for the removal of street trees in the public ROW and removal of Protected Trees on private property. RR BIO-2 and RR BIO-3 require the Project Applicant/Property Owner to obtain and abide by the standards set forth in the permits and to submit a landscaping plan for review and approval by the City Public Works Services Department, respectively. The landscaping plan would include specifications for replacement street trees that would need to be removed as part of the project. The Project's on-site landscaping would include a total of 46 new trees. Among these would be 21 trees along the frontages of Morlan Place, Santa Anita Avenue, and Huntington Drive, planted in a 4-foot by 8-foot tree well consistent with City standards. With incorporation of RR BIO-2 and BIO-3, a less than significant impact would result from the Project, and no mitigation is required.

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

No Impact. The Project site is not located within an adopted habitat conservation plan or natural community conservation plan (Arcadia 2010a). Therefore, there would be no impact and no mitigation measures are required.

3.4.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to biological resources; therefore, no mitigation measures are required.

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

In addition to adhering with the requirements of CEQA, the Project must also comply with Section 9107.07.030 of the City's Development Code, which outlines the procedures for issuance of Certificates of Demolition given that the Project proposes to demolish nine buildings and one structure on the site that are over 50 years old. Consistent with City requirements, a qualified architectural historian was retained to conduct an assessment to determine whether any of the nine buildings and one existing structure have any historical significance and whether any of the buildings or the structure proposed for demolition are eligible for listing in the California Register of Historic Resources. The Project Applicant/Property Owner will submit the report along with an application for a certificate of demolition. As discussed in more detail below, the *Historical Resource Evaluation Report* (Historical Report) prepared by GPA Consulting and dated March 2020 (GPA 2020, Appendix B-1) provides evidence and supporting documentation related to the lack of historic significance of the nine buildings and one structure proposed for demolition on the Project site (not including the Jiffy Lube structures), including photographic evidence as to the current condition, and a narrative evaluation by the qualified architectural historian. It should also be noted that the 2020 Historical Report follows the City's 2019 Development Code for Historic Preservation.

The Historical Report also documents the structures and provides a full evaluation of the structures. To comply with Section 9107.07 of the Development Code, the Project Applicant/Property Owner will pay for an architectural historian to complete the California Department of Parks and Recreation Primary Record Form (DPR 523A), a Building, Structure, and Object (BSO) Record Form (DPR 523B); and Location Map Form (DPR 523J) and submit these forms with the City's application for a Certificate of Demolition, if determined necessary by the City in addition to the Historical Report already prepared for the Project. If the DPR forms are requested by the City, once they are complete the Project architectural historian or Project Applicant/Property Owner shall submit the completed DPR forms to the South Central Coastal Information Center (SCCIC) at the California State University at Fullerton. It is noted the Historical Report does not include evaluation of the existing Jiffy Lube building located at 5 Huntington Drive because this parcel was not included in the Project site at the time the historic assessment was conducted. However, this building is not 50 years old and is not otherwise considered to be potentially historic.

Information in this section is based upon the records searches and literature reviews of information available from the SCCIC at California State University, Fullerton and the Native American Heritage Commission (NAHC) (Appendix B-2); as well as the Historical Report, which is provided in its entirety in Appendix B-1 of this IS/MND.

3.5.1 ENVIRONMENTAL SETTING

Cultural Resources Records Search at the South-Central Costal Information Center

Previous Cultural Resources Studies

A literature review of documents on file at the SCCIC was completed on July 30, 2020. The results of the records search identified 13 studies that have been previously conducted within ½-mile of the Project site, which includes 4 previous studies (LA-06859, LA-12525, LA-10896, and LA-12497) covering a portion of the Project site, which are described in more detail in Table 12, Previous Cultural Resource Studies Including Portions of the Project Site. In general, prior studies within a half-mile of the Project area consist of archaeological reconnaissance or Phase I cultural resource studies conducted between 1984 and 2015.

LA-06859 is an overview study that encompasses the entire City of Arcadia for the Arcadia General Plan. LA-12525 is a National Historic Preservation Act (NHPA) Section 106 review for the Metro A Line Phase II Extension Project that occurred alongside the northeastern boundary of the Project site along Indiana Street during the environmental review of the A Line. LA-10896 is a historic properties survey also conducted for the A Line Phase II Project (Pasadena to Montclair). The Area of Potential Effect (APE) for LA-10896 included the Project site located along Santa Anita Avenue. LA-12497 is also an overview study that encompasses the entire City of Arcadia for the 2010 Arcadia General Plan Update.

TABLE 12
PREVIOUS CULTURAL RESOURCE STUDIES INCLUDING PORTIONS OF THE PROJECT SITE

Report No	Affiliation	Year	Author	Title
LA-06859	LSA Associates, Inc.	1996	Unknown	Arcadia General Plan
LA-12525	Federal Highway Administration, Federal Transit Administration	2003	Poka, Ervin	NHPA Section 106 Review; Metro A Line Phase II Extension Project
LA-10896	Myra L. Frank/Jones & Stokes, Applied EarthWorks	2004	Greenwood, David	Historic Properties Survey and Effects Report for the A Line Phase II Project (Pasadena to Montclair) Los Angeles and San Bernardino Counties, CA
LA-12497	BonTerra Consulting	2010	Maxon, Pat	Draft Program Environmental Impact Report, City of Arcadia, 2010 General Plan Update
Source: South Central Coastal Information Center. 2020 (July 30). Re: Records Search Request for the 3ARD012200 Project. Fullerton, CA: SCCIC.				

Previously Recorded Cultural Resources

SCCIC records indicate that a total of 54 previously recorded cultural resources have been identified within half-mile of the Project site, all of which are historic-era buildings, structures, or districts. None of these resources were identified within the Project site.

Native American Heritage Commission Sacred Lands Files

Psomas submitted a request to the NAHC on July 10, 2020, to review the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its Sacred

Lands File search on July 15, 2020. The results were positive for known Tribal Cultural Resources and/or sacred sites in the vicinity of the Project site. Additionally, the NAHC recommended contacting the Gabrieleño Band of Mission Indians – Kizh Nation for more information., in which the City did The analysis of tribal cultural resources is provided in Section 3.18 of this IS/MND.

REGULATORY REQUIREMENTS

In addition to adherence to the City's Development Code including the requirements associated with obtaining a Certificate of Demolition, RR CUL-1 would be implemented during Project excavations.

Regulatory Requirements

RR CUL-1 If human remains are encountered during excavation activities, all work shall halt in the immediate vicinity of the discovery and the Los Angeles County Coroner shall be notified (California Public Resources Code Section 5097.98). The Coroner shall determine whether the remains are of forensic interest. If the Coroner determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code Section 7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code Section 5097.98).

3.5.2 IMPACT ANALYSIS

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

No Impact. In April 2019, the Arcadia City Council adopted a Historic Preservation Ordinance, Ordinance No. 2359, with the goal of identifying and preserving historic buildings throughout the City and establishing policies for how to evaluate and consider approval of projects that proposed alterations to historic resources. A literature review and record search were conducted for the Project through the SCCIC failed to identify known, significant historic resources on the Project site.

None of the existing buildings or the structures on the Project site are currently listed under national, State, or local landmark designation programs. None of the buildings on the Project site have been previously evaluated. One structure on the Project site, a retaining wall constructed circa 1910, was recorded during the 2016-2017 citywide historic resources survey of the City of Arcadia and given a Status Code of 5S3 (appears to be individually eligible for local listing or designation through survey evaluation). As part of the Historic Report prepared for the Project, all properties over 45 years of age were evaluated as potential historical resources under CEQA. After careful inspection, investigation, and evaluation, it was concluded that the properties on the Project site are ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, as well as ineligible for designation as City of Arcadia Historic Landmarks for lack of historical significance and architectural distinction. In the case of the retaining wall

segment, it became evident upon closer examination that it no longer retained sufficient integrity to convey its significance. Therefore, none of the structures evaluated are historical resources as defined by CEQA. Furthermore, the literature review and records search did not identify any resources designated on the CRHR or NRHP immediately adjacent to the Project site.

The Project would not involve any direct or indirect impacts to historic resources pursuant to CEQA, and no mitigation is required.

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

Less Than Significant With Mitigation. The literature review and record searches conducted through the SCCIC failed to identify known, significant archaeological resources within the Project site or within a half-mile of the site. Therefore, the Project would not cause a substantial adverse change in the significance of a documented archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines. Nevertheless, even though the SCCIC has identified the Project site as having low sensitivity for prehistoric archaeological resources, the NAHC sacred lands file did identify sacred sites in the vicinity of the Project site. Therefore, there is the possibility that undiscovered intact cultural resources, including archaeological resources, may be present below the surface in native sediments. Therefore, MM CUL-1 would require that any inadvertently uncovered resources during grading be evaluated by a qualified archaeologist to determine their significance and the need to protect in place, salvage and preserve, or other measure(s) as appropriate to reduce impacts to important cultural resources. With implementation of MM CUL-1, potential impacts to archaeological resources would be reduced to a less than significant level.

c) Would the project disturb any human remains, including those interred outsides of formal cemeteries?

Less Than Significant Impact. There is no indication that human remains are present within the Project site, including those interred outside formal cemeteries. The records search indicates no evidence of human remains on or near the Project site. In the unlikely event of an unanticipated encounter with human remains within the Project site, the California Health and Safety Code and the California Public Resources Code require that any activity in the area of a potential find be halted and the Los Angeles County Coroner be notified, as described in RR CUL-1. Through compliance with RR CUL-1, there would be less than significant and no mitigation is required.

3.5.3 MITIGATION PROGRAM

MM CUL-1 Prior to the issuance of a demolition permit, the Project Applicant/Property Owner shall submit the name and qualifications of a qualified archaeologist to the City of Arcadia Development Services Department for review and approval. Once approved, the qualified archaeologist shall be retained by the Applicant. If suspected cultural (archaeological) resources or tribal cultural resources are inadvertently unearthed during excavation activities, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The Project contractor or Property Owner/Applicant shall contact the qualified archaeologist to request an evaluation of the significance of the find and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State California Environmental Quality Act Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

3.6 ENERGY	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

3.6.1 ENVIRONMENTAL SETTING

As discussed previously, SCE and SoCal Gas are the utility companies that currently provide electrical and natural gas services, respectively, to the site. Compliance with energy efficiency and conservation policies and regulations is discussed in this section.

The Resource Sustainability Element of the City's General Plan provides for the following policies related to energy use by proposed projects in the City of Arcadia.

g) Policy RS-5.3: Require that all new development meets or exceeds the State and local energy conservation requirements.

h) Policy RS-5.9: Facilitate the provision of energy-efficient modes of transportation and fixed facilities which establish transit, bicycle, and pedestrian modes as viable alternatives.

The State of California has also adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the California Code of Regulations (CCR, specifically, Part 6) is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings.

The 2022 Energy Code focuses on four key areas in newly constructed homes and businesses:

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100 percent clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction

in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the Code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The regulation of energy efficiency for residential and non-residential structures is established by the CEC and its California Energy Code.

3.6.2 PROJECT IMPACTS

Regulatory Requirements

RR ENR-1 The Project shall be consistent with the Title 24 energy efficiency standards and the mandatory requirements of the CALGreen code in effect at the time the grading plans are approved. Construction activities shall comply with idling requirements and maintenance requirements for on- and off-road vehicles.

Impact Discussion

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

Less than Significant Impact. The Project would consume energy during the construction and operations phases of the Project. Energy consumption of the different fuels from each of these phases have been calculated and is discussed below.

Construction

Project construction would require the use of construction equipment for grading and building activities. All off-road construction equipment is assumed to use diesel fuel. Construction also includes the vehicles of construction workers and vendors traveling to and from the Project site. Off-road construction equipment use was calculated from the equipment data (mix, hours per day, horsepower, load factor, and days per phase) provided in the CalEEMod construction output files which informed the air quality and greenhouse gas emissions analyses and is included in Appendix A (Air Quality and Greenhouse Gas Emissions Calculations). The total horsepower hours for the Project was then multiplied by fuel usage estimates per hours of construction activities included in the OFFROAD2017 Model (see Appendix C, Energy Calculations).

Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using CARB's EMissions FACtor (EMFAC) 2017 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks.

Table 13, Energy Use During Construction, on the following page provides an estimate of diesel and gasoline fuel consumption during Project construction.

TABLE 13
ENERGY USE DURING CONSTRUCTION

Source	Gasoline - gallons	Diesel Fuel - gallons
Off-road construction equipment	20,574	18,296
Worker commute trips	51,050	260
Vendor trips	8,605	154
On-road haul trips	0	289
Total[1]	**80,230**	**18,999s**

[1]Totals may be affected by rounding.
Sources: Based on data from CalEEMod, OFFROAD2007 and EMFAC2017. See Appendix A for CalEEMod data and Appendix C for energy calculations

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project would also implement BMPs such as requiring equipment to be properly maintained and minimize idling and where feasible, use electric or clean alternative fuel equipment. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Energy used in the construction of the Project would enable the development of buildings that meet the latest energy efficiency standards as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operations

The Project would consume energy from transportation fuels (gasoline and diesel) and electricity and natural gas for the proposed land uses. The Project would result in energy consumption shown in Table 14, Energy Use During Operations, below.

TABLE 14
ENERGY USE DURING OPERATIONS

Land Use	Gasoline (Gallons/yr)	Diesel (Gallons/yr)	Natural Gas (kBtu/yr)	Electricity (kWh/yr)
Project Land Uses	143,864	13,479	5,407,501	1,523,198

yr: year; kBtu: kilo-British thermal unit; kWh: kilowatt hour.
Sources: Based on data from CalEEMod, OFFROAD2007 and EMFAC2017. See Appendix A for CalEEMod data and Appendix C for energy calculations

The Project would be required to comply with the latest Title 24 energy efficiency standards. These Standards expand upon energy efficiency and renewable energy generation requirements as well as providing electric-ready requirements (cleaner electric heating, cooking and electric vehicle charging options). Therefore, the new buildings would be more energy efficient than the existing buildings to be demolished due to the incorporation of the latest energy efficiency standards and renewable energy options. The Project would add residential units and commercial uses proximate to mass transit, contribute to pedestrian-oriented development in downtown Arcadia, and incorporate the latest adopted Title 24 energy efficiency standards. As detailed in Section 2.3.2, Development Characteristics, the Project would provide both short-term and long-term parking with 30 long-term and 2 short-term bicycle parking stalls. Promoting pedestrian- and transit-oriented development would result in less energy consumption by reducing traffic congestion and single-occupancy vehicle ridership. As such, the Project is not considered a wasteful, inefficient, or unnecessary consumption of energy resources and would result in less than significant energy impacts relative to the consumption of energy for Project construction and operation. There would be a less than significant impact and no mitigation is required.

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

Less than Significant Impact. The Project would be required to comply with the State of California's Title 24 Building Standards. As discussed previously, the latest building standards will incorporate the CEC's building energy efficiency standards and renewable energy options which would reduce energy consumption. The Project would also be consistent with the Policies RS-5.3 (meets or exceeds the State conservation requirements) and RS-5.9 (provision of energy-efficient modes of transportation and fixed facilities which establish transit, bicycle, and pedestrian modes) of the City of Arcadia's Resource Sustainability Element. Because the Project would comply with the latest State of California energy efficiency standards, provides infill development close to mass transit, and promotes pedestrian-oriented development, the Project would not conflict with or obstruct a State or the City of Arcadia's Resource Sustainability Element for renewable energy or energy efficiency. There would be a less than significant impact and no mitigation is required.

3.6.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to energy; therefore, no mitigation measures are required.

3.7 GEOLOGY AND SOILS	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
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 onsite or offsite 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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Information in this section is derived from the *Geotechnical Investigation, Proposed Huntington Park View Mixed-Use Development, 25 North Santa Anita, Arcadia, California* (Geotechnical Investigation) dated April 29, 2021, and prepared by Geocon West, Inc. (Geocon West, Inc. 2021, Appendix D), as well as information from the City of Arcadia General Plan and EIR (Arcadia 2010a and 2010b) and other sources, where noted.

3.7.1 ENVIRONMENTAL SETTING

The City of Arcadia lies at the boundary between the Peninsular Ranges geomorphic province (on the south) and the Transverse Ranges geomorphic province (on the north). The east-west trending San Gabriel Mountains, which underlie the northern part of the City, are part of the Transverse Ranges. The City is in the north-central portion of the San Gabriel Valley, which is bound on the north by the San Gabriel Mountains, on the west by the Raymond Basin, on the

south by the Puente Hills, and on the east by the Covina and Indian Hills. The San Gabriel Mountains are the result of uplift along a predominant fault line at the base of this steep mountain front. This fault line is a part of the Sierra Madre Fault system that extends from the western San Fernando Valley to the City of Claremont on the east, where it joins the Cucamonga Fault. Due to its location along and just south of the southern slope of the San Gabriel Mountains, the City of Arcadia is situated within a very seismically active area of Southern California. Numerous faults capable of producing significant ground motion are located near the Project site.

The two active and potentially active faults that pass beneath Arcadia and are evident at the ground surface or just below it, are the Sierra Madre and Raymond Faults. Deep beneath the City are two blind thrust faults: the shallower Elysian Park Fault and the deeper Puente Hills Fault. They are called blind-thrust faults due to their depth and the fact that fault movement consists of upward or thrusting action. The Eaton Wash Groundwater Barrier shows no surface geologic evidence of existence, and the nature of this possible buried fault is not known. In addition to these local faults, there are several regional faults that could produce significant ground shaking at the Project site, including the San Gabriel Fault and the San Andreas Fault.

The Project site is underlain by artificial fill and Holocene age young alluvial fan deposits, consisting of varying amounts of sand, silt, clay, and gravel. The near surface soil conditions encountered at the site generally consist of artificial fill extending to a maximum depth of approximately 6.5 feet below existing ground surface. The artificial fill generally consists of brown to reddish brown silty sand with some fine to coarse gravel and a few cobbles. The fill is characterized as fine- to medium-grained, slightly moist, and loose to medium dense. The fill is likely the result of past grading or construction activities at the site. Deeper fill may exist between excavations and in other portions of the site that were not directly explored. The Holocene age alluvium was encountered beneath the artificial fill and consists primarily of light brown to brown and reddish brown to olive brown interbedded silty sand, poorly graded sand, and well-graded sand with varying amounts of fine to coarse gravel and cobbles. Locally, there are zones with a very high concentration of gravel and cobbles. The alluvium is characterized as slightly moist and loose to very dense. Additionally, the Project site occurs within an area classified as Zone X as mapped by the Federal Emergency Management Agency (FEMA), which is described as areas of minimal flood hazard and determined to be outside the 0.2 percent annual chance floodplain (Geocon West, Inc. 2021).

3.7.2 PROJECT IMPACTS

Regulatory Requirements

RR GEO-1 Geotechnical design considerations for Project implementation are governed by the Arcadia Building Code, as set forth in Article VIII of the Arcadia Municipal Code, which incorporates by reference the California Building Code (CBC), including the California Building, Plumbing, Mechanical, Electrical and Existing Building Codes. Future buildings and structures shall be designed in accordance with applicable requirements of the CBC, the Arcadia Municipal Code, and any applicable building and seismic codes in effect at the time the grading plans are approved.

RR GEO-2 The Project building design specifications shall include recommendations from the *Geotechnical Investigation, Proposed Huntington Park View Mixed-Use Development, 25 North Santa Anita, Arcadia, California* (Geocon West, Inc. 2021, Appendix D). These recommendations include, but are not limited to, specifications for the following:

- Demolition and site preparation

- Fill placement
- Remedial grading and over excavation
- Foundation recommendations
- Building Floor Slabs and reinforcement

The Project building design specifications shall be verified by the City of Arcadia Building Official prior to issuance of a demolition permit.

Impact Discussion

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

No Impact. The Project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or a City-designated Fault Hazard Management Zone for surface fault rupture hazards. The Project is not expected to be impacted directly by ground rupture from a known fault due to the distances between the Project site and mapped faults in the area (Geocon West, Inc. 2021, Appendix D). There would be no impact, and no mitigation is required.

ii) Strong seismic ground shaking?

Less than Significant Impact. The Project site, as with the entire Southern California region, is subject to secondary effects from earthquakes. No known Holocene-active or pre-Holocene faults with the potential for surface rupture are known to pass directly beneath the site. The nearest known faults in the vicinity of the Project site include the Raymond Fault (0.6 mile from the Project site); Sierra Madre Fault (1.8 miles from the Project site); the Duarte Fault (2.3 miles from the Project site); the East Montebello Fault (6.6 miles from the Project site); Whittier Fault (11.0 miles from the Project site). The active San Andreas Fault is located approximately 23 miles northeast of the site.

Implementation of the Project would not change the intensity of ground shaking that would occur on the Project site during a seismic event, but it would increase exposure to additional people. The proposed buildings would be designed in accordance with the most recent California Building Code (CBC) (see RR GEO-1). The CBC contains minimum standards regulating the design and construction of excavations, foundations, retaining walls, and other building elements to control the effects of seismic ground shaking and adverse soil conditions. The CBC includes provisions for earthquake safety based on factors such as occupancy type, the types of soil and rock on-site, and the strength of ground motion that may occur at the Project site. Project implementation would also occur consistent with the recommendations outlined in the Geotechnical Investigation prepared for the Project, as set forth in RR GEO-2 (Geocon West, Inc. 2021, Appendix D). Based on the Geotechnical Investigation, the Project is geotechnically feasible provided that the recommendations in the geotechnical report are reviewed in the context of the final Project design and are incorporated during the Project's construction phase. Seismic design parameters have been included in the Geotechnical Investigation (Geocon West, Inc. 2021, Appendix D). based on the seismic zone, soil profile, and proximity of known faults to the Project site, which provide the minimum design procedures to avoid significant cosmetic damage to the structure.

Compliance with the applicable regulations as identified in RR GEO-1, and proper grading, design, and building construction methods required in RR GEO-2, would ensure that impacts that may result from strong seismic ground shaking at the Project site are less than significant and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations. The current standard of practice requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction (Geocon West, Inc. 2021, Appendix D).

The Seismic Hazards Map for the Mt. Wilson Quadrangle, published by the CGS indicates that the Project site, is not located within a zone of required investigation for liquefaction. In addition, the General Plan and the County of Los Angeles Safety Element indicate that the Project is not located within an area designated as having potential for liquefaction. Groundwater was not encountered in our borings drilled to a maximum depth of 60½ feet beneath the existing ground surface and the historic high groundwater level in the area is reported to be approximately 100 to 150 feet beneath the existing ground surface. As such, the potential for liquefaction and associated ground deformations beneath the site is very low (Geocon West, Inc. 2021, Appendix D). No impacts would result, and no mitigation is required.

iv) Landslides?

No Impact. Earthquake-induced land sliding often occurs in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical, and subsurface groundwater conditions are conducive to permanent ground displacements. No slopes are present on or near the site, which was previously graded and developed. The City of Arcadia General Plan and Los Angeles County Seismic Safety Element indicate that the site is not located in a “hillside area” or an area identified as having a potential for slope stability hazards. The Project site is not located within a designated earthquake-induced landslide zone. Also, there are no known occurrences of landslides in the Project vicinity nor is the site in the path of any known or potential landslides (Geocon West, Inc. 2021, Appendix D). Therefore, no impact would result, and no mitigation is required.

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

Less Than Significant Impact. The Project would demolish the existing buildings and surface parking lots on the Project site and would develop the site with new impervious surfaces and new pervious (i.e., landscaped) areas. The Project would not result in a substantial change in the amount of pervious/impervious area during operation of the Project. Project construction would expose soils on the site and would require the hauling of soil and demolition materials off-site, which could result in soil erosion and the loss of topsoil if not implemented consistent with regulatory requirements. The Project’s potential construction and operational stormwater impacts, and applicable regulatory requirements are addressed further in Section 3.10, Hydrology and

Water Quality. As discussed, less than significant impacts would result, and no mitigation is required.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed in Threshold 3.6(a)(iv) above, the Project site is not located in an area subject to on- or off-site landslides. As discussed under the analysis of Threshold 3.6(a)(iii) above, impacts from seismic-related ground failure related to liquefaction for the Project are considered to have no impact. Lateral spreading, a phenomenon associated with liquefaction, is a function of ground shaking and may occur during an earthquake. The potential for earthquake-induced lateral spreading of confined, discontinuous interbedded zones of liquefiable sandy soils underlying a relatively level surface is low.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site (Geocon West, Inc. 2021, Appendix D).

Based on the depth of the proposed excavations, the proximity to adjacent property lines, and the granular nature of the soils, sloping and/or shoring measures would be required for excavation of the subterranean level of the Project. Excavation recommendations are provided in Section 7.16 of the Geotechnical Investigation (Geocon West, Inc. 2021, Appendix D), which would be implemented to maintain lateral support of existing off-site improvements.

As stated in RR GEO-1, the Project would be designed and constructed in compliance with current CBC standards. Project implementation would also occur consistent with the recommendations outlined in the Geotechnical Investigation prepared for the Project, as set forth in RR GEO-2 (Geocon West, Inc. 2021, Appendix D). Compliance with RRs GEO-1 and GEO-2 would ensure that impacts related to soil engineering constraints would be less than significant, and no mitigation is required.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1004), creating substantial direct or indirect risks to life or property?

No Impact. Expansive soils are materials that, when subject to a constant load, are prone to expand when exposed to water. The hazard associated with expansive soils is that they can overstress and cause damage to the foundation of buildings set on top of them. The Geotechnical Investigation (Geocon West, Inc. 2021, Appendix D) states that based on depth of the proposed subterranean levels, the proposed structure would not be prone to the effects of expansive soils. The soils encountered at the site are primarily granular in nature and are considered to be “non-expansive”. The Project would implement the applicable regulations and geotechnical recommendations, as identified in RRs GEO-1 and GEO-2, which assume that near surface foundations and slabs will derive support in these materials with a “low” expansion potential. Since the foundations and slabs for the Project would be in an area that is already developed and since all construction would be required to comply applicable building codes (as required by RR GEO-1), there would be no impacts related to expansive soils.

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

No Impact. Project development would be connected to the municipal sewer system for wastewater disposal. The Project does not require the development of either septic tanks or alternative wastewater systems. No related impacts would result, and no mitigation is required.

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

Less Than Significant With Mitigation. A paleontological resources records search conducted by the Natural History Museum of Los Angeles (LACM) did not identify any fossil localities that lie directly within the proposed Project site; therefore, the Project will not directly destroy a known unique paleontological resource. However, the LACM did identify localities nearby from the same sedimentary deposits that occur in the Project site. If the Project would require excavations that would likely penetrate the paleontologically sensitive sediment deposits, the Natural History Museum of Los Angeles (LACM) has recommended monitoring of all substantial excavations. Impacts to paleontological resources, if encountered, would be significant without mitigation. MM GEO-1 requires that a qualified paleontologist be retained to observe grading activities in the older Quaternary Alluvium on the Project site and to salvage and catalogue fossils as necessary. With implementation of MM GEO-1, impacts to paleontological resources would be reduced to a less than significant level.

3.7.3 MITIGATION MEASURES

MM GEO-1 Prior to the issuance of a demolition permit, the Project Applicant/Property Owner shall submit the name and qualifications of a qualified paleontologist to the City of Arcadia Development Services Department for review and approval. Once approved, the qualified paleontologist shall be retained by the Project Applicant/Property Owner on an on-call basis to observe grading activities in the older Quaternary Alluvium on the Project site and to salvage and catalogue fossils as necessary. At the Project's Pre-Grade Meeting, the paleontologist shall discuss the sensitivity of the sediment being graded and shall establish procedures for monitoring. Protocols must be developed and explained for temporarily halting or redirecting work to permit sampling, identification, and evaluation of any fossils discovered. If the fossils are deemed significant, the paleontologist shall determine appropriate actions, in cooperation with the City of Arcadia, to recover and treat the fossils and to prepare them to the point of identification. A final Paleontological Resources Monitoring Report shall include a catalogue and analysis of the fossils found; a summary of their significance; and the repository that will curate the fossils in perpetuity.

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

3.8.1 ENVIRONMENTAL SETTING

Climate change refers to any significant change in measures of climate (e.g., average temperature, precipitation, or wind patterns) over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth's surface; this is attributed to an accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere which, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through fossil fuel combustion in conjunction with other human activities appears to be closely associated with global warming.

GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development Projects, nor can they be controlled in these Projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies, such as CARB, or climate change groups, such as the California Climate Action Registry, as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

As previously discussed in Section 3.3, Air Quality, of this IS/MND, air quality in the County of Los Angeles is regulated by the SCAQMD, the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SoCAB). To that end, the SCAQMD, a regional agency, works directly with SCAG, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Working Group was scheduled to meet once per month. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of

10,000 $MTCO_2e$ per year ($MTCO_2e$/yr)[5] for industrial projects where the SCAQMD is the lead agency. In September 2010, the Working Group presented a revised tiered approach to determining GHG significance for residential and commercial projects (SCAQMD 2010). These proposals have not yet been considered by the SCAQMD Board.

At Tier 1, GHG emissions impacts would be less than significant if the Project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the Project is consistent with a previously adopted GHG reduction plan that meets specific requirements.[6] At Tier 3, the Working Group proposes extending the 10,000 $MTCO_2e$/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For residential and commercial projects (that is, non-industrial projects), the Working Group proposes the following Tier 3 screening values: either (1) a single 3,000 $MTCO_2e$/yr threshold for all land use types or (2) separate thresholds of 3,500 $MTCO_2e$/yr for residential projects, 1,400 $MTCO_2e$/yr for commercial projects, and 3,000 $MTCO_2e$/yr for mixed-use projects. These screening values were developed from a survey of CEQA projects. It is estimated that projects with emissions above these values would produce 90 percent of the anticipated GHG emissions from residential/commercial projects and projects below the screening level would contribute 10 percent or less of the regional GHG emissions from land development. Therefore, a project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of three methods:

1. **A Percent Emission Reduction Target.** This method is used by the Sacramento Metropolitan and San Joaquin Valley Air Districts and the City of San Diego. The SCAQMD Working Group made no recommendation relative to this method.
2. **Early Implementation of Applicable AB 32 Scoping Plan Measures.** The Working Group assumes implementation of AB 32 measures would be incorporated in method 3 below.
3. **Efficiency Targets.** On the project level, 2020 GHG emissions should not exceed 3.8 $MTCO_2e$/year per service population (SP) where SP is project residents plus employees. Further, 2035 GHG emissions should not exceed 3.0 $MTCO_2e$/year per SP (SCAQMD 2010).

Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings.

In summary, to date, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. This proposed

[5] GHG emissions are commonly expressed as $MTCO_2e$. Larger quantities of emissions, such as on the world or State scale, are expressed in $MMTCO_2e$.

[6] The plan must (a) quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (b) establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; (c) identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; (d) specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (e) establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (f) be adopted in a public process following environmental review (State CEQA Guidelines, Section 15183.5).

screening and mitigation proposal from SCAQMD remains a work in progress; the Working Group has not convened since the fall of 2010. The proposal has not been considered or approved for use by the SCAQMD Board. Thus, no GHG significance thresholds are approved for use in the SoCAB for non-industrial projects.

City of Arcadia General Plan

For the purposes of the Project, the City's existing General Plan is the applicable planning document. The City does not have an adopted Climate Action Plan. GHG reduction is a cross-cutting issue relevant to various policy arenas, including policies that address land use, transportation, buildings, energy, waste, and ecology. The Land Use and Community Design Element includes policies that focus on encouraging compact, mixed-use development in the City's downtown around the Metro A Line Station; along Live Oak Avenue and N. First Avenue; and in other focus areas through the City. Trip reduction strategies are addressed in the Circulation and Infrastructure Element (Arcadia 2010a). The Resource Sustainability Element of the General Plan also includes GHG-reducing goals and policies to reduce the City's carbon footprint.

The Project site has a General Plan land use designation of DMU, is zoned as DMU, and is developed with commercial land uses and surface parking lots (Arcadia 2010a). Existing GHG emissions result from the existing on-site commercial uses and associated mobile (i.e., vehicular) emissions.

3.8.2 PROJECT IMPACTS

Regulatory Requirements

None required.

Impact Discussion

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

Less than Significant Impact. In developing methods for GHG impact analysis, there have been suggestions of quantitative thresholds, often referred to as screening levels, which define an emissions level below which it may be presumed that climate change impacts would be less than significant. Neither the SCAQMD, the City of Arcadia nor the County of Los Angeles have adopted a significance threshold for the GHG emissions from non-industrial development projects.

As explained in further detail above, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. At their September 28, 2010, meeting, the Working Group suggested a Tier 3 threshold of 3,000 $MTCO_2e$ per year for all land use types. This proposed screening and mitigation proposal from SCAQMD remains a work in progress as the Working Group has not convened since the fall of 2010. As no additional GHG thresholds have been established thus far, the GHG analysis in this IS/MND relies on the interim threshold for its evaluation.

Construction

Construction GHG emissions are generated by vehicle engine exhaust from construction equipment, on-road hauling trucks, vendor trips, and worker commuting trips. Construction

GHG emissions were calculated by using CalEEMod Version 2022.1.1.0 (the model is described in Section 3.3, Air Quality). Input details are provided in Appendix A (Air Quality and Greenhouse Gas Emissions Calculations). The results are output in $MTCO_2e$ for each year of construction. The estimated construction GHG emissions for the Project are shown in Table 15, Estimated Annual Greenhouse Gas Emissions From Construction.

GHG emissions generated from construction activities are finite and would occur for a relatively short-term time period. Unlike the numerous opportunities available to reduce a project's long-term GHG emissions through design features, operational restrictions, use of green-building materials, and other methods, GHG emissions-reduction measures for construction equipment are relatively limited. Therefore, SCAQMD staff recommended that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). As shown in Table 15, Estimated Annual Greenhouse Gas Emissions from Construction, the 30-year amortized construction emissions would be 52 $MTCO_2e$/yr.

TABLE 15
ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS
FROM CONSTRUCTION

Year	Emissions ($MTCO_2e$)
2024	631
2025	642
2026	301
Total	**1,574**
Annual GHG Emissions*	**52**

$MTCO_2e$: metric tons of carbon dioxide equivalent

* Combined total amortized over 30 years

Notes:

- Totals may not add due to rounding
- Detailed calculations in Appendix A.

Operations

As stated previously, the Project site is developed with existing commercial and office uses. Table 16, Estimated Annual Greenhouse Gas Emissions From Existing Use, on the following page shows the estimated annual GHG emissions from existing uses at the Project site.

TABLE 16
ESTIMATED ANNUAL GREENHOUSE GAS
EMISSIONS FROM EXISTING USE

Source	Emissions ($MTCO_2e$/yr)
Mobile	457
Area	1
Energy	37
Water	2
Waste	7
Refrigerants	0
Total	**504**

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year
Notes:
- Totals may not add due to rounding
- Detailed calculations in Appendix A.

Operational GHG emissions would come primarily from vehicle trips; other sources include electricity and water consumption; natural gas for space and water heating; and gasoline-powered landscaping and maintenance equipment. Estimated Project operational GHG emissions are shown in Table 17, Estimated Annual Greenhouse Gas Emissions from Project Operation.

TABLE 17
ESTIMATED ANNUAL GREENHOUSE GAS
EMISSIONS FROM PROJECT OPERATION

Source	Emissions ($MTCO_2e$/yr.)
Mobile	1,519
Energy	528
Water	51
Waste	63
Refrigerants	2
Stationary	18
Total	**2,181**

$MTCO_2e$/yr.: metric tons of carbon dioxide equivalent per year
Notes:
- Totals may not add due to rounding
- Detailed calculations in Appendix A.

As described above, construction and operational GHG emissions are combined by amortizing the construction operations over a 30-year period. As shown in Table 18, Estimated Annual Greenhouse Gas Emissions, on the following page with consideration of amortized construction emissions, the total annual estimated GHG emissions for the Project is 1,729 $MTCO_2e$/yr, with the reduction of emissions associated with the existing uses. This value is less than the draft SCAQMD Tier 3 screening threshold (e.g., 3,000 $MTCO_2e$/yr for all land use types). Because the Project's GHG emissions would be less than 3,000 $MTCO_2e$/yr, the emissions would not be cumulatively considerable. Therefore, the Project would result in less than significant GHG emissions.

TABLE 18
ESTIMATED TOTAL ANNUAL GREENHOUSE GAS EMISSIONS

Source	Emissions $MTCO_2e/yr$
Construction (amortized) (from Table 15)	52
Operations (from Table 17)	2,181
Net Reduction: Existing Emissions (from Table 16)	-504
Total	***1,729***
$MTCO_2e/yr$: metric tons of carbon dioxide equivalent per year.	

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

No Impact. The SCAQMD and the City of Arcadia have not adopted standards for the purpose of reducing GHG emissions. As discussed previously, the State policy and standards adopted for the purpose of reducing GHG emissions that are applicable to the Project are Executive Order S-3-05, Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and Senate Bill (SB) 32. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020 to 80 percent below 1990 levels by 2050, and for SB 32, to 40 percent below 1990 levels by 2030. Statewide plans and regulations (such as GHG emissions standards for vehicles, the Low Carbon Fuel Standard, Cap-and-Trade, and renewable energy) are being implemented at the Statewide level, and compliance at a project level is not addressed.

The Project would reduce GHG emissions due to its location to complementary uses and mass transit, as well as incorporation of the latest energy efficiency standards for buildings. The proposed development is an infill and mixed-use development project. The Project's mixed-use nature would result in trip reductions internally due to the walkability of this site relative to nearby commercial and park uses and accessibility of mass transit. The Project is located within a half-mile of the Metro A Line Station. The proximity of the Project site to the station would encourage the use of mass transit which is consistent with the City of Arcadia's and State of California's goals of using non-single occupancy vehicles. Public transit availability would also reduce vehicle trips and associated GHG emissions when compared with similar projects located on sites that do not have similar transit accessibility. The development of the Project would support the GHG emissions reduction goals detailed in the California Scoping Plan and RTP/SCS by developing residential uses in a TPA, HQTA, and TPP area which provides mass transit options which leads to less air quality and greenhouse gas emissions as compared to transportation with single-occupant vehicles. The provision of infill development near high-quality transit service supports the goals and policies of the SCAG RTP/SCS, thereby also supporting SB 375 and AB 32 goals. Additionally, the Project would provide bicycle parking and storage areas to encourage the reduction of fossil-fueled vehicle use by employees and residents and the associated GHG emissions, and it would provide new facilities for charging of electric vehicles.

The regulations, plans, and polices adopted for the purpose of reducing GHG emissions that are directly applicable to the Project include the Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code. These codes are enforced by the City, and adherence to standard requirements for construction and operations would ensure that the Project would comply with both of these regulations.

Because the Project would promote mixed use infill development in a TPA, HQTA, and TPP area which promotes mass transit options as well as includes the latest building energy efficiency

measures, the Project would not conflict with the City's General Plan nor the State of California's Scoping Plan. There would be a less than significant impact, and no mitigation is required.

3.8.3 MITIGATION MEASURES

There would be no significant adverse impacts related to GHG emissions; therefore, no mitigation measures are required.

3.9 HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Information in this section is derived from the *EDR Radius Map Report* (EDR Report) dated March 10, 2021, and prepared by Environmental Data Resources, Inc. (EDR 2021, Appendix E-1). The site boundary that is the subject of the EDR Report does not include the Jiffy Lube site. However, the Jiffy Lube site is within the EDR Report's search radius; therefore, this information is applicable to the Project site as a whole. Information in this section pertinent to the Jiffy Lube site is derived from the *Phase I Environmental Site Assessment* (Phase I ESA), dated May 4, 2021, and the *Phase II Soil Gas Screening Report* (Phase II Report) dated May 5, 2021, prepared by EDI Consultants, Inc. and provided in Appendix E-2 and Appendix E-3, respectively.

3.9.1 ENVIRONMENTAL SETTING

On-Site Hazardous Materials

Project Site – EDR Report

As stated in the EDR Report, a search of available environmental records was conducted by to meet the search requirements of USEPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed or the evaluation of environmental risk associated with a parcel of land. The Project site was not listed in any of the databases searched as part of the EDR Report (EDR 2021, Appendix E-1).

Jiffy Lube Site – Phase I and II ESA

As stated in the Phase I ESA, the existing Jiffy Lube site is equipped with a 29-year-old gasoline service station, with a fueling system consisting of three 10,000-gallon gasoline underground storage tanks (USTs) (EDI 2021a, Appendix E-2). The latest tank, piping, and sensors testing completed in 2021 indicated no leakage in the UST system and compliance with all federal and State requirements for a passing system. However, due to the sensitive nature of service station operations, which involve the storage and dispensing of fuels, a soil gas screening was conducted to investigate the potential impact of VOCs–including benzene, toluene, ethylbenzene, and xylenes (BTEX) found in petroleum products such as gasoline–and Total Petroleum Hydrocarbons as Gasoline (TPH-g) to soil gas as a consequence of potentially one or more historic releases from the on-site gasoline service station and auto repair/lube operations. The scope of the Phase II Report included the collection of nine soil gas samples and a field duplicate from six locations on April 27, 2021. Laboratory analytical results indicated that none of the soil gas samples had concentrations of TPH-g or VOCs detected above the listed reporting limits. Therefore, a significant environmental threat or human health concern was not discovered on the Jiffy Lube site and no further action was warranted (EDI 2021b, Appendix E-3).

Nearby Hazardous Materials

Review of government databases as well as field reconnaissance conducted as part of the Phase I ESA indicates that there are no users of hazardous materials or generators of hazardous wastes in the vicinity of the Project site (EDI 2021a, Appendix E-2).

Nearby Airports

The nearest airport to the site is the San Gabriel Valley Airport, formerly known as the El Monte Airport, located in El Monte, a public use airport owned by the County of Los Angeles, which is located approximately 3.5 miles south of the Project site.

3.9.2 PROJECT IMPACTS

Regulatory Requirements

RR HAZ-1 Activities at the Project site shall comply with existing federal, State, and local regulations regarding hazardous material use, storage, removal and disposal of underground storage tanks, and transport to prevent Project-related risks to public health and safety. All on-site generated waste that meets hazardous waste criteria

shall be stored, manifested, transported, and disposed of in accordance with the California Code of Regulations (Title 22) and in a manner to the satisfaction of the local Certified Unified Program Agency (CUPA), as applicable. Any hazardous materials removed from the Project site shall be transported only by a Licensed Hazardous Waste Hauler, who shall be in compliance with all applicable State and federal requirements, including U.S. Department of Transportation regulations under Title 49 (Hazardous Materials Transportation Act) and Title 40, Section 263 (Subtitle C of the Resource Conservation and Recovery Act) of the Code of Federal Regulations; California Department of Transportation (Caltrans) standards; and Division of Occupational Safety and Health (Cal/OSHA) standards.

Impact Discussion

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

Less Than Significant Impact. The Project would not involve the routine use, transport, handling, or storage of hazardous materials on-site. The proposed land uses are limited to residential and commercial, and no industrial or manufacturing land uses would be developed. The Project would result in the on-site handling of materials that are common in similar urban developments, such as commercial cleansers, solvents and other janitorial or industrial-use materials; paints; and landscape fertilizers/pesticides. While many such common materials are technically labeled “hazardous”, the presence of such materials is common in a mixed-use urban environment and their transport and use is considered a less than significant impact. The proposed land uses would not generate hazardous emissions, nor would they involve hazardous materials that would create a substantive hazard to the public or environment. There would be a less than significant impact, and no mitigation is required.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Project construction activities routinely involve the use and handling of limited volumes of commonly used hazardous materials, such as petroleum (fuel), paints, adhesives, and solvents. During construction, there is a limited risk of spills and/or accidental release of hazardous materials that are used for the operation and maintenance of construction equipment. The on-site temporary handling, storage, and usage of these materials would be subject to applicable local, State, and/or federal regulations, including BMPs) related to stormwater required by the City (see RR HWQ-1 in Section 3.10 of this IS/MND). As required by RR HAZ-1, any hazardous materials used during construction would also be transported, used, stored, and disposed of according to any applicable local, State, and/or federal regulations. Compliance with applicable regulations would reduce the risk of any damage or injury from any potential spill hazards to a less than significant level.

As stated above, the Project site excluding the Jiffy Lube site was not listed on any databases as searched by the EDR. The latest testing completed in 2021 indicated no leakage and compliance with all federal and State requirements for a passing system. However, due to the sensitive nature of service station operations, a soil gas screening was conducted to investigate whether one or more historic releases of petroleum products from the on-site gasoline service station and auto repair/lube operations had occurred. Laboratory testing indicated that no soil gas samples collected on the Jiffy Lube site had detectable concentrations of TPH-g or VOCs. Therefore, the Phase II Report concluded that a significant environmental threat or human health concern was not present. The proposed land uses would not create a significant hazard to the public or

environment involving release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. There are a total of 3 public and private K-12 schools and other educational institutions within 0.25 mile of the Project site: Excelsior School, located approximately 0.08 mile to the northwest at 41 Santa Clara Street; Arroyo Pacific Academy, located approximately 0.20 mile to the north at 325 N Santa Anita Avenue; and s, located approximately 0.20 mile to the east at 17 East Huntington Drive. However, as discussed above, the Project would not develop land uses that involve the use, storage, or transport of hazardous materials that represent a significant hazard to the public or the environment. No industrial or manufacturing land uses would be developed as part of the Project. During Project operations, the Project would result in the routine on-site handling of materials that are common in similar urban developments, such as commercial cleansers, solvents and other janitorial or industrial-use materials; paints; and landscape fertilizers/pesticides. The on-site temporary handling, storage, and usage of these materials would be subject to applicable local, State, and/or federal regulations, including BMPs required by the City (see RR HWQ-1). Therefore, impacts would be less than significant, and no mitigation is required.

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

No Impact. Section 65962.5 requires the development of a hazardous waste and substances site list, also known as the Cortese List, which provides the location of known hazardous materials release sites. The EDR Report did not identify any Cortese List sites on the Project site. Details of the databases searched, along with descriptions of each database researched, are provided in Appendix E-1. The nearest cleanup site reported on the Cortese list database is the Foulger Ford site location at 55 Huntington Drive, approximately 0.01 miles from the Project site. However, the Foulger Ford site cleanup status is completed and currently closed (EDR 2021, Appendix E-1).

The Project site and adjacent sites were not identified on any databases reviewed. Given that the Project does not occur on a Cortese List property or contain other hazardous materials of concern that would create a significant hazard to the public or environment, no impact would result from implementation of the Project, and no mitigation is required.

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?

No Impact. The nearest airport to the site is the San Gabriel Valley Airport (formerly El Monte Airport), a public use airport, which is owned by the County of Los Angeles and located approximately 3.5 miles south of the Project site. The Project site is located outside the airport Area of Influence of the San Gabriel Valley Airport (LA County 1991). There are no other private airstrips in the vicinity of the Project. Therefore, the Project does not pose an adverse aeronautical effect. No impacts are anticipated, and no mitigation is required.

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

Less Than Significant with Mitigation. The City has adopted an Emergency Preparedness Program that addresses the City's response to extraordinary emergency situations associated with natural disasters, technological incidents, and threats to national security. It provides operational concepts related to various emergency situations; identifies components of the City of Arcadia Emergency Management Program; and describes the overall responsibilities of the organization for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, State and federal agencies, and the private sector.

Project construction activities would be constrained due to the fully developed nature of the surrounding land uses and location near heavily traveled roadways. As such, construction activities have the potential to disrupt traffic and emergency access through temporary lane closures or traffic diversions. As required by MM TRANS-1, a Construction Management Plan shall be prepared in compliance with the Manual on Uniform Traffic Control Devices (MUTCD). Compliance with MM TRANS-1 would ensure that potential short-term impacts to emergency response plans or evacuation routes would be less than significant. Once construction activities that could impact surrounding roadways are completed, the roads would be returned to the previous condition and there would be no impact. As required by MM TRANS-1, the Project Applicant/Property Owner would be responsible for repairing any damage to City roadways that may occur during construction or through transport of heavy trucks or equipment related to construction. Therefore, with implementation of MM TRANS-1, short term impacts would be reduced to a less than significant level.

The long-term operation of the Project involves residential, commercial, and parking land uses that would not result in a significant impact to existing roadways and would neither interfere with nor impact the implementation of the City's Emergency Preparedness Program. Additionally, emergency access to the site and surrounding areas would be maintained in compliance with applicable City requirements during and after construction.

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

No Impact. As discussed in Section 3.20, the Project site is not located within a very high fire hazard severity zone (CalFire 2023). The nearest high-risk zone closest to the Project site is located approximately 2 miles to the north, at the base of the San Gabriel Mountains. The Project site is located in an urban area of the City and is not adjacent to wildlands. Therefore, implementation of the Project would not result in a significant risk of loss, injury, or death involving wildland fires. No mitigation is required.

3.9.3 MITIGATION MEASURES

MM TRANS-1, presented in Section 3.17, Transportation, would also be applicable to the analysis of hazards and hazardous materials.

3.10 HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
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 offsite;	☐	☐	☐	☒
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 storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect 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?	☐	☐	☐	☒

Information in this section is partially derived from the *Civil Engineering Hydrology Report* dated August 21, 2024, and prepared by Fuscoe Engineering (Fuscoe 2024a2024a, Appendix F).

3.10.1 ENVIRONMENTAL SETTING

Surface Drainage

The Project site is located within the 824-square-mile Los Angeles River Watershed (Watershed). The Watershed is highly modified; the northern 324-square-mile portion is covered by forest or open space, while the remaining 500 square miles is intensely urbanized (California Water Board 2014). The Watershed encompasses and is shaped by the path of the Los Angeles River. The Project site is located within the intensely urbanized portion of the Watershed and is currently developed with existing buildings and paved surface parking lots.

Storm drainage in the City of Arcadia is provided by curbs and gutters along streets, which direct storm water into the catch basins, pipes, and washes that run in a southerly direction in or near the City. Over four miles of City-maintained storm water management facilities are present in the

City, which connect to regional flood control and runoff conveyance facilities (Arcadia 2010b). Most storm water from the City flows in a southerly direction predominately through Arcadia Wash and Santa Anita Wash, as well as through Sawpit Wash, which all ultimately flow to the Rio Hondo, which runs southwest to join the Los Angeles River in Downey.

Flooding

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map indicates that the Project site is located in Flood Zone X, which designates areas that are determined to be outside the 0.2-percent annual chance floodplain (Geocon West, Inc. 2021, Appendix D). However, inundation can also occur as a result of significant structural damage to a dam or other water retention facility upstream of the Project site. Dam or reservoir failure could occur because of an earthquake, erosion, design flaw, or water overflow during storms (for a dam). The City's location along the San Gabriel Mountain foothills and below extensive regional flood control facilities places it within the potential inundation area of six water retention facilities. The Project area is located within the inundation hazard area of the Santa Anita Dam (Arcadia 2010b).

Groundwater

The Project site overlies the Main San Gabriel Groundwater Basin (Main Basin), which has a 255 square mile surface area and is in eastern Los Angeles County. The Main Basin is present beneath the majority of the San Gabriel Valley floor and is bound by the Raymond Basin on the northwest, the base of the San Gabriel Mountains on the north, the Puente Basin on the east, and Whittier Narrows to the south. The Main Basin is replenished by stream runoff, rainfall, and inflow from the surrounding Raymond and Puente Basins, and is also replenished with imported water through the Upper San Gabriel Valley Municipal Water District (Arcadia 2010a). The Raymond Basin's main water-bearing materials are unconsolidated to semi-consolidated Quaternary alluvial sediments deposited by streams originating in the San Gabriel Mountains (DWR 2004).

During the drilling of soil borings for the Geotechnical Investigation (Geocon West, Inc. 2021, Appendix D), groundwater was not encountered drilled to a maximum depth of 60 ½ feet. Also, a review of available data indicates that the historically highest groundwater level in the immediate area is approximately 100- 150 feet beneath ground surface.

3.10.2 PROJECT IMPACTS

Regulatory Requirements

RR HWQ-1 Prior to the City's issuance of a demolition permit, the Project Applicant/Property Owner shall obtain coverage under the General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2022-0057-DWQ, NPDES No. CAS000002), which will require the development and implementation of a Project-specific Storm Water Pollution Prevention Plan (SWPPP). As required by Section 7800 et. seq., Stormwater Management and Discharge Control, of the Arcadia Municipal Code, the Project's grading permit would only be issued after the Project Applicant/Property Owner submits proof that an NOI was filed and a SWPPP prepared to the satisfaction of the City's Public Works Director.

Impact Discussion

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

Less Than Significant Impact. This section discusses the Project's potential construction- and operational-related water quality impacts.

Construction-Related Water Quality Impacts

The Project could result in short-term construction impacts to surface water quality from demolition, grading, and other construction-related activities. Storm water runoff from the Project site during construction could contain soils and sediments from these activities. Spills or leaks from heavy equipment and machinery, construction staging areas, and/or building sites can also enter runoff and typically include petroleum products such as fuel, oil and grease, and heavy metals.

The State Water Resources Control Board (SWRCB) has issued the Statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2022-0057-DWQ, NPDES No. CAS000002, which became effective on September 1, 2023) (Construction General Permit). Individual NPDES permits or Construction General Permit coverage must be obtained for discharges of storm water from construction sites with a disturbed area of one or more acres. Since the Project site is 2.27 acres, coverage under the Construction General Permit is required. To obtain coverage, the Project Applicant/Property Owner must retain the services of a certified Qualified SWPPP Developer (QSD) to prepare a SWPPP for the Project. The Project Applicant/Property Owner, or the contractor if specifically delegated, would electronically submit permit registration documents prior to beginning construction activities in the Storm Water Multi-Application Report Tracking System (SMARTS), which would consist of a Notice of Initiation (NOI), Risk Assessment, Post-Construction Calculations, a site map, the SWPPP, a signed certification statement, and the first annual fee. Project construction would also be required to adhere to the SCAQMD's Rule 402 (Nuisance) and Rule 403 (Fugitive Dust) to avoid and minimize airborne dust from leaving the site.

Also, as required by Section 7827 of the AMC, the Project would be required to implement an erosion and sediment control plan, or SWPPP, and BMPs required by the City's Director of Public Works to ensure that discharges of pollutants are effectively prohibited and would not cause or contribute to an exceedance of water quality standards. Also, consistent with Section 7827 of the AMC and Ordinance No. 2325 (Article VII, Chapter 8, Stormwater Management and Discharge Control), since the Project would disturb more than one acre, BMPs for new development and redevelopments would apply. This would include the requirement to comply with the Construction General Permit. The SWPPP would include BMPs to control erosion and sedimentation, and to manage waste and non-stormwater in accordance with the Construction General Permit. The Project Applicant/Property Owner may also be required by the City to develop an Erosion and Sediment Control Plan including structural BMPs, which would need to be certified by a QSD. The Project's grading permit would only be issued after the Project Applicant/Property Owner submits proof that an NOI was filed and a SWPPP prepared to the satisfaction of the Public Works Director. Construction activities are not anticipated to encounter groundwater, as levels are anticipated to be more than 100 to 150 feet below ground surface at the Project site (Geocon West, Inc. 2021, Appendix D), which is well below the depth of proposed excavation.

With implementation of RR HWQ-1, the impacts to surface water quality during construction would be less than significant, and no mitigation is required.

Operational Water Quality Impacts

The Project is subject to requirements of the 1972 Federal Water Pollution Control Act, subsequently known as the Clean Water Act (CWA). In 1972, the CWA was amended to require NPDES permits for the discharge of pollutants to "waters of the U.S." from any point source. In 1987, the CWA was amended to require that the USEPA establish regulations for municipal and industrial storm water discharges for permitting under the NPDES permit program. The regulations require that municipal separate storm sewer system (MS4) discharges to surface waters be regulated by an NPDES permit. The MS4s are designated or used for collecting or conveying stormwater.

The City of Arcadia is located in both the Rio Hondo and San Gabriel River Watersheds, while the Project site is solely located in the San Gabriel River Watershed, and is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The City is therefore subject to the MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), which became effective on September 11, 2021. The MS4 Permit governs stormwater and urban runoff discharges to public storm drain systems owned and operated by "the Permittees". Permittees that have land use authority are responsible for implementing a storm water management program to inspect and control pollutants from industrial and commercial facilities, new development and re-development projects, and development construction sites within their jurisdictional boundaries. As a Permittee under the MS4 Permit, the City has the authority to enforce the terms of the permit for design and operation of the Project.

The MS4 Permit also provides the option to develop integrated planning and monitoring plans to address many of the MS4 Permit's water quality and program requirements. The City of Arcadia is a participant in the Rio Hondo/San Gabriel River Water Quality Group (RH/SGRWQG), which also includes the County of Los Angeles, the Los Angeles County Flood Control District, and the cities of Azusa, Bradbury, Duarte, Monrovia, and Sierra Madre. In 2013, the RH/SGRWQG began preparation of an Enhanced Watershed Management Program (EWMP) and Coordinated Integrated Monitoring Program (CIMP) pursuant to the MS4 Permit in effect at that time (Order No. R4-2012-0175, NPDES Permit No. CAS004004). The LARWQCB approved the CIMP in 2015 and the EWMP in 2016. In 2019, a Revised EWMP was approved by the LARWQCB and replaces the 2016 EWMP. The 2019 rEWMP and 2015 CIMP are the current plans in place for the RH/SGRWQG.

The technique of Low Impact Development (LID) is the preferred stormwater management approach across the region. LID practices emphasize water conservation and the use of existing natural site features integrated with stormwater controls to more closely mimic natural hydrology patterns in residential, commercial, and industrial settings. The City's LID Ordinance, Ordinance No. 2325, was passed, approved, and adopted by the Arcadia City Council on April 7, 2015. This added Article VII, Chapter 8, to the AMC, entitled Stormwater Management and Discharge Control. The intent of Ordinance No. 2325 is to protect and enhance the water quality of the City's watercourses, water bodies, and receiving waters of the United States in a manner pursuant to and consistent with the Clean Water Act (CWA).

The Project meets the definition of a Planning Priority Project as defined in Ordinance No. 2325, as it is a redevelopment project that would disturb more than 5,000 square feet of impervious surface area on an already developed site. Therefore, the Project must be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. Prior to issuance of a Demolition or Grading Permit for the Project, the City Public Works Director would ensure that the Project Applicant/Property Owner has had a LID Plan prepared. The LID Plan must include measures to

retain stormwater runoff onsite for the Stormwater Quality Design Volume (SWQDv), as defined further in the AMC. This LID Plan would be reviewed by the City to ensure the Project minimizes hydromodification impacts to natural drainage systems. When, as determined by the City, 100 percent onsite retention of the SWQDv is not technically feasible, partially or fully, the infeasibility shall be demonstrated in the LID Plan.

If partial or complete onsite retention is determined by the City to be technically infeasible as documented in the LID Plan, the Project may instead biofiltrate 1.5 times the portion of the remaining SWQDv that is not reliably retained onsite. Biofiltration BMPs must adhere to the design specifications provided in the MS4 Permit. Additional alternative compliance options such as offsite infiltration will be analyzed, although much of the area surrounding the Project site is developed with impervious surfaces and unlikely to be able to be used for infiltration. Alternative compliance options are further specified in the County of Los Angeles Department of Public Works' *Stormwater Best Management Practices Design and Maintenance Manual*. The Project Applicant/Property Owner should contact the City Public Works Director to determine eligibility and obtain approval. In all cases, the Project would comply with all relevant provisions of the MS4 Permit.

The remaining SWQDv that cannot be retained or biofiltered onsite must be treated onsite to reduce pollutant loading. BMPs must be selected and designed to meet pollutant specific benchmarks as required per the MS4 Permit. Flow through BMPs may be used to treat the remaining SWQDv and must be sized based on a rainfall intensity of: 0.2 inches per hour, or the one year, one hour rainfall intensity as determined from the most recent Los Angeles County isohyetal map, whichever is greater (Fuscoe 2024a).

The Project's preliminary drainage design complies with City requirements for stormwater management and discharge control contained in the AMC to reduce pollutants in stormwater discharges to the maximum extent practicable. Compliance with applicable regulatory requirements, including the City's LID Ordinance and requirements contained in the County's LID Standards Manual, would ensure that long-term water quality impacts would be less than significant, and no mitigation would be required.

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

Less Than Significant Impact. The Project would not involve direct or indirect withdrawals of groundwater. Domestic water service would be provided by the City, as described in Section 3.17, Utilities and Service Systems. Also, the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Most of the Project site is currently covered in impervious surfaces and Project implementation would also result in full coverage with impervious surfaces, except for some limited landscaping as described in Section 2.2. Therefore, there would be minimal change in groundwater recharge. There would be a less than significant impact, and no mitigation is required.

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

i) Result in substantial erosion or siltation on- or offsite?

No Impact. Most of the Project site is covered with impervious surfaces and is relatively flat. Implementation of the Project would not result in a substantial increase in the amount of

impervious surface. The Project site is in an urban setting and there are no natural streams or rivers within or near to the Project site. The Project would convey storm water to existing storm drains that connect to regional flood control and runoff conveyance facilities (Arcadia 2010b), which run southwest into the Whittier Narrows and continues southwest to join the Los Angeles River in Downey. Therefore, Project implementation would not result in an increase in erosion or sedimentation on- or off-site. There would be no impact, and no mitigation is required.

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

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

No Impact. The rate of stormwater runoff from the Project site would generally remain unchanged with Project implementation because the impervious cover on the Project site would not be substantively changed. Therefore, no net increase in storm flows is anticipated because of the Project, and no additional incremental flows would be contributed to the City's storm drain system. As such, the runoff from the site would not result in flooding on- or off-site and would not exceed the capacity of the storm drain system. Additionally, as described under the analysis of Thresholds 3.9(a) above, the Project would not result in substantial additional sources of polluted runoff. There would be no impact, and no mitigation is required.

iv) Impede or redirect flood flows?

No Impact. The Project site is not located in an area identified as a 100-year flood area (Arcadia 2010a). Therefore, the Project would not impede or redirect flood flows. There would be no impact, and no mitigation is required.

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

Less Than Significant Impact. The Project is not located in a flood zone or near the ocean or other water body with the potential to be at risk of seismically-induced tidal phenomena. Furthermore, the Project would not utilize, store, or otherwise contain pollutants that would be at risk of release if inundated. Therefore, hazards related to the potential release of pollutants due to inundation caused by a flood, tsunami, and/or seiche are considered to be negligible.

However, the Project site and surrounding area are located within the inundation hazard area of the Santa Anita Dam (Arcadia 2010a). The potential for inundation because of significant structural damage to the Santa Anita Dam as a result of an earthquake, erosion, a design flaw, or water overflow during storms is an existing inundation hazard that affects the Project site. As such, implementation of the Project would not exacerbate these hazards. There would be a less than significant impact, and no mitigation is required.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The Project would develop a mix of residential and commercial uses. These land uses exist on or near the Project site currently and would not introduce sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan. Moreover, the Project would mitigate runoff in a manner that

removes stormwater pollutants prior to the water being discharged into the municipal storm water system. There would be no impact, and no mitigation is required.

3.10.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to hydrology and water quality; therefore, no mitigation is required.

3.11 LAND USE AND PLANNING	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

3.11.1 ENVIRONMENTAL SETTING

The Project site is located in the downtown area of the City of Arcadia. The Project site isis within the downtown area of the City north of Huntington Drive and west of Santa Anita Avenue. All five parcels within the Project site (APNs 5775-025-032, -033, -034, -037, and -038) have a land use designation of DMU and are zoned as DMU. According to applicable design standards, all parcels within the Project site are permitted a maximum building height of 60 feet with an additional 10-foot height allowance for mechanical equipment, maximum residential density of 80 units per acre, and maximum FAR of 1.0, applicable only to the non-residential component of a development.

As shown on Exhibit 2, the Project site is located within a fully developed portion of the City and is surrounded to the north, east, and west by existing urban development, consisting of retail, restaurants, and office businesses, an Elks Lodge, and associated surface parking. Single-family residential uses are located approximately 410 feet or more to the northwest of the Project site across Santa Clara Street and multi-family residential uses are located approximately 280 feet or more to the southeast of the Project site across Santa Anita Avenue. Arcadia County Park is located immediately to the south of the Project site across Huntington Drive. Most of the structures that are adjacent to the Project site are one to two stories in height with heights ranging from 14 feet to 37 feet, with some taller structures interspersed. Within the immediate viewshed of the Project site, there is a 5-story storage building on Huntington Drive approximately 120 feet west of the Project site at 35 West Huntington Drive, and an 8-story office building on Santa Anita Avenue approximately 200 feet northeast of the site at 150 North Santa Anita Avenue. The former Van de Kamp's Bakery building, which is now a Denny's restaurant, is located east of the Project site at the northeast corner of Huntington Drive and Santa Anita Avenue. The Denny's restaurant exhibits variable heights with a single-story main building topped by a 40-foot-tall stylized, operational, windmill.

3.11.2 PROJECT IMPACTS

Impact Discussion

a) Would the project physically divide an established community?

No Impact. As shown in Exhibit 2, Aerial Photograph, and described in Section 2.1, Project Location, the Project site is currently developed and is surrounded by other urban development including commercial land uses. The Project involves redevelopment of the Project site and would not disrupt the physical arrangement of an established community. There would be no impact related to this threshold, and no mitigation is required.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. There are several land use-related planning programs, policies, and ordinances that are relevant to the Project, which are discussed below including the City of Arcadia General Plan and Zoning Ordinance.

City of Arcadia General Plan

The City's General Plan was adopted in 2010 (Arcadia 2010a). Each Element of the General Plan contains goals, policies, and implementation programs designed to guide the various aspects of the future land use, development, and revitalization decisions of the City. The State's general rule for a General Plan consistency determination is an action, program, or Project is consistent with the General Plan if, considering all aspects, it will further the objectives and policies of the General Plan and will not inhibit or obstruct their attainment.

The Project site has a General Plan land use designation of DMU. The Project would advance the City's goal as embodied in the General Plan of providing the residential uses necessary to support and complement the existing and proposed businesses in the downtown as well as the nearby Metro A Line Station. A goal of the Project is to transform the Project site within the City's downtown into a more vibrant, dynamic, transit- and pedestrian-oriented mixed-use development consistent with the Arcadia General Plan and related development standards and requirements. The Land Use and Community Design Element of the General Plan includes goals and policies that apply citywide. The Project would be consistent and help achieve the following goals and policies.

- **Goal LU-1:** A balance of land uses that preserves Arcadia's status as a Community of Homes and a Community of Opportunity.
    - **Policy LU-1.1:** Promote new infill and redevelopment projects that are consistent with the City's land use and compatible with surrounding existing uses.
    - **Policy LU-1.2:** Promote new uses of land that provide diverse economic, social, and cultural opportunities, and that reinforce the characteristics that make Arcadia a desirable place to live.
    - **Policy LU-1.3:** Encourage community involvement in the development review process.
    - **Policy LU-1.4:** Encourage the gradual redevelopment of incompatible, ineffective, and/or undesirable land uses.

- **Policy LU-1.6:** Establish consistency between the Land Use Plan and the Zoning Code.
- **Policy LU-1.7:** Encourage developments to be placed in areas that reduce or better distribute travel demand.
- **Policy LU-1.8:** Encourage development types that support transit and other alternative forms of transportation, including bicycling and walking.
- **Policy LU-1.9:** Establish incentives and development standards to encourage development of land uses that provide public amenities and/or desirable facilities or features, as well as private open space and recreation areas.
- **Policy LU-1.10:** Require that new development projects provide their full fair share of the improvements necessary to mitigate project generated impacts on the circulation and infrastructure systems.

- **Goal LU-2:** A City with a distinctive and attractive public realm, with pedestrian-friendly amenities in commercial and mixed-use districts and single-family neighborhoods that continue to maintain Arcadia's standard of architectural and aesthetic quality.
  - **Policy LU-2.1:** Ensure that trees planted in the public right-of-way continue to be well maintained where they exist, are planted in areas where they are currently lacking, and encourage replacement of undesirable tree species in public rights-of-way.
  - **Policy LU-2.2:** Emphasize the use of public spaces and design that are oriented toward the pedestrian and use of transit throughout the community.
  - **Policy LU-2.6:** Ensure the aesthetic quality and pedestrian orientation of the City's commercial corridors by implementing the recommendations of this Community Design section, as well as the Architectural Design Guidelines for commercial and industrial properties.
  - **Policy LU-2.7:** Through a combination of incentives to business owners and enforcement measures, attain compliance with signage standards and guidelines throughout the City, with a priority placed on high-traffic commercial corridors and gateway areas.

Also, the Land Use and Community Design Element of the General Plan includes various goals and policies specific to development within the City's downtown. The Project would be consistent with and help achieve the following goal and policies:

- **Goal LU-10:** A thriving downtown, with healthy commercial areas supported by high-quality, residential uses and supportive of the Metro A Line transit station (e.g., Arcadia A Line Station).
  - **Policy LU-10.1:** Provide diverse housing, employment, and cultural opportunities in downtown, with an emphasis on compact, mixed-use, transit- and pedestrian-oriented development patterns that are appropriate to the core of the City.
  - **Policy LU-10.2:** Promote the Metro A Line Extension and establishment of a transit station in downtown Arcadia and take full advantage of the opportunities the A Line station (e.g., Arcadia A Line Station) will bring to downtown and the City as a whole.
  - **Policy LU-10.3:** Work toward the establishment of public gathering areas in downtown to bring public activities and civic events into downtown.

- **Policy LU-10.4:** Establish commercial uses that complement the vision of the downtown core with opportunities for more intense, quality development at key intersections that are unique from the regional offerings at the regional mall.
- **Policy LU-10.6:** Encourage high standards for property maintenance, renovation and redevelopment.
- **Policy LU-10.7:** Provide accessible plazas and public spaces throughout downtown that provide both intimate, outdoor rooms and larger spaces that could accommodate public gatherings and celebrations.
- **Policy LU-10.9:** Connect various activity areas and plazas via sidewalks, paseos, and pedestrian alleys to create a comprehensive pedestrian network.
- **Policy LU-10.10:** Establish a "park once" system in downtown with a collection of shared surface and parking structures.
- **Policy LU-10.11:** Buildings should be oriented to the pedestrian and the street.
- **Policy LU-10.12:** Encourage architecture that uses quality, lasting building materials; provides building scale that relates to intimate nature of downtown; and applies a unified theme.
- **Policy LU-10.13:** Recognize that well-designed public open spaces are vital to the success of downtown. Work with private developers and landowners to facilitate the construction of such spaces.
- **Policy LU-10.14:** Create a high-quality pedestrian experience in downtown through the use of street trees, public art, street furniture, and public gathering spaces. Using signage, art, and unique uses, entice and encourage people to walk and explore the commercial core of downtown.

The Land Use and Community Design Element of the City's General Plan identifies the ¼-mile radius surrounding the Metro A Line Station as an "activity node", which is defined as "places of pedestrian activity and excitement. These are places where people congregate, socialize, and shop. Activity nodes are places where residents can leisurely stroll, participate in a recreational activity, or relax and experience the outdoors" (Arcadia 2010a). The Project site is within ¼-mile of the Metro A Line Station.

In summary, the Project would implement the City's goals for the City's downtown by enhancing the street frontage, orienting the retail and publicly accessible components of the Project towards Huntington Drive and Santa Anita Avenue, and by providing additional vehicle, pedestrian, and bicycle facilities. The Project would support the City's goals to provide a connected, balanced, and integrated bicycle and pedestrian network by developing a mixed-use project that promotes pedestrian connectivity with the City and includes on-site improvements to facilitate circulation and community cohesion within the existing environment. Therefore, the Project would be consistent with the applicable goals and policies of the City's General Plan.

City of Arcadia Development Code

The Arcadia's Development Code Zoning Ordinance is the primary tool for implementing the City's General Plan. It provides development standards (e.g., setbacks, building height, site coverage, parking, and sign requirements). Also, the Development Code provides detailed guidance for development based on and consistent with the land use policies established in the General Plan. As discussed previously, current zoning for the Project site is DMU.

The DMU zone is intended to provide opportunities for complementary service and retail commercial businesses, professional offices, and residential uses located within the City's downtown. A wide range of commercial and residential uses are appropriate, oriented towards pedestrians to encourage shared use of parking, public open space, and interaction of uses within the zone. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site, and exclusive residential structures are not allowed. Development standards for the DMU zone are defined in Table 19, Project Consistency with the Downtown Mixed-Use Zone Development Standards, which includes an analysis of Project consistency.

TABLE 19
PROJECT CONSISTENCY WITH THE DOWNTOWN MIXED-USE ZONE DEVELOPMENT STANDARDS

Standard	Development Standards for DMU Zone	Project Consistency
Minimum Lot Area	10,000 sf	98,880 sf
Maximum Residential Density	80 units per acre	79.7 units per acre
Maximum Height (excluding mechanical equipment[1])	60 feet	60 feet
Maximum Floor Area Ratio for Non-Residential Uses	1.0	0.13
Minimum Open Space for Residential Uses	100 sf per unit	213.9 sf per unit
Setbacks		
Front (or adjacent to a street)	0 feet minimum; 10 feet maximum	3 foot minimum (Santa Anita Ave) and 2.5- and 10-foot-wide ROW dedications
Side (Interior Abutting Non-residential or Mixed-Use Zone)	0 feet minimum (no maximum)	6 inch minimum (Morlan Place)
Side (Street Side)	0 feet minimum; 10 feet maximum	8 feet 6 inch minimum at retail level (Huntington Dr) 18-inch-wide ROW dedication
Rear (Abutting Non-residential or Downtown Zone)	0 feet minimum (no maximum)	2 foot minimum (Project site interior)

sf: square feet, Ave: Avenue, Dr: Drive, ROW: right-of-way
[1] Mechanical equipment may exceed the maximum height limit by up to 10 feet per Development Code Section 9103.01.050(D)
Source (DMU zone standards): Arcadia Development Code Section 9102.05.030

The Project's maximum building height of 60 feet would comply with the DMU zone development standard of up to 60 feet, excluding mechanical equipment. As described in Section 9103.01.050(D) of the Development Code, in any commercial, industrial, or mixed-use zone, mechanical equipment required for the operation of or maintenance of structures, including elevators and stairways, may exceed the maximum height limit by up to 10 feet. The Project proposes up to 5 feet of additional height for the building's mechanical equipment. This can be seen most clearly in Exhibits 11a and 11b, Proposed Project Elevations. Therefore, the proposed Project would be consistent with all applicable Arcadia Development Code requirements.

As noted in Table 19, Project Consistency with the Downtown Mixed-Use Zone Development Standards, there are no front, side, or rear minimum setback requirements for buildings within the DMU zone. The maximum setback permitted for any street side is 10 feet, which may be used for landscaping, pedestrian circulation, entry court, outdoor dining, and similar uses related to a downtown pedestrian environment. For the proposed Project, Santa Anita Avenue is defined as the building's front and Huntington Drive and Morlan Place are defined as the building's sides.

As noted in Table 19, the Project includes dedications to the City that would become part of the public ROW. On Santa Anita Avenue, 2.5 feet of sidewalk alongside the Jiffy Lube parcel and the 10-foot-wide sidewalk for the remaining frontage to Morlan Place would be dedicated. And on Huntington Drive, 18 inches of sidewalk along the entire frontage would be dedicated. The Project's setbacks are measured in addition to the ROW dedications. As shown in Table 19, the Project's setbacks would be consistent with the range allowed for the DMU zone. Also, as part of the City's design review, City staff will ensure that the Project complies with all other applicable City regulations, including those contained in:

Division 2 of the Development Code – Zones, Allowable Uses, and Development Standards;

- Division 3 of the Development Code – Regulations Applicable to All Zones – Site Planning, Parking Standards, and General Development Standards; and
- Division 4 of the Development Code – Regulations for Specific Land uses and Activities.

As mentioned above, in DMU zones in the City's downtown, multi-family dwellings require the issuance of a Minor Use Permit. Therefore, prior to commencement of any construction activities, the Project Applicant/Property Owner shall obtain approval of a Conditional Use Permit from the City.

City Center Design Plan

In addition to consistency with the development standards for the DMU zone and other elements of the City Development Code, the Project has been designed to comply with the *City Center Design Plan* (City Center Design Plan, Plan) (Onyx Architects 2018). The City Center Design Plan was approved by the City Council in August 2018 and provides additional design standards for new development in the City's downtown. The Plan was developed to balance the goals of increasing density and improving walkability and mobility while at the same time embracing the scale and architecture of the existing downtown buildings that give the area its identity and character by improving design quality for all future projects.

One goal of the City Center Design Plan is to make the downtown more walkable and to improve mobility. The Project would promote this goal by providing mixed uses in the downtown near transit. Also, the Project would include ground-floor public spaces associated with the non-residential uses. The Project would provide residential uses and commercial space in close walking distance to the Metro A Line Station. Also, in furtherance of the City Center Design Plan goal of increasing density, the Project would increase density on the site. The Project has been designed to be consistent with the urban design principles and all relevant design concepts provided in the City Center Design Plan. The Project would not result in any conflicts with the Plan while at the same time implementing many of its goals. The Project massing is developed to step back from the ground level with height along Huntington Drive and Santa Anita Avenue, which is consistent with the recommendations in the Plan. The Plan's proposed massing diagram allows 5-story structures on Wheeler Avenue and maximum 3-story structures along Huntington Drive, but a note is included in the Plan stating that some flexibility is necessary for individual projects fronting Huntington Drive. Finally, the Project implements the Plan's goal of having centralized, shared parking below 4 to 5 story developments to allow for a "park-once" approach so that every parking stall can serve several uses within the area (Onyx Architects 2018).

Therefore, impacts related to applicable land use plans, policies, or regulations would be less than significant, and no mitigation is required.

3.11.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to land use and planning; therefore, no mitigation measures are required.

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

3.12.1 ENVIRONMENTAL SETTING

Mineral resources are naturally occurring chemicals, elements, or compounds formed by inorganic processes or organic substances. These resources include bituminous rock, gold, sand, gravel, clay, crushed stone, limestone, diatomite, salt, borate, potash, geothermal, petroleum, and natural gas resources. Construction aggregate refers to sand and gravel (natural aggregates) and crushed stone (rock) that are used as Portland-cement-concrete aggregate, asphaltic-concrete aggregate, road base, railroad ballast, riprap, fill, and the production of other construction materials.

The State Mining and Geology Board classifies lands in California based on the availability of mineral resources. The Project site is located within an MRZ-4 zone, meaning there is insufficient data to assign any other MRZ designation. However, as discussed in the Resource Sustainability Element of the Arcadia General Plan, the only area available for future mining activity is the Livingston-Graham sand and gravel extraction site, which is located approximately 2.5 miles south of the Project site and most of which occurs in the adjacent City of Irwindale (Arcadia 2010a). Review of maps prepared by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources shows that there are no gas, geothermal fields, or active wells in or near the Project site (Arcadia 2010b).

3.12.2 PROJECT IMPACTS

Regulatory Requirements

None required.

Impact Discussion

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

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

No Impact. Based on review of the Resource Sustainability Element of the City of Arcadia General Plan, the Project site does not contain known State or locally designated mineral resources or locally important mineral resource recovery sites (Arcadia 2010a). Project implementation would not result in adverse impacts to any significant mineral resource. There would be no impact, and no mitigation is required.

3.12.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to mineral resources; therefore, no mitigation measures are required.

3.13 NOISE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

3.13.1 ENVIRONMENTAL SETTING

Overview of Noise and Vibration

Several rating scales (or noise "metrics") are used to analyze the effects of noise on a community. These scales include the equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL). Average noise levels over a period of minutes or hours are usually expressed as A-weighted decibels (dBA) L_{eq}, which is the equivalent noise level for that period of time. The period of time averaging may be specified; where $L_{eq(3)}$ would be a 3-hour average. When no period is specified, a 1-hour average is assumed. Noise of short duration (e.g., substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting several seconds, or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

To evaluate community noise impacts, CNEL was developed to account for human sensitivity to evening and nighttime noise. CNEL separates a 24-hour day into three periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assigned a 5-dBA penalty, and the nighttime sound levels are assigned a 10-dBA penalty prior to averaging them with daytime hourly sound levels. Several statistical descriptors are also often used to describe noise, including L_{max} and L_{min}, which are the highest and lowest A-weighted sound levels that occur during a noise event, respectively. Noise levels measured in

dBA associated with common events and activities is shown in Exhibit 17, Noise Levels for Common Events.

Vibration amplitudes are commonly expressed in peak particle velocity (ppv) or root-mean square (rms) vibration velocity. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV and RMS vibration velocity are normally described in inches per second. Similar to airborne sound, vibration velocity can be expressed in decibel notation as vibration decibels (VdB).

Existing Conditions

To evaluate the existing noise environment, noise level measurements were collected at the Project site boundaries on April 12, 2023. A total of four 20-minute noise measurements were collected for the Project. The short-term measurement results are provided in Table 20, Summary of Short-term Ambient Noise Level Measurements, and include the energy average (L_{eq}), maximum noise level (L_{max}), and minimum noise level (L_{min}) values. The complete noise monitoring results are included in Appendix G (Noise Calculations).

TABLE 20
SUMMARY OF SHORT-TERM AMBIENT NOISE LEVEL MEASUREMENTS

Location	Time	Noise Levels (dBA)			Primary Noise Source
		L_{eq}	L_{max}	L_{min}	
Western Project Boundary	4:25-4:45	54.0	61.7	47.2	Heating Ventilation and Air Conditioning unit at the Rusnak Mercedes Benz dealership to the north of the site
Northern Project Boundary	4:47-5:07	61.0	67.2	56.1	Pressure washer and Heating Ventilation and Air Conditioning unit at the Mercedes Benz dealership to the north of the site
Eastern Project Boundary	5:14-5:34	64.9	76.6	50.4	Vehicle traffic traveling along Santa Anita Avenue
Southern Project Boundary	5:36-5:56	66.3	81.6	53.8	Vehicle traffic traveling along Huntington Drive

dBA: A-weighted decibels; L_{eq}: equivalent noise level; L_{max}: maximum noise level; L_{min}: minimum noise level
Source: see Appendix G for noise calculations

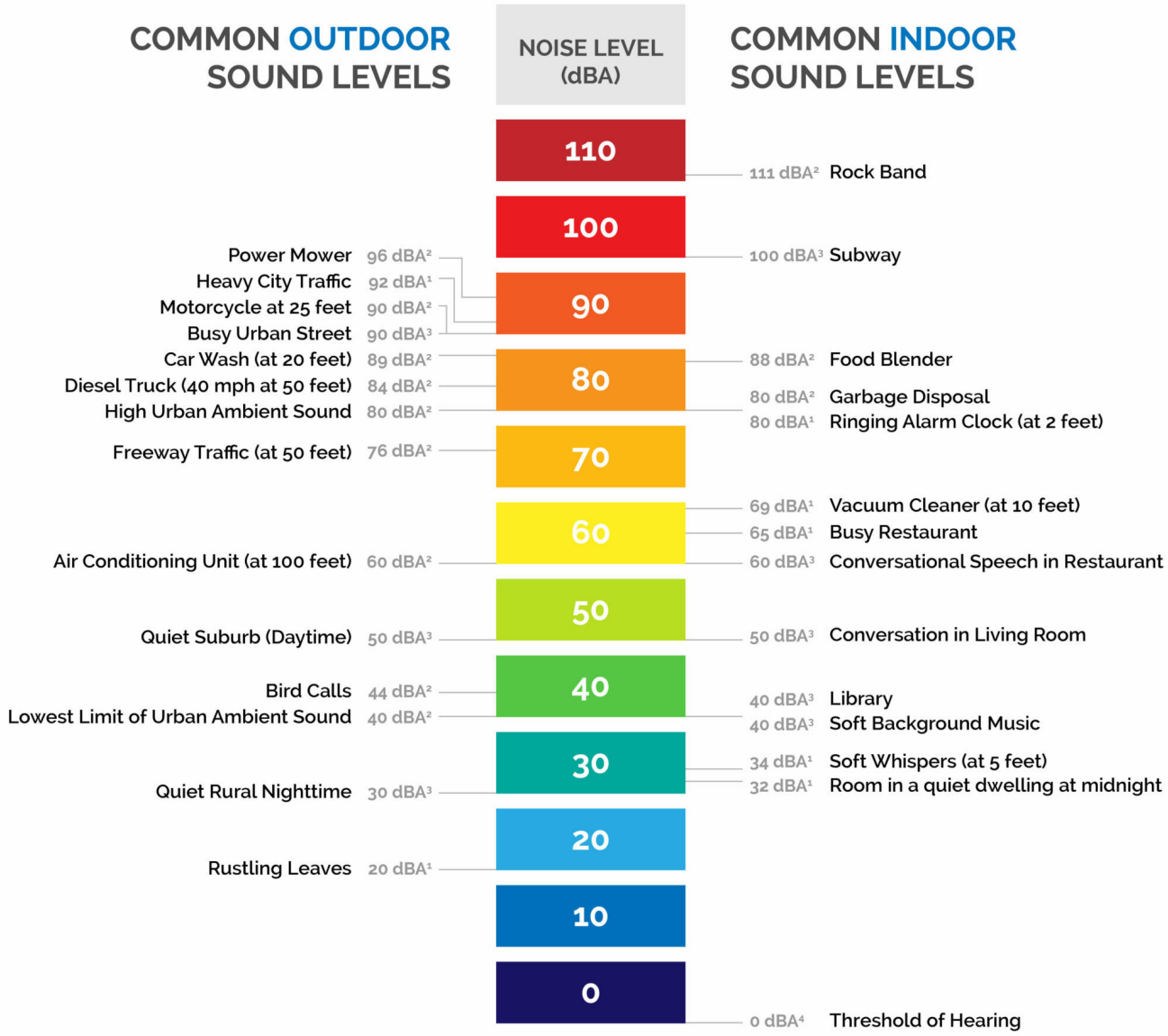
As shown in Table 20, the traffic along Huntington Drive and Santa Anita Avenue are the primary noise sources affecting noise exposure levels on the eastern and southern Project boundaries. The maximum noise levels recorded ranged from 61.7 to 81.6 dBA L_{max} and average noise levels ranged from 54.0 to 66.3 dBA L_{eq}.

Measured noise levels on the western Project boundary are considered relatively low with primary contribution of noise from the Heating Ventilation and Air Conditioning (HVAC) unit at the Mercedes Benz dealership to the north of the site. At the northern Project site boundary, noise measurements were most heavily influenced by a pressure washer used for cleaning cars as well as the HVAC unit at Mercedes Benz dealership.

Sensitive Receptors

Noise-sensitive receptors are generally considered to be humans who are engaged in activities that may be subject to the stress of significant interference from noise. The Project site is adjacent to commercial uses present to the north and east; an Elk's Lodge to the west, and the Arcadia

Comparative Noise Levels (dBA)



1 Aviation Noise Effects, FAA, AEE, March, 1985 (FAA-EE-85-2), Table 1.1
2 Federal Agency Review of Selected Airport Noise Analysis Issues (Federal Interagency Committee on Noise), August 1992, Table B.1
3 Children's health and the environment, A Global Perspective, World Health Organization, 2005. Table 15.1
4 OSHA Technical Manual, TED 01-00-015. Section III (Health Hazards), Chapter 5 (Noise, Updated 8/15/2013)

Source: Federal Aviation Administration 2020

Noise Levels for Common Events

Exhibit 17

Arcadia Town Center Project

PSOMAS

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County Park to the south. The nearest residential uses are located approximately 280 feet to the southeast and 410 feet to the northwest.

City of Arcadia Noise Element and Municipal Code

The City of Arcadia has established guidelines and standards in the General Plan and the AMC.

General Plan Noise Element

The City of Arcadia is affected by several different sources of noise, including automobile traffic, Santa Anita Race Track events and other sports events, commercial activity, periodic nuisances such as construction, and other sources typical of urban and suburban areas. The Noise Element of the General Plan is intended to identify these sources and provide objectives and policies that ensure that noise from these sources does not create an unacceptable noise environment (Arcadia 2010a).

The Noise Element of the General Plan acknowledges that noise from major roadways may affect sensitive receptors and identifies roadways proximate to the Project site such as Santa Anita Avenue and Huntington Drive. The following policy measures are applicable to the Project:

Policy N-1: Effective incorporation of noise considerations into land use planning decisions.

Policy N-1.1 Consider noise impacts as part of the development review process relative to residential and other noise-sensitive land uses.

Policy N-1.2 Ensure that acceptable noise levels are maintained near schools, hospitals, and other sensitive areas in accordance with the Noise/Land Use Compatibility Guidelines in Figure N-4, Table N-2 Interior/Exterior Noise Standards (of the Noise Element), and the City's noise ordinance.

Policy N-1.3 New commercial and industrial developments located adjacent to residential areas and identified noise-sensitive uses shall demonstrate reduction of potential noise impacts on neighboring sensitive uses to acceptable levels.

Policy N-1.4 Discourage new development of residential or other noise-sensitive uses in noise-impacted areas unless effective mitigation measures are incorporated into the project design to reduce noise levels that comply with Noise/Land Use Compatibility Guidelines in Figure N-4 and Table N-2 Interior/Exterior Noise Standards (in the Noise Element).

Policy N-1.5 Require that proposed projects that have the potential to result in noise impacts include an acoustical analysis and appropriate mitigation to achieve the interior and exterior noise standards indicated in Table N-2 Interior/Exterior Noise Standards. (in the Noise Element)

Policy N-3: Limited intrusion of point-source noise within residential neighborhoods and on noise-sensitive uses.

Policy N-3.1 Enforce the noise ordinance to protect residents and noise-sensitive uses from excessive noise levels associated with stationary sources.

Policy N-3.3 Explore requiring the use of noise suppression devices and techniques on all exterior noise sources (construction operations, pumps, fans, leaf blowers) to lower exterior noise to levels that are compatible with adjacent land uses.

Policy N-3.4 Require any new mixed-use structures to be designed to minimize the transfer of noise and vibration from commercial or industrial to residential and other noise-sensitive uses.

Policy N-3.5 Require noise created by new non-transportation noise sources to be mitigated so as not to exceed acceptable interior and exterior noise level standards identified in this Noise Element.

The Noise Element contains guidelines for noise-compatible land use for long-term operations, as shown in Table 21, City of Arcadia Guidelines for Noise Compatible Land Uses.

TABLE 21
CITY OF ARCADIA GUIDELINES FOR NOISE COMPATIBLE LAND USES

Land Use Category	Community Noise Exposure Ldn or CNEL, DBA						
	55	60	65	70	75	80	85
Estate Residential, Very Low Density Residential, Low Density Residential (1)							
Medium Density Residential							
High Density Residential, Mixed Use, Downtown Mixed Use							
Commercial, Regional Commercial, Horse Racing							
Commercial/Light Industrial							
Public/Institutional							
Open Space – Outdoor Recreation							
Open Space - Resource Protection							

NORMALLY ACCEPTABLE

Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirement.

NORMALLY UNACCEPTABLE

New construction or development generally is discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and incorporated into project design.

CONDITIONALLY ACCEPTABLE

New construction or development should be undertaken after an analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

CLEARLY UNACCEPTABLE

New construction or development should generally not be undertaken, unless it can be demonstrated that an interior level of 45 dBA can be achieved.

Source: Arcadia 2010a.

While the compatibility guidelines in Table 21 above show the degree of noise exposure that is considered acceptable, the Noise Element also provides interior and exterior noise standards for different land uses, as shown in Table 22, City of Arcadia Interior/Exterior Noise Standards, on the following page.

TABLE 22
CITY OF ARCADIA INTERIOR/EXTERIOR NOISE STANDARDS

Land Use	Maximum Exterior Noise Level	Maximum Interior Noise Level
Residential: Rural, Single-Family, and Multifamily	65 dBA CNEL	45 dBA CNEL
Schools Classroom Playground	 70 dBA CNEL 70 dBA CNEL	 45 dBA L_{eq} -
Libraries	-	45 dBA L_{eq}
Hospitals/Convalescent Facilities Sleeping Areas Living Areas Reception, Office	 65 dBA CNEL - -	 45 dBA CNEL 50 dBA CNEL 50 dBA CNEL
Hotels/Motels Sleeping Areas Reception, Office	 - -	 45 dBA CNEL 50 dBA L_{eq}
Places of Worship	65 dBA CNEL	45 dBA L_{eq}
Open Space/Recreation Wildlife Habitat Passive Recreation Areas Active Recreation Areas	 60 dBA CNEL 65 dBA CNEL 70 dBA CNEL	 - - -
Commercial and Business Park Office Restaurant, Retail, Service Warehousing/Industrial	 - - -	 55 dBA L_{eq} 65 dBA L_{eq} 70 dBA L_{eq}
dBA: A-weighted decibels; L_{eq}: equivalent noise level; CNEL: Community Noise Equivalent Level. Source: Arcadia Noise Element of the General Plan, Table N-2 (Arcadia 2010a).		

Municipal Code

The AMC (Article IV, Chapter 6, Noise Regulations) is the City's Noise Ordinance. As stated in the AMC, "It is hereby declared to be the policy of the City to prohibit unnecessary, excessive, and annoying noises from all sources subject to its police power. At certain levels, noises are detrimental to the health and welfare of the citizenry, and, in the public interests, such noise levels shall be systematically proscribed." The following sections of the Noise Ordinance are applicable to the Project:

Article IV, Chapter 6 – Noise Regulations, Part 1.
4610.3. – Noise Limits.

(a) It shall be unlawful for any person within the City of Arcadia to produce or cause or allow to be produced sound or noise which is amplified by the use of sound amplifying equipment and which amplified noise or sound is received on property occupied by another person within the designated region, in excess of the following levels (shown in Table 23 on the following page), except as expressly provided otherwise or exempted hereinafter:

TABLE 23
STATIONARY SOURCE NOISE LIMITS

Region	Day 7:00 AM to 10:00 PM	Night 10:00 PM to 7:00 AM
Residential Zone	55 dBA	50 dBA
Commercial Zone	65 dBA	60 dBA
Industrial Zone	70 dBA	70 dBA
dBA: A-weighted decibels.		
Source: Arcadia Municipal Code, Chapter 6.		

Article IV, Part 6. – Nighttime Construction

4261. – Prohibited Hours Defined

The term "prohibited hours" as used in this Part shall mean any time after the hour of 6:00 PM of any weekday; any time before the hour of 7:00 AM of any weekday; any time after the hour of 5:00 PM of any Saturday; any time before the hour of 8:00 AM of any Saturday; any time on any Sunday; and any time on any of the following holidays: New Year's Day; Memorial Day; Independence Day; Labor Day; Veteran's Day; Thanksgiving Day; and Christmas Day, provided that if in any calendar year any such holiday falls on a Sunday, the following Monday shall constitute the holiday.

4262. – Construction Limited

Unless a permit to do so has first been obtained as provided in Section 4263, no person shall during prohibited hours engage in any earth excavation, land fill or earth moving operation or in the construction of any portion of a building or structure, nor shall any person during prohibited hours use or operate any truck, tractor, crane, rig or any mechanical equipment of any kind in connection with, in the performance of or in furtherance of any of the foregoing.

4263. - PERMIT

Any person desiring a permit to do any act described in Section 4262 during prohibited hours may make application to the Superintendent of Building and Safety for a permit therefor. No such permit shall be granted unless the applicant therefor submits proof of special circumstances establishing that the performance of any such act during prohibited hours is by its very nature necessary, or that the public welfare of the City or of the community will be better served by the performance or such activities during prohibited hours, or that the location for which a permit is requested is so far removed from occupied buildings that the public welfare and convenience will not be adversely affected by the performance of any such work during prohibited hours. Mere financial hardship or loss shall not of itself constitute sufficient proof of necessity to warrant the issuance of a permit under this Section.

4630.2. – Noise. Gardening and Landscaping

No person shall operate any mechanical equipment related to the gardening and/or landscaping of any property within a residential zone other than from seven (7) AM to seven (7) PM, Monday through Saturday, and from nine (9) AM to five (5) PM on Sundays within all residential zones; provided, however, that use of mechanical equipment for tree trimming on Sundays shall be prohibited. (Added by Ord. 2246 adopted 10-7-08)

3.13.2 PROJECT IMPACTS

Impact Discussion

a) Would the project result in 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?

Construction (Temporary) Noise Generation

Less than Significant Impact. Temporary noise increases associated with the Project would occur during the construction phase. Article IV, Chapter 6, Noise Regulations of the AMC is the City's Noise Ordinance, as described above. Construction activities are anticipated to involve demolition of existing structures and pavement, grading and excavation for parking, utilities and building foundations, and building construction. Construction activities are anticipated to start in 2026 and finish in 2028. All construction activities would occur within the hours specified by the Noise Ordinance.

During the demolition and grading activities, trucks are expected to enter and leave the Project site on a regular basis during working hours. Table 24 lists the anticipated number of truck trips associated with each construction phase. The number of truck trips traveling along the City-designated truck routes would vary daily depending on the nature of the construction activity at the site. It is anticipated that the trucks would use Santa Anita Avenue and travel to the 210 freeway which is approximately half-a-mile away to the north. Santa Anita Avenue has approximately 1,400 average daily trips per hour. The addition of up to 17 haul truck trips per hour would not result in a substantial change in noise levels along Santa Anita Avenue. Thus, this impact would be less than significant.

TABLE 24
TRUCK HAULING QUANTITIES

Construction Phase	Hauling Quantity (cubic yards)	Truck Loads	Truck Capacity	Duration (Days)	Hourly Truck Trips
Demolition	4,900	315	16	15	5
Site Preparation	70	5	14	5	<1
Shoring	350	35	10	22	<1
Grading	44,520	4,452	10	66	17
Based on responses to a data request provided to the Applicant/Property Owner.					

In typical construction projects (such as the Project), demolition and grading activities generate the highest noise levels since these phases involve use of the largest equipment. During demolition and grading, persons in the immediate vicinity of the construction site would experience short-term noise impacts related to the operation of heavy construction equipment such as bulldozers, excavators, and dump trucks. Noise levels would fluctuate depending on equipment type, duration of use, and distance between noise source and receiver. The operation of heavy equipment may occur adjacent to existing commercial buildings.

Local commercial, fraternal, and recreational uses would be subject to elevated noise levels due to the operation of Project-related construction equipment. Construction activities are carried out in discrete steps, each of which has its own mix of equipment and, consequently, its own noise

characteristics. These various sequential phases would change the character of the noise levels surrounding the construction site as work progresses. Construction noise levels reported in the USEPA's *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* were used to estimate future construction noise levels for the Project (USEPA 1971).

Typically, the estimated construction noise levels are governed primarily by equipment that produces the highest noise levels. Construction noise levels for each generalized construction phase (ground-clearing/demolition, excavation, foundation construction, building construction, paving, and site cleanup) are based on a typical construction equipment mix for this type of project and do not include the use of atypical, very loud, and/or vibration-intensive equipment (e.g., pile drivers). According to the Project Applicant, Project construction would utilize equipment such as backhoes, excavators, bulldozers, augers, cranes, and track loaders, which are typical of infill construction projects in urban areas.

The degree to which noise-sensitive receptors are affected by construction activities depends heavily on their proximity. Estimated noise levels attributable to the development of the Project are shown in Table 25, Construction Noise Levels at Noise-Sensitive Uses, and calculations are included in Appendix G, Noise Calculations.

TABLE 25
CONSTRUCTION NOISE LEVELS AT NOISE-SENSITIVE USES

	Noise Levels (L_{eq} dBA)							
	North - Commercial Use		West - Elks Lodge		South - Arcadia County Park		East – Commercial Use	
Construction Phase	Max (60 ft)	Avg (240 ft)	Max (10 ft)	Avg (170 ft)	Max (95 ft)	Avg (305 ft)	Max (110 ft)	Avg (230 ft)
Ground Clearing/ Demolition	82	70	98	73	78	68	77	71
Excavation	77	65	93	68	73	63	72	66
Foundation Construction	76	64	92	67	72	62	71	65
Building Construction	73	61	89	64	69	59	68	62
Paving and Site Cleanup	73	61	89	64	69	59	68	62

L_{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet
Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures.
Source: USEPA 1971 (see Appendix G for Project-related noise calculations)

Table 25 shows both the maximum and average noise levels for construction equipment activity at the distances shown for each land use. In Table 25, maximum noise levels represent the noise generation from a mix of construction equipment operating nearest to the noise sensitive use/receptor. Average noise levels represent the noise exposure to sensitive uses based on the distance to the center of the Project site. Noise levels from general Project-related construction activities would range from 68 to 98 dBA L_{eq} for the maximum noise levels and 59 to 73 dBA L_{eq} for the average noise levels. Although no sensitive receptors occur near the Project construction site, some construction activities would generate an increase in the ambient noise level experienced at nearby properties including adjacent commercial, fraternal, and recreational properties.

For comparison, the noise generation measured on the site from traffic on Huntington Drive ranged from approximately 54 to 81 dBA, which overlaps much of the estimated construction

noise levels. Exhibit 17, provided above, also provides context for these noise levels against common, everyday events and activities. As noted above, Project construction would not entail the use of unusually loud or vibration-intensive equipment to implement the Project. Construction of the Project would be implemented to comply with Section 4261 of the AMC, which establishes restrictions related to construction activities. This includes limiting construction noise generation to the least noise-sensitive portions of the day (i.e., 7:00 AM–6:00 PM Monday through Friday and 8:00 AM–5:00 PM Saturday) consistent with Section 4261 of the AMC. The ambient noise level during construction activities would fluctuate over the course of each workday as well as based on distance and relative location from the site. Noise attenuation, or reduction, provided by distance from the construction area would further limit the ambient noise level increase experienced by the surrounding land uses. For these reasons, construction noise generation would not be considered a substantial temporary increase in ambient noise levels in the vicinity of the Project and would not be in excess of standards established by City of Arcadia (i.e., Section 4261 of the AMC). Therefore, the Project would result in less than significant construction noise impacts, and no mitigation is required.

Operational (Permanent) Noise Generation

Permanent sources of noise associated with the Project involves vehicle trips traveling to and from the Project site, property maintenance activities (landscaping), and mechanical sources of noise.

Noise Generated by Project-Related Traffic

Less than Significant Impact. In community noise assessments, a 3-dBA increase is considered "barely perceptible," and increases over 5 dBA are generally considered "readily perceptible" (Caltrans 2009). Operation of the Project would displace traffic generated by existing uses. The difference between vehicle trips generated by existing and Project uses is 867 net new trips per day, with 75 net new trips during the AM peak hour and 67 net new trips in the PM peak hour (refer to Section 3.17, Transportation, for further information). The corresponding increase in off-site traffic noise would range from 0.0 to 1.9 dBA for the analyzed roadway segments proximate to the Project site. Table 26, Existing and Projected Traffic Noise Levels, on the following page summarizes the noise increase from the Project's net traffic generation. Thus, the traffic noise increases are below the 5 dBA noise increase threshold and would also not be perceptible or substantial. The impact on traffic noise levels would be less than significant, and no mitigation is required.

Noise Generated by On-Site Sources

Less than Significant Impact. The primary on-site noise sources generated by operation of the Project would be HVAC equipment, landscape maintenance, and trash collection, similar to the existing conditions. Noise generated by HVAC equipment is regulated by the Section 4610.3(c), which requires that noise exposure at offsite residential uses not exceed 55 dBA. For maintenance and landscaping activities, Section 4630.2 of the AMC limits activities to the hours of 7:00 AM and 7:00 PM Monday through Saturday, and from 9:00 AM to 5:00 PM on Sundays within all residential zones; provided, however, that use of mechanical equipment for tree trimming on Sundays shall be prohibited. Activities associated with maintenance of property would comply with Section 4630.2 of the AMC. There would be a less than significant noise impact, and no mitigation is required.

TABLE 26
EXISTING AND PROJECTED TRAFFIC NOISE LEVELS

Roadways		Existing Traffic		Future No Project		Future With Project		Project Noise Increase	Cumulative Plus Project Noise Increase
		ADT	*dBA CNEL*	*ADT*	*dBA CNEL*	*ADT*	*dBA CNEL*	*dBA CNEL*	*dBA CNEL*
Santa Anita Avenue	north of Morlan Place	14,200	70.9	15,580	71.3	15,710	71.3	0.0	0.4
	south of Morlan Place	14,190	70.9	15,510	71.3	15,530	71.3	0.0	0.4
Morlan Place	west of Santa Anita Ave	930	59.0	930	59.0	1,120	59.8	0.8	0.8
	east of Santa Anita Ave	1,640	61.5	2,340	63.0	2,340	63.0	0.0	1.5
Santa Anita Avenue	north of Huntington Drive	14,120	70.9	15,460	71.2	15,540	71.3	0.0	0.4
	south of Huntington Drive	20,470	72.5	21,600	72.7	21,750	72.7	0.0	0.3
Huntington Drive	west of Santa Anita Ave	24,240	73.1	26,060	73.4	26,360	73.5	0.0	0.4
	east of Santa Anita Ave	20,920	72.5	22,330	72.8	22,560	72.8	0.0	0.3
Huntington Drive	west of South Driveway	24,240	73.1	26,050	73.4	26,170	73.5	0.0	0.3
	east of South Driveway	24,240	73.1	26,050	73.4	26,350	73.5	0.0	0.4
Morlan Place	west of North Driveway	805	58.4	810	58.4	1,010	59.4	1.0	1.0
	east of North Driveway	805	58.4	810	58.4	1,250	60.3	1.9	1.9
Santa Anita Avenue	north of Morlan Place	14,200	70.9	15,580	71.3	15,710	71.3	0.0	0.4
	south of Morlan Place	14,190	70.9	15,510	71.3	15,530	71.3	0.0	0.4

ADT: average daily traffic volume. CNEL: Community Noise Equivalent Level

Note: Noise levels calculated from the FHWA's RD-77-108 Traffic Noise Prediction Model Source: FHWA 1978, see Appendix G for noise calculations.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation. Construction of the Project would involve use of vibration-generation equipment. There are no applicable City standards for structural damage from vibration. The California Department of Transportation (Caltrans) vibration damage potential guideline thresholds are shown in Table 27, Vibration Damage Threshold Criteria.

TABLE 27
VIBRATION DAMAGE THRESHOLD CRITERIA

Structure and Condition	Maximum ppv (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

ppv: peak particle velocity; in/sec: inch(es) per second.

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020.

The nearest structures to the Project site are the Elks Lodge located adjacent to the Project's western property line and the commercial uses further to the west. In terms of classifications in Table 27, the structures to the west are conservatively considered "Older residential structures" for purposes of this analysis. Though the existing uses are commercial buildings, the nearest offsite building to the west (Elks Lodge) is a wood-framed stucco building that has similar characteristics to older residential structures. Therefore, the criterion for a significant impact for continuous/frequency intermittent sources is 0.3 ppv inches per second for older residential structures.

The newer commercial structures to the north of the site are recently constructed and have been evaluated under the thresholds developed for "Modern industrial/commercial buildings". Similar to structural damage from vibration, there are no applicable standards in the AMC for human annoyance from construction vibration. The Caltrans vibration annoyance potential guideline thresholds are shown in Table 28, Vibration Annoyance Criteria, on the following page. Based on the guidance in Table 28, the "strongly perceptible" vibration level of 0.9 ppv in/sec is used in this analysis as the threshold for a potentially significant vibration impact for human annoyance.

TABLE 28
VIBRATION ANNOYANCE CRITERIA

Average Human Response	ppv (in/sec)
Severe	2.000
Strongly perceptible	0.900
Distinctly perceptible	0.240
Barely perceptible	0.035
ppv: peak particle velocity; in/sec: inch(es) per second. Source: Caltrans 2020.	

Conventional construction equipment would be used for demolition and grading activities, with no pile driving or blasting equipment. Table 29, Vibration Levels for Construction Equipment summarizes typical vibration levels measured during construction activities for various vibration-inducing equipment at a distance of 25 feet.

TABLE 29
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	ppv at 25 ft (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
ppv: peak particle velocity; ft: feet; in/sec: inches per second. Source: Caltrans 2020.	

Demolition, grading, and construction would occur up to the property lines and, as noted above, off-site land uses are relatively close to the property lines. Table 30, Vibration Levels and Annoyance Criteria at Sensitive Uses, on the following page shows the estimated vibration levels from construction activity compared to the annoyance criterion (i.e., 0.9 ppv at land uses proximate to the Project site.

TABLE 30
VIBRATION LEVELS AND ANNOYANCE CRITERIA AT SENSITIVE USES

	Vibration Levels (ppv)			
	North - Commercial Use	**West – Elks Lodge**	**South – Arcadia County Park**	**East – Commercial Use**
Equipment	**(ppv @ 85 ft)**	**(ppv @ 10 ft)**	**(ppv @ 1,070 ft)**	**(ppv @ 115 ft)**
Vibratory roller	0.03	0.83	0.00	0.02
Caisson Drill	0.01	0.35	0.00	0.01
Large bulldozer	0.01	0.35	0.00	0.01
Small bulldozer	0.00	0.01	0.00	0.00
Jackhammer	0.01	0.14	0.00	0.00
Loaded trucks	0.01	0.30	0.00	0.01
Annoyance Criteria	**0.9**	**0.9**	**0.9**	**0.9**
Exceeds Criteria?	No	No	No	No

ppv: peak particle velocity; Max: maximum; avg: average; ft: feet
Source: Caltrans 2020, calculations can be found in Appendix G.

As shown in Table 30, ppv would not exceed the annoyance criteria threshold when construction activities occur under maximum (e.g., closest to the receptor) exposure conditions. These vibration levels represent conditions when construction activities occur closest to receptor locations. Construction-related vibration would be substantially less under average conditions when construction activities are located further away. Because vibration levels would be below the applicable thresholds, vibration generated by the Project's construction equipment would not be expected to generate strongly perceptible levels of vibration at the nearest uses. There would be less than significant impacts related to vibration annoyance, and no mitigation is required.

Table 31, Building Damage Criteria at Sensitive Uses, shows the estimated vibration levels from construction compared to the building damage criteria from construction activity at land uses proximate to the Project site.

TABLE 31
VIBRATION LEVELS AND BUILDING DAMAGE CRITERIA AT SENSITIVE USES

	Vibration Levels (ppv)			
	North - Commercial Use	**West – Elks Lodge**	**South – Arcadia County Park**	**East – Commercial Use**
Equipment	**(ppv @ 85 ft)**	**(ppv @ 10 ft)**	**(ppv @ 1,070 ft)**	**(ppv @ 115 ft)**
Vibratory roller	0.03	**0.83**	0.00	0.02
Caisson Drill	0.01	**0.35**	0.00	0.01
Large bulldozer	0.01	**0.35**	0.00	0.01
Small bulldozer	0.00	0.01	0.00	0.00
Jackhammer	0.01	0.14	0.00	0.00
Loaded trucks	0.01	**0.30**	0.00	0.01
Building Damage Criteria	**0.5**	**0.3**	**0.5**	**0.3**
Exceeds Criteria?	No	**Yes**	No	No

ppv: peak particle velocity; Max: maximum; avg: average; ft: feet
Note: Calculations can be found in Appendix G.
Source of vibration criteria: Caltrans 2020.

As shown in Table 31, all vibration levels would be below the building damage criteria at adjacent off-site structures except for loaded trucks, vibratory rollers, caisson drills, and large bulldozers at the Elks Lodge building to the west. Therefore, MM NOI-1 specifies the minimum distance from this off-site building that the construction contractor may operate these three types of construction equipment. Specifically, vibratory rollers shall operate a minimum of 25 feet from the building face and loaded trucks, caisson drills, and large bulldozers shall operate a minimum of 15 feet from the building. Table 32, Mitigated Construction Vibration Levels at the Nearest Land Use, shows the estimated vibration levels from these four types of equipment at the minimum distances specified in MM NO-1. As shown in Table 32, estimated vibration levels from this equipment would be below the building damage criteria with implementation of MM NOI-1. Potential impacts associated with cosmetic structural damage would be less than significant.

TABLE 32
MITIGATED CONSTRUCTION VIBRATION LEVELS AT THE NEAREST LAND USE

Equipment	Vibration Levels (ppv)	
	West – Elks Lodge	**West – Elks Lodge**
	(ppv @ 25 ft)	**(ppv @ 15 ft)**
Vibratory roller	0.21	N/A
Caisson Drill	N/A	0.19
Large bulldozer		0.19
Loaded trucks		0.16
Building Damage Criteria	**0.3**	**0.3**
Exceeds Criteria?	No	No

ppv: peak particle velocity; ft: feet; N/A: not applicable
Note: Calculations can be found in Appendix G.
Source of vibration criteria: Caltrans 2020.

With implementation of MM NOI-1, vibration generated by construction equipment would at levels that would avoid cosmetic building damage to off-site buildings when operated beyond the distances specified in MM NOI-1. As a result, potential impacts related to vibration are anticipated to be less than significant with mitigation.

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?

No Impact. The Project site is not located within 2.0 miles of an airport. There are no private airstrips in the Project area or in the City. The nearest public airport is the San Gabriel Valley Airport, which is located 3.5 miles south of the Project site. The Project site is not located within the planning areas (including the Runway Protection Zones, Safety Compatibility Zones, and Airport Impact Zones) for these airports. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from airport operations. There would be no impact related to excessive airport noise levels, and no mitigation is required.

3.13.3 MITIGATION MEASURES

MM NOI-1 The Project Applicant/Property Owner shall require that all construction contractors restrict the operation of the following construction equipment to beyond the following distances from off-site buildings: (1) vibratory rollers – 25 feet, and (2) Caisson drilling, large bulldozers, loaded trucks, and other large equipment (vehicle weight greater than 25,000 lbs.) – 15 feet. Any activities occurring within 5 feet of existing property line shall use non-vibration intensive methods such as use of concrete saws, universal processors, and/or expansive agents for demolition.

Implementation of MM NOI-1 would reduce impacts related to vibration to a less than significant level during Project construction.

3.14 POPULATION AND HOUSING	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 ENVIRONMENTAL SETTING

As of January 2022, the City of Arcadia had a population of 55,918 persons and a housing stock consisting of 20,619 dwelling units (DOF 2022). The California Employment Development Department estimates the February 2019 labor force for the City of Arcadia at 28,700 persons, of which 1,200 persons (4.1 percent) are unemployed (EDD 2023). The Project site includes a total of 11 existing commercial buildings and associated surface parking lots.

3.14.2 PROJECT IMPACTS

Regulatory Requirements

None required.

Impact Discussion

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new units and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project is not anticipated to generate substantial unplanned population growth. Using an estimate of 2.83 persons per dwelling unit for residential development (DOF 2022), the 181-unit Project would generate approximately 512 residents. It is unlikely that all the Project residents would be new residents to the City as some current City residents would likely relocate to the Project site. However, for purposes of providing a conservative analysis, it is assumed that the Project would result in an increase of 512 residents to the City. This additional population would represent approximately 0.92 percent of the current City of Arcadia population estimate of 55,918 persons for the year 2022, and approximately 0.82 percent of the projected population of 62,200 persons by 2045 (SCAG 2020). A population increase of approximately 0.82 percent would not be considered substantial unplanned population growth. Additionally, as stated above in Section 3.11, Land Use and Planning, the Project would be consistent with the zoning and planned use of the Project site with incorporation of a Conditional Use Permit, as multi-family dwellings require a CUP in the DMU zone in the City's downtown.

The proposed ground floor space would consist of up to 13,130 sf of commercial space. Because the specific tenants are not yet identified, the exact number of employees anticipated for the Project's retail uses at full occupancy is not known. Based on an employee generation factor for Los Angeles County from the *Employment Density Study Summary Report* prepared for the

Southern California Association of Governments (SCAG) of 1 employee per 424 sf of retail/service land uses, a total of approximately 31 jobs may be generated by the Project (SCAG 2001).

As such, a generation of 31 additional jobs is a negligible increase in new jobs when compared to the total existing and projected jobs in the County or the City of Arcadia. Specifically, this additional employment would represent approximately 0.11 percent of the current City of Arcadia population estimate of 28,700 positions as of June 2023 (EDD 2023), and approximately 0.09 percent of the projected employment of 36,100 positions by 2045 (SCAG 2020). Also, the unemployment rate in Los Angeles County is 5.3 percent and in the City of Arcadia is 4.1 percent, or 1,200 positions as of June 2023 (EDD 2023). Also, additional jobs would be created associated with the proposed residential units in addition to the retail jobs, which would include a limited number of leasing and maintenance employees.

It is expected that the positions generated by the Project would involve opportunities that would be found in the large and diverse Southern California demographic and would not offer an opportunity unique enough to encourage relocation from outside the region. Further, the majority of new employment positions generated by the Project are the type that may be filled by the local labor force in the City of Arcadia and surrounding municipalities based on the type of positions and the existing unemployment rate in the region. There would not be substantial indirect population growth as a result of the employment generated by the Project. There would be a less than significant impact, and no mitigation is required.

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

No Impact. The Project would result in a -mixed-use development, including accommodations for approximately 512 residents and would not require the demolition of any existing residential structures. Therefore, implementation of the Project would not displace existing housing or people and would not require the construction of replacement housing. There would be no impact, and no mitigation is required.

3.14.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to population or housing; therefore, no mitigation measures are required.

3.15 PUBLIC SERVICES	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
ii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

3.15.1 ENVIRONMENTAL SETTING

Fire protection for the Project area is provided by the City of Arcadia Fire Department. As of 2023, the Arcadia Fire Department has 59 full-time employees (not including reserve firefighters, temporary employees, ambulance operators, and volunteers). The Arcadia Fire Station that would respond to calls in the area of the Project site is Station 105, which is located at 710 South Santa Anita Avenue, approximately one mile south of the Project site. Station 105 has daily staffing of nine personnel, including one battalion chief, two fire captains, two engineers, two firefighter paramedics, and two firefighters. If units from Station 105 are committed to an incident, resources from neighboring stations and/or jurisdictions may be required to response to the Project site. As of 2018, the average response time for Fire Station 105 was 5.48 minutes (Spriggs 2019).

Police protection for the Project site is currently provided by the Arcadia Police Department, which is located at 250 Huntington Drive, approximately 0.7 miles southwest from the Project site. Additionally, the Los Angeles County Sheriff's Department serves the Arcadia area from the Temple Station located at 8838 Las Tunas Drive in Temple City. The Arcadia Police Department currently has 97 full time police employees. The department's response time was 2 minutes and 54 seconds as of the last study conducted in 2015 (Torrico 2019).

The Project site is located in the Arcadia Unified School District (AUSD), and residents of the Project would be served by Holly Avenue Elementary School, First Avenue Middle School, and Arcadia High School.

The Project site is currently developed with eleven commercial structures, which may generate a limited demand for libraries and parks. The nearest library is the City of Arcadia Public Library located at 20 West Duarte Road, approximately 0.9 mile to the south of the Project site. The nearest parks are the Arcadia Regional Community Park, located 0.2 miles south of the Project site, and Newcastle Park located at 143 Colorado Boulevard approximately 0.5 mile north of the Project site.

3.15.2 PROJECT IMPACTS

Regulatory Requirements

RR PUB-1 The Project Applicant/Property Owner shall comply with all applicable codes, ordinances and regulations, including the most current edition of the California Fire Code and the Arcadia Municipal and Development Codes, regarding fire prevention and suppression measures; fire hydrants; fire access; water availability; and other, similar requirements. Prior to issuance of building permits, the City of Arcadia Development Services Department and the Arcadia Fire Department shall verify compliance with applicable codes and that appropriate fire safety measures are included in the Project design. All such codes and measures shall be implemented prior to occupancy.

RR PUB-2 In accordance with the City's Ordinance 7492, prior to the issuance of the building permit, the Project Applicant/Property Owner shall remit the most current fire protection facilities impact fee to the City. All money collected as fees imposed shall be used against the capital and infrastructure costs required to maintain acceptable life safety and fire protection in the City. The Development Services Department shall confirm compliance with this requirement prior to issuance of a building permit.

RR PUB-3 Prior to issuance of the building permit, the Project Applicant/Property Owner shall pay new development fees to the AUSD pursuant to Section 65995 of the California Government Code. As an option to the payment of developer fees, the AUSD and the Project Applicant/Property Owner can enter into a facility and funding agreement, if approved by both parties. Evidence that agreements have been executed shall be submitted to the Development Services Department, or fees shall be paid with each building permit.

RR PUB-4 In accordance with the City's Ordinance 2237 and Section 9105.15 of the City's Development Code, prior to the issuance of the building permit, the Project Applicant/Property Owner shall remit the most current park facilities impact fee and/or other negotiated park fees to the City. All money collected as fees imposed shall be deposited in the Park Facilities Impact Fee Program and shall be used for the acquisition, development, and improvement of public parks and recreational facilities in the City, as proposed by the City's Parks and Recreation Master Plan. The Development Services Department shall confirm compliance with this requirement prior to issuance of a building permit.

Impact Discussion

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:

i) Fire protection?

Less Than Significant Impact. As discussed above, fire protection services for the Project site would be provided by the City of Arcadia Fire Department, and Station 105 is the nearest station to the Project site. The Project would require fire protection services, including administrative tasks

associated with approval and construction of the Project (e.g., building plan check) and response to fire service calls once the Project is occupied. The City has established a Fire Protection Facilities Impact Fee and authorized the collection of development impact fees to provide a funding source for capital and infrastructure costs required to maintain acceptable life safety and fire protection services throughout the City. Pursuant to Council Resolution 7492, effective July 2, 2023, the City's fire protection facilities impact fee is $0.35 per square foot for residential uses, which would apply to the Project's 181 residential units; and $1.91 per square foot for commercial uses, which would apply to the Project's 13,130 sf of ground floor commercial.

Based on coordination with the City's Fire Department, the increase in demand for fire protection services is not expected to independently require the construction of new or alteration of existing fire protection facilities to maintain an adequate level of fire protection service to the Project area. Accordingly, no physical impacts associated with the provision of fire protection services would occur and no mitigation is required. Compliance with fire protection design standards during Project-specific site planning and construction design processes (RR PUB-1) and payment of required fire protection facilities impact fees (RR PUB-2) would ensure that the Project would not inhibit the ability of fire protection or paramedic crews to respond at optimum levels. Therefore, impacts would be less than significant, and no mitigation is required.

ii) Police protection?

Less Than Significant Impact. Police protection services for the Project site are provided by the Arcadia Police Department, located approximately 0.7 miles from the Project site. The City participates in a mutual aid program with Los Angeles County Sheriff's Department at various levels, which provides back-up support to member departments as needed.

Construction of the proposed 181 residential units would result in approximately 512 new residents and the proposed 13,130 sf of proposed commercial on the Project site would collectively increase the demand for police protection services in the City. As population and commercial activity increases, the demand for police services in the City also increases. Although the relatively small number of new residents and commercial activity is not anticipated to generate the need for new sworn officers, the Project would require police protection services, including administrative tasks associated with approval and construction of the Project (e.g., building plan check) and response to police service calls once the Project is occupied. This increase in demand for police protection services would not require the construction of new or alteration of existing police department facilities to maintain an adequate level of service to the Project area. Therefore, no physical impacts associated with the provision of police protection services would occur, impacts would be less than significant and no mitigation is required.

iii) Schools?

Less Than Significant Impact. The Project site is within the AUSD, which offers an open enrollment policy to City residents. The proposed 181 residential units are estimated to generate approximately 33 students in grades K-5, 20 students in grades 6-8, and 26 students in grades 9--12.[7]

Senate Bill (SB) 50 (Leroy Green School Facilities Act), enacted in 1998, established a comprehensive program for funding school facilities based on 50 percent funding from the State and 50 percent funding from local districts, while limiting the obligation of developers to mitigate

[7] Student generation rates were provided during a phone conversation with Connie Chu of the Arcadia Unified School District on 4/8/2019. Student generation rates are currently calculated by the District to be 0.181 students per occupied dwelling unit for Grades K-5, 0.108 students per occupied dwelling unit for Grades 6-8, and 0.141 students per occupied dwelling unit for Grades 9-12.

the impact of projects on school facilities. Except in very limited circumstances prescribed by statute, Section 65995 of the California Government Code establishes the statutory criteria for assessing construction fees for school facilities. The legislation recognizes the need for the fees to be adjusted periodically to keep pace with inflation; therefore, the State of California Department of General Services State Allocation Board increases the maximum fees according to the adjustment for inflation in the Statewide cost index for Class B[8] construction. The AUSD has adopted impact fees for new residential uses pursuant to SB 50.

The payment of school mitigation impact fees authorized by SB 50 is deemed to provide "full and complete mitigation of impacts" on school facilities from the development of real property (California Government Code Section 65995). SB 50 provides that a State or local agency may not deny or refuse to approve the planning, use, or development of real property based on a developer's refusal to provide mitigation in amounts in excess of that established by SB 50.

With payment of school fees or execution of a facility and funding agreement between the Applicant/Property Owner and the school district(s) as required by RR PUB-3, potential impacts to schools would be less than significant and no mitigation is required.

iv) Parks?

Less Than Significant Impact. As specified in Article II, Chapter 5, Part 3, Division I of the AMC, the City has established a Park Facilities Impact Fee Program and authorized the collection of development impact fees to provide a funding source from new development for parks to serve new development. Pursuant to Council Resolution 6602 as codified in Article IX, Chapter 1, Division 5, Section 9105.15.040 of the Development Code, effective March 14, 2008, the City's park facilities impact fee is $3.73 per square foot for multifamily projects, which would apply to the Project's 181 residential units. Also, the City requires 100 sf per unit minimum open space for residential uses in the DMU zone, which results in a required minimum of 18,100 sf of open space for the 181 proposed residential units. Per the AMC, open space may be in the form of private or common open space via balconies, courtyards, at-grade patios, rooftop gardens, and/or terraces. The Project includes 39,713 sf of open space, which is approximately 2.2 times more than the amount of open space that is required for the Project. Exhibit 15, and Exhibits 16a through 16h, illustrate the public and private open spaces that would be provided as part of the Project, as discussed in Section 2.0.

The increase in Project residents and employees would increase the demand on public parks and recreational facilities in the nearby vicinity. However, because the Project results in a relatively small number of new residents and employees to the City's existing population and provides on-site recreational amenities, the increased use of existing public park facilities would not be at a level that would result in a substantial deterioration of existing facilities or require the need for new or physically altered facilities.

Additionally, the Project Applicant/Property Owner would be required to pay the park facilities impact fee applicable at the time building permits are issued. Although the Project's impacts to City of Arcadia park facilities would be less than significant, payment of required park facilities impact fees would further reduce any potential impacts on City parks and recreational facilities associated with the increased demand and use of the facilities (RR PUB-4). Therefore, less than significant impacts would result from the Project, and no mitigation is required.

[8] The Office of Public School Construction defines Class B construction as buildings constructed primarily of reinforced concrete, steel frames, concrete floors, and roofs.

v) Other public facilities?

Less than Significant Impact. Implementation of the Project would increase the demand for library services; however, the Project would not result in the need for the construction of new or expanded library facilities. No physical environmental impacts would result, and no mitigation is required.

3.15.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to public services; therefore, no mitigation measures are required.

3.16 RECREATION	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would/does the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐

3.16.1 ENVIRONMENTAL SETTING

There are various County and City parks and recreational facilities in the Project area. Table 33, Parks and Recreational Facilities Within a half-mile of the Project Site, summarizes the eight park and recreational facilities located in the Project site vicinity (Arcadia 2010a).

TABLE 33
PARKS AND RECREATIONAL FACILITIES WITHIN A HALF-MILE OF THE PROJECT SITE

Name (Location)	Size (acres)	Distance from Site (miles)	Type	Facilities
Arcadia Community Regional Park (405 S Santa Anita Ave)	52	0.2	County Park and Facility	Baseball diamonds, bowling greens, play areas, community room, open field, swimming pool, tennis courts
Santa Anita Golf Course (405 S Santa Anita Ave)	147	0.4	County Park and Facility	18-hole golf course
First Avenue Middle School (301 S. First Ave)	3.30	0.4	Joint-Use Park and Facility	3.3 acres of basketball courts and open field
Newcastle Park (143 Colorado Blvd)	2.64	0.5	Neighborhood Park	Tennis courts, handball courts, sand volleyball courts, play area, picnic sites
Civic Center Athletic Field (240 W Huntington Dr)	2.24	0.7	Special Park	Open field for soccer, bleachers
Eisenhower Park and Dog Park (Second Ave and Colorado Blvd)	5.39	0.8	Neighborhood Park	Baseball field, bleachers, batting cage, game courts and fields, picnic shelter, play area, dog park
Bonita Park and Skate Park (Second Ave and Bonita St)	3.38	0.8	Special Park	Baseball diamond, bleachers, batting cage, picnic sites, play area, skate park
Forest Avenue Park (132 Forest Ave)	0.26	1.0	Mini Park	Picnic sites

Source: Arcadia 2010a.

In addition to the facilities discussed above, the following open space and park areas also serve the residents of the City: the Los Angeles County Arboretum and Botanical Gardens (127 acres); the Arcadia Wilderness Park (120 acres); the Arcadia Par-3 Golf Course (25.8 acres); and the Peck Road Water Conservation Park (120 acres).

The Angeles National Forest is located in the San Gabriel Mountains just north of the City. This National Forest has a natural environment, offering scenic views, with developed campgrounds, picnic areas, and opportunities for swimming, fishing, and skiing. Walking and hiking trails wind throughout the forest for use by hikers, equestrians, mountain bikers, and off-highway vehicle enthusiasts.

3.16.2 PROJECT IMPACTS

Regulatory Requirements

Refer to RR PUB-4 in Section 3.15, Public Services.

Impact Discussion

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

Less than Significant Impact. Project implementation would lead to an increase in the population within the City by approximately 512 residents. These residents would increase demand for parks and recreational facilities and are likely to use proposed recreational amenities on the Project site, existing parks, and other recreational facilities in the City, especially those that are immediately surrounding the Project including Newcastle Park and Arcadia Community Regional Park. The City's Parks and Recreation Master Plan would continue to be implemented for the improvement of existing parks and recreational facilities, as well as the development of new facilities to meet City needs. As stated in RR PUB-4, the Project Applicant/Property Owner would be responsible for paying park facilities impact fees for the development of new or expanded park facilities in the City.

Improvement and expansion of existing parks and facilities would be made through implementation of the Parks and Recreation Master Plan, supported through payment of park facilities impact fees by new residential development, including the subject Project. These improvements would reduce the use and accompanying deterioration that may occur on existing park facilities due to the increase in the City's resident population. With implementation of RR PUB-4, impacts from the increased use of parks and recreational facilities by implementation of the Project would be less than significant. No mitigation is required.

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?

Less than Significant Impact. As described in Section 2.2, Project Description, the Project would include plazas and outdoor areas including courtyards, a swimming pool, spa, large artificial turf area, barbeque grills with counter space, additional seating areas, decorative paving, skydecks and landscaping that would be available for use by residents. These areas would be on the Project site and the physical impacts resulting from the construction of these facilities have been addressed through the impact analysis presented throughout this IS/MND. Impacts would be less than significant, and no mitigation is required.

3.16.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to recreation; therefore, no mitigation measures are required.

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

Unless otherwise noted, the information presented in this section is based on the *Traffic Impact Study for the Arcadia Town Center Project* (Traffic Study) prepared by Psomas and dated September 2024 (Psomas 2024, Appendix H). The Traffic Study was prepared in accordance with the *City of Arcadia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment.*

3.17.1 ENVIRONMENTAL SETTING

Regional and Local Vehicle Access

Interstate (I) 210 (Foothill Freeway) provides regional access to the Project site via the on- and off-ramps at both Santa Anita Avenue and Huntington Drive. Local access is provided by Huntington Drive, which is a four-lane divided road with dedicated turn lanes and located to the south; Santa Anita Avenue, which is a four-lane divided road with dedicated turn lanes and located to the east; Morlan Place, which is a two-lane road connecting Huntington Drive and Santa Anita Avenue located to the north; and Santa Clara Street, which is a four-lane undivided road with dedicated turn lanes, also located to the north. There are eight existing vehicular access points to the existing uses including four on Huntington Drive to the south, two on Santa Anita Avenue to the east, and two on Morlan Place to the north.

Pedestrian Access

There are existing sidewalks adjacent to the Project site, including a 10-foot-wide sidewalk along Huntington Drive, a 7-foot-wide sidewalk along Santa Anita Avenue, and a 5-foot-wide sidewalk along Morlan Place.

3.17.2 PROJECT IMPACTS

Regulatory Requirements

RR TRANS-1 Require the Applicant/Property Owner to contribute, on a cost-share basis, to the City's Transportation Impact Fee program, for any intersections affected by the Project, based on the net new PM Peak House vehicle trips generated, per the City's Transportation Impact Fee Program Update adopted on October 18, 2016.

Impact Discussion

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

Less than Significant Impact. The proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, as discussed below.

RTP/SCS Consistency

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal) is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. The 2020 RTP/SCS goals aim to:

(1) encourage regional economic prosperity and global competitiveness;

(2) improve mobility, accessibility, reliability, and travel safety for people and goods;

(3) enhance the preservation, security, and resilience of the regional transportation system;

(4) increase person and goods movement and travel choices within the transportation system;

(5) reduce greenhouse gas emissions and improve air quality;

(6) support healthy and equitable communities;

(7) adapt to a changing climate and support an integrated regional development pattern and transportation network;

(8) leverage new transportation technologies and data-driven solutions that result in more efficient travel;

(9) encourage development of diverse housing types in areas that are supported by multiple transportation options; (10) promote conservation of natural and agricultural lands and restoration of habitats (SCAG 2020).

Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. As discussed in Section 3.11, Population and Housing, the proposed Project would result in approximately 512 residents, which would estimate approximately 0.82 percent of the 2045 SCAG estimate for the City's projected total population of 62,200 persons by 2045. Additionally, it is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City, which would be consistent with the RTP/SCS.

In addition, the Project would facilitate a more balanced jobs-housing profile and, once constructed, would continue to support regional economic development. The Project site's vicinity is served by existing public transit and is located adjacent or up to within one-half mile of the Metro A Line Station, Foothill Transit bus lines 187 and 270, and Metro bus lines 179 and 287. Project development would increase transit accessibility of jobs and services within the Project site's vicinity and would provide an additional mix of residential and commercial development, thereby reducing travel demands for people. Therefore, the proposed Project would not conflict with the applicable goals in the RTP/SCS.

City of Arcadia General Plan

The proposed Project's consistency with the City of Arcadia General Plan is summarized in Section 3.11, Land Use and Planning. The Project is designed to implement the City's goals for the City's downtown by enhancing the street frontage, orienting the retail and publicly accessible components of the Project towards Huntington Drive and Santa Anita Avenue, and by providing additional pedestrian and bicycle facilities, such as bicycle parking and proximity to nearby transit facilities, as discussed in further detail below. The Project would not hinder the City's ability to provide an efficient roadway system that serves all transportation modes and balances the roadway system with planned land uses.

In addition, the Project site is located in an Enhanced Pedestrian Environment as identified in the Circulation Element of the City's General Plan (Arcadia 2010a). An Enhanced Pedestrian Environment is defined by the City as a focus area where the goal is to make streets friendlier to pedestrians and improve walkability in mixed use areas. Typical improvements that the City envisions in these zones may include wider sidewalks, ensuring sufficient space and clearance on sidewalks available for walking, improved lighting, seating, enhanced landscaping, shade trees, distinctive sidewalk paving, sidewalk bulb-outs or similar treatments at intersections where feasible, wider crosswalks, and pedestrian signage. Project design has incorporated several of these components, including sufficient space, improved lighting, seating, enhanced landscaping, shade trees, and distinctive sidewalk paving. Furthermore, the Project's orientation towards the streetscapes of Huntington Drive and Santa Anita Avenue would maintain and enhance pedestrian conditions in the Project vicinity.

The Project would support the City's goals to provide a connected, balanced, and integrated bicycle and pedestrian network by developing a mixed-use project that promotes pedestrian connectivity with the City and includes on-site improvements to facilitate circulation and community cohesion within the existing environment. Therefore, the Project would be consistent with the applicable goals and policies of the City's General Plan.

Transit, Bicycle and Pedestrian Facilities

The proposed Project would support transit, bicycle, and pedestrian circulation throughout the Project site and the surrounding environment and would not conflict with any plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the Project vicinity.

The Project would include bicycle parking as well as on-site improvements to support pedestrian connectivity with the City and nearby transit facilities. The Project would provide 40 long-term bicycle parking stalls and 3 short-term bicycle parking stalls. Both Metro and Foothill Transit provide bus service to and through the City as part of their regional systems. Three transit routes occur along Huntington Drive, and the site is located within 0.5 mile of the Metro A Line Station. The Project would not conflict with or result in the change of bus routes in the Project vicinity; therefore, the Project would not severely delay, impact, or reduce the service level of transit in the area.

The Project would enhance the street frontage and orient the retail and publicly accessible components of the Project towards the main thoroughfares. All residential units would be accessible from interior walkways that connect to the three elevators and four stairwells. The elevators would provide access to the basement parking garage, the ground floor, and all four levels of residential units. Sidewalks and other designated pathways would follow direct and safe routes from the external pedestrian circulation system to each building on the Project site. All pedestrian areas within the Project site would meet American Disability Act (ADA) requirements and adhere to the City's Design Guidelines and City Center Design Plan. Site

improvements include open space for future residents including playas, courtyards, skydecks, and landscaping areas.

The Project's setbacks are measured in addition to the ROW dedications.

Additionally, as part of Project implementation, the Project includes dedications to the City that would become part of the public ROW. On Santa Anita Avenue, 2.5 feet of sidewalk alongside the Jiffy Lube parcel and the 10-foot-wide sidewalk for the remaining frontage to Morlan Place would be dedicated. And on Huntington Drive, 18 inches of sidewalk along the entire frontage would be dedicated.

As stated above, the Project would not adversely affect, in a manner that conflicts with, an applicable program, plan, ordinance, or policy, addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. The following VMT analysis is based on the City of Arcadia *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* and OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

The City's Guidelines provide VMT screening criteria that can be applied to the proposed Project to screen from a project-level VMT assessment, as discussed in the Project's Traffic Study (Psomas 2024, Appendix H). As discussed previously, the Project site is within one-half mile of the Metro A Line station and is therefore within a TPA. Per the City's Guidelines, projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project would have an FAR greater than 0.75, the vehicle parking provided would not exceed the amount required by the City, the Project would be consisting with the RTP/SCS, and would not replace affordable residential units with a smaller number of moderate or high income units. Also, consistent with City Public Works requirements, the Applicant/Property Owner would be required to contribute to the City's Transportation Impact Fee Program for any intersections affected by the Project, as defined in the approved Traffic Impact Study (RR TRANS-1). Therefore, the Project is presumed to have a less than significant impact on VMT, and no mitigation is required.

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

Less Than Significant Impact. Primary vehicular access to the Project's parking structure is proposed via entries accessible from Huntington Drive and Morlan Place. All vehicular access from the street leads to parking for visitors to the commercial areas and for residents and guests on the ground level. As shown on Exhibit 3, there is a through path on Level 1 between the Huntington Drive to Morlan Place entrances for commercial visitors. Vehicles would be able to leave the site via these same two driveways. Additionally, the proposed vehicle access point to the building at the sidewalk on Huntington Drive would be oversized to provide vehicles with expanded views of pedestrians on the sidewalk, thus reducing potential public safety hazards. There is one ramp to and from Level B1, the subterranean level with resident parking only. The Project driveways would be constructed to City of Arcadia standards.

The Project's circulation system, including parking areas, would be designed to meet the standards of the City and would not result in uses or design features that would create traffic hazards. The Project would not interfere with access, circulation, or activities at the surrounding land uses. Therefore, impacts would be less than significant, and no mitigation is required.

d) Would the project result in inadequate emergency access?

Less Than Significant With Mitigation. As discussed under Threshold 3.8(g) in Section 3.8, Hazards and Hazardous Materials, construction activities on the Project site have the potential to disrupt traffic and emergency access through temporary lane closures or traffic diversions. As required by MM TRANS-1, a Construction Management Plan shall be prepared in compliance with the MUTCD. Compliance with MM TRANS-1 would ensure that potential short-term impacts to emergency response plans or evacuation routes would be less than significant. Once construction activities that could impact surrounding roadways are completed, the roads would be returned to the previous condition and there would be no impacts. As required by MM TRANS-1, the Project Applicant/Property Owner would be responsible for repairing any damage to City roadways that may occur during construction or through transport of heavy trucks or equipment related to construction.

The long-term operation of the Project involves residential, commercial, and parking land uses that would not result in a significant impact to existing roadways and would neither interfere with nor impact the implementation of the City's Emergency Management Plan. The City Fire Department would review the Project's plans during design review to ensure that emergency access to the site and surrounding areas would be maintained in compliance with applicable City requirements. Therefore, impacts would be less than significant, and no mitigation is required.

3.17.3 MITIGATION MEASURES

MM TRANS-1 Prior to the issuance of a grading permit, a Construction Management Plan shall be prepared by the Project Applicant/Property Owner for the review and approval of the City of Arcadia and any other affected jurisdictions in accordance with the Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall comply with the approved plan to the satisfaction of the City of Arcadia. The Project Applicant/Property Owner will begin coordination with the City on the Construction Management Plan as soon as practicable during the final design process and in advance of construction so that effective measures can be developed to avoid, minimize, and mitigate construction impacts to parking and circulation within the City of Arcadia downtown.

At a minimum, the Construction Management Plan shall:

- Describe the duration and location of lane closures.
- Address traffic control for any partial street closures, detours, or other disruption to traffic circulation during project construction, including as-needed use of flagpersons and signage.
- Identify the routes that construction vehicles would utilize for the delivery of construction materials to access the project site. Haul routes would follow the City's approved truck routes and avoid residential streets.
- Identify the location of parking and materials storage for construction workers during all phases of construction. Parking for construction workers would be provided on-site or at additional off-site locations that are not on public streets.
- Identify of emergency access points/routes.
- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.
- Require the contractor to keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The contractor shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer), of any material, which may have been spilled, tracked, or blown onto adjacent streets or areas.
- All hauling or transport of oversize loads would occur between the hours of 7:00 AM and 5:00 PM only, Monday through Friday, unless approved otherwise by the City Engineer. No hauling or transport shall be allowed during nighttime hours, weekends or Federal holidays.
- Include details on the maintenance of bicycle and pedestrian facilities and connectivity through the Project to the satisfaction of the City Engineer.
- Require that haul trucks entering or exiting public streets shall at all times yield to public traffic, pedestrians, bicyclists, and other users.
- Provisions for the contractor to repair existing pavement, streets, curbs, sidewalks, and/or gutters that may be altered during project construction. The repairs shall be completed in consultation with and to the satisfaction of the City Engineer.
- Require that all construction-related parking and staging of vehicles will be kept out of the adjacent public roadways and will occur either on-site or on designated off-site parcels that would not adversely affect access to or parking within the downtown.

3.18 TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 § 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

3.18.1 EXISTING CONDITIONS

Section 3.4, Cultural Resources, of this IS/MND addresses other cultural resources, including historical resources, archaeological resources, and human remains. The impact analysis concluded that impacts on these resources would be less than significant. For historic resources, the existing structures are not listed in the CRHR, the NRHP, California Historical Landmarks, or California Points of Historical Interests lists. Existing properties located on the Project site are ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, as well as ineligible for designation as City of Arcadia Historic Landmarks for lack of historical significance and architectural distinction.

For archaeological resources, the cultural resources impact analysis concluded the Project could result in unanticipated discovery of previously unknown archaeological resources. In order to reduce this impact, the Project will be required to implement mitigation measure MM-CUL-1, which includes retaining a professional archaeologist to evaluate the significance of any suspected archaeological resources and to determine an appropriate course of action as necessary. Also, RR CUL-1 provides guidance in the event of inadvertent discovery of human remains, the regulatory requirements that address the handling of human remains if previously unknown human remains are encountered, as well as if the remains are determined to be Native American. Compliance with the State-required regulations would ensure such impacts are reduced to a less than significant level. The following subsections address the potential for the discovery of tribal cultural resources.

METHODOLOGY

Native American Sacred Lands File Review

Psomas submitted a request to the NAHC on July 10, 2020, to review the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its Sacred Lands File search on July 15, 2020. The results were positive for known Tribal Cultural Resources and/or sacred sites in the vicinity of the Project site. Additionally, the NAHC recommended contacting the Gabrieleño Band of Mission Indians – Kizh Nation for more information.

AB 52

AB 52 is applicable to projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or notice of a Negative Declaration (ND) or Mitigated Negative Declaration (MND) on or after July 1, 2015. AB 52 requires that the tribes ask the lead agency to be contacted for consultation. Then, the lead agency must contact the tribes to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project and have requested such consultation prior to determining the type of CEQA documentation that is applicable to the project (i.e., EIR, ND, MND). AB 52 allows Tribes 30 days after receiving notification to request consultation. The lead agency then has 30 days to initiate consultation. Significant impacts to Tribal cultural resources are considered significant impacts to the environment.

Consistent with requirements of AB 52, the City of Arcadia sent a letter to the one tribe that has previously expressed interest in being consulted regarding Native American resources for projects being undertaken in the City of Arcadia. On December 28, 2022, the City sent an invitation to Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, to request any information or knowledge regarding Native American Sacred Lands or other tribal cultural resource in or around the Project site, and to ask whether the Tribe would like to consult with the City pursuant to AB 52. The City requested that the Tribe respond within 30-days after receiving notification of the letter. On January 19, 2023, Andrew Salas of the Gabrieleño Band of Mission Indians – Kizh Nation emailed the City and requested to schedule consultation to discuss the Project in further detail. On April 12, 2023, the City and Gabrieleño Band of Mission Indians – Kizh Nation met, agreed on mitigation measures (discussed below), and closed consultation.

3.18.2 IMPACT ANALYSIS

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:

a) 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

No Impact. For purposes of impact analysis, a tribal cultural resource is considered a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe and is either eligible for the CRHR or a local register. As indicated in Section 3.4 of this document, based on a SCCIC record search and the results from the NAHC SLF database results there are no resources within the Project area that are currently listed on the CRHR or

local register. As such, there are no known resources on the Project site. The Project would have a less than significant impact on tribal cultural resources and would not cause a substantial adverse change in the significance of a known tribal cultural resource. There would be no impact, and no mitigation is required.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant With Mitigation. As stated previously in Section 3.4, Cultural Resources, the Project site is generally developed, and only limited work would occur within native sediments. However, due to the excavation within native sediments that is required to construct the Project's subterranean parking garage, there is a potential to encounter unknown cultural, historic, and/or tribal cultural resources. Therefore, MM CUL-1 will be implemented during construction requiring the procedures for temporarily stopping work and obtaining an evaluation of the find by a qualified archaeologist. With implementation of MM CUL-1, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. There would be a less than significant impact on tribal cultural resources with MM CUL-1.

Additionally, based on information available through the record searches at the SCCIC and the NAHC, and the disturbed and urbanized nature of the Project area, there is no information available that indicates there are significant tribal resources within the Project area that would be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. However, as noted above, AB 52 consultation with the Gabrieleño Band of Mission Indians – Kizh Nation indicates that the area was traditionally and culturally affiliated with their Tribe. Although no archaeological resources important to Native Americans have been identified within the Project area, there is the possibility that undiscovered intact cultural resources, including tribal cultural resources may be present below the surface in native sediments. Mitigation measures were agreed upon by the Gabrieleño Band of Mission Indians – Kizh Nation and the City during the AB 52 consultation process and would be implemented as part of construction activity to ensure impacts to tribal cultural resources would be less than significant. With implementation of RR CUL-1, MM CUL-1, and MMs TCR 1 through TCR 3, any inadvertent discoveries of tribal cultural resources and/or human remains would be reduced to a less than significant level.

3.18.3 MITIGATION MEASURES

MM TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing

activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

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

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the Project/Applicant/City that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

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

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

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

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

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

3.19 UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Information in this section is derived from the *Sewer Area Study Report for Tentative Tract No. 83325, Arcadia Town* Center (Sewer Area Study) prepared by Fuscoe Engineering and dated September 19, 2024 (Fuscoe 2024b, Appendix J); the City of Arcadia's and the utilities' websites; the City of Arcadia General Plan and its Environmental Impact Report (EIR); the City of Arcadia's *2020 Urban Water Management Plan* (UWMP); the will-serve letter from the County Sanitation Districts of Los Angeles County regarding wastewater; and other sources as cited herein.

3.19.1 ENVIRONMENTAL SETTING

The potable water and sewer services for the Project site are provided by the City of Arcadia Public Works Services Department. Water pipeline infrastructure and sewer infrastructure is available in the vicinity. Potable water is available from existing water infrastructure including a 30-inch-diameter welded steel water main in Santa Anita Avenue, a 16-inch-diameter welded steel water main in Huntington Drive, and a 6-inch-diameter water main is available in Morlan Place. Existing sewer infrastructure includes 8-inch8 and 10-inch diameter sewer pipelines located in Huntington Drive, Santa Anita Avenue, and Morlan Place.

The City's water supply sources include groundwater production from Main Basin and the Raymond Basin and direct delivery of treated imported water from the Metropolitan Water District (MWD). The City primarily obtains its water from groundwater wells located in the Main Basin. The City is also a sub-agency of Upper San Gabriel Municipal Water District, a wholesale water agency and can purchase treated, imported water (Arcadia 2021).

Los Angeles County Sanitation Districts (LACSD) includes 24 independent special district and operates 11 wastewater facilities that provide sanitation services, including wastewater and solid waste management, to approximately 5.5 million people in the County. The LACSD currently conveys and treat approximately 510 million gallons per day (mgd) of wastewater. Approximately 165 mgd of the treated wastewater is available for reuse, after receiving a high level of treatment. Wastewater is treated through a regional interconnected sewerage system called the Joint Outfall System (JOS), which includes the main Joint Water Pollution Control Plant in Carson and six satellite water reclamation plants (LACSD 2023).

The City contracts with Waste Management Inc. for solid waste collection services. Waste Management Inc. operates the El Sobrante Landfill located in the City of Corona in Riverside County, which accepts construction/demolition waste, contaminated soil, mixed municipal waste, and tires. Waste generated in the City is ultimately disposed of in this landfill or others in the vicinity. As of April 1, 2018, the latest data available, El Sobrante Landfill had a remaining capacity of 143,977,170 cubic yards (38,873,835 tons). The facility's maximum permitted throughput is 16,054 tons per day, a remaining capacity of 143,944,170 cubic yards as of 2018, and a cease operation date of 2051 (CalRecycle 2023b).

3.19.2 PROJECT IMPACTS

Regulatory Requirements

RR UTIL-1 The Project Applicant/Property Owner shall comply with all applicable regulations and restrictions set forth in the Arcadia Municipal Code, including Section 7472 regarding restrictions on discharges into the sewer and Section 5130 regarding achievement of annual waste diversion rates and other applicable requirements in compliance with but not limited to Assembly Bill 939, Assembly Bill 341, and Assembly Bill 1826.

Impact Discussion

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

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

Less Than Significant With Mitigation. The City of Arcadia provides water and wastewater service to the Project site, LACSD provides conveyance and wastewater treatment, SoCal Gas provides natural gas service, SCE provides electrical service, and telecommunications services are provided by a variety of providers throughout the City. Required Project infrastructure improvements are described in Sections 2.2.2 and 2.2.3, and Project-related off-site improvements are discussed in Section 2.2.4.

Potable Water Conveyance

The City of Arcadia Public Works Services Department is responsible for producing, storing, and distributing potable water to the City and maintaining the City's water system infrastructure. The existing water infrastructure adjacent to the Project site includes a 30-inch-diameter welded steel

water main in Santa Anita Avenue, a 16-inch-diameter welded steel water main in Huntington Drive, and a six-inch-diameter water main is available in Morlan Place.

The Project's proposed water infrastructure would include domestic, irrigation, and fire water service lines, meters, and backflow preventers. The Project would connect to the existing water lines in Santa Anita Avenue, Huntington Drive via several proposed 2-inch lateral pipes. Domestic water service for residential units would be provided by a common master meter with an approved reduced-pressure backflow device for meter services protection. Additionally, a proposed eight-inch fire water line would be connected to the existing water line in Santa Anita Avenue for use by the existing fire hydrant, and a two-inch irrigation lateral would be connected to the existing water line in Morlan Place. Any portions of Huntington Drive, Santa Anita Drive, or Morlan Place that are disturbed during Project construction would be repaved in-kind, as described in MM TRANS-1.

The City of Arcadia has confirmed that the Project's anticipated potable water demands (discussed below under Threshold 3.19b) can be accommodated with the existing potable water infrastructure, and therefore, impacts would be less than significant.

Sewer Conveyance

On-Site Sewer Improvements

Local sewer main lines adjacent to the Project site are maintained by the City, and they convey wastewater into trunk lines that are maintained by the LACSD. The City's sewer system has approximately 138 miles of sewer pipes, six siphons, and one pump station. There are also 15 miles of County-owner pipelines within the City limits into which the City's system discharges. The City's sewer system serves existing developments in the City, with connections to the sewer systems of the cities of Sierra Madre, Temple City, and Monrovia and in unincorporated County areas that allow for sewage conveyance through the City's system and discharging into trunk lines maintained by LACSD (Arcadia 2010b).

In the existing condition, sewage from the Project site is conveyed via 8-inch-diameter and 10-inch-diameter sewer pipelines located in Huntington Drive and Santa Anita Avenue. Wastewater generated on the Project site discharges into the 18-inch diameter Arcadia-Sierra Relief Trunk Sewer Section 2, located in First Avenue at East Camino Real. The Project proposes to connect to these existing sewer lines located in Santa Anita Avenue via several proposed 6-inch lateral pipes.

Off-Site Sewer Improvements

The Sewer Area Study (Fuscoe 2024b, Appendix J) determined that approximately 1.3 miles (6,685 linear feet) of sewer line would need to be upsized along Santa Anita Avenue between Huntington Drive and Camino Real Avenue to properly handle the additional capacity needed for the Project's wastewater generation. This additional capacity must be available before residents and businesses occupy this Project. Therefore, the City's proposed off-site sewer upsizing is being addressed in this IS/MND.

The proposed sewer upsizing along Santa Anita Avenue would replace the existing 8- and 10-inch-diameter sewer lines with 12-inch diameter sewers. The sewer upsizing would be split into three phases to be included in future capital improvement plans (CIPs) for the years prior to occupancy of the Project, as follows:

- Phase 1, scheduled for Fiscal Year 2024 – 2025, would upsize approximately 0.47 mile (2,467 linear feet) of sewer line between Christina Street and Camino Real Avenue;
- Phase 2, scheduled for Fiscal Year 2025 – 2026, would upsize approximately 0.41 mile (2,176 linear feet) of sewer line between Christina Street and El Dorado Street; and
- Phase 3, scheduled for Fiscal Year 2026 – 2027, would upsize approximately 0.39 mile (2,304 linear feet) of sewer line between Huntington Drive and El Dorado Street.

The Sewer Area Study considered all tributary flow, existing and proposed; and a portion of existing sewer mains downstream of the Project site were studied based on the City's built-out development condition. Based on the Project's incremental impact to the City's sewer infrastructure on Santa Anita Avenue downstream on the site, the Project Applicant would be required to implement MM UTIL-1 that requires a fair share payment for the upsized sewer line.

The depth of the existing sewer lines along Santa Anita Avenue varies between 7 feet to 15 feet. The average, approximate trench dimensions would be 10 feet deep by 40 feet long by 4 feet wide. The length of open trench and number of trenches that would be in active construction at any one time as well as the excavation depth would vary depending on field conditions. However, the trench width of 4 feet would be consistent. This represents a typical and common construction scenario for municipal utility work in the City of Arcadia, the San Gabriel Valley, and the wider area. Construction of this type of utility work typically results in limited impacts for a brief period, as the work moves in a linear fashion.

Construction of the sewer upsizing would not entail the use of unusually loud or vibration-intensive equipment to implement the Project. Excavation during the replacement of the sewer lines would not extend more than about 12 inches below the bottom of the existing sewer lines (i.e., between 8 feet and 15 feet). The materials located immediately below the existing sewer lines were previously disturbed during construction of the existing sewer line. Therefore, it is unlikely that excavation would extend into undisturbed soils and potentially encounter unknown cultural resources. Additionally, the off-site construction activity would be limited to the public right-of-way of Santa Anita Avenue, which is a paved roadway throughout the sewer upsizing alignment. No built structures, natural resources, or other environmentally sensitive conditions existing in the proposed sewer alignment. Additionally, the sewer upsizing would be constructed in compliance with applicable federal, State, and City planning, engineering, and environmental regulations, including but not limited to: SCAQMD rules related to air quality, the requirements of the Migratory Bird Treaty Act and California Fish and Game Code regarding nesting birds that may be present in the vicinity, Title 24/CALGreen construction energy efficiency requirements, coverage under the NPDES Construction General Permit related to water quality, Section 4261 of the AMC related to construction noise generation, preparation of a Construction Management Plan related to traffic control, and Section 5130.1 of the AMC related to construction and demolition debris reduction and recycling.

The Project would be required to fund its fair share of the costs associated with the necessary sewer upsizing and this municipal improvement would have to be fully constructed before a Certificate of Occupancy is issued, as required in MM UTIL-1. Therefore, indirect impacts on the City's wastewater infrastructure from Project implementation would be less than significant with mitigation. Additionally, the potential direct impacts of the City's construction of the sewer upsizing

as per MM UTIL-1 would be less than significant through compliance with applicable federal, State, and City regulations, as addressed above, and no mitigation is required.

LACSD Wastewater Conveyance and Treatment

The Sewer Area Study estimated the Project would generate an average wastewater generation of approximately 66,266 gallons per day (gpd) and a peak flow of approximately 165,665 gpd. The LACSD estimates the net increase in average wastewater generation from the Project, when considering the site's existing wastewater generation, that would be contributed to its facilities would be 26,379 gpd.

As noted above, wastewater from the Project site discharges into the LACSD's 18-inch-diameter trunk sewer in First Avenue at East Camino Real. According to the LACSD will-serve letter for the Project (see Appendix D of the Sewer Area Study [Appendix J to this IS/MND]), this trunk sewer "has a capacity of 6.7 million gallons per day (mgd) and conveyed a peak flow of 3 mgd when last measured in 2013" (Fuscoe 2024b). The proposed Project's estimated average net increase of 26,379 gpd, or 0.026 mgd, represents approximately 0.007 percent of the approximate 3.7 mgd remaining capacity of the downstream trunk sewer. The Project site's future total average wastewater generation (66,266 gpd) would represent approximately 0.018 percent of the remaining capacity of this sewer line. Even when considering the area's growth since 2013 when the capacity was last measured, these miniscule incremental wastewater contributions would not exceed the capacity of any LACSD conveyances. Therefore, the Project can be accommodated and no capacity-driven expansions and/or relocations of LACSD sewer lines are required.

The LACSD states that wastewater generated by the proposed Project would be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.7 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson (Fuscoe 2024b). The average net increase with Project implementation of approximately 0.026 mgd would represent about 0.0007 percent of the San Jose Creek WRP's approximate 37.3 mgd remaining treatment capacity. Therefore, the LACSD would have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

Therefore, impacts related to the LACSD's infrastructure would be less than significant, and no mitigation is required.

Dry Utilities

As discussed, dry utility service for the Project would be provided by SCE (electric); SoCal Gas (natural gas); and one or more of the private telecommunications providers with facilities in the City such as AT&T, Spectrum, EarthLink, and Frontier. The Project would require the removal and replacement of the existing dry utility lines within the Project site, which include electricity, telephone, and cable lines. The Project would connect to the existing electric lines located in Morlan Place; existing gas infrastructure located in Huntington Drive, Santa Anita Avenue and Morlan Place; and existing telecommunications lines located in Santa Anita Avenue. Existing utility service to adjacent and nearby parcels would be maintained throughout Project construction. The Project would not necessitate the construction of additional dry utility infrastructure outside the laterals to connect to the existing utility lines and related infrastructure. Therefore, there would be less than significant impacts related to dry utilities, and no mitigation is required.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. Based on information provided by the Project Applicant, the average existing water demand for the Project site is approximately 2,367 gallons per day (gpd) and the estimated total water use for the Project would be approximately 57,459 gpd. Therefore, the net water demand would be approximately 55,092 gpd. The Project would be required to comply with the California Green Building Standards Code (CALGreen) (California Code of Regulations [CCR], Title 24, Part 11) water efficiency and conservation requirements; and City of Arcadia Ordinance 2330, Water Efficient Landscaping, which requires drought tolerant plants and LID strategies, as discussed in further detail in Section 3.10, Hydrology and Water Quality.

Water supplies would be provided by the City of Arcadia and subject to the requirements set forth in the City's 2020 Urban Water Management Plan (UWMP) (Arcadia 2021). UWMPs are prepared every five years by urban water suppliers to support long-term resource planning and ensure that adequate water supplies are available to meet existing and future water needs. The Project, then referred to as Huntington Parkview, was considered as a major project during development of the 2020 UMWP (Lee 2024). As such, the water demand for the Huntington Parkview project was factored into the water supply forecast during UWMP preparation. While the Huntington Parkview project included slightly fewer residential units (160 units instead of 181 units) and slightly more commercial uses (18,000 sf instead of 13,130 sf), this iteration of the Applicant's development is consistent in scale, form, and intensity of land uses with the proposed Project. As such, the water demand for these two project variations would be comparable.

It is also noted the Project is consistent with the General Plan land use designation and zoning, and the Huntington Parkview project was consistent as well. Buildout of the applicable land use plan(s) within the service area of a water supplier is also considered in UWMP preparation. Because the Project (represented as Huntington Parkview) was included in the 2020 UWMP and both projects are consistent with land use planning policies, the water demand for the Project would already be anticipated in the City's protections of future water supply.

The Project is consistent with the 2020 UWMP, which concluded that the City is able to meet projected water demands during normal years, single dry years, and five consecutive year drought periods over the next 25 years (Arcadia 2021). Therefore, less than significant impacts would occur, and no mitigation is required.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. The Project involves demolition of the existing structures, removal of the existing vegetation on the site, and removal of soil to accommodate the subterranean parking garage, which would generate debris that would need to be removed from the site. To comply with the State of California Waste Management Act (AB 939), the City of Arcadia has implemented a recycling program. In accordance with Section 5130.1, Commercial/Industrial Waste Hauler Requirements, of the AMC, the Project Applicant/Property Owner is required to divert at least 50 percent of demolition debris generated at the Project site from landfills by recycling, reuse, and diversion programs. Even without recycling efforts, the solid waste generated from the demolition Project could be accommodated within the permitted capacity of the El Sobrante Landfill as discussed below.

Project implementation would result in the development of 181 multi-family residential units and 13,130 sf of commercial space. Based on a solid waste generation rate of 4.9 pounds per person per day, assuming a maximum occupancy of 512, the Project's residential uses would generate 2,509 pounds of trash per day (USEPA 2023). Based on 5 pounds per 1,000 sf per day for commercial solid waste generation, the Project's commercial uses would generate approximately 66 pounds of solid waste per day (CalRecycle 2023b).

The City of Arcadia is serviced by Waste Management, Inc., which takes trash from Southern California to the El Sobrante Landfill in the City of Corona in Riverside County. The Project's estimated increase in solid waste disposal could be accommodated within the permitted capacity of the El Sobrante Landfill, which has a remaining capacity of 143,944,170 cubic yards as of 2018, and a cease operation date of 2051 (CalRecycle 2023b). Less than significant impacts would occur, and no mitigation is required.

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

No Impact. Section 5130 of the AMC sets forth requirements for achieving annual diversion rates in compliance with AB 939 for all commercial waste as defined in the City's Source Reduction and Recycling Element, including varieties of paper, plastic, glass, wood, yard and greenwaste, and construction/demolition debris. These diversions must be reported to the City by the recycling company or waste hauler, and each permitted commercial hauler must provide a recycling container for the customer's separated recyclables at no additional charge upon request of the commercial customer. Also, AB 341 requires that businesses generate over four cubic yards of waste per week and multifamily residential properties with five or more units must establish a recycling program. Similarly, AB 1826 requires businesses and multifamily properties to separate and recycle organic waste if they generate more than four cubic yards of each type of waste per week. The AMC Section 5130.1 covers commercial/industrial waste hauler requirements, including multifamily residential, and outlines how the City's contracted waste hauler shall comply with State requirements related to waste diversion. Compliance with the AMC (RR UTIL-1) will ensure that the Project has no impact on the ability to satisfy applicable regulations related to solid waste.

3.19.3 MITIGATION MEASURES

MM UTIL-1 **Sewer Upsizing Fair Share Payment.** Prior to issuance of a Certificate of Occupancy permit for the Project, the Applicant/Property Owner shall make a fair share contribution of 9 percent of the total Santa Anita Avenue sewer upsizing project cost to the City's Development Services Department. This payment shall help fund replacing the existing sewer line in Santa Anita Avenue between Huntington Drive and Camino Real Avenue with 12-inch diameter pipelines. The Santa Anita Avenue sewer upsizing project shall be split into three phases and included in the City's 2024-25, 2025-26, and 2026-27 Capital Improvement Plan budgets, respectively. The sewer work will be completed by the City's Public Works Department by approximately the end of the 2026-27 Fiscal Year. A Certificate of Occupancy shall not be issued until all phases of the Santa Anita Avenue sewer upsizing project are fully implemented. This measure shall be implemented to the satisfaction of the City Public Works Services Department as appropriate.

3.20 WILDFIRE	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

3.20.1 ENVIRONMENTAL SETTING

The Project is located in a fully developed location within the City of Arcadia with no exposure to wildfire risk. The Project site is not located within a very high fire hazard severity zone (VHFHSZ) (CalFire 2023). The nearest VHFHSZ is located over two miles to the north associated with the undeveloped foothills in the City.

3.20.2 PROJECT IMPACTS

Regulatory Requirements

None required.

Impact Discussion

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

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

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

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?

No Impact. As detailed in response to Threshold 3.9(g), given the Project is not located in lands classified as VHFHSZ and there is no wildfire risk to the Project during or site users during its construction or operation, the Project would have no impact and no mitigation is required.

3.20.3 MITIGATION MEASURES

Project implementation would not result in significant impacts related to wildfire; therefore, no mitigation measures are required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Does the project:				
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?

Less Than Significant With Mitigation. As discussed in Section 3.4, Biological Resources, there are no sensitive biological resources, habitat, or species located on the Project site that would be affected by implementation of the Project. Potential impacts to nesting birds would be less than significant with implementation of standard regulatory requirements listed in RR BIO-1, and impacts related to removal of Protected Trees and trees in the public ROW would be less than significant with implementation of City requirements listed in RRs BIO-2 and BIO-3.

As discussed in Section 3.5, Cultural Resources, potential impacts to unknown cultural resources and human remains from implementation of the Project would be less than significant with implementation of MM CUL-1 and RR CUL-1, respectively. Similarly, as discussed in Section 3.18, Tribal Cultural Resources, potential impacts to unknown tribal cultural resources from implementation of the Project would be less than significant with implementation of MMs TCR-1 through TCR-3. Therefore, with the incorporation of identified RR's and MM's, the Project does not have the potential to restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. No further mitigation is required.

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)?

Less Than Significant With Mitigation. The proposed Project would result in potentially significant impacts involving cultural resources, hazards and hazardous materials (emergency access during construction), noise (vibration during construction), transportation (construction traffic), tribal cultural resources, and utilities and service systems (wastewater conveyance). However, feasible mitigation measures have been identified that would reduce these impacts to less than significant levels. All reasonably foreseeable future development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City's General Plan and by the regulations established in the Development Code and AMC. Therefore, compliance with applicable land use and environmental regulations and implementation of the mitigation program would ensure that environmental effects associated with the proposed Project would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. Cumulative impacts would therefore be less than significant with mitigation incorporated. No further mitigation is required.

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

Less Than Significant With Mitigation. As detailed throughout this IS/MND, the proposed Project would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials (involving hazard materials), public services, or transportation (involving long-term adverse effects). However, as described in Section 3.13, Noise, the proposed Project would result in a potential significant impact related to vibration generated during construction activity. With implementation of MM-NOI-1, this impact would be reduced to a less than significant level. As such, impacts would be less than significant with mitigation incorporated. No further mitigation is required.

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