347 HIGHLAND PLACE RESIDENTIAL SUBDIVISION AND NEW DEBRIS BASIN PROJECT

INITIAL STUDY

Prepared for:

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Prepared by:

February 2025

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INITIAL STUDY

1. Project Title:

347 Highland Place Residential Subdivision and New Debris Basin

2. Lead Agency Name and Address:

City of Monrovia Planning Division
Department of Community Development
415 South Ivy Avenue
Monrovia, CA 91016

3. Contact Person and Phone Number:

Sheri Bermejo
Director of Community Development
City of Monrovia
(626) 932-5539

4. Project Location:

The site is located at 347 Highland Place, which is north of West Hillcrest Boulevard and south of Scenic Drive. The project site consists of Assessor's Identification Number (AIN) 8503-013-004 (7.8 acres). The property currently includes a single-family home with a guest house, a shed, paved driveway and walkways, retaining walls, and ornamental landscaping confined to the lower elevations on the southern portion of the parcel. There is also an existing low dam and stormwater retention basin near the west end of the canyon. The project location is shown in Figure 1 – Vicinity Map.

5. Project Sponsor's Name and Address:

Todd Bowden
Bowden Development, Inc.
212 West Foothill Boulevard
Monrovia, CA 91016

6. General Plan Designation:

Madison Specific Plan-C Modified (1 du/2.5 acres)

7. Zoning:

Madison Specific Plan-C Modified (1 du/2.5 acres)

Figure 1 — Vicinity Map - **Project Site**

8. Project Description:

Project Location. As stated, the site is located at 347 Highland Place, which is north of West Hillcrest Boulevard and south of Scenic Drive. The project site consists of Assessor's Identification Number (AIN) 8503-013-004 (7.8 acres).

Existing Conditions. The property currently is developed with a single-family home and guest house; a shed, paved driveway and walkways; retaining walls, and ornamental landscaping. There is also a low dam and retention basin near the west end of the canyon that was constructed by the previous landowner as a temporary facility to control off-site flows into the canyon below during storm events. The basin was designed to provide flood control but is not intended to protect the community from debris flows. The existing development is surrounded by steep ascending hillsides cut with natural drainages within native habitat. Existing development is concentrated in the lower elevations on the southern portion of the parcel. Figures 2a through 2g provide photographs of existing on-site conditions.

The northern portion of the site is located within the southern boundary of San Gabriel Mountain foothills. The northern portion of the Project site, outside of the Project Impact Area, is immediately adjacent to a section of the City of Monrovia Hillside Wilderness Preserve (HWP) (see Figure 3).

Existing General Plan and Zoning Designation. As stated, the project site is designated Madison Specific Plan-C Modified (1 du/2.5 acres) in the City of Monrovia General Plan. The site has the same zoning designation. The Madison Specific Plan C Modified serves as the primary document governing land use regulations over the Madison Specific Plan area. It implements the Monrovia General Plan and Hillside Development Policies and Standards for the Madison Planning Area. The Specific Plan is intended to concentrate development in previously disturbed areas and non-sensitive environmental areas. Development standards are provided for maximum building height limits, yard (setback) requirements, projections permitted in yards, building separation on same lot and surrounding lots, standards regarding location of accessory equipment in front yards, fence and wall regulations, landscape requirements, minimum lot area width, parking and access, design standards and sign regulations.

The Specific Plan grants the Planning Commission authority to grant modifications to yard/setback requirements where topographical features, subdivision plans or other conditions create an unnecessary hardship or unreasonable regulation or make it impractical to require compliance. Furthermore, as implementing development proposals within the area progress, the plan provides provisions for the Development Review Committee to make minor changes and/or adjustments provided they are consistent with the Specific Plan. The Monrovia City Council adopted the "C modified" plan on March 16, 2000.

Photograph 1. Entrance to project site from Highland Drive, facing northwest.

Photograph 2. Flat area in southeast portion of project site, facing northwest.

Figure 2a—Site Photographs

Photograph 3. View of portion of project site, facing east-southeast.

Photograph 4. Minor drainage within project site, facing north.

Figure 2b—Site Photos

Photograph 5. View within project site, facing south.

Photograph 6. View of residence in project site, facing west.

Figure 2c—Site Photographs

Photograph 7. View of residence in project site, facing east.

Photograph 8.View of catchment basin berm, facing west.

Figure 2d—Site Photographs

Photograph 9.View of water catchment pool, facing southeast.

Photograph 10.Dense vegetation near southwest corner of project site.

Figure 2e—Site Photographs

Photograph 11.Steep terrain near north-central portion of project site.

Photograph 12.View from above residence, facing southeast.

Figure 2f—Site Photographs

Photograph 13.View of earthen berm and steep canyon, facing southwest.

Photograph 14.Dense vegetation and steep terrain near northeast corner of project site.

Figure 2g—Site Photographs

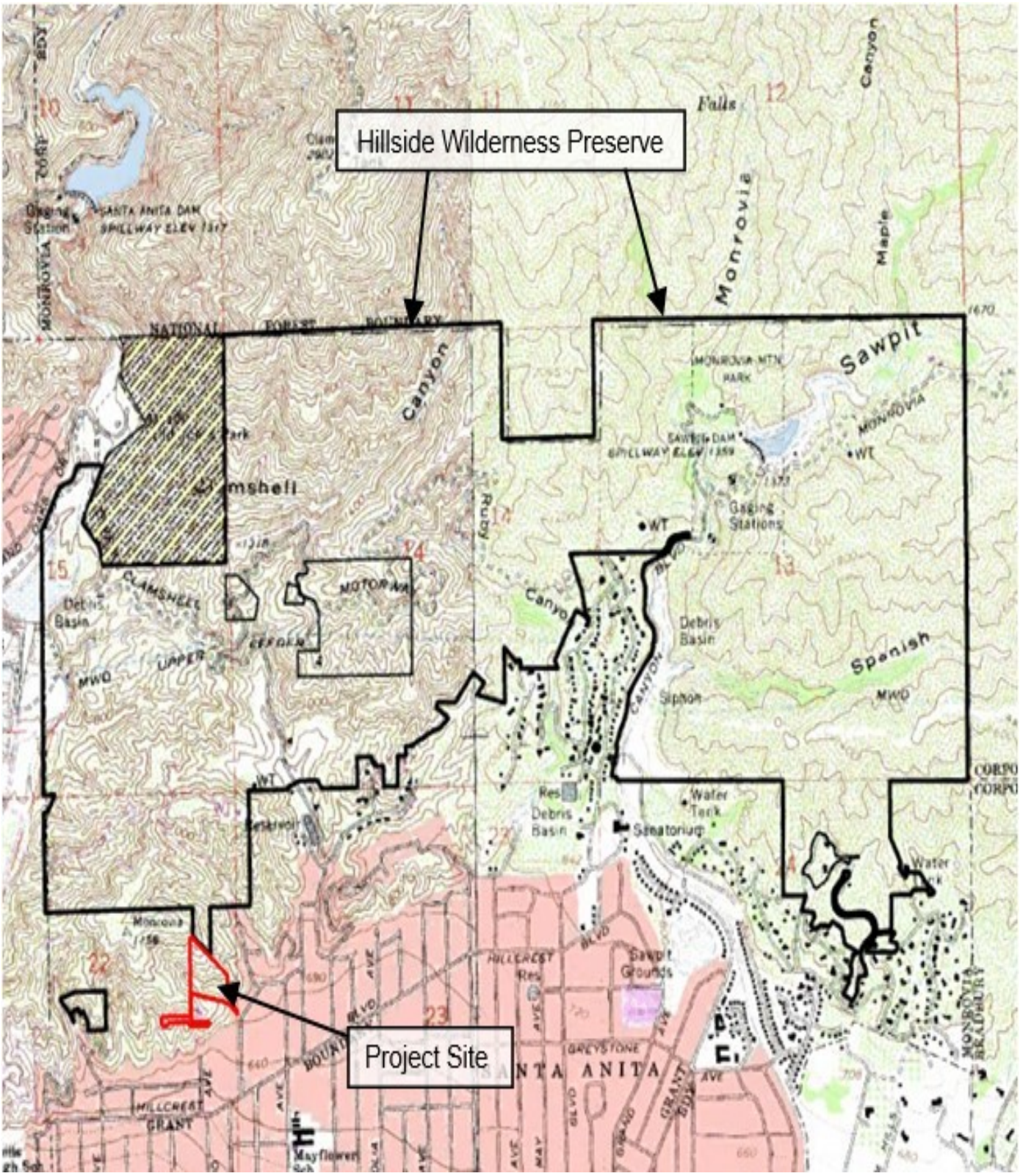

Figure 5— Hillside Preserve Area

Project Characteristics

The Project would remove the existing residence, outbuildings, and low dam and retention basin and construct three (3) pads for residential units with attached garages; retaining walls, a private hillside street easement, a common driveway, and supporting utilities. The Project would also include a new ±52,466-square-foot flood control basin (Highland Desilting Basin) and access road at the western end of the site.

The subdivision consists of four new parcels. Lot 1 is located furthest to the west. It is proposed to be a 4.35-acre parcel that would be improved with the debris basin. Lot 2 (Residential Pad #1) is an approximately one-acre parcel located east of Lot 1 and would be developed with a new 4,039 square foot single-family residence. Lot 3 (Residential Pad #2) is an approximately one-acre parcel just to the east of Lot 2 and would be developed with a 4,493 square foot new residence. Lot 4 (Residential Pad 3) is also proposed to be approximately one acre in size and would be developed with a 4,544 square foot single-family residence. The site plan is shown in Figure 4.

Architectural Design. The three residences would be designed with a mountain modern architectural theme. This would entail the use of multiple planes and large vertical window/door fenestration to accentuate the connection between interior and exterior spaces. The exterior would be finished with stone veneer and natural wood to further blend the residences into the natural environment found on-site. Figures 5a, 5b and 5c show proposed elevations for the three single-family residences.

Circulation and Parking. Access to the proposed project would be provided by the pre-existing private way which currently provides access from Highland Place to the private driveways serving 343, 347, and 349 Highland Place. To accommodate the new development, the pre-existing private way would be upgraded to satisfy the requirements of Monrovia Municipal Code (MMC) Section 16.08.220 and extended to Lots 1, 2 and 3. The pre-existing segment of the private way would be improved to a paved width of 24 feet with a parking pocket added to accommodate two vehicles proximal to Lot 4. A new emergency turn-a-round cul-de-sac would be constructed within Lots 3 and 4 where the pre-existing private way intersects with the existing private driveway that serves 343 Highland Place. Beyond the emergency turn-a-round cul-de-sac, the private way would be extended west and improved to a paved width of 16 feet with adequate drainage control and fire access. Maintenance will be provided through recorded conditions, covenants, and restrictions. Each residence would include a driveway and two-car garage to accommodate resident and guest parking. As stated, two parking spaces would also be provided along the pre-existing way proximal to Lot 4.

Water/Sewer. The City of Monrovia would provide potable water and sewer services via existing lines located along Highland Place. The Project would require the installation of new water and sewer lines between Highland Place and the proposed residences within the pre-existing driveway and common driveway corridors. All utility extensions would be located within existing disturbed areas.

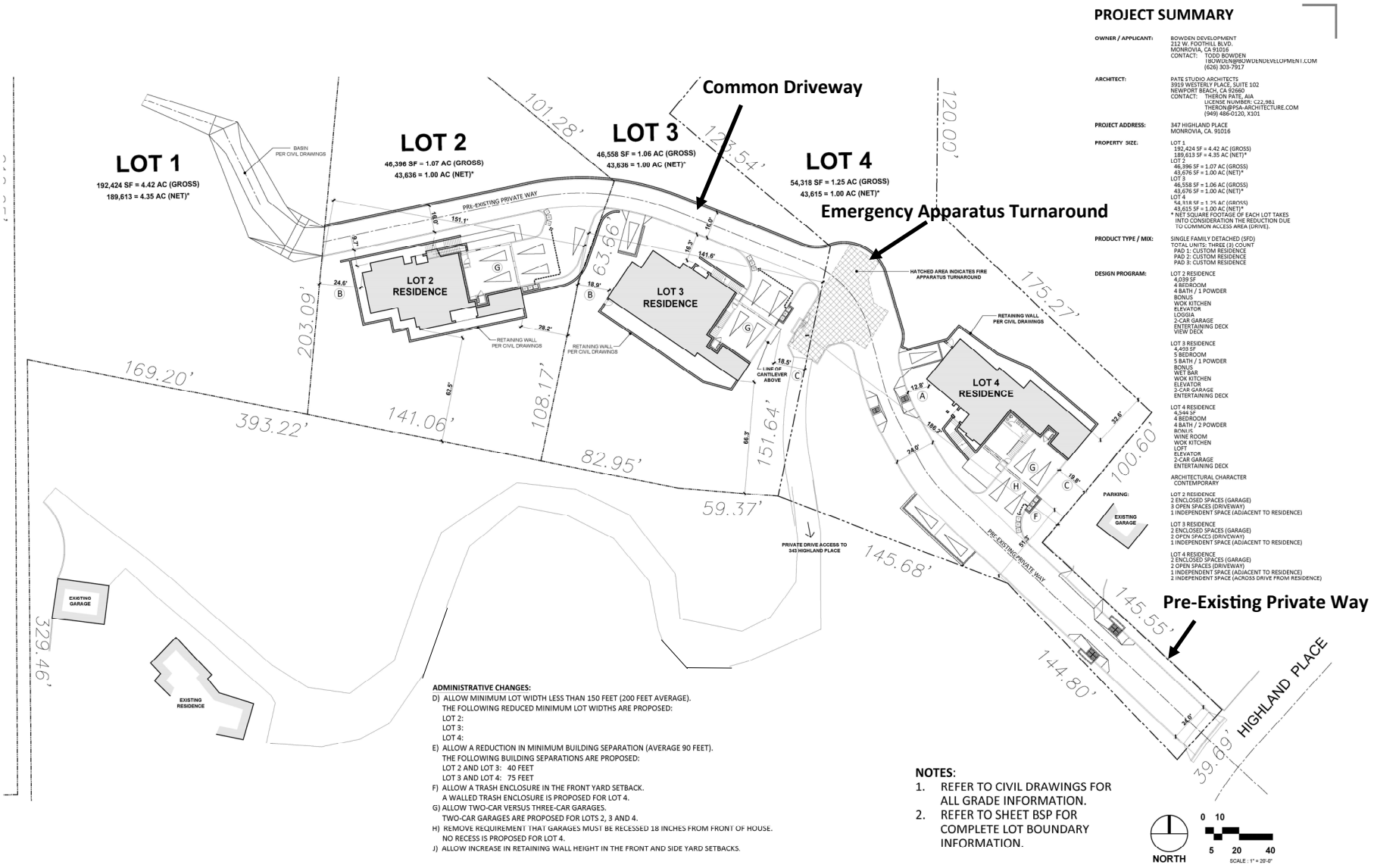

Figure 4 — Site Plan

Figure 5a — Lot 2, Residence 1 Elevation

Figure 5b — Lot 3, Residence 2 Elevation

Figure 5c — Lot 4, Residence 3 Elevation

Stormwater. Existing storm flows drain from northwest to southeast toward Highland Place. Post development, drainage pattern will remain the same as existing. The project site currently receives off-site drainage from west, north and south of the property. The majority of the drainage originates in a 13.38-acre area to the north. The existing water retention basin is comprised of a concrete and rock upper pool set into a canyon narrow, with a secondary downstream basin enclosed by an earthen berm with a corrugated steel pipe through it to direct water flow down the canyon. The applicant is constructing the desilting basin as a condition of approval to fulfill the requirements of the Madison Specific Plan – "C Modified" and alleviate runoff impacts to downslope areas. The existing low dam and retention basin would be removed and replaced with a ±52,466-square-foot flood control and debris basin (Highland Desilting Basin) located at the western end of the development area. The new desilting basin would retain the water for desilting purposes and then discharge via a 24" line east to existing City of Monrovia storm drainage infrastructure located at the intersection of the site driveway and Highland Place.

Electric Service. Electric Service will be provided to the Project by Southern California Edison (SCE). Existing local service electrical transmission lines along Highland Place would be extended within the pre-existing driveway and common driveway corridors. The property owner will apply to SCE to establish residential customer connections prior to construction.

Lighting. Lighting associated with the Project would be installed consistent with the Madison Specific Plan "C Modified" Part III, Design Standards, (a) Architecture, (23) Lighting. All interior lighting would be standard residential lighting. All exterior lighting would be low wattage, indirect and shielded to prevent spillover onto adjacent lots, open space, the private way and Highland Place. Consistent with the Madison Specific Plan "C Modified" *Resources Management* section, all lighting in proximity to natural areas would be low wattage, minimized and deflected away from natural habitat areas.

Landscaping. The proposed project landscaping has been designed consistent with the California Fire Code, Los Angeles County Fuel Modification Plant Selection Guidelines, and the Madison Specific Plan – "C Modified" Part III, Design Standards, B. *Landscape Regulations.* Lot and building pad landscaping was designed to mitigate the impacts of new grading and construction in accordance with the Madison Specific Plan. Plant mix and palette were selected to satisfy the State of California and Los Angeles County fuel modification requirements. The proposed landscaping plan is shown in Figure 6.

Construction. Construction is expected to begin in mid-2025 and be completed by late 2026 (approximately 18 months). Construction equipment is expected to operate on the Project site up to eight hours per day during the allowed days and time period; however, the typical working hours for most construction contractors are 7:00 a.m. to 4:00 p.m., and construction equipment is not in continual use. Construction would require removal of the existing low dam and retention basin, single-family residence and related on-site improvements, grading for the proposed residential pads, construction of the new residences and desilting basin, utility

PLANT PALETTE:

TREES & VINES

PRIMARY THEME AND BACKGROUND TREE

Quercus agrifolia	Coast Live Oak

UPRIGHT EVERGREEN SCREEN TREE CLUSTER

Prunus ilicifolia	Hollyleaf Cherry

SMALL FLOWERING ACCENT TREE

Cercis occidentalis	Western Redbud

SHRUBS AND GROUNDCOVER

(Per LA County Fuel Modification Plant Selection Guidelines)

ZONE A

Aloe striata	Coral Aloe
Bouteloa g. 'Blonde Ambition'	Blonde Ambition Grama Grass
Carpenteria californica 'Elizabeth'	Elizabeth Bush Anemone
Leymus c. 'Canyon Prince'	Canyon Prince Wild Rye
Myoporum p. ""Putah Creek'	Creeping Myoporum
Penstemon spectabilis	Showy Beardtongue
Senecio mandraliscae	Blue Chalksticks
Teucrium x. lucydris 'Prostratum'	Wall Germander

ZONE B

Artemisia c. 'Powis Castle'	California Sagebrush
Baccharis p. "Pigeon Point'	Coyote Bush
Calliandra californica	Baja Fairy Duster
Cotoneaster salicifolius	Willowleaf Cotoneaster
Epilobium c. 'Everett's Choice	California fuchsia
Iva hayesiana	Poverty Weed
Salvia greggii	Autumn Sage

FUEL MODIFICATION PLAN NOTES

5' Ember/Ignition resistant zone

- All efforts shall be made to eliminate any combustible materials including plants, organic mulches, patio furniture etc. This zone has been found to be the most important area to address during planning and future maintenance.

Zone A (30' from the edge of any qualifying structure)

- Zone A should be planted with the least density (limited use of large woody plants) and plant selections should consist of small herbaceous or succulent plants less than 2'-3' in height or regularly irrigated and mowed lawns.
- It is best not to use woody trees, shrubs, subshrubs, perennials or masses of un-mowed grasses over 12" tall within 10 feet of the structure; especially in front of windows, which are weak points in a structure.
- Occasional accents of woody plants can be used sparingly to soften hard edges of structures if the selections are widely spaced and zone appropriate.
- Consider locating hardscape features such as walkways, patios, driveways, sport courts etc. so they abut the structure itself. Potted plants can be used to soften walls if necessary.

Zone B (30'-100' from the edge of any qualifying structure)

- Zone B can be planted with a slightly higher density than Zone A. However, care should be taken not to create any horizontal or vertical fuel ladders.
- Screen plantings can be used to hide unsightly views. Hedging can be used provided the species of plant is acceptable and maintenance is performed regularly to minimize any accumulated leaf/twig litter.
- Zone B is the ideal location to introduce larger shade trees, provided they are zone appropriate and the canopies are not continuous.
- Avoid planting woody plant species larger than 2' at maturity directly beneath any tree canopy.

Zone C (100'-200' from the edge of any qualifying structure; may be necessary only if an "extra hazard" has been identified by fuel modification personnel)

- Although Zone C is often not landscaped on many projects, it may still be subject to hazard reduction requirements (brush clearance section 325.2.2 "extra hazard"). Do not denude the property. http://www.readyforwildfire.org/
- If Zone C is to be landscaped, avoid creating a landscape that is as dense and hazardous as the unmaintained vegetation.
- A good rule of thumb is to follow the same guidelines as Zones A and B with a slight increase in density.

FEATURE LEGEND:

1. Debris Basin.
2. Concrete V-Ditch Draininage.
3. Retaining Block Wall (Smooth Stucco Finish where Viewable from Street).
4. Concrete Step Risers.
5. Medium Broom, Natural Color Concrete Private Residential Path.
6. Concrete Driveway.
7. Asphalt Paving.
8. Crushed Rock Layer with Aluminum Edging within 5' Ember / Ignition Resistant Zone.
9. Trash Bin Location with Concrete Pavement.
10. Additional Parking Stall.
11. Concrete Curb.
12. Storm Drain.
13. Existing Driveway to Neighboring Lot. Connect New Asphalt Paving.
14. Small Courtyard with Enhanced Concrete Paving.
15. New Concrete Driveway Apron at Existing Home Entry.
16. New Concrete Driveway Apron to Project Enrty.
17. Provide Guardrail where there is a 24" or Greater of Elevation Drop.

OAK TREE REMOVAL AND REPLACEMENT CALCULATION:

Oak Trees Removed	=	14 E.A.
Oak Trees Required Replacements (4:1 Ratio of Removed)	=	56 E.A.
Oak Trees to be Planted on Site	=	27 E.A.
Oak Trees to be Planted on Mitigated Site.	=	29 E.A.

CONCEPTUAL LANDSCAPE AND FUEL MODIFICATION PLAN

BOWDEN DEVELOPMENT

3 SINGLE FAMILY LOTS WITH 1 DEBRIS BASIN LOT

347 HIGHLAND PLACE, MONROVIA, CALIFORNIA

0' 20' 40' 80'

SCALE: 1" = 20'

NORTH

SCALE: 1" = 40'
DATE: APRIL 11, 2023
ADG JOB #: 2309

ARCHITERRA DESIGN GROUP

Figure 6— Landscape Plan

installation and related access improvements described above. All grading soils are anticipated to balance on-site; thus, no off-site import/export trips would be required.

Project Entitlements. The Project site is designated Madison Specific Plan – "C Modified"; and thus, is required to meet all applicable design standards contained therein. As stated, a purpose of the Madison Specific Plan – "C Modified" is to implement the Monrovia General Plan and Hillside Development Policies and Standards for the Madison Planning Area. The Specific Plan is intended to concentrate development in previously disturbed areas and non-sensitive environmental areas; and thus, provides flexibility in the implementation of design standards to accomplish this objective. This flexibility is intended to balance the need for housing development with careful resource management and neighborhood compatibility by integrating development projects into the natural environment. This flexibility is achieved through the review and approval of exceptions to yard/setback requirements and administrative changes to the subdivision and design standards on a case-by-case basis where topographical features would make compliance impractical and provided they are consistent with the overall goals and objectives of the Specific Plan as well as the purpose and intent of the Monrovia General Plan and Hillside Development Policies and Standards.

The following lists all anticipated entitlements from the City of Monrovia. In this case, multiple exceptions and administrative changes to the Madison Specific Plan – "C Modified" development standards are proposed to address development constraints (i.e., topography and native vegetation) unique to the project site. The purpose of these improvements is to reduce grading impacts and the overall project footprint:

- Tentative Parcel Map for the proposed four-lot subdivision;
- Conditional Use Permit for the use of the pre-existing private way for Lots 1, 2 and 3;
- Minor Determination that the use of the pre-existing private way is consistent with the Monrovia Municipal Code Section 16.08.135 with respect to the number of total lots a pre-existing driveway will serve.
- Plot Plan Review for residential development proposal on Lots 2, 3, and 4; and
- Approval of the following yard/setback exceptions from residential development standards;
    - Exception would allow less than 35-foot front yard setback for Lot 4;
    - Exception (2) would allow less than 25-foot west side yard setback for Lots 2 (19 feet) and Lot 3 (18.9); and
    - Exception (2) would allow less than 25-foot east side yard setback for Lot 3 (18.5 feet) and Lot 4 (19.8 feet).
- Approval of the following Administrative Changes for this project proposal:
    - An Administrative change to allow minimum lot width less than 150 feet (average 200 feet) for Lot 2, Lot 3 and Lot 4;
    - An Administrative Change to allow a reduction in the minimum building separation of 90 feet (average 90 feet) for Lots 2 and 3 (40 feet) and for Lots 3 and 4 (75 feet);

- An Administrative Change to allow a walled trash enclosure outside of the front yard setback on Lot 4;
- An Administrative Change to allow two-car versus three-car garages for Lots 2, 3 and 4;
- An Administrative Change removing requirement that garages must be recessed 18 inches from front of house; and
- An Administrative Change to allow an increase in retaining wall height in the front and side yard setbacks.

For planning purposes, construction is expected to begin in 2025 and be completed by late 2026. The Initial Study will be the primary document used to support approval of a Mitigated Negative Declaration (MND). The MND will demonstrate compliance with the California Environmental Quality Act (CEQA) required by the City of Monrovia as part of the discretionary review process for the Project.

9. Surrounding Land Uses and Setting

As stated, the northern portion of the site, is located within the southern boundary of San Gabriel Mountain foothills. The northern portion of the Project site, outside of the Project Impact Area, is immediately adjacent to a section of the City of Monrovia Hillside Wilderness Preserve (HWP) (see Figure 3). In 2000, the residents of the City of Monrovia voted to approve a Special Open Space Tax to establish the HWP, which is intended to protect and conserve habitat and ecological function while providing opportunities for passive recreational uses. The Hillside Wilderness Preserve consists of 1,416 acres of city-owned land referred to as "Hillside Wilderness Preserve" and "Hillside Recreation."

Approximately 85 percent of the project site is comprised of steep south and north-facing slopes, with ridgelines along portions of the southern and northern site boundaries. The canyon bottom within the south-central portion of the site, where the development is proposed, is mostly disturbed in association with an existing residence and various outbuildings, ornamental landscaping, a driveway, an existing storm flow basin and other residential land uses. Single-family residential uses are located to the south, east, southeast and northeast of the site along Highland Place and West Scenic Drive. Undeveloped open space is located to the southwest, west, north and northwest of the site. A brush fire (Madison Fire) impacted a large portion of the property in April 2013.

Elevation on the site ranges between 687 feet (209 meters) above mean sea level (AMSL) at the southeast corner and 1,034 feet (315 meters) AMSL at the staked northwest corner. The canyon slopes are very steep. Soils on most of the site are mapped as Trigo family, granitic substratum, 60 to 90 percent slopes, while the southernmost portion is mapped as Urban land- Palmview-Tujunga, gravelly complex, 2 to 9 percent slopes.

10. Other Public Agencies Whose Approval is Required:

- **California Department of Fish and Wildlife** – Section 1602 Lake and Streambed Alteration Agreement for impacts to Waters of the State.
- **Los Angeles Regional Water Quality Control Board** – Waste Discharge Requirements for impacts to Waters of the State.

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, has consultation begun?

A Phase I Cultural Resources Report was prepared for the Project and is included as Appendix D. As part of the process, a Sacred Lands File (SLF) search was conducted by the Native American Heritage Commission. Tribal representatives identified as part of the SLF search were noticed during preparation of the Phase I Cultural Resources Report. Responses are provided as part of the Phase I Cultural Resources Report (Appendix D). The City of Monrovia conducted Tribal consultation required per Assembly Bill (AB) 52 with the *Gabrieleño Band of Mission Indians – Kizh Nation* (Tribe) on July 26, 2022. The Tribe proposed the mitigation measures provided herein which are intended to avoid potential impacts to previously undiscovered subsurface resources that may be encountered during grading and excavation.

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

☐ I find that the proposed project MAY have a "potentially significant 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 proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Signature Date

_____

Printed Name

ENVIRONMENTAL CHECKLIST AND IMPACT ANALYSIS

The following sections include a discussion of potential Project impacts. For those topical issues potentially affected by approval of the proposed Madison Specific Plan – "C Modified" design exceptions referenced herein, impacts are also discussed.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. <u>AESTHETICS</u> – would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view 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?	☐	☐	☒	☐

a) A scenic vista is typically defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Aesthetic components of a scenic vista generally include scenic quality, sensitivity level and view access. The Project would occur on a site currently developed with one existing single-family residence and various outbuildings. The impact area is located within a canyon and at the end of a private driveway extension from the main access way off Highland Place. The existing driveway serves the Project site and

continues up the hill to the southwest serving a residence at 343 Highland Place. The existing residence is not visible from Highland Place because of topography and vegetation.

The three residences have been designed with a mountain modern architectural theme. This would entail the use of multiple planes and large vertical window/door fenestration to accentuate the connection between interior and exterior spaces. The exteriors would be finished with stone veneer and composite wood material to further blend the residences into the natural environment found on-site (see Figures 5a, 5b and 5c above). The Project design is consistent with the Madison Specific – "C Modified" development standards, which calls for balancing land use between low density single-family residences and natural open space, and making every reasonable effort to preserve or minimize the impact on view corridors and scenic vistas. The Project is not located within any of the documented visually sensitive areas in the Madison Specific Plan area. Furthermore, development on the Project site would be setback approximately 150 feet from Highland Place.

Details including architectural massing, elevations, finished color, landscaping and branding for the development would be consistent with neighboring single-family residential development. These will be reviewed and verified by the Design Review Committee prior to review by the Planning Commission.

Development on the site would be expanded; and thus, the site would visually change. However, the site would remain screened from Highland Place. Figure 7 shows a simulation of existing views and views with the project from Highland Place at the pre-existing driveway intersection. As shown, the proposed residences and debris dam are not visible from Highland Place. Views within the area are not designated scenic nor does the site contain any unique visual features (Madison Specific Plan, "C Modified"). A **less than significant** impact would occur with development of the project and approval of the Madison Specific Plan "C Modified" design exceptions.

b) There are three designated state scenic highways in Los Angeles as defined by the California Department of Transportation (California Department of Transportation Scenic Highway System List, website visit December 2021). The nearest state-designated scenic highway to the study area is the segment of State Route 2, 2.7 miles north of State Route 201 from La Canada to the San Bernardino County line. Highland Place is not a scenic view corridor nor are there any designated scenic highways in the City of Monrovia (General Plan Open Space Element Initial Study, 2018). **No impact** to these resources would occur with development of the project and approval of the Madison Specific Plan "C Modified" design exceptions.

Figure 7— Visual Simulation

c) The site is located in an urbanized area as defined by Section 15387 of the CEQA Guidelines and depicted in the US Department of Census 2010 Los Angeles-Long Beach-Anaheim, California, Urbanized Area Reference Map (US Department of Census, 2010) (https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/), The Project would occur on a primarily vacant site designated for residential development per the Madison Specific Plan – "C Modified." The Project site would be developed with three new residences and a new debris basin on individual lots at least one acre in size. The road corridors proximal to the Project site are not designated scenic nor does the Project site contain any unique visual features. The on-site ornamental trees are not visually significant or otherwise protected by the City of Monrovia.

As discussed in Section IV, *Biological Resources*, the Project would remove or encroach upon the protected zone of 14 oak trees, regulated by the City of Monrovia. Impacted oaks will be mitigated at a 4:1 ratio in accordance with the Madison Specific Plan – "C" Modified Tree Preservation, Removal and Transplantation standards located in Part III-4, *Tree Preservation* and in Part V *Resource Management*.

Thus, while views of the site would change, the Project would be consistent with zoning and other regulations governing scenic quality as stated above. **No impact** would occur with development of the project and approval of the Madison Specific Plan "C Modified" design exceptions.

d) Temporary outdoor lighting may be used and visible during operation of construction equipment; however, construction is expected to occur primarily during daylight hours. Lighting associated with the Project would be installed consistent with the Madison Specific Plan C "Modified" Part III, Design Standards, (a) Architecture, (23) Lighting. As required, all exterior lighting would be low wattage, indirect and shielded to prevent spillover onto adjacent lots, open space and the street. Further, the Madison Specific Plan – "C" Modified, *Resources Management*, Section III, *Habitat Enhancement and Monitoring Components*, Subsection g, states that all lighting in proximity to natural areas shall be low wattage, minimized and deflected away from natural habitat areas (see also Mitigation Measure BIO-1). No design exceptions are being requested to address lighting. Thus, impacts related to light and glare would be **less than significant.**

While no significant or adverse Aesthetic impacts are anticipated, the following Standard Conditions would be implemented:

> **Standard Condition AES-1: Maintenance of Construction Barriers.** Prior to issuance of any construction permits, the City of Monrovia Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the construction contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that

unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours."

Standard Condition AES-2: Project lighting shall be directed and shielded to focus illumination on the desired areas only and avoid light trespass into adjacent areas. Reflective glass, metallic, and other highly reflective and glare producing materials shall not be used in new building construction.

Standard Condition AES-3: Comprehensive Lighting Plan. Prior to issuance of a building permit, the Project Applicant shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America [IESNA]) and shall be in compliance with applicable standards of the Madison Specific Plan "C Modified" and City's Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, onsite driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer:

- Exterior onsite lighting shall be shielded and confined within site boundaries;
- No direct rays or glare shall be permitted to shine onto public streets, private ways or adjacent developed sites/areas;
- Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted; and
- The site shall not be excessively illuminated based on the illumination recommendations of the IESNA.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – Would the project:				
a) Convert Prime Farmland, Unique Farmland, 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?	☐	☐	☐	☒

a) The site is designated "urban built up land" in the California Important Farmland Finder database. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs on the Project site and these resources would not be affected by the Project. **No impact** would occur.

b) The Project site is zoned Madison Specific Plan – "C Modified" which is intended to support residential development at a density of up to one unit per 2.5 acres. The Project site is not enrolled in a Williamson Act contract. The Project would not conflict with any zoning designations designed to promote agriculture. **No impact** would occur**.**

c-e) Neither the site nor surrounding areas are used for forestry, timber production or commercial agriculture. The Project site is zoned is Madison Specific Plan – "C Modified" which is intended to support residential development at a density of up to one unit per 2.5 acres. Thus, the Project would not conflict with any zoning designations designed to preserve timber or agricultural resources and would not involve changes in the existing environment which could result in conversion of Farmland to non-agricultural use. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The Project site is located within the South Coast Air Basin (Basin), which includes portions of Riverside, Los Angeles and Orange Counties. Air quality conditions in the South Coast Air Basin are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." The Basin in which the Project area is located is a non-attainment area for both the federal and state standards for ozone and Particulate Matter $(PM)_{2.5}$. The Basin is in attainment for the state and federal standards for PM_{10}, nitrogen dioxide (NO_2), and carbon monoxide (CO). Table 1 shows the significance thresholds that have been recommended by the SCAQMD for development projects within the Basin.

Localized Significance Thresholds. In addition to the thresholds described above, the SCAQMD has developed Localized Significance Thresholds (LSTs). LSTs were devised in response to concerns regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in

Table 1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
Nitrogen Oxides (NO_x)	100 lbs/day	55 lbs/day
Reactive Organic Gases (ROG)	75 lbs/day	55 lbs/day
Particulate Matter 10 (PM_{10})	150 lbs/day	150 lbs/day
Particulate Matter 2.5 ($PM_{2.5}$)	55 lbs/day	55 lbs/day
SO_x	No standard	150 lbs/day
CO	550 lbs/day	550 lbs/day

[a] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, unless otherwise stated.*

Lbs/day = pounds per day

each source receptor area (SRA), project size and distance to the sensitive receptor. The nearest receivers are single-family residential development adjacent to the site along Highland Place and south of the site at 343 Highland Place.

LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs are only applicable to the following criteria pollutants: Nitrogen Oxides (NO_x), CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003, Revised July 2008). As such, LSTs for operational emissions do not apply to the proposed development as the majority of emissions would be generated by cars on roadways. LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas.

Construction emissions associated with implementing the Project were calculated using the CalEEMod version 2022.1 (2022) software. (*see* Appendix A, CalEEMod files, October 2024). Construction emissions modeling for site preparation, grading, building construction, paving, and architectural coating application is based on the overall scope of the proposed development and construction phasing. In addition to SCAQMD Rule 403 requirements for fugitive dust control, emissions modeling also accounts for the use of low-VOC paint (50 g/L for non-flat coatings) as required by SCAQMD Rule 1113.

Project construction is expected to begin in mid-2025 and be completed by late 2026. Operation of the Project would generate vehicle trips which would be the primary source of emissions. However, emissions from area and energy sources are also calculated and reported herein.

a) The main purpose of an Air Quality Management Plan (AQMP) is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area. A

nonattainment area is considered to have worse air quality than the National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS), as defined in the federal Clean Air Act. The Basin is in nonattainment for the federal and State standards for ozone (O3), and particulate matter less than 2.5 microns in diameter (PM2.5). In addition, the Basin is in nonattainment for the State particulate matter less than 10 microns in diameter (PM10) standard, and in attainment/maintenance for the federal PM10, carbon monoxide (CO), and nitrogen dioxide (NO2) standards. The most recent AQMP was adopted in December 2022 and focuses on attaining the 2015 8-hour ozone standard of 70 parts per billion.

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. Thus, the local city General Plans and the Southern California Association of Governments' (SCAG) Regional Transportation Plan socioeconomic forecast projections of regional population, housing and employment growth are incorporated into the AQMP to estimate regional emissions and related effects on attainment of the 2018 8-hour ozone standard. Projects proposing higher density growth or that may generate higher emissions than forecast with growth projections exceeding the assumptions used in air emissions modeling, may be in conflict with the AQMP.

The General plan Housing Element adopted in November, 2022, states that the City of Monrovia is built out; and thus, no significant population growth has occurred. Between 2000 and 2010, the population decreased by 0.9 percent. Between 2010 and 2020, as reported by the California Department of finance, the population of Monrovia grew approximately 3.7 percent, from 36,590 to 37,935 residents. This growth rate was slightly less in Monrovia than in Los Angeles County as a whole (4.2 percent). The Southern California Association of Governments (SCAG) growth forecast predicts a steady increase in population through 2045. From 2020 to 2045, SCAG estimates that Monrovia's population will grow by nearly 11 percent. As projected in the 6th Cycle Housing Element (approved November 2022), the population of Monrovia will increase from 37,935 in 2020 to 42,100 by 2045.

The 2021-2029 Regional Housing Needs Assessment (RHNA) allocates a total of 1,670 housing to the City of Monrovia for the housing element period. Of the total, 635 units are allocated to the above moderate income category (i.e., greater than 120 percent of the Area Median Income). There are eight projects in various stages of planning which are considered approved projects. Combined, these approved projects can accommodate 1,444 units and demonstrate that the City of Monrovia has already achieved a portion of its RHNA. The proposed Project would provide a net increase of two units.

The City has a remaining 6th Cycle RHNA of 982 units (491 extremely low/very low-income units, 249 low-income units, and 254 moderate-income units) that must be addressed within housing sites identified in the 2021-2029 Housing Element. The City has various residential and mixed-use development opportunities with sufficient capacity to meet and exceed the identified housing need. The Project would provide a net increase of two single-family detached units.

The Project is consistent with the growth projections anticipated for Monrovia within the General Plan Housing Element and within the SCAG population projections referenced above. The Project would be consistent with the existing zoning and densities allowed within the Madison Specific Plan – "C Modified" zoning designation. Project-related air emissions would not exceed thresholds recommended by the SCAQMD and the Project would be compliant with Vehicle Miles Traveled (VMT) thresholds (see Section XVII, *Transportation*). Thus, the Project would be consistent with the AQMP. The proposed Madison Specific Plan – "C Modified" design exceptions would have no effect on AQMP Consistency air quality. **No impact** would occur.

b) Project construction would generate temporary air pollutant emissions. Both construction emissions and vehicle emissions associated with operation of the Project are quantified herein. The CalEEMod output file for summer emissions is provided in Appendix A of this Initial Study.

Construction Emissions

Construction vehicles and equipment operating on the graded site as well as grading/site preparation activities have the potential to generate fugitive dust (PM_{10} and $PM_{2.5}$) through the exposure of soil to wind erosion and dust entrainment. Project-related construction activities would also emit ozone precursors (oxides of nitrogen (NO_x), reactive organic gases (ROG) as well as carbon monoxide (CO). The majority of construction-related emissions would result from the use of heavy-duty construction equipment during site preparation and grading. However, emissions would also be associated with building construction (including the application of paint) and the paving of surface parking areas.

The Project would be required to comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is mandatory for all construction sites located within the Basin. Rule 403 Reduction Measure 2 as defined below, was included in the CalEEMod analysis for the site preparation and grading phases of construction. SCAQMD Rule 403 is a standard regulatory requirement and condition of approval rather than mitigation. The modeling assumed the site would be watered two times daily as a required condition of approval to ensure compliance with SCAQMD Rule 403.

The City of Monrovia General Plan EIR (January 2008) includes the following standard conditions within project-specific CEQA documents. The following measures shall be incorporated into all project specifications as Standard Conditions AIR-1 to reduce fugitive dust during construction and AIR-2 to reduce diesel engine emissions of O3 precursors ROG and NOX, PM10, PM2.5, and diesel PM. Standard Condition AIR-3 would be implemented to reduce VOC emissions associated with the application of architectural coatings:

> **Standard Condition AIR-1**. Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the project stipulates that, in compliance with SCAQMD Rule 402 and Rule 203, excessive fugitive dust

emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rules 403 and 402 are as follows:

- The project construction contractor shall develop and implement dust control methods that shall achieve this control level in a SCAQMD Rule 403 dust control plan, designate personnel to monitor the dust control program and order increased watering, as necessary, to ensure a 55 percent control level. Those duties shall include holiday and weekend periods when work may not be in progress. Additional control measures to reduce fugitive dust shall include, but are not limited to, the following:
    - Apply water twice daily or nontoxic soil stabilizers according to manufacturer's specifications, to all unpaved parking or staging areas or unpaved road surfaces or as needed to areas where soil is disturbed.
    - Use low-sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2.
    - During earthmoving or excavation operations, fugitive dust emissions shall be controlled by regular watering to prevent excessive amounts of dust, ceasing earthmoving and excavation activities during periods of high winds (i.e., winds greater than 20 miles per hour (mph) averaged over 1 hour), and minimizing the area disturbed by earthmoving or excavation operations at all times.
    - After earth moving or excavation operation, fugitive dust emissions shall be controlled by revegetating and watering portions of the construction area to remain inactive longer than a period of 3 months and watering all active portions of the construction site:
    - At all times, fugitive dust emissions shall be controlled by limiting the on-site vehicle speed to 15 mph and paving road improvements as soon as feasible.
    - At all times during the construction phase, ozone precursor emissions from mobile equipment shall be controlled by maintaining equipment engines in good condition and in proper tune according to manufacturers' specifications.
    - Outdoor storage piles of construction materials shall be kept covered, watered, or otherwise chemically stabilized with a chemical wetting agent to minimize fugitive dust emissions and wind erosion.

Standard Condition AIR-2: Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the project complies with

Mitigation Measure AIR-C of the Final Environmental Impact Report, Monrovia General Plan Proposed Land Use and Circulations Elements (dated January 2008) to reduce diesel engine emissions of ozone precursors ROGs and NOx, particulate matter less than 10 microns in size (PM_{10}), particulate matter less than 2.5 microns in size ($PM_{2.5}$), and diesel particulate matter (DPM). Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:

- When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;

- When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;

- To bring the equipment to the manufacturers' recommended operating temperature.

- When the ambient temperature is below 40 degrees Fahrenheit (F) or above 85 degrees F, or when the equipment is being repaired.

Standard Condition AIR-3: The Project Applicant shall comply with South Coast Air Quality Rule 1113 to reduce VOC emissions from architectural coating applications. Prior to the issuance of a building permit for the Project, the Applicant shall submit, to the satisfaction of the Planning Division, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines. The Applicant shall include in any construction contracts and/or subcontracts a requirement that Project contractors adhere to the requirements of the CRP. The CRP shall include a requirement that all interior and exterior residential and non-residential architectural coatings used in Project construction meet the SCAQMD "super compliant" coating VOC content standard of less than 10 grams of VOC per liter of coating. The CRP shall also specify the use of high-volume, low pressure spray guns during coating applications to reduce coating waste.

It is assumed for modeling purposes that the entire site would be disturbed during construction. In addition to SCAQMD Rule 403 requirements referenced above, emissions modeling also accounts for the use of low-VOC paint (50 g/L for non-flat coatings) as required by SCAQMD Rule 1113. Table 2 summarizes the estimated maximum mitigated daily emissions of pollutants occurring during each construction year.

Table 2
Estimated Maximum Daily Construction Emissions

Construction Phase		Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
2025 Maximum lbs/day	1.9	10.0	10.5	0.02	2.6	1.4
SCAQMD Regional Thresholds (lbs/day)	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix A – CalEEMod Output.

As shown in Table 2, construction of the Project would not exceed the SCAQMD regional thresholds. Compliance with SCAQMD Rule 403 and Rule 1113 would be standard project features. No mitigation would be required as construction emissions would be less than significant.

Localized Significance Thresholds. The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District 2011). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. Construction-related emissions reported by CalEEMod are compared to the localized significance threshold lookup tables. The CalEEMod output in Appendix A shows the equipment assumed for this analysis.

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. A total of 1.5 acres is assumed to be disturbed daily during grading; thus, the associated look up table values for two acres were used to provide a conservative evaluation of potential impacts. The Project site is located in Source Receptor Area 8 (SRA-8, West San Gabriel Valley). LSTs for construction related emissions in the SRA 8 at varying distances between the source and receptor property are shown in Table 3.

The nearest sensitive receptors to the Project site is located adjacent to and east of Lot 4 at 349 Highland Place. To provide a conservative evaluation of construction emissions relative to LST thresholds, allowable emissions are based on a receptor distance of 25 meters. As shown in Table 4, emissions of NOx, CO, PM_{10} and $PM_{2.5}$ would not exceed the LST thresholds shown in Table 3 using the 25-meter threshold. Project-related construction impacts would be less than significant per III(b) and III(d) referenced above.

Operation Emissions

Table 5 summarizes emissions associated with operation of the Project. Operational emissions include emissions from vehicle trips (mobile sources) and area sources including landscape

equipment and architectural coating emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the Project site. Trip volumes were based on trip generation factors for residential uses.

Table 3
SCAQMD LSTs for Construction

Pollutant	Allowable emissions as a function of receptor distance in meters from a five-acre site (lbs/day)				
	25	**50**	**100**	**200**	**500**
Gradual conversion of NO_x to NO_2	98	95	104	124	175
CO	812	1,125	1,594	2,785	7,957
PM_{10}	6	19	34	66	160
$PM_{2.5}$	4	5	9	21	82

Source:http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 *October 2009.*

Table 4
On-site Construction Emissions

	Pollutant (lbs/day)			
Construction Phase	NOx	CO	PM_{10}	$PM_{2.5}$
Demolition	4.3	5.4	2.4	0.28
Site Preparation	4.1	5.5	4.1	0.21
Grading	10.0	10.0	2.4	1.4
Building Construction	5.1	6.9	0.2	0.2
Paving	4.3	5.3	1.9	1.7
Architectural Coating	0.8	1.3	0.02	0.02

Note: Daily emissions shown are the highest value occurring each phase

As shown in Table 5, Project operational emissions would not exceed the SCAQMD thresholds. Further, with approval of the Madison Specific Plan – "C Modified" design exceptions, the proposed development footprint would be smaller; thus, construction and operational emissions would be incrementally less than if the project were constructed consistent with design standards. With implementation of Standard Condition AIR-1, the Project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be **less than significant.**

Table 5
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Maximum lbs/day	0.2	0.1	1.0	0.002	0.2	0.05
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Appendix A – CalEEMod Output. *Summer emissions shown.*

c) The nearest sensitive receptors to the Project site are the residences located adjacent to and east of Lot 1 along Highland Place at the site driveway intersection. As shown above, neither the total construction emissions nor operational emissions would exceed the SCAQMD thresholds. In addition to quantifying emissions, SCAQMD recommends performing a local CO hotspot analysis if an intersection meets one of the following criteria: 1) the intersection is at Level of Service (LOS) D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) a project decreases LOS at an intersection to D or worse. A CO hotspot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. Localized CO "hotspots" can occur at intersections with heavy peak hour traffic.

Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal ambient air quality standards (AAQS) of 35.0 parts per million (ppm) or the state AAQS of 20.0 ppm. Cumulative traffic volumes at build out would be approximately 28 trips daily. This would not trigger a traffic study; and thus, are not presumed to cause or contribute to LOS conditions that would trigger a CO hotspot analysis at any of the intersections proximal to the site. Therefore, the Project, with approval of the proposed Madison Specific Plan – "C Modified" design exceptions, would not result in CO hot spots. Impacts would be **less than significant.**

d) The Project would generate odors from construction (i.e., diesel exhaust, asphalt). However, these construction odors would be temporary. Construction emissions would not exceed SCAQMD impact thresholds; thus, short-term odors would be less than significant. During operation, the Project does not propose any new, major sources of potential odors, and any odor impacts would be minimized through enforcement of the City's Municipal Code, Section 8.12.030. Implementation of Standard Condition AIR-2 as defined above, would reduce temporary odors associated with diesel equipment operation. Odor impacts associated with construction and operation, with approval of the proposed Madison Specific Plan – "C Modified" design exceptions, would be **less than significant.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. <u>BIOLOGICAL RESOURCES</u> -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or 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	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES -- Would the project:				
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?	☐	☐	☐	☒

The material presented herein is based on the *Biological Resource Assessment, Botanical Survey, Oak Tree Survey and Protocol California Gnatcatcher Survey, 347 North Highland Place, City of Monrovia, Los Angeles County, California*, prepared by L&L Environmental, Inc., July 2021, updated May 2024 and October 2024 (Appendix B) and a *Revised Jurisdictional Delineation With Least Environmentally Damaging Practical Alternative for the City of Monrovia Highland Desilting Basin and Three Residential Units*, prepared by L&L Environmental, Inc., September 2019 and updated May 2024 and October 2024 (Appendix C).

a) As stated in the *Biological Resources Assessment*, (Appendix B), the biological habitat assessment examined the property to determine presence/absence of biological resources on the property and potential for special status species to occur. Surveys included a focused botanical survey, a protocol breeding season survey for coastal California gnatcatcher (*Polioptila californica californica*), vegetation community mapping, a mountain lion habitat assessment and an oak tree inventory.

The Project site is located in the southern foothills of the San Gabriel Mountains and consists mainly of steep slopes with the existing and proposed development in the canyon bottom. Conserved open space is located to the north of the site. Most of the northern portion of the Project site burned in the Madison Fire in 2013. Native vegetation on the site is a mix of coastal scrub and chaparral vegetation with oak woodland in the canyon. There is no riparian habitat and no sensitive vegetation communities are present on the Project site.

No state or federally listed plant species were observed on the Project site. Braunton's milk-vetch (*Astragalus brauntonii*), a federally listed endangered species, was not observed but has a moderate potential to occur on the northern portion of the Project site outside of the Project

Impact Area, or area that would be disturbed by project-related improvements (i.e., grading, demolition, and vegetation removal). Two (2) special status plant species were observed on the Project site: San Gabriel oak (*Quercus durata var. gabrielensis*) and Southern California black walnut (*Juglans californica*). Both have a California Rare Plant Rank of 4.2 (limited distribution with moderate degree and immediacy of threat). San Gabriel oak was observed on the northern portion of the parcel outside the Project Impact Area. One southern California black walnut tree is present along the existing driveway and would be impacted by the project. While black walnut is listed as a special status plant, its listing status has not yet risen to a level that requires mitigation should an impact to this species occur. Impacts to the black walnut tree would be adverse but is not regionally significant and does not require mitigation. Thus, impacts would be less than significant. No other special status plants were observed, but several have potential to occur on the Project site. These species could potentially occur on the Project site but are unlikely to be found within the Project Impact Area.

The oak inventory identified 23 coast live oak trees (*Quercus agrifolia*) within or adjacent to the Project Impact Area. Impacts to oak trees on the Project site are regulated per the Madison Specific Plan and are addressed in detail under threshold (e) below. An additional 21 non-native ornamental trees are present in or adjacent to the Project Impact Area. Table 6 shows the vegetation communities and associated acreages on-site and within the Project Impact Area.

Sensitive Plant Species

No state or federally listed plants were observed on the Project site which includes the Project Impact Area. Braunton's milk-vetch is a federally listed species that was not observed on the Project site during focused surveys but has a moderate potential to occur on the Project site (Appendix B). There is no suitable habitat for Braunton's Milk Vetch within the Project Impact Area; thus, this species is considered absent from that area.

Table 6
Vegetation Communities
(Associated Acreages On-site and Project Impact Areas)

Vegetation Community and Classification	Area (acres)			
	On-Site AIN 8513-013-004	Off-Site AIN 8513-004-021	Total	Project Impact Area
Coast Live Oak Woodland	1.65	0.05	1.70	0.35
Coast Live Oak Woodland/Laurel Sumac Scrub	0.26	0.26	0.52	0.0
Laurel Sumac Scrub (burned)	3.52	0.069	4.21	0.10
Laurel Sumac Scrub (unburned)	0.25	0	0.25	0.0
Disturbed/Developed/Ornamental	0.77	0	0.77	0.72
Total	**6.45**	**1.00**	**7.45**	**1.17**

No other special status plants have been observed on the Project site and Project Impact Area; however, several have some potential to occur. These species would likely occur on the northern portion of the Project site outside the Project Impact Area. Impacts, if any, would not

substantially affect regional populations or result in loss of substantial areas of potential habitat; and thus, would be less than significant.

Two special status plant species were observed during surveys; the southern California black walnut and San Gabriel oak. Impacts to these species are addressed under threshold (e) of this section. There are no sensitive vegetation communities that would be adversely impacted by the Project.

Wildlife Species
A total of 56 vertebrate wildlife species, plus domestic dog, were detected onsite during surveys in 2019 and 2021. Eight (8) special status wildlife species, as well as habitat for nesting birds and roosting special status bats, were observed on the site, as described below. Potential for occurrence of other listed and special status wildlife is provided in Appendix B.

Listed and Fully Protected Wildlife. No state and/or federally listed wildlife species were observed during surveys. Surveys included a protocol breeding season survey for coastal California gnatcatcher. No California gnatcatchers were detected as described below. Two (2) other listed, candidate for listing, or fully protected species have a moderate potential to occur on the project site and are described below. No other listed or fully protected wildlife species have a moderate or high potential to occur.

Coastal California gnatcatcher. The northern portion of the Project site includes potentially suitable habitat for coastal California gnatcatcher. Thus, surveys included a protocol breeding season survey for coastal California gnatcatcher. No California gnatcatchers were detected. There is minimal potentially suitable habitat within the Project Impact Area and it is subject to ongoing human disturbance. This species was not detected on the project site during the protocol breeding season surveys in 2021, or incidentally during other biological surveys in 2019 and 2021 and is considered absent from the Project site at this time.

Crotch Bumble Bee. Crotch bumble bee (*Bombus crotchii*) was formerly a special status species but became a candidate for state listing as endangered on June 12, 2019. The status of this species is currently unresolved and impacts may require incidental take permitting. Suitable habitat and food plants for the species occur in the northern portion of the Project site and the species has a moderate potential for occurrence there. However, there is no suitable habitat within the Project Impact Area and the species is considered absent from that area.

Mountain Lion. The Southern California/Central Coast Evolutionarily Significant Unit (ESU) of mountain lion (*Puma concolor*) became a candidate for listing under the California Endangered Species Act (CESA) on April 21, 2020. The CDFW evaluation is still pending and there has been no listing update since 2021.

Mountain lions occur throughout California and are known to occur in the San Gabriel Mountains. Mountain lions are known to use large areas, with home range sizes averaging 372 kilometers (km)2 (92,000 acres) for adult males and 134 km2 (33,000 acres) for adult females.

Mountain lions will hunt at night, especially when there is human activity nearby. No published studies on mountain lion activity patterns within the San Gabriel Mountains were found during the literature and database searches conducted for this analysis and no reference to ongoing studies for mountain lions were found for the area. Therefore, this analysis uses data from other areas to assess the habitat and potential impacts that may occur from this project.

Mountain lions are exceptionally vulnerable to human disturbance and areas of high human activity have lower occupancy of rare carnivores in general. Mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used. The assessment relied on both a literature review and a field survey. The record search included online data sources and interviews with knowledgeable people in the area such as residents and local landowners. The field survey included a search for and an identification of plant communities present on site and in the general area with the composition and density of both native and non-native habitat suitable for use by mountain lions. The criteria for the quality of habitat to support mountain lion use included suitability to provide foraging, breeding/denning, migration, and home range activities. The field survey included 100 percent visual coverage of the study area and a visible buffer around the project site, plus a review of topographic maps, aerial photos and Google Earth imagery which provides sufficient clarity to understand the density and spatial ecology of habitat that could reasonably be used by mountain lions near the project site.

Mountain lion denning sites are typically located away from development in areas of native plant communities with dense ground level cover, where caves or other natural cavities and rock outcrops are common, and large expanses of surrounding foraging areas suitable to support a reproducing pair with young. To be effective ambush predators like mountain lions require dense woody vegetation such as chaparral, coastal sage scrub, or woodlands with a dense understory in which to hide. They do not typically follow prey into open areas, rather they tend to instead wait in dense brush at the edge and ambush prey when they enter the denser vegetation.

Mountain lion observations are not tracked in the CNDDB, but there have been recent news reports of mountain lions seen in Monrovia (Los Angeles Times, June 23, 2020; Patch, January 6, 2020; WTHR, November 20, 2020). A mountain lion was also observed on the site by the current resident. Mule deer (*Odocoileus hemionus*), the mountain lion's primary prey, were frequently observed on the site during surveys, both within the canyon bottom and on the steep slopes, and usually in groups. iNaturalist[1] records 3 sightings of mountain lions in the City of Monrovia. The closest (Jun 8, 2021, 2:43 am) along Crescent Drive and El Nido Avenue, within blocks of the project site, may be the individual mountain lion the current resident reported. A more recent sighting occurred on November 27th, 2023, along Lower Clamshell TKTL and an earlier sighting occurred on Dec. 12, 2020, along Oakglade Drive.
Because it is generally accepted that developed areas are used less by mountain lions and because the project is already developed and surrounded by other developed areas, it is not

[1] Mountain Lion from Monrovia, CA, USA on June 08, 2021 at 02:43 AM by Dave Campbell · iNaturalist

expected that the project would cause new habitat fragmentation, and it will not extend development further into a wildland area. Rather the proposed project makes use of an existing developed and disturbed residential site which is consistent with current conservation goals of increasing human land use within areas which have already been converted from native habitat.

Indirect impacts could occur if light or noise from construction were to extend into adjacent mountain lion habitat areas to the north and west of the proposed development. To avoid potential edge effects to mountain lions from night lighting or construction noise and developments, Mitigation Measure BIO-1 limits time of construction to daytime hours, requires fencing and trash and debris control during construction, and restricts night lighting spillover in the adjacent undeveloped areas. In addition, Mitigation Measure BIO-2 provides for proper notification of large wildlife, including mountain lions. These mitigation measures will reduce the potential impacts to less than significant. Impacts to this species would be **less than significant.**

Special Status Wildlife. Eight (8) special status wildlife species, all birds, were observed on the entire site during the 2019 and/or 2021surveys (see Appendix B). These species and their current conservation status are summarized as follows:

- Allen's hummingbird (*Selasphorus sasin*; USFWS Bird of Conservation Concern);
- Cooper's hawk (*Accipiter cooperii*; CDFW Watch List species);
- Costa's hummingbird (*Calypte costae*; CDFW Special Animal, USFWS Bird of Conservation Concern);
- Northern harrier (fly over) (*Circus hudsonius*; CDFW Species of Special Concern);
- Nuttall's woodpecker (*Dryobates nuttallii*; USFWS Bird of Conservation Concern);
- Oak titmouse (*Baeolophus inornatus*; USFWS Bird of Conservation Concern),
- Wrentit (*Chamaea fasciata*; USFWS Bird of Conservation Concern); and
- Yellow warbler (*Setophaga petechia*; CDFW Species of Special Concern, USFWS Bird of Conservation Concern).

The observation locations for these species are shown in Figure 10 of the *Biological Resource Assessment, Botanical Survey, Oak Tree Survey and Protocol California Gnatcatcher Survey, 347 North Highland Place, City of Monrovia, Los Angeles County, California*, October 2024 (see Appendix B). As discussed below in Standard Conditions BIO-2 and BIO-3, a preconstruction nesting bird survey would be performed to identify the presence/absence of nesting birds species within the impact area (SC BIO-2). Further, a Protection Plan (SC BIO-3) would be prepared and approved by the City of Monrovia prior to construction to identify methods and protocol for handling and/or relocating wildlife species within impact area. However, birds are not generally directly affected by construction as they tend to avoid active work zones. Mitigation for these species, in addition to the Standard Conditions referenced herein, is not required.

An additional fourteen (14) special status wildlife species, while not observed on the project site during surveys, have a low to moderate, moderate, or high potential to occur.

- San Gabriel chestnut snail (*Glyptostoma gabrielense*; CDFW Special Animal),
- Coast Range newt (*Taricha torosa*; CDFW Species of Special Concern),
- Southern California legless lizard (*Anniella stebbinsi*; CDFW Species of Special Concern),
- California glossy snake (*Arizona elegans occidentalis*; CDFW Species of Special Concern),
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*; CDFW Species of Special Concern),
- Coast horned lizard (*Phrynosoma blainvillii*; CDFW Species of Special Concern),
- Black swift (foraging) (*Cypseloides niger*; USFWS Bird of Conservation Concern, CDFW Species of Special Concern),
- Lewis's woodpecker (foraging and nesting) (*Melanerpes lewis*; USFWS Bird of Conservation Concern, CDFW Special Animal),
- Rufous hummingbird (foraging) (*Selasphorus rufus*; USFWS Bird of Conservation Concern, CDFW Special Animal),
- Lawrence's goldfinch (foraging and nesting) (*Spinus lawrencei*; USFWS Bird of Conservation Concern, CDFW Special Animal),
- Western mastiff bat (foraging and roosting) (*Eumops perotis californicus*; CDFW Species of Special Concern),
- Western red bat (foraging and roosting) (*Lasiurus blossevillii*; CDFW Species of Special Concern),
- Hoary bat (foraging and roosting) (*Lasiurus cinereus*; CDFW Special Animal),
- Southern grasshopper mouse (*Onychomys torridus ramona*; CDFW Species of Special Concern).

Most of the terrestrial wildlife species are more likely to occur in the northern portion of the site outside the Project Impact Area which is developed and disturbed. Any project impacts would not substantially affect the amount of suitable habitat in the region or substantially affect regional populations of these species. Further, these species are not frequently observed even when present and the biological survey was sufficient to address the presence/absence of these species. Impacts to special status wildlife would be **less than significant.**

Nesting/Migratory Birds. The U.S. Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711) is an international treaty that makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Sections 3503, 3503.5, and 3800 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests, or eggs. Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) or loss of habitat upon which the birds depend could be considered "take" and constitute a violation of the MBTA. Migratory birds include common, sensitive and listed species as referenced above in the discussion of Special Status Wildlife.

Habitat suitable for nesting birds (including raptors and species referenced above) protected by the California Fish and Game Code is present throughout the Project site and adjacent areas. Birds may nest in trees, shrubs, and other vegetation, in tree cavities, on open ground, or on structures and other surfaces. One (1) active songbird nest was observed during surveys in 2021

in ornamental vegetation near the existing driveway. No active songbird nests were observed in 2019. No raptor nests (active or inactive) were observed during surveys in 2019 and 2021. Mitigation Measure BIO-3 would reduce potential nesting bird impacts to **less than significant.**

Roosting Bats. Special status bat species may utilize the Project site, including trees and structures for foraging and roosting. Since potentially suitable habitat for foraging and roosting bats is common in the Southern California region, loss of the suitable habitat on the project site would not be significant. Mitigation Measures BIO-4, BIO-5 and BIO-6 would be implemented to avoid or reduce potential roosting bat impacts.

The following City of Monrovia Standard Conditions are intended to reduce direct and indirect impacts to biological resources to less than significant.

> **SC BIO-1 Capture and Handling of Wildlife.** The project may require capture, handling, and relocation of wildlife. Pursuant to the California Code of Regulations, title 14, section 650, the project sponsor's qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with project construction and activities. Details on what activities require a permit, permit application forms, and other information are available from CDFW at https://wildlife.ca.gov/Licensing/Scientific-Collecting.
>
> CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650).
>
> **SC BIO-2 Special-status Species Preconstruction Survey.** The project sponsor shall retain a qualified biologist with experience surveying for coast (Blainville's) horned lizard, coastal whiptail, Southern California legless lizard, California glossy snake, and coast patch-nosed snake. Prior to commencing any project-related ground- disturbing activities, the qualified biologist shall conduct focused surveys for species of special concern (SSC) and suitable habitat no more than one month before the start of any ground- disturbing activities or vegetation removal where there may be impacts to SSC. Project-related activities include construction, equipment and vehicle access, parking, and staging. In addition, the qualified biologist shall conduct daily biological monitoring during any activities involving vegetation clearing or modification of natural habitat. Positive detections of SSC and suitable habitat at the detection location shall be mapped and photographed. The qualified biologist shall provide a summary report of SSC surveys to the City prior to implementing any project- related ground-disturbing activities and vegetation removal. Depending on the survey results, a qualified biologist shall develop species-specific mitigation measures for implementation during the project. All observations of special-status species will be documented and submitted to

the CNDDB by reporting any special status species detected by completing and submitting CNDDB Field Survey Forms. This includes all documented occurrences of mountain lion, San Diego desert woodrat, and potential occurrences of Crotch's bumble bee, and other special status species. The City shall ensure the data has been properly submitted, with all data fields applicable filled out, prior to project ground-disturbing activities. The City will require the project sponsor's qualified biologist's assistance with the required reporting. The project sponsor shall provide CDFW with confirmation of data submittal.

SC BIO-3 Protection Plan. Wildlife should be protected or allowed to move away on its own (non-invasive, passive relocation) to adjacent appropriate habitat within the open space on site or in suitable habitat adjacent to the project area (either way, at least 200 feet from the grading limits). Special status wildlife shall only be captured by a qualified biologist with proper handling permits (see SC BIO-1). The qualified biologist shall prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during project construction and activities/biological construction monitoring.

SC BIO-4 **Injured or Dead Wildlife.** If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area shall stop immediately, the qualified biologist will be notified, and dead or injured wildlife documented. A formal report shall be sent to CDFW and the City within three calendar days of the incident or finding. Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

SC BIO-5 Entrapment. The project may result in the use of open pipes used as fence posts, property line stakes, signs, etc. CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality because these structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality. Metal fence stakes used on the project site are required to be plugged with bolts or other materials to avoid this hazard.

SC BIO-6 Rodenticides. Second-generation anticoagulant rodenticides shall not be used on site during construction and over the life of the project.

Project Specific Mitigation Measures. The following project specific mitigation measures are referenced above and intended to reduce direct and indirect impacts to listed and fully protected wildlife species to less than significant.

BIO-1 Mountain Lion. As directed by CDFW, a habitat assessment for mountain lion was conducted for the parcel in 2019. As a result of the assessment, measures to avoid potential impacts to mountain lions from night lighting or construction noise have been identified. The following measures shall be required to address potential construction-period impacts

to the mountain lion, could occur adjacent to the project site in habitat that is suitable for mountain lions for foraging and dispersal or movement events:

- The construction site shall be fenced to exclude wildlife such as mountain lions from entering the development areas.
- Fencing or walls shall be prohibited within areas of native habitat, except where necessary for public safety or habitat protection or restoration. Fencing or walls that do not permit the free passage of wildlife shall be prohibited in any wildlife corridors.
- Construction activities for the project shall be restricted and no work shall occur from 1-hour after sunset to 1-hour before sunrise.
- Trash and debris shall be contained onsite during construction.
- Exterior lighting (except traffic lights, navigational lights, and other similar safety lighting) shall be minimized, restricted to low intensity features, shielded, and directed away from native habitats to minimize impacts on wildlife. Permitted lighting shall conform to the following standards:
    - The minimum necessary to light walkways used for entry and exit to the structures, including parking areas, on the site. This lighting shall be limited to fixtures that do not exceed two feet in height, that are directed downward, and use bulbs that do not exceed 60 watts, or the equivalent, unless a higher wattage is authorized by the City.
    - Security lighting attached to the residence controlled by motion detectors limited to 60 watts, or the equivalent.
    - The minimum lighting necessary for safe vehicular use of the driveway. The lighting shall be limited to 60 watts, or the equivalent.
    - No lighting around the perimeter of the site, no lighting for sports courts or other private recreational facilities, and no lighting for aesthetic purposes is allowed.

In addition, all observations of special-status species will be documented and submitted to the CNDDB by reporting any special status species detected by completing and submitting CNDDB Field Survey Forms. The City shall ensure the data has been properly submitted, with all data fields applicable filled out, prior to project ground-disturbing activities. The City will require the project sponsor's qualified biologist's assistance with the required reporting. The project sponsor shall provide CDFW with confirmation of data submittal.

If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction and over the life of the Project, the Proponent shall consult CDFW and acquire a CESA Incidental Take Permit (pursuant to Fish & Game Code, Section 2080 *et seq.*).

BIO-2 Mountain Lion and Black Bear Reporting. Due to the location of the site at the foothills of the San Gabriel mountains, any occurrence of mountain lion or black bear spotted in the project area (any location visible from the project site) shall be reported to the South Coast Regional Office of CDFW – (858) 467-4201 or AskR5@wildlife.ca.gov. If the sighting is not during normal business hours, the sighting should first be reported to the local police or sheriff officers. If it is determined during consultation with the CDFW that a mitigation and avoidance plan and/or incidental take permit (ITP) are needed, construction will not proceed until these have been prepared and approved by CDFW and the City.

BIO-3 Nesting Birds. If possible, construction activities for the project should avoid the bird and raptor nesting season recommended by CDFW (January 1 through September 15). In the event that vegetation and tree removal or trimming needs to occur between January 1 and September 15, the Project Sponsor shall retain a qualified biologist to conduct a nesting bird survey no more than 3 days prior to commencement of construction, vegetation removal and/or ground disturbing activities (e.g., staging, mobilization, grading). Results of the pre-construction survey shall be submitted to the City's Planning Division and CDFW prior to the commencement of all such construction or ground disturbing activities and the issuance of any permits. The biologist conducting the clearance survey shall document the negative results, if no active bird nests are observed on the project site or within the vicinity during the clearance survey with a brief letter report, submitted to the City's Planning Division prior to commencement of construction or ground disturbing activities, indicating that no impacts to active bird nests would occur, before construction or ground disturbing activities can proceed.

If an active avian nest is discovered during the pre-construction clearance survey, all construction and ground disturbing activities shall stay outside of a 300-foot buffer around the active nest. For listed raptor species, this buffer shall be 500 feet. All observations of special-status species will be documented and submitted to the CNDDB by reporting any special status species detected by completing and submitting CNDDB Field Survey Forms. The City shall ensure the data has been properly submitted, with all data fields applicable filled out, prior to project ground- disturbing activities. The City will require the project sponsor's qualified biologist's assistance with the required reporting. The project sponsor shall provide CDFW with confirmation of data submittal. If active nests are determined to be present, a biological monitor shall be on-site to delineate the boundaries of the buffer area and to monitor the active nest at least twice weekly to ensure that nesting behavior is not adversely affected by construction or ground disturbing activity or until construction activity is completed, whichever comes

first. No impacts to active nests and/or nesting habitat shall be allowed without prior approval from CDFW. Monitoring activities shall be reported to the City's Planning Division and CDFW for review and approval monthly until nesting behavior is not adversely affected by construction or ground disturbing activity or all such construction activity is completed, whichever comes first. If, as a result of the monitoring, active nesting habitat is identified and determined to be an impediment to construction activities, CDFW shall be consulted to identify next steps and appropriate protection and compensation approaches. Removal or impact to an active nest or nesting habitat shall not occur without CDFW approval. CDFW may require compensation for any proposed habitat loss. Compensation for habitat loss would increase with the occurrence of any California Species of Special Concern and/or CESA-listed species.

BIO-4 Preconstruction Bat Survey. Prior to construction activities, a qualified bat specialist shall conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of the survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the project on bats and include species-specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). All observations of special-status species will be documented and submitted to the CNDDB by reporting any special status species detected by completing and submitting CNDDB Field Survey Forms. The City shall ensure the data has been properly submitted, with all data fields applicable filled out, prior to project ground-disturbing activities. The City will require the project sponsor's qualified biologist's assistance with the required reporting. The project sponsor shall provide CDFW with confirmation of data submittal. Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City prior to any project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

BIO-5 Tree Roost Impact Minimization. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees at a given location, during tree trimming, trees shall be pushed using heavy machinery prior to using a chainsaw to remove branches. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape.

BIO-6 Bat Maternity Roosts. If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when

young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

b-c) As part of the regulatory review process and to ensure consistency with applicable guidelines, a jurisdictional delineation was conducted and a report prepared to identify and assess impacts to aquatic resources on the project site, including resources under the jurisdiction of the U.S. Army Corps of Engineers (USACE) per Section 404 of the federal Clean Water Act, the Regional Water Quality Control Board (RWQCB) per Section 401 of the Clean Water Act and/or the state Porter-Cologne Water Quality Control Act, and the CDFW under Section 1600 of the California Fish and Game Code (see Appendix C).

It is important to note that terms herein reference federal wetlands/non-wetland waters to describe those features under the regulatory authority of the US Army Corps of Engineers. Features under the regulatory authority of the California Department of Fish and Wildlife are described as linear features or channels (i.e., streambeds). Those features under the regulatory authority of the Regional Water Quality Control Board are referenced as State Waters. Wetlands for the purpose of state jurisdiction are habitat areas meeting any one of the three (3) criteria of appropriate hydrology, hydric soils, or hydric vegetation.

The nearest Traditional Navigable Water (TNW) is the Pacific Ocean, which is located 33 miles to the west. The nearest Relatively Permanent Water (RPW) is the San Gabriel River, which is located approximately 12.2 miles away. Stormwater leaves the Project site and flows down the street (Highland Place) to the storm drain entry point located at the intersection of Highland Place and West Hillcrest Boulevard. The storm drain then flows to Santa Anita Wash. Santa Anita Wash is almost entirely lined with concrete, except at a basin near the meeting point of Arcadia, Monrovia, and El Monte and farther downstream within a flood control and recreation area at Whittier Narrows Dam (which is at the point where Santa Anita Wash meets the San Gabriel River.

One Non-Relatively Permanent Water (Non-RPW) feature (i.e., ephemeral carrier of periodic rainfall) and ten tributaries were identified within the Project footprint. These are described as follows and shown in Figure 8:

Drainage 1 crosses the parcel from the western boundary, southeast to where the driveway meets the street. At the time of the field visit, no water was present. The drainage is vegetated or contains sandy mineral deposits, is unvegetated or vegetated with upland species, and is mostly hard pack or paved. In the developed portions it contains a residential unit (occupied at the time of the site visit), a guest house, a shed, and concrete walkways and a paved driveway. This (852 linear foot) drainage comprises 10,275 square feet of ephemeral CDFW California streambed and RWQCB State Waters. No state or federal wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

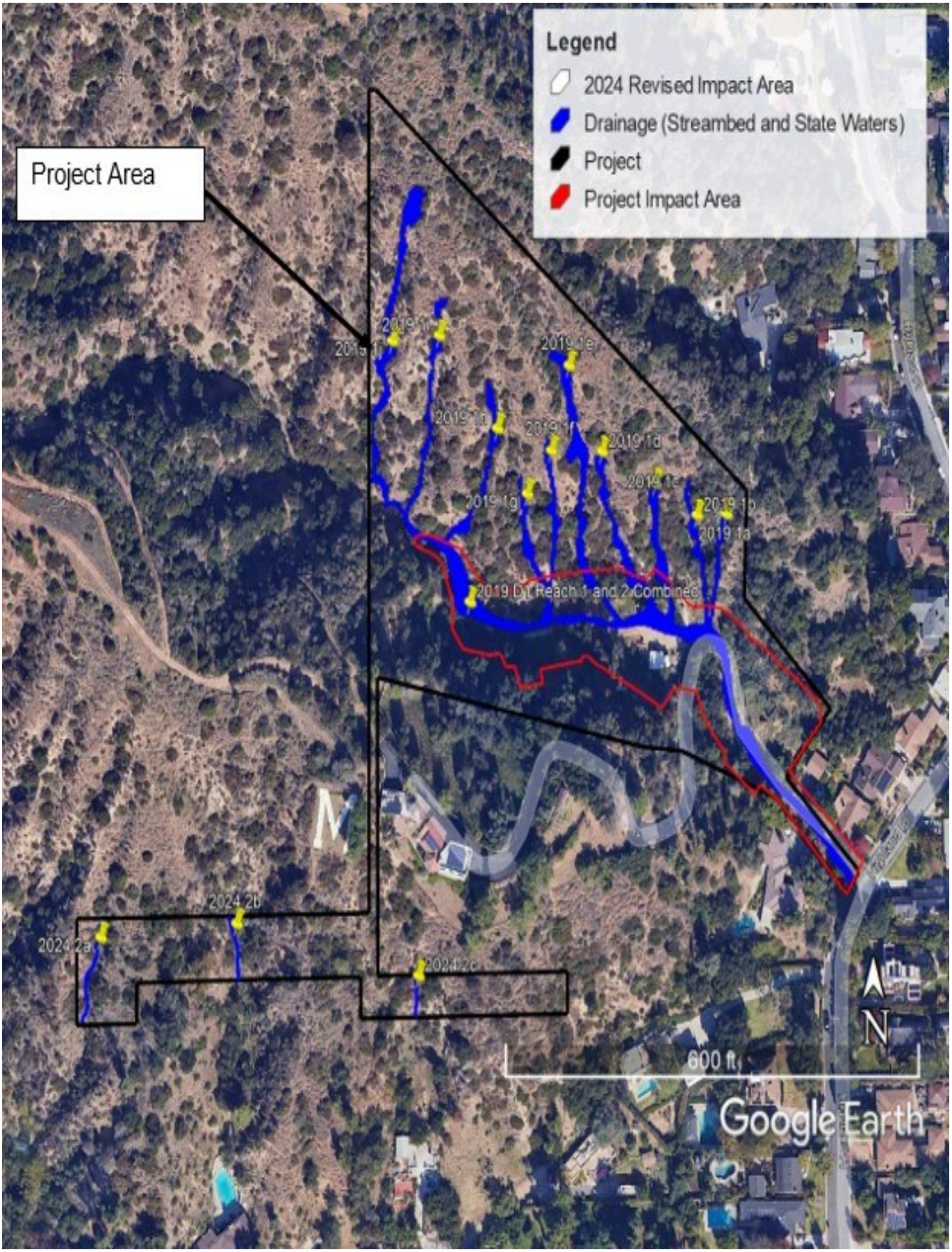

Figure 8— Non-Jurisdictional and Jurisdictional Features

Tributary 1a. Tributary 1a is an ephemeral tributary to drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (138 lf) drainage comprises 639 sq. ft. of ephemeral CDFW California streambed and RWQCB State Waters. No state or federal wetlands are present.. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1b. Ephemeral Tributary 1b is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (170 lf) drainage comprises 729 sq. ft. of ephemeral CDFW California streambed and RWQCB State Waters. No state or federal wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1c. Ephemeral Tributary 1c is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (171 lf) drainage comprises 1,455 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No state or federal wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1d. Ephemeral Tributary 1d is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (209 lf) drainage comprises 1,757 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters No state or federal wetlands are present.. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1e. Ephemeral Tributary 1e is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (340 lf) drainage comprises 3,114 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No state or federal wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1f. Ephemeral Tributary 1f is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (171 lf) drainage comprises 849 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No wetlands are present.

Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1g. Ephemeral Tributary 1g is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (128 lf) drainage comprises 1,114 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1h. Ephemeral Tributary 1h is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (214 lf) drainage comprises 1,196 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1i. Ephemeral Tributary 1i is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (262 lf) drainage comprises 1,271 sq. ft. of ephemeral CDFW California streambed and RWQCB state waters. No wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

Tributary 1j. Ephemeral Tributary 1j is a tributary to Drainage 1 and flows from north to south. At the time of the field visit no water was present. Vegetation within the drainage was dominated by upland chamise chaparral. This (316 lf) drainage comprises 2,453 sq. ft. (0.056 acre) of ephemeral CDFW California streambed and RWQCB state waters. No wetlands are present. Observed functions and values include nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality, and wildlife habitat.

In summary, there are a total of 0.58 acres of jurisdictional CDFW California Streambeds and RWQCB Waters of the state within the project site. The project would impact 1,191 linear feet (0.29 acres) of jurisdictional CDFW California Streambeds and RWQCB Waters of the State. No state or federal wetlands or "Waters of the U. S." will be impacted by the proposed project design as none are present. The remaining 0.29 acres of CDFW California Streambeds and RWQCB Waters of the State are located outside the impact area.

Riparian/Riverine and Vernal Pool Habitat. Riparian/riverine combined are defined as lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year. The Project site does not contain woody water dependent vegetation. Willows, mulefat, and/or other facultative

trees are not present on the property. Certain facultative shrubs are present and where these are contained within or adjacent to drainage features, they have been incorporated into the jurisdictional boundary limits.

Vernal pools are defined as seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season. Soil types are not consistent with an alkali playa or vernal pool complex and pools or depressions characteristic of vernal pool habitat are not present on the Project site.

As stated, one (1) primary drainage and associated tributaries (2,971 linear feet / 0.58 acre) consisting of ephemeral non-wetland jurisdictional drainages meeting the definition of CDFW California Streambeds and RWQCB Waters of the State under the Porter-Cologne Water Quality Act (as amended 2016) occur on-site. No state wetlands are present and no there is no jurisdiction under the Clean Water Act (federal waters or federal wetlands). When a discharge is proposed to waters outside of the Clean Water Act[1] (federal) jurisdiction, the Water Boards regulate the discharge under Porter-Cologne[2] through the issuance of Waste Discharge Requirements (WDRs) and are referred to as orders or permits.

The Project would impact 1,191 lf (0.29 acre) of jurisdictional CDFW California Streambeds and RWQCB Waters of the State. No state or federal wetlands or "Waters of the U. S." will be impacted by the proposed project design as none are present. The remaining 0.29 acres of CDFW California Streambeds and RWQCB Waters of the State are outside the impact area. The proponent has worked to restrict development to only those areas necessary to achieve the project design. The current project design is the least environmentally damaging practicable alternative (LEDPA).With implementation of Mitigation Measure BIO-7, impacts to Waters of the State and California Streambed would be less than significant.

> **Mitigation Measure BIO-7.** The Applicant shall prepare and submit Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement and Waste Discharge Requirement application to the California Department of Fish and Wildlife and Los Angeles Regional Water Quality Control Board, respectively. No ground disturbance within jurisdictional waters shall occur until the Applicant obtains the above permits and provides the City verification of permit acquisition. Note that the final compensation package contained in the permit shall be implemented by the Applicant. If the permit conditions are different than the mitigation listed in this document to protect biological resources, the City shall implement the mitigation identified in the permits, which must be equivalent or more effective in mitigating or avoiding potential significant effects and the substitution of any mitigation measure will not cause any potentially significant effect on the environment.

d) Wildlife corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated "islands" of wildlife habitat. Various studies have concluded that in the absence of habitat linkages that allow movement to adjoining open space areas, some wildlife species (especially the larger and more mobile mammals) would not likely persist over time. Such fragmented or isolated habitat areas hinder the transfer of new individuals and genetic information.

Corridors mitigate the effects of this fragmentation by:

- Allowing animals to move between remaining habitats, thereby permitting depleted populations to be replenished and promoting genetic exchange;

- Providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (fire, disease, etc.) result in population or local species extinction; and

- Serving as travel routes for individual animals as they move in their home ranges when in search of food, water, mates, and other necessary resources.

Wildlife movement activities usually fall into one of three movement categories: dispersal (e.g., juvenile animals from natal areas or individuals extending range distributions), seasonal migration, and movements related to home range activities (e.g., foraging for food or water, defending territories, or searching for mates, breeding areas, or cover).

The Project site is bordered on the north and east by undeveloped land, some of which is conserved open space (Hillside Wilderness Preserve) with additional conserved open space to the north (Arcadia Wilderness Park, Hillside Wilderness Preserve, Monrovia Canyon Park, and Angeles National Forest). The Project site likely contributes generally to wildlife movement in the area. The Project site, particularly the undeveloped northern portion, provides native habitat and local movement opportunities for species that live within the Project site and immediately adjacent undeveloped lands. However, the Project site does not provide linkage between two habitat blocks and is not within a wildlife corridor. Because the northern portion of the Project site would not be impacted by the proposed development, **no impact** would occur.

e) The removal and replacement of oak trees on the Project site is governed by the Madison Specific Plan – "C Modified", Part III Design Standards, Subsection (4), *Tree Preservation* and Part V, *Resource Management* Subsection 2, *Tree Removal and Transplantation.*

Tree Inventory. As required per the Madison Specific Plan – "C Modified", Resource Management section, a tree inventory was conducted June 22 and 24, 2021 and included as part of the Biological Resources Assessment (see Appendix B). The inventory included only the Project Impact Area and immediately adjacent areas. Trees were mapped and measured, and

each individual photographed. Trees were identified by number according to tree tags that were affixed to each tree. The trees are tagged beginning with the number 45 and ending with 89. Data collected consisted of species, estimated height, trunk diameter at two (2) feet above the ground, GPS coordinates, approximate base elevation, and a health assessment and base elevation. The 45 trees identified within and adjacent to the Project Impact Area are depicted in Figure 9.

Oak and Non-oak Trees. As stated, the trees are comprised of 23 coast live oak trees (*Quercus agrifolia*), one (1) southern California black walnut tree within the Project impact area, and 21 non-native ornamental trees. Coast live oak is a native evergreen oak tree found in valleys, on steep hillsides, rocky canyons, and along streams in coastal California from the Mexican border north to Mendocino County. It is not a special status species but impacts to oak trees on the Project Impact Area are regulated per the Madison Specific Plan. Scrub oak (*Quercus berberidifolia*) and/or San Gabriel oak (*Quercus durata var gabrielensis*) or hybrids were also observed on the site but are not present within the Project Impact Area.

Other trees within or adjacent to the Project Impact Area are two (2) ornamental junipers (*Juniperus* species), one (1) hibiscus (*Hibiscus* species), two (2) avocados (*Persea americana*), nine (9) Italian cypresses (*Cupressus sempervirens*), two (2) olives (*Olea europaea*), two (2) date palms (*Phoenix dactylifera*), one (1) apricot (*Prunus* species), one (1) jacaranda (*Jacaranda mimosifolia*), and one (1) sapote (*Casimiroa* species). All trees within or adjacent to the Project Impact are assumed to be impacted during construction either by removal, trimming/damage to branches and trunks, disturbance to roots or changes in hydrology. Of the 23 oak trees, 14 would be removed. Only impacts to oak trees require mitigation.

As required per the Madison Specific Plan – "C Modified", *Resource Management* section, prior to removing any oak trees, an arborist must evaluate each tree. Preparation and approval of a Landscape and Revegetation Plan is required demonstrating replacement of impacted trees at a 4:1 ratio. as well as how the applicant will comply with related requirements. There is one (1) southern California black walnut tree within or adjacent to the Project Impact Area as noted above. As stated, black walnut is listed as a special status plant; however, its listing status has not yet risen to a level that requires mitigation should an impact to this species occur. Impacts to the black walnut tree would be adverse but is not regionally significant and does not require mitigation. This tree would not be removed nor is mitigation required to address construction related impacts. An additional 21 non-native ornamental trees are present in or adjacent to the Project Impact Area.

Of the 23 oak trees, 14 would be removed to accommodate the project. These are depicted as 49, 59, 64, 66, 67, 68, 73, 74, 75, 76, 77, 78, 87 and 88 in Figure 9 and the locations are shown in Figures 10a, 10b and 10c. The Madison Specific Plan Part III, Design Standards, Landscape Requirements, Subsection 4, *Tree Preservation*, states that significant trees with trunk diameters greater than six inches (6") or vertical heights over twenty-five feet (25') shall be conserved where possible during subdivision, grading, site development or other site work or construction. All oak trees within the Project Impact area are 6" or greater in diameter. Only 12

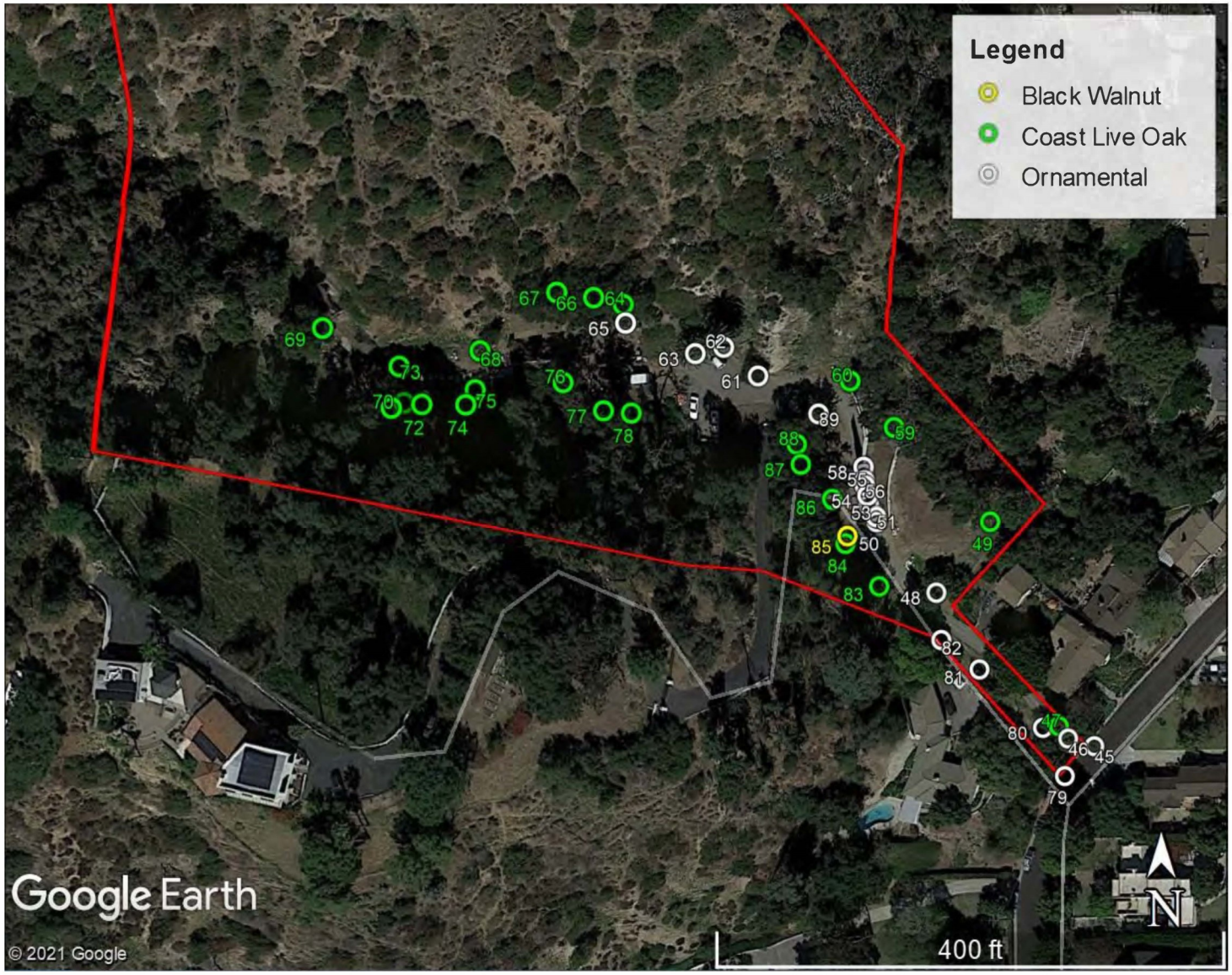

Figure 9—Oak and Non-Oak Trees

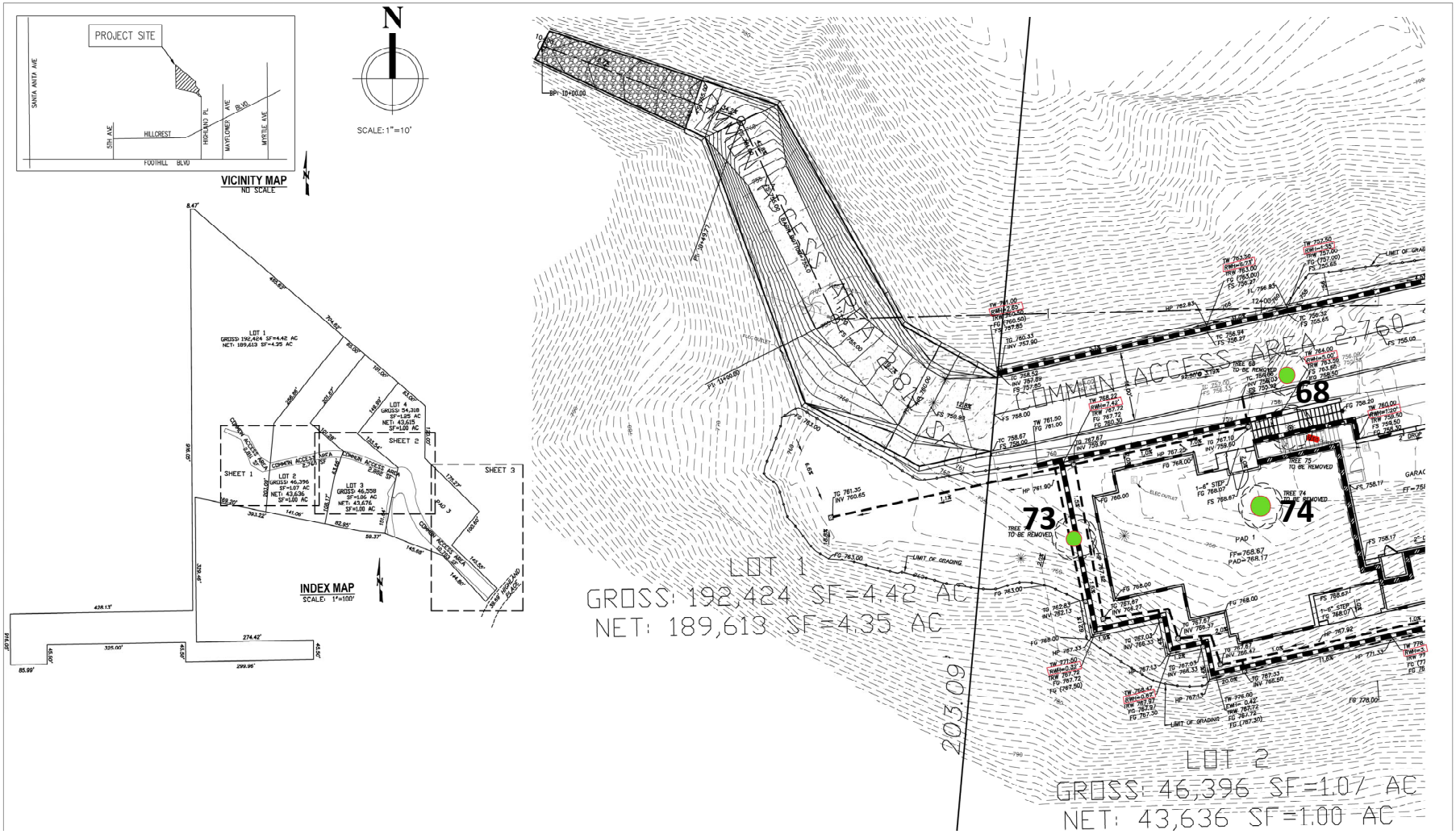

Figure 10a—Trees Proposed for Removal

● - Location of trees 68, 73 and 74

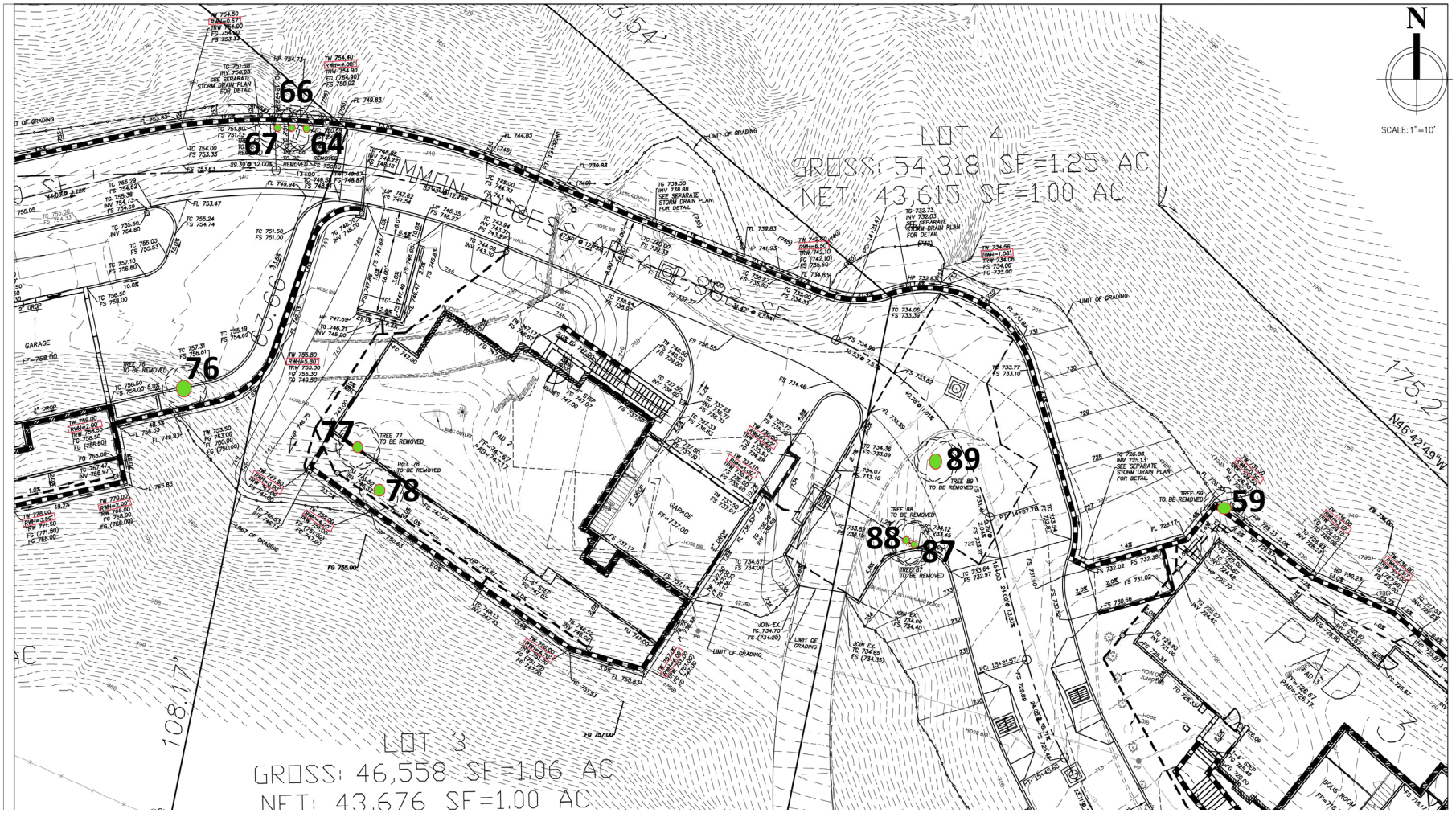

Figure 10b—Trees Proposed for Removal

● - Location of Trees 59, 64, 66, 67, 76, 77, 78, 87, 88, 89

Figure 10c—Trees Proposed for Removal ● - Location of Tree 49

are over 25" in height. The Specific Plan permits the loss of trees in specified conditions; however, the actual removal, relocation and replacement of such trees is regulated as identified in the Resources Management section of the Madison Specific Plan as stated above. Mitigation Measures BIO-8 and BIO-9 would be implemented to ensure project consistency with the Tree Preservation standards in the Madison Specific Plan. Further, approval of the proposed Madison Specific Plan – "C Modified" design exceptions would minimize the overall development footprint in comparison to what would be impacted if the Project were developed

consistent with all Specific Plan standards. This would reduce the potential for oak and mature non-oak tree impacts. With implementation of Mitigation Measures BIO-8 and BIO-9, impacts to oak and mature non-oak trees located on-site would be **less than significant.** To facilitate implementation of Mitigation Measures BIO-8 and BIO-9, these measures shall be added to the site plans as notes labeled "TREE PROTECTION REQUIREMENTS."

BIO-8 Oak Tree Infectious Disease Management. An infectious tree disease management plan shall be developed and implemented prior to initiating project activities. All trees scheduled for pruning shall be inspected prior to start of those activities for contagious tree diseases including but not limited to: thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*). To avoid the spread of infectious tree diseases, diseased trees, or any parts thereof, shall not be transported from the project site without first being treated using best available management practices relevant for each tree disease observed.

BIO-9 Oak Tree Construction Management. The following measures shall be implemented to protect the coast live oak trees prior to and during the construction process. Numbering reference for the oak trees corresponds with the numbering in the arborist report and as shown on Figures 10a-c of this Initial Study/Mitigated Negative Declaration. All work shall be overseen by a certified arborist, who will serve as the arborist for the project (project arborist).

a. Provide protective fencing at the edge of the canopy plus 5 feet. Fencing shall be already installed and inspected by the project arborist prior to the beginning of work on-site. Tree protection fencing shall be a chain link fence with an access gate at least 4 feet high with 2 inch by 6-inch steel posts installed at 8 feet on center. Post locations to be installed under observation by a qualified consulting arborist to avoid root damage.

b. Provide a minimum 8.5 inch by 11-inch retroreflective sign spaced a maximum of every 100 feet along each fence perimeter. The signs shall display the following information:

   I. "TREE PROTECTION ZONE"

   II. Name and contact information of project owner or authorized representative.

III. Mechanical injury and compaction to roots, root flares, trunks, and branches under the dripline of any tree to be retained shall not occur.

IV. Lay steel plates across any areas near street trees or under protected trees used for access.

V. No construction staging, washout or disposal of construction materials or by products shall be placed within the tree protection zones. Avoid storing soil or material on unprotected natural grade. Containment to be provided for concrete, paint, stucco, and other washout activities.

VI. Equipment shall not idle under the driplines of trees. Significant burn can occur to leaves and bark from exhaust and heat.

VII. The tree/root protection zone shall be irrigated sufficiently with clean, potable water to keep the tree in good health and vigor before, during and after construction. Trees shall be soaked so that water reaches a depth of 2-3 feet on a monthly basis, starting as soon as possible.

VIII. Apply mulch and compost around the trees once every 6 months during construction. Mulch in the form of wood chips is recommended for application over the surface of the soil to 4 inches deep to preserve moisture and improve soil condition.

c. INSPECTION: Trees shall be inspected on a periodic basis by a qualified tree consultant. The relative age, condition and targets under the tree shall determine the inspection frequency. It is the responsibility of the property owner to establish and implement an appropriate inspection schedule based on the recommendation provided by a qualified arboricultural consultant.

f) The Project site is not located within the boundaries of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The northern portion of the Project site, outside of the Project Impact Area, is immediately adjacent to a section of the Hillside Wilderness Preserve. The City of Monrovia established the HWP to protect and conserve habitat and ecological function while providing opportunities for passive recreational uses. The Hillside Wilderness Preserve consists of 1,416 acres of city-owned land referred to as "Hillside Wilderness Preserve" and "Hillside Recreation." Project impacts would not affect the Hillside Wilderness Preserve. **No impact** would occur.

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

The following information is based in part on the results of the *Phase 1 Cultural Resources Assessment,* prepared by Anza Resource Consultants, Inc., updated April 2024, and included herein as Appendix D.

a) Historic Resources. The existing residence within the Project site (347 Highland Place) was constructed in 1920 (Los Angeles County Office of the Assessor, 2022). The single-family home appears to have undergone multiple additions and alterations in various styles resulting in a somewhat dilapidated condition today. Additions appear to include expansion of the house into portions with different rooflines and enclosure of a patio into a sunroom. Alterations include multiple styles of fenestration and siding. The residence is not identified in the City's 1985 historic survey nor identified in the City's Resolution No. 95-15 regarding potential historic landmarks. Similarly, the residence at 347 Highland Place was not identified in the Monrovia Historic Preservation Group lists of current or potential landmarks. These findings suggest the residence is not eligible for the California Register of Historic resources (CRHR) or local listing; however, this current study does not include formal CRHR eligibility evaluation of the residence. Further, in 2018, the Monrovia Historic Preservation Commission conducted a Determination of Historic Significance for the existing residence and found that it did not meet any of the eligibility criteria. The residence was determined ineligible for listing.

The existing water retention basin comprises a concrete and rock upper pool set into a canyon narrow, with a secondary downstream basin enclosed by an earthen berm with a corrugated steel pipe through it to direct water flow down the canyon. The upper pool may have been used for water storage; however, the overall purpose appears to be management of water flow to avoid inundation of the residence during storm events. The basin would be removed to accommodate construction of the new debris basin. This Cultural Resources Assessment does

not include formal CRHR eligibility evaluation of the water basin, but it appears to be associated with the residence. Neither the residence or water retention basin appear eligible for inclusion in the CRHR or City of Monrovia historic resource listings. Both would be removed as part of the Project; however, because neither are considered historical, **no impact** to historical resources would occur.

b) Archaeological Resources. A record search request was submitted to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC) located at University of California, Riverside. The search was requested to identify previous cultural resources studies and previously recorded cultural resources within a 0.5-mile radius of the Project site. The SCCIC conducted the records search on March 18, 2022. The CHRIS search included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of all available historic USGS 7.5-, 15-, and 30-minute quadrangle maps. The SCCIC records search identified three cultural resources studies that were conducted within a 0.5-mile radius of the project site. One of the studies, LA-03308, included the Project site. None of studies identified cultural resources within the Project site.

Study LA-0338 was prepared in February 1993 for the Madison/Cloverleaf Specific Plan Area, Monrovia, Loa Angeles County, California. This study encompassed approximately 640 acres and included the entire Project site. The study found one previously unrecorded archaeological site and described six historic built environment resources, none of which were within or adjacent to the Project site.

Four cultural resources have been identified within a 0.5-mile radius of the Project site. None are within or adjacent to the Project site. All four are historic built environment resources including two residential complexes, one single-family residence and one survey monument.

Native American Scoping. A Sacred Lands File (SLF) review by the Native American Heritage Commission (NAHC) was requested on February 7, 2022. In anticipation of the NAHC response, Anza mailed letters on February 8, 2022, to five Native American contacts describing the Project and asking if they had knowledge regarding cultural resources of Native American origin within or near the Project site (Appendix B of Appendix D). The City of Monrovia also sent AB52 consultation letters Native American contacts on May 22, 2022.

The NAHC sent a response on March 25, 2022, stating that a search of the SLF was completed with positive results (i.e., sacred lands or resources important to Native Americans are recorded within the vicinity of the Project site) and recommended the Gabrieleno Band of Mission Indians – Kizh Nation be contacted. The NAHC provided a list of Native American contacts that may have knowledge regarding Native American cultural resources within or near the Project site. Outreach letters included the Gabrieleno Band of Mission Indians – Kizh Nation. Responses from the Kizh Nation received as part of the AB 52 consultation process are incorporated into Section XVIII, *Tribal Cultural Resources*.

Pedestrian Survey. On March 26, 2022, a pedestrian survey was conducted for the 7.8-acre Project site. Where possible, transects were spaced 10 meters apart and oriented following natural contours. Much of the Project site was too steep and densely vegetated for intensive pedestrian survey.

All areas of exposed ground surface were examined for prehistoric artifacts (e.g., chipped stone tools and production debris, stone milling tools, ceramics), historic debris (e.g., metal, glass, ceramics), or soil discoloration that might indicate the presence of a cultural midden. Characteristics of the Project site and survey conditions were recorded using a notepad and digital camera.

The Project site is a densely vegetated steep canyon and ridgeline with a residence and water catchment basin within the west central portion of the canyon bottom. Ground visibility during the survey was generally poor (mostly between 10-30 percent) because of dense vegetation in flatter areas with the exception of one open area possessing approximately 70 percent visibility near the southeast corner of the Project site. This area appears intentionally leveled and cleared. Greater visibility (60-80 percent) was observed on steep canyon sides and game trails; however, these surfaces were generally too steep to be likely for archaeological deposition. Gray quartz diorite bedrock was exposed on many steep slopes. Sediments within the approximately 60 percent of the Project site was too steep to survey or access; however, the Project is focused within the canyon bottom and 100 percent of the Project footprint was surveyed. The survey was negative for archaeological resources.

In summary, the site is located within the heavily disturbed canyon bottom and the archaeological sensitivity of the project footprint is considered low. The Sacred Lands File search was positive, indicating that resources important to Native Americans are present within the vicinity of the Project site. However, Native American outreach produced no specific concerns regarding the Project. Based on these findings, no further cultural resources study is recommended. However, Standard Condition CUL-1 from the Monrovia General Plan EIR (January 2008), Mitigation Measures CUL-1 and CUL-2 as well as Mitigation Measures **TCR-1**, **TCR-2** and **TCR-3** are incorporated herein to avoid or reduce **potentially significant impacts** to the unanticipated discovery of unknown cultural resources to **less than significant.**

> **Standard Condition CUL-1.** A Cultural Resources Management Plan (CRMP) shall be prepared to institute a plan for monitoring the potential for indirect impacts to unanticipated discovery of buried cultural resources, paleontological resources, and human remains during construction activities involving grading, grubbing, and excavation, which warrants the consideration of avoidance and minimization measures to ensure conservation of cultural resources and conformance with the applicable sections of the PRC. The approved CRMP shall incorporate the mitigation measures as included in this Initial Study/Mitigated Negative Declaration (IS/MND).
>
> **Mitigation Measure CUL-1**. If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and an archaeologist meeting the Secretary of the Interior's Historic Preservation Professional Qualification Standards for archaeology (National Park Service 1997) shall be contacted immediately to evaluate

the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted.

Mitigation Measure CUL-2. If human remains are found during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner shall notify the Native American Heritage Commission, which shall determine and notify a Most Likely Descendant. The Most Likely Descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

c)There is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. If human remains are discovered during any phase of construction, including disarticulated or cremated remains, all ground-disturbing activities must cease within 100 feet of the remains and the County Coroner and the Lead Agency (City of Monrovia) must be immediately notified.

California State Health and Safety Code §7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to CEQA regulations and Public Resources Code (PRC) §5097.98. If the County Coroner determines that the remains are Native American, the NAHC shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project contractor shall implement approved mitigation measure(s), to be verified by the Lead Agency, prior to resuming ground-disturbing activities within 100 feet of where the remains were discovered. With adherence to the existing regulations and implementation of Mitigation Measure CUL-3, **potentially significant impacts** to the unanticipated discovery of human remains would be **less than significant.**

Mitigation Measure CUL-3: In the event that human remains are encountered on the Project site, work within 50 ft. of the discovery shall be redirected and the Los Angeles County Coroner notified immediately consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code (HSC) Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. If the remains are determined to be Native American, the Los Angeles County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and

nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated items in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains. Prior to the issuance of grading permits, Director of the City Community Development Department, or its designee, shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State HSC Section 7050.5, and PRC Section 5097.98, as stated above.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY – would the project:				
a) Result in potentially significant adverse impact due to wasteful, inefficient, 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?	☐	☐	☒	☐

a) Project construction would utilize common methods for site preparation, grading and installation of all infrastructure. Construction vehicles and equipment would utilize fossil fuels such as gasoline, diesel fuel, and motor oil. However, construction would be short-term and temporary. The Project is not anticipated to include any unique features or construction techniques that would generate high energy demand or be wasteful or otherwise result in inefficient use of fuels or other sources of energy. The Project would conform with all state and local requirements regarding construction-related energy use, including anti-idling regulations.

During operation, the Project would utilize energy in the form of electricity and natural gas, as well as fuel for vehicle trips to and from the site. The Project is estimated to generate demand for 115,006 kBTU of natural gas annually and 20,685 kWh of electricity annually (CalEEMod 2022.1) (Appendix A). However, the Project would be designed to comply with all applicable standards for building energy efficiency in the California Energy Code (Title 24, Part 6) and California Green Building Standards Code (Title 24, Part 11), as adopted by the City. (Monrovia Mun. Code Section IX). The Project would not result in wasteful energy use, and would result in a **less than significant** impact.

b) The Project would construct three single-family residences, debris basin and related improvements. The Project would be required to comply with California Energy Code Title 24 requirements. Further, the Project would implement water conservation strategies focused on achieving the goals set forth by Senate Bill X7 7 (2010) which mandates a statewide 20% per capita reduction in water consumption by 2020. As stated in the City of Monrovia Energy Action Plan (2008), electricity is the largest source of energy for buildings and natural gas is the second largest source.

The 2019 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings went into effect on January 1, 2020. The 2022 Update was approved in September 2022 and became effective January 1, 2023. CALGreen is intended to (1) reduce 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. CALGreen contains requirements for stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more.

Further, the City's Energy Action Plan adopted in 2008, includes 21 action items on major topics of sustainability, energy, waste reduction, urban design, urban nature, transportation, environmental health, and water. These action items are focused on City assets and energy efficiency improvements. The Project would have to meet Title 24 energy requirements and comply with CalGreen standards as well as California's Building Code's (CBC) Zero Net Energy requirements if in effect at the time of building permit issuance.

The Project would comply with applicable elements of state and local plans through the implementation of measures addressing energy efficient design, water conservation and related features that reduce energy demand. When in operation, the Project is estimated to generate demand for 115,006kBTU of natural gas annually and 20,685kWh of electricity annually (Appendix A. While the Project would increase demand for public utilities in the region; for reasons stated above, this would not represent a significant impact with respect to energy consumption nor would it conflict with state or local plans for renewable energy or energy efficiency. **No impact** would result from the Project.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☒	☐	☐
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 as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – would the project:				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Information provided in this section was obtained in part from the *Report of Engineering Geological and Geotechnical Engineering Investigation for Three Single-Family Residences, Lot 3, Tract 3029, 347 Highland Place, Monrovia, California,* prepared by Environmental Geotechnical Laboratory, Inc., November 2021, provided as Appendix E.

a) (i) Surface fault ruptures occur along traces of active or potentially active faults. Like all of Southern California, the City of Monrovia is located within a seismically active region. The subject property is located within a dissected northwest southeast trending canyon within a faulted up lifted block bordering the Raymond fault in easterly San Gabriel Valley. The Raymond fault trends nearly northeast southwest from Monrovia Ruby Debris Dam area that is located at westerly intersection with Sierra Madre fault zone and extends westerly toward lineament of Hollywood-Santa Monica fault zone. The Raymond fault system is considered active. Recent seismic events and reportedly surface ruptures (within the last 11,000 years) before present did occur in Pasadena and presumably on Raymond fault trace in 1988.

During field reconnaissance performed for the Project, evidence of previous slope instabilities were not encountered and/or observed at the surrounding ascending slopes. The Project site is located outside the earthquake induced liquefaction hazard zone but is within the earthquake induced landslide potential hazard zone and within the northerly *Alquist-Priolo Earthquake Zones of Required Investigation* of Raymond fault. The Raymond fault system is considered active. Fault traces that have past seismic events occurred in 1988 and within the last 11,000 years based on definition of California Geological Survey. Based on recent fault trenching data, aerial photo interpretation and field geologic mapping of fault scarps, Southern California Earthquake Center estimated that at least eight (8) surface-rupturing events have occurred along entire fault in the last 36,000 years. Thus, the grading, excavation and related construction methods and recommendations provided in the above referenced Geotechnical Report would be implemented to minimize potential impact from seismic events associated with the Raymond fault trace and/or other fault systems within southern California. With implementation of Mitigation Measure GEO-1, the potential for surface fault rupture and related impacts at the site would be **less than significant**.

Mitigation Measure GEO-1: Prior to issuance of a grading permit or encroachment permit, the respective Project Sponsor shall provide a geotechnical report that addresses earthwork and foundation recommendations, including but not limited to, earthwork, retaining walls and foundation construction adjacent to the existing structures located on the property, pavement structural sections and recommendations. The geotechnical report shall include data regarding the nature, distribution and strengths of existing soils, conclusions and recommendations for grading procedures, design criteria for and identified corrective measures, and opinions and recommendations regarding existing conditions and proposed grading. The report shall also include subsurface geology of the site, degree of seismic hazard if any, conclusions and recommendations regarding the effect of geologic conditions on the proposed development, opinions and recommended design criteria to mitigate any identified geologic hazards including locations of surface and subsurface fault lines in the area as applicable.

Prior to the issuance of grading and/or building permits, the recommendations in Geotechnical Investigation Section 6.0 – Recommendations, Section 7.0 – Seismic Design; 8.0 – Corrosion Potential, Section 9.0 – Inspection, and Section 10.0 – Drainage shall be confirmed or modified by a geotechnical engineer to ensure compliance with the California Building Code. The recommendations of the geotechnical engineer shall be implemented during site grading and Construction.

a) (ii) During the life of the proposed improvements, the Project site would likely experience moderate to occasionally high ground shaking from known faults, as well as background shaking from other seismically active areas of the Southern California region. The Geotechnical Report provided recommendations for site preparation and foundation design to minimize impacts associated with a seismic event. With implementation of Mitigation Measure GEO-1, applicable elements of the current California Building Code requirements, seismic concerns and related structural impacts associated with ground shaking would be reduced to **less than significant.**

a) (iii) Liquefaction of soils typically occurs within the upper 30 feet nearest the ground surface. When saturated, loose, fine- to medium-grained soils (sand and silt) are present. Earthquake shaking suddenly increases pressure in the water that fills the pores between soil grains, causing the soil to lose strength and behave as a liquid. When liquefaction occurs, the strength of the soil decreases, reducing the ability of the underlying soil to support foundations for buildings and other structures. No groundwater, seepage or wet soils were encountered during the exploratory borings which were drilled to a maximum depth of 12 feet. As stated in the Geotechnical Report, the Project site is outside the area of liquefaction zone **No impact** would occur.

a) (iv) The subject property is located outside the earthquake induced liquefaction hazard zone but is within the earthquake induced landslide potential hazard zone and within the northerly Alquist-Priolo *Earthquake Zones of Required Investigation* of Raymond fault. The area proposed for development is at the bottom of a canyon with ascending slopes to the north and south. Based on field observation and slope stability analysis, the existing and proposed slopes are considered geologically stable but geotechnically unstable for the current conditions. Therefore, the temporary cut slope conditions are unstable and require additional support and/or alternative excavation methods. Temporary shoring methods are included in Section 6.2.2 of the Geotechnical Report. These include the use of shoring piles to support the existing northerly and southerly upslope retaining wall and to protect construction personnel during the deep excavation. Based on the materials encountered at the subject site and the depth of the proposed excavation, soldier piles could be used to support vertical cuts during construction of the proposed basement level. As recommended, shoring should have a maximum deflection of ½-inch at the top to protect adjacent structures and streets. If necessary, bracing should be used to provide additional lateral support. See Mitigation Measure GEO-2.

Post-construction, the alluvial terrace deposits and weathered bedrock materials located on the existing ascending slopes would continue to be subjected to sloughing when saturated. Surficial soils at the existing ascending slopes would not adversely affect the Project site or neighbor's property and should remain in the current condition because of the existing low to medium height bushes and medium- to large diameter trees with well-established wide canopies. However, it is recommended that a minimum of one (1) foot high freeboard be provided on any retaining walls constructed along the ascending slopes. See Mitigation Measure GEO-3.

With approval of the proposed Madison Specific Plan – "C Modified" design exceptions, the development footprint would be minimized; thus, reducing the potential for impacts to existing slopes and related earthquake induced landslides. With implementation of Mitigation Measure GEO-1 above, GEO-2 and GEO-3, construction and post-construction impacts related to landslides or other impacts associated with slope stability would be reduced to **less than significant with mitigation**.

> **Mitigation Measure GEO-2**. Shoring shall have a maximum deflection of ½-inch at the top to protect adjacent structures and streets. If necessary, bracing should be used to provide additional lateral support.
>
> **Mitigation Measure GEO-3**. A minimum of one (1) foot high freeboard shall be provided on any retaining walls constructed along the ascending slopes.

b) As previously noted, the Project site is a canyon with ascending slopes on the north and south sides. Earthwork would be required to create the building pads, street infrastructure and related improvements. The Project site is greater than one acre in size and individual improvements would disturb more than one acre; thus, the Project would be subject to the State Water Resources Control Board General Construction Permit during construction to minimize soil erosion. For additional information, see Section X *Hydrology and Water Quality*. Further, the

Project would comply with the City of Monrovia Earthwork and Grading Specifications that would be imposed as Project conditions. With the implementation of Best Management Practices (BMPs) specified in the Stormwater Pollution Prevention Plan (SWPPP) prepared for the Project and compliance with grading conditions, soil erosion hazard impacts would be **less than significant.**

c, d) Land subsidence is defined as the sinking or settling of land to a lower level. Causes can include: (1) earth movements; (2) lowering of groundwater level; (3) removal of underlying supporting materials by mining or solution of solids, either artificially or from natural causes; (4) compaction caused by wetting (hydro-compaction); (5) oxidation of organic matter in soils; or (6) added load on the land surface. The Project site is not located in an area of significant subsidence.

Expansive soils have a significant amount of clay particles which can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The occurrence of these soils is often associated with geologic units having marginal stability. Expansive soils can be widely dispersed and can be found in hillside areas as well as in low-lying alluvial basins.

Soils within the Project site are comprised of artificial fill, young alluvial deposits and remnant alluvial terrace deposits. Artificial fill (Af) is located in the elevated building and landscape areas above the existing canyon bottom and shared driveway. The thickness is approximately two (2) to four (4) feet and consists of silty sand with mixed in gravel- to small cobble sized granitic rock fragments, brown, dark brown and greyish brown in color, slightly moist, porous and moderately dense.

Onsite young alluvial deposits (Qal) are composed of silty sand, pale brown to olive brown in color, slightly moist to moist, porous and moderately dense. Variable amount of gravel- and small cobble sized rock clasts are locally encountered and observed at lower depths within the trenches excavated during the geotechnical exploration. The thickness of alluvial deposits is unknown. Weathered crystallined bedrock of Cretaceous Wilson Diorite were encountered underlain the existing alluvial fan deposits and exposed surficially at the surrounding ascending cut and natural slopes.

Remnant of alluvial terrace deposits (Qt) were encountered in the elevated and higher elevation of the ascending slopes above the canyon bottom. The old alluvial deposits composed of clayey silty sand, light brown and brown in color, slightly moist, porous and dense. The alluvial terrace deposit thickness is unknown.

No evidence was provided in the Geotechnical Report that the soils on-site have expansive characteristics. Further, the site is outside a mapped potential earthquake induced liquefaction area. Recommendations in Section 6.0 of the Geotechnical Report related to remedial grading and compaction summarized above would minimize settlement or compaction post-construction. With approval of the proposed Madison Specific Plan – "C Modified" design

exceptions, the development footprint would be minimized; thus, reducing the potential for impacts related to land subsidence or expansive soils. With implementation of Mitigation Measure GEO-1 and applicable elements of the current California Building Code requirements, impacts related to land subsidence and expansive soils would be **less than significant.**

e) The Project would connect to the existing sewer line located along Highland Place. No septic systems would be installed. **No impact** would occur.

f) As stated in the City of Monrovia General Plan Open Space Element/Park Master Plan Initial Study/Negative Declaration (February 12, 2018), soils within the City of Monrovia are comprised of gravel and sand of major stream channels and alluvial fan outwash from the major canyons in the northern portion of the City. Further, development on the Project site would be restricted to the canyon bottom which is comprised artificial fill and alluvial deposits as referenced above. Because alluvial fan outwash is likely to have covered any pre-existing paleontological resources, the potential for discovery of new resources are extremely low. Standard Condition PAL-1 would be implemented to address paleontological impacts associated with an unanticipated find during grading or other ground disturbing activity. With implementation of Standard Condition PAL-1, impacts related to paleontological resources would be **less than significant.**

> **Standard Condition PAL-1.** If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease within 50 feet of the discovery and the construction contractor shall contact the City Planning Division. With direction from the City Planning Division, a qualified paleontologist, who meets the guidelines defined by the Society of Vertebrate Paleontology, shall be retained to evaluate the find and recommend a course of action. If warranted, the qualified paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for identified resources. Construction shall not resume within 50 feet of the discovery until the qualified paleontologist states in writing that the proposed construction activities would not significantly damage paleontological resources.

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

The information presented herein is based on the greenhouse gas calculations prepared by Birdseye Planning Group, October 2024 and provided herein as Appendix A.

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 2014).

California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In July 2017, California's state legislature passed Assembly Bill (AB) 398 to reauthorize and extend until 2030 the state's economy-wide greenhouse gas (GHG) reduction program. California has established a GHG target of at least 40% below the 1990 level of emissions by 2030.

In the absence of an approved Climate Action Plan (CAP), potential GHG impacts in the South Coast Air Basin are evaluated per the SCAQMD's recommended/preferred option threshold for all land use types of 3,000 metric tons CO_2E per year. The City of Monrovia Energy Action Plan (EAP) adopted in June 2008, provides action items for improving the energy of City facilities and assets. The EAP does not provide thresholds that can be used to determine the significance of project-specific GHG emissions. Thus, the discussion below addresses project-specific GHG emissions relative to the SCAQMD 3,000 MT CO_2E annual emission threshold referenced above.

a) Construction activities would generate GHG emissions associated with equipment operation. The Project-related construction emissions would be generated over an anticipated one year construction phase extending from mid-2025 to early 2026. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used onsite at one time. Air districts such as the SCAQMD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Construction of the Project would generate approximately 73 metric tons of GHG emissions during construction (Appendix A). Amortized over 30 years, the Project would generate 2 metric tons as shown in Table 7 below.

Table 7
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	2 metric tons
Operational	
Energy	11 metric tons
Solid Waste	1 metric tons
Water	1 metric tons
Mobile	34 metric tons
Total	**49 metric tons**

See Appendix A for CalEEMod software program output

Table 7 also shows new construction, operational, and mobile GHG emissions generated by the Project. Long-term operational emissions relate to energy use, solid waste, water use, and transportation. As shown, the Project would generate approximately 49 MT CO_2E annually. The majority (69%) of the Project's GHG emissions are associated with motor vehicular travel (represented in Table 9 as mobile sources). Project-related annual GHG emissions would not exceed the threshold of 3,000 metric tons per year. Emissions would be less than significant. The Project would be designed to ensure consistency with applicable statewide codes and standards that in part, are intended to maximize energy efficiency and reduce project GHG emissions. Project-specific GHG emissions would be **less than significant**.

b) The Project would entail construction and operation of three new single-family residences, a debris basin and on-site improvements. The Project would replace one residence; thus, the net increase would be two residences. The Project would be designed consistent with Title 24 of the California Energy Code which includes the installation of energy efficient appliances and low flow plumbing fixtures.

The Project would increase demand for electricity and natural gas on-site as well as off-site for the treatment of water for potable use as well as the treatment of wastewater. CalEEMod assumed the use of water- efficient systems both indoor and outdoor to reduce potable and irrigation water demand by 20 percent. Further, the Project would be conditioned to install water efficient landscaping systems to reduce water demand. This would be achieved in part by designing project landscaping consistent with the City of Monrovia Model Water Efficient Landscape Ordinance (2016-01) adopted in 2016 and implemented via Municipal Code Sections 17.20.030 and 17.12.010 as well as the Madison Specific Plan Study, Part III Design Standards, Subsection B, landscape requirements.

Consistency with EO S-3-05 and SB 32

EO S-3-05. This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

SB 32. This bill establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. Some of the policies related to this goal include updated building codes for energy efficiency, the low carbon fuel standard, Pavley (California Assembly Bill) vehicle emissions standards, and the Renewable Portfolio Standards for utility companies. The Project would not exceed the 3,000 MT CO2e annual screening threshold defined by SCAQMD; and thus, is not considered a cumulatively considerable source of GHG emissions. However, the Project would be required to implement efficiency strategies intended to reduce overall energy and water demand and related GHG emissions associated with generating and conveying energy to the site as well the energy required to treat and convey potable water to the Project site.

CARB has indicated that statewide, California is on track to achieving both the 2030 and 2050 goals. CARB stated in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014, p. ES2).This is confirmed in the 2017 Scoping Plan, which states that the Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets. CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

The Project would not generate enough GHG emissions to cumulatively contribute to global climate change; and thus, would not adversely impact the attainment of statewide reductions in GHG emissions referenced above. However, the measures implemented by the Project as required per existing state and local plans, policies and regulatory codes, would contribute to GHG reduction goals mandated by AB 32 and further address in EO S-3-05 and SB 32. The Project would not impede or delay local, regional or statewide initiatives to reduce GHG emissions. Impacts would be **less than significant.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous material 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 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	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
risk of loss, injury, or death involving wildland fires?				

a-c) The Project would demolish an existing single-family residence and construct three new single-family residences, a new debris basin with related improvements. No hazardous materials other than small quantities of cleansers, automobile fluids, and swimming pool chemicals typical of residential development would be used or stored on-site. All such substances would be used in accordance with applicable requirements and would not pose a significant hazard to the public or environment. No hazardous materials would be created on-site nor would hazardous materials be released from the Project site.

Prior to demolition of the existing structures, the contractor would be required to obtain a demolition permit. The permit application submittal instructions require an asbestos and lead survey be performed for each structure proposed for demolition. If asbestos or lead is found within any of the structures, the applicant would be required to implement Mitigation Measure HAZ-1. Compliance with Mitigation Measures HAZ-1 and applicable protocol associated with issuance of a demolition permit, would avoid the release of hazardous materials from the site during demolition and reduce potential impacts to **less than significant.**

The nearest school to the project site is Mayflower Elementary School located at 210 North Mayflower Avenue. This school is located approximately one-half mile south of the Project site. No schools are located within ¼ mile from the site. A **less than significant** impact would occur.

> **Mitigation Measure HAZ-1**. If asbestos or lead is found within any of the structures to be removed or demolished as part of the project, an approved abatement contractor shall be retained to remove all lead, asbestos or other hazardous materials and dispose of the material at an approved landfill or disposal site.

b) No uses or activities that could have caused or contributed to a release of hazardous chemicals or materials occur or have occurred on the Project site. This was confirmed during review of available databases listing known hazard sites (i.e, Geotracker, Envirostar accessed December 15, 2021). There are no files on either Geotracker or Envirostar for the Project site that would indicate evidence of hazardous environmental conditions on or in proximity to the project site. The closest case is a Leaking Underground Storage Tank clean up at 400 Foothill Boulevard, West approximately one mile south of the Project site. The case was closed February 12, 2008. **No impact** would occur.

e) San Gabriel Valley Airport is located approximately seven miles southwest of the Project site. The Project is not located within the San Gabriel Valley Airport land use boundary, nor is it located within 2 miles of a public use airport or in proximity to a private airstrip (San Gabriel Valley Airport, Airport Layout Drawing Set, May 2015 https://planning.lacounty.gov/assets/upl/project/aluc_elmonte-plan.pdf). **No impact** would occur.

f) The established evacuation routes for the City of Monrovia include West Hillcrest Boulevard and West Foothill Boulevard for east-west movement and multiple streets for north-south movement of traffic to SR-210. Highland Place is not a designated evacuation route; however, residents in that area use this street for ingress/egress. The Project would not obstruct emergency ingress/egress to and through the Project vicinity through road closures or other project actions. The Project site entrance would utilize an existing driveway improvement to meet City of Monrovia standards. Any improvements that require lane closures or other modifications to traffic flow during construction would be managed per a Traffic Control Plan, which would be required as a Public Works Construction Standard and Mitigation Measure TR-1. Access to areas surrounding the site via Highland Place would not be affected by the Project. **No impact** would occur.

g) The Project site is located in a developed residential area and within a Local Responsibility Area for fire protection. The project site is located in a Very Fire Hazard Severity Zone as designated in maps prepared by the California Department of Forestry and Fire Protection (Cal Fire FHSV Viewer https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008), accessed November 20241). Project development would require preparation and implementation of a Fire Protection Plan that specifies the establishment and maintenance of defensible space specified in Section 15.20.301 of the Municipal Code. Water for fire protection would be provided by hydrants installed every 600 feet from all points of all structures per City of Monrovia Fire Code requirements. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. <u>HYDROLOGY AND WATER QUALITY</u> – Would project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that 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 surveys, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface water runoff which would result in flooding on- or off-site?	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
(iv) Otherwise impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami or seiche risk release of pollutants due to project inundation?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would project:				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Material in this section was obtained in part from the Hydrology Analysis prepared by EGL Associates, Inc. (September 15, 2023) (Appendix F).

a, c) Pollutants of concern during Project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled, leaked or transported via storm runoff into adjacent drainages and into downstream receiving waters. Any of these pollutants has the potential to be transported via stormwater runoff.

The Project site is primarily undeveloped; however, one existing residence with outbuildings and an existing storm flow detention basin are located on the Project site. The existing basin was constructed as a temporary facility by the former property owner to control off-site flows into the canyon below during storm events. The basin was designed to provide flood control but is not intended to protect the community from debris flows. The existing buildings and storm flow detention basin would be demolished as part of the Project. Existing drainage is from the northwest to the southeast towards Highland Place. Post development, drainage will remain the same as existing conditions. The project site currently receives off-site drainage from land west, north and south of the property. The majority of the drainage originates in a 13.38-acre area to the north. The total off-site peak drainage is 40.40 cubic feet per second (cfs). These flows will continue after development of the project and will discharge towards Highland Place. Total site runoff under existing conditions is 14.12 cfs. This will increase by 1.26 cfs to 15.38 cfs in the post-development condition.

On-site drainage infrastructure would be comprised of a ±52,466-square-foot flood control and debris basin (Highland Desilting Basin) located at the western end of the development area. The proposed desilting basin would replace the existing basin in the same location and is being constructed as a condition of approval to fulfill the Specific Plan requirements. The existing

water retention basin is comprised of a concrete and rock upper pool set into a canyon narrow, with a secondary downstream basin enclosed by an earthen berm with a corrugated steel pipe through it to direct water flow down the canyon. The new desilting basin would minimize runoff and manage downslope erosion from adjacent hillsides above the canyon floor where the Project is located. The new desilting basin would retain the water for desilting purposes and then discharge via a 24" line east to existing City of Monrovia storm drainage infrastructure located at the intersection of the site driveway and Highland Place. The debris basin would reduce uncontrolled runoff that flows through the Project site to the west and into the canyon; thus, protecting the downstream community from debris flows. Two drainage features would be constructed on the property adjacent to the driveway to capture and convey flows from the Project development areas into the 24" storm drain line.

Part II, *Project Description, Section 2, Stormwater and Flood Control*, of the Madison Specific Plan – "C Modified", provides policy language for the provision of stormwater control infrastructure within the Specific Plan area. The goal is to provide stormwater control infrastructure that ensures a safe environment for Specific Plan residents and protection against property loss and damage by constructing improvements which complement the natural environment. The following specifies stormwater related policies and objectives applicable to all projects constructed within the Specific Plan:

Objectives
(1) Provision of adequate flood control facilities to protect Specific Plan Area structures and downstream receptors; and

(2) Every reasonable effort shall be made to preserve and minimize the impact on riparian habitats by utilizing innovative designs which incorporate streambeds and channels into development.

Policies
(1) Drainage channels shall be placed in less visible locations, and more importantly, should receive a naturalizing treatment including native rock, colored concrete, and naturalized landscaping so that the structure is "masked" and appears as an integral part of the environment.

The proposed project would be consistent with the policy. The proposed desilting basin would be constructed in the same location as the existing basin at the western end of the development area. It would not be visible from Highland Place or any other publicly accessible location. As stated, the drain lines would extend east to existing stormwater infrastructure located in Highland Place; thus, avoiding any downstream runoff below the site. Consistent with Objective 2 above, no riparian habitat would be impacted by constructing the proposed desilting basin.

(2) Natural drainage courses should be preserved and enhanced to the extent feasible. Drainage features should be incorporated as an integral part of the project design in order to enhance the

overall quality and aesthetics of a site, to provide attractive open space vistas, and to preserve the natural character of the area.

The proposed project would be consistent with the policy. As stated in Section IV, *Biological Resources*, there is one (1) primary feature and associated tributaries. This (852 linear foot) drainage comprises 10,275 square feet of ephemeral CDFW California streambed and RWQCB State Waters. the Project would impact 1,191 lf (0.28 acre) of jurisdictional CDFW California Streambeds and RWQCB Waters of the State would be impacted by the Project. No state or federal wetlands or "Waters of the U. S." will be impacted by the proposed project design as none are present. The project will avoid 0.29 ac of CDFW California Streambeds and RWQCB Waters of the State. The impact would be mitigated with the purchase of off-site credits at an approved mitigation bank (see Mitigation Measure BIO-7). The on-site drainage features carry storm flows. These are isolated features and not part of an attractive publicly accessible open space. The mitigation credits purchased at an off-site mitigation bank would preserve waters of the State as part of a larger assemblage of such resources in perpetuity.

During construction, the Project would be required to implement Best Management Practices (BMPs) as required per Chapter 16.10 of the Municipal Code which is referenced as the stormwater and urban runoff management and discharge controls ordinance. The BMPs would minimize or avoid storm runoff entering the on-site drainage features and being conveyed off-site. In addition, Standard Condition HYD-1 would be implemented to address stormwater runoff and water quality.

> **Standard Condition HYD-1.** Based upon the requirements of the City's Stormwater Management Ordinance, Monrovia Municipal Code 12.36 and the Los Angeles County Municipal Storm Water National Pollutant Discharge Elimination System (MS4 NPDES) Permit issued by California Regional Water Quality Control Board, Los Angeles Region, the following shall be incorporated into the project application:
>
> - Minimize impacts from storm water runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under the California Environmental Quality Act (California Public Resources Code Section 21100), Section 13369 of the California Water Code, Sections 319, 402(p), and 404 of the Clean Water Act, Section 6217(g) of the Coastal Zone Act Reauthorization Amendments, Section 7 of the Environmental Protection Act, and local governmental ordinances.
>
> - Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground.
>
> - Minimize the amount of storm water directed to impermeable surfaces.

- The Applicant shall integrate Best Management Practices to ensure compliance with NPDES guidelines and the City's Stormwater Management Ordinance, MMC 12.36 to the satisfaction of the City Engineer, prior to the issuance of the grading permit. The design, implementation, construction activities and maintenance of the management devices shall mitigate and reduce pollutants in storm water discharges to the maximum extent practicable and shall be identified as on a "site specific mitigation plan." Site Specific Mitigation Plan must specifically address and provide best management practices (BMPs) either structural or non-structural to mitigate pollutants.

- The Applicant shall conduct annual maintenance inspections by the manufacturer or by a City approved inspector of all structural and/or treatment control storm water devices by following best management practices which shall also verify the legibility of all required stencils and signs which shall be repainted and labeled as necessary. Proof of such inspection shall be retained by the Applicant and a copy submitted to the City of Monrovia on a yearly basis.

There are no rivers or streams on the Project site; however, natural drainage features are present as described Section IV, *Biological Resources*. As stated above, the Project would modify on-site drainages; however, it would not alter the course of an existing stream or river that would result in on- or off-site erosion or siltation or otherwise impact riparian or other natural resources. As stated, the applicant would be required to purchase off-site mitigation credits at an approved mitigation bank to mitigate on-site impacts to drainage features. Further, construction of the desilting basin is intended to retain design capture volumes for the Project. While the total runoff would increase in the post-construction conditions, the runoff volumes leaving the site would be controlled to the existing conditions level. All discharge from the desilting basin would be conveyed to existing stormwater infrastructure in Highland Place; thus, eliminating off-site downstream flows which occur under existing conditions. No flooding on- or off-site would occur. The stormwater system would treat flows to achieve water quality requirements prior to discharge off-site if required. The Project would not substantially degrade water quality or otherwise violate discharge standards. Approval of the Madison Specific Plan "C Modified" design exceptions would reduce the overall development footprint; and thus, the area of impervious surface post-construction. Impacts would be **less than significant**.

b) The Project site would be served via existing water/wastewater lines located along Highland Place adjacent to and east of the Project site. The City of Monrovia Department of Public Works provides water service to an approximately 14 square mile service area. Per the 2020 Urban Water Management Plan, the City obtains its water supply from groundwater wells that produce water from the Main San Gabriel Basin. The City is also a sub-agency of Upper District, a wholesale water agency. The City's water distribution system consists of seven pressure zones, twelve reservoirs, 111 miles of water pipelines, two water treatment facilities, and five active wells. The City's service area population is approximately 40,541. Current water demand for single-family residential uses is 3,613-acre feet annually. This is projected to increase to 3,793 acre feet by 2025 and 3,988 acre feet by 2030.

The City of Monrovia relies on groundwater produced from the Main Basin. The Main Basin (which is included as a subbasin of the San Gabriel Valley Basin, Basin Number 4-13) has been identified by DWR as a very low-priority groundwater basin partially due to the fact it is adjudicated. In that regard, the Main Basin is actively managed by the Main Basin Watermaster. Supplies are projected to 7,469-acre feet in 2025 and 7,855-acre feet in 2030. This would exceed anticipated single-family residential demand and equal estimated demand for all water customers within the City.

The major sources of recharge to the Main Basin are direct penetration of rainfall on the valley floor, percolation of runoff from the mountains, percolation of imported water and return flow from applied water. The Project would increase the impervious surface on the Project site and convey stormwater off-site via a new debris basin into the City's stormwater infrastructure. The Project may reduce the amount of water percolating into the soil but is not expected to change the overall volume of runoff that recharges the Main Basin. The Project would not change how the regional groundwater is managed; thus, the Project would not directly interfere with groundwater recharge. A l**ess than significant** impact would occur.

d)The Project site is not located within a 100-year mapped flood zone (Federal Emergency Management Agency (FEMA)Flood Insurance Rate Map No. 06037C1400F (September 26, 2008). As stated, the project would construct a new debris basin with the intent of desilting storm flows and then conveying the flows within a new storm drain system that is connected to the county storm drain system in Highland Place for conveyance to flood control facilities. The Project would redirect on-site drainage; however, rather than flow through the existing basin and downslope into the canyon below, the proposed debris basin would capture and convey flows east into existing conveyance facilities as stated. While the on-site flows would increase post-construction, all drainage would be managed to ensure pre-construction flows off-site are reduced or maintained at preconstruction volumes. The Project would reduce the exposure of people or structures to flood hazard from severe storm events. **No impact** would occur.

The Project site is not located in proximity to a reservoir. Per the City of Monrovia General Plan, Safety Element (2002), the City of Monrovia is within the inundation area for both the Sawpit Debris Basin and Santa Anita Dam. The Project site is located between the two inundation areas; and thus, would not be affected should a dam failure occur. **No impact** would occur.
Seiches are oscillations of the surface of inland bodies of water that vary in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Tsunamis are large sea waves produced by submarine earthquakes or volcanic eruptions. The Project site is located well inland from the Pacific Ocean and there are no open water bodies in proximity to the Project site that would impact the property should a seiche event occur. The Project site does contain steep slopes and as stated in Section VII, Geology/Soils, the soils could destabilize when saturated. However, the Project site is not located within an inundation area or upslope water source that could generate mud flows as a result of runoff. **No impact** would occur.

e) This section addresses Project consistency with applicable surface and groundwater management plans.

Los Angeles Regional Water Quality Control Board, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The Project site is located within the jurisdiction of the Los Angeles RWQCB. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) establishes water quality standards for ground and surface waters within the Los Angeles region, which includes the City of Monrovia, and is the basis for the Los Angeles RWQCB's regulatory programs. Chapter 8, Groundwater Quality Management, of the Basin Plan focuses on basin/sub-basin groundwater quality management and includes Salt and Nutrient Management Plans (SNMPs) specific to each basin within the Los Angeles region. Specifically, Section F of the Basin Plan includes the program of implementation based on the Basin's SNMP, which includes existing and planned programs to manage salts and nutrients in the Basin (SNMP management measures). The SNMP management measures developed by local water entities in the San Gabriel Valley Basin, are voluntary measures that are designed to maintain water quality that is protective of beneficial uses, while increasing recycled water use and supporting the sustainable use of groundwater. These measures are applied in conjunction with existing water quality protection measures in each groundwater basin area.

Sustainable Groundwater Management Plan. The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a groundwater sustainability plan. The Project site is located within the San Gabriel Valley groundwater basin (Basin), which is designated as a Very Low priority basin. Therefore, there is no groundwater sustainability plan established for the Basin.

The Project would retain all stormwater on-site and treat the water prior to percolation into subsurface soils. These requirements are outlined in Chapter 12.36 of the City's Municipal Code. As such, the Project would comply with the latest National Pollutant Discharge Elimination System (NPDES) General Permit and would include a Stormwater Pollution Prevention Plan that incorporates BMPs for reducing or eliminating construction-related pollutants on-site. Thus, the Project would not affect water quality within the Los Angeles Coastal Watershed nor would the Project adversely impact groundwater supplies or interfere with groundwater recharge. The Project is not anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. LAND USE AND PLANNING -- Would the proposal:				
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?	☐	☐	☒	☐

a) The Project site is zoned Madison Specific Plan – "C Modified" (1 du/2.5 acres) and would be developed consistent with the Madison Specific Plan.

The Madison Specific Plan – "C" Modified serves as the primary document governing land use regulations over the Madison Specific Plan area. It implements the Monrovia General Plan and Hillside Development Policies and Standards for the Madison Planning area. The Specific Plan is intended to concentrate development in previously disturbed areas and non-sensitive environmental areas. Development standards are provided for maximum building height limits, yard (setback) requirements, projections permitted in yards, building separation on same lot and surrounding lots, standards regarding location of accessory equipment in front yards, fence and wall regulations, landscape requirements, minimum lot area width, parking and access, design standards and sign regulations.

The Project would replace an existing single-family residence and outbuildings located on the Project site. The net increase would be two single-family units and a new debris basin. Proposed densities are similar to existing densities in the surrounding neighborhood. The Project site currently does not provide a public thoroughfare, nor would it impede on any existing or planned roadway though the area. Because the Project area is primarily developed with low density single-family housing, the Project would not result in the construction of improvements that would physically divide an existing community. Implementation of Mitigation Measure LU-1 would ensure that on-site private access improvements are constructed consistent with Monrovia Municipal Code (MMC) requirements. Improvements would facilitate circulation to/from the site and on public roadways surrounding the site consistent with that anticipated in the General Plan and Madison Specific Plan – "C Modified". A less than significant impact would occur with mitigation.

Mitigation Measure LU-1: To accommodate the new development, the pre- existing

private way shall be upgraded to satisfy the requirements of MMC Section 16.08.220 and extended to Lots 1, 2 and 3. The pre-existing private way shall meet the standard and has been approved by the City of Monrovia Public Works and Fire Departments with respect to drainage control and fire apparatus accessibility.

b) The Project is consistent with the Madison–Specific Plan – "C Modified" land use designation. The density is one dwelling per 2.5 acres. With recordation of the parcel merger in March 2022, the Project site is 7.8 acres; and thus, able to accommodate the three proposed residential lots and the lot for the new debris basin. This would satisfy the minimum lot size and density requirements. The Project site would be developed consistent with the Madison Specific Plan – "C Modified".

Madison Specific Plan – "C Modified" Development Standard Consistency

Land Use. As stated, the Madison Specific Plan – C Modified supersedes the General Plan with respect to land use, circulation and related development standards. Section 1, Introduction, Subsection D, Authority and Scope, of the Specific Plan, states that the Madison Specific Plan is a regulatory plan which serves as the zoning ordinance for properties within the Specific Plan boundary. Proposed development plans or agreements, tentative tract or parcel maps and any other development approval must be consistent with this Specific Plan. Projects which are found consistent with the Specific Plan are deemed consistent with the General Plan.

As discussed in the Project Description, the project applicant has requested a total of five separate exceptions and six Administrative Changes to the Specific Plan single-family residential development standards as defined in Part IV of the Specific Plan. The Planning Commission has the authority to grant exceptions to yard/setback requirements where topographic features, subdivision plans, or other conditions create an unnecessary hardship or unreasonable regulation or make it impractical to require compliance with the yard or setback standards. These can be justified based on topography and need for sensitivity to resources within hillside areas as stated in Specific Plan Part IV, *Single-Family Development Standards, Subsection N, Exceptions*. All other requests for exceptions (not related to setbacks) are processed as Administrative Changes to the Specific Plan as stipulated in Part VI, Administration and Implementation, Subpart D.2. Subpart D.2 states that as development is proposed within the Specific Plan area, it may be demonstrated that certain detail changes with respect to items discussed in general terms in the Specific Plan are appropriate. These changes or adjustments shall be made as an administrative procedure approved by the Development Review Committee, or highest reviewing authority responsible for making a determination on the project. Changes do not require a Specific Plan Amendment; however, they are subject to CEQA review.

The following exceptions would require approval from the Planning Commission:

- Exception would allow less than 35-foot front yard setback for Lot 4 (12.8 feet);
- Exception (2) would allow less than 25-foot west side yard setback for Lots 2 (19 feet) and Lot 3 (18.9 feet); and

- Exception (2) would allow less than 25-foot east side yard setback for Lot 3 (18.5 feet) and Lot 4 (19.8 feet).

These exceptions can be justified based on existing topography and related development constraints associated with retaining, to the extent feasible, natural areas and related resources within hillside areas. Approval of these exceptions would result in reduced grading and a minor reduction in the overall development footprint relative to the area affected if the development standards were met. Thus, environmental impacts associated with implementation of these exceptions, specifically with respect to hillside encroachment, would be less than what would occur if the project were developed consistent with the existing yard and setback standards in the Specific Plan.

The following Administrative Changes to the Madison Specific Plan would be reviewed for approval by the Planning Commission.

- An Administrative Change would allow minimum lot width less than 150 feet (average 200 feet) for Lot 2, Lot 3 and Lot 4;
- An Administrative Change would allow a reduction in the minimum building separation of 90 feet (average 90 feet) for Lots 2 and 3 (40 feet) and for Lots 3 and 4 (75 feet);
- An Administrative Change would allow walled trash enclosure outside of the front yard setback on Lot 4;
- An Administrative Change would allow two-car versus three-car garages for Lots 2, 3 and 4; and
- An Administrative Change would remove the requirement that garages must be recessed 18 inches from front of house; and
- An Administrative Change would allow an increase in retaining wall height in front of the side yard setbacks.

These Administrative Changes pertain to development details within the Specific Plan area and are specific to the proposed Project. Similar to the yard and setback standards discussion, these Administrative Changes, if approved, would result in less environmental impact than if the project were constructed consistent with the existing development standards in the Specific Plan. Approval of the Administrative Changes would reduce the overall development footprint; thus, facilitating construction of the proposed project to maximize density within a constrained site consistent with the minimum lot size requirements per the Madison Specific Plan – "C Modified" while balancing the need for housing development with careful resource management and neighborhood compatibility.

Circulation. The Madison Specific Plan – "C" Modified, calls for utilizing street designs and improvements which serve to minimize grading impacts and harmonize with natural contours and character of the planning area. Access to the proposed project would utilize a pre-existing private way which extends from Highland Place to the proposed cul-de-sac. The existing private way would provide direct access to proposed Lot 4. From the cul-de-sac, the pre-

existing private way would provide direct access to Lots 1, 2 and 3. MMC § 16.08.220 states that a Conditional Use Permit (CUP) is required when an unimproved lot is improved with a residence and is to be served by a pre-existing private way or when a new lot is created that takes primary or secondary access from a pre-existing private way (up to maximum of five total lots, new and existing, when a new lot is created). Pre-existing private ways must be maintained with a minimum 16-foot paved width on a minimum 24 foot wide right- of-way and reconstructed or repaired to the satisfaction of the City Engineer, with adequate drainage control, from the entrance onto the easement to the furthest point of the newly improved parcel. Fire safety considerations, include installation of fire plugs, fire truck accessibility and maneuvering area, shall be included in a determination as to the safe length for improvements taking access from a private way. When considering approval of the CUP allowing use of the pre-existing driveway, the Planning Commission must find that use of a pre-existing private way creates a more desirable living environment and better utilization of the site than other access options, where other options exist.

The applicant is requesting a Minor Determination so that the use of the pre-existing private way is consistent with the Monrovia Municipal Code (MMC) 16.08.135 with respect to the number of total lots a pre-existing way may serve. The pre-existing private way serves the existing residence located on the project site and two additional private residences or a total of three lots. Approval of the proposed project would create a total of four lots, or three new lots. The total number of lots served by the pre-existing private way would be six. This exceeds the five-lot total allowed to be served by the pre-existing way. However, Lot 1 has been proposed to accommodate the debris basin. This is not a residential use; thus, the total number of residential lots to be served by the pre-existing driveway would be five, the maximum allowed per MMC § 16.08.220 as stated above. Further, the pre-existing private way, from Highland Place to the cul-de-sac would be improved to a paved with of 24 feet with a parking pocket added to accommodate two vehicles proximal to Lot 4. To accommodate the new development, the pre-existing private way would be upgraded to satisfy the requirements of MMC Section 16.08.220 and extended to Lots 1, 2 and 3. The pre-existing private way would meet the standard and has been approved by City of Monrovia Public Works and Fire Departments with respect to drainage control and fire apparatus accessibility.

Madison Specific Plan C-Modified Circulation Goal Consistency

The following goals, objectives and policies pertaining to circulation are provided in Section II, Project Description, B, Circulation/Street Component, Subsection 1, Vehicular Circulation of the Madison Specific Plan – "C" Modified. The following addresses project consistency with applicable elements of this section.

Goal (1): Provision of a safe network of neighborhood streets which creates minimum disturbance of the natural terrain and environmental resources.

The prosed project is consistent with this goal: The project would provide safe access to the site from Highland Place to all new lots and utilize the pre-existing private way which would be improved consistent with Municipal Code standards referenced herein. This would avoid the

need for constructing additional right-of-way and related disturbance within the hillside area. The pre-existing private way would accommodate a desilting basin maintenance truck. These trucks are commonly 10-wheel vehicles and smaller than standard fire engines which could be accommodated on the site. Thus, safety of the street network and pre-existing private would not be adversely affected.

Goal (2): Utilization of street designs and improvements which serve to minimize grading impact and harmonize with the natural contours and character of the specific plan area.

The proposed project is consistent with this goal: As stated, the project would utilize the pre-existing private way which would be improved consistent with Municipal Code standards referenced herein. No additional grading or disturbance would be required to widen the existing streets; thus, related disturbance within the hillside area would be avoided.

Policy (2): Streets shall have grades of not more than fifteen percent or steeper than ten percent (10%) for twenty-five feet (25') on either side of a hydrant.

The proposed project is consistent with this goal: The proposed driveway grades are less than fifteen percent.

Policy (3): Cul-de-sac streets shall be limited to a length of eight hundred feet (800') unless provided with an emergency access connector, or design solution approved by the Fire Chief and Director of Public Works.

The proposed project is consistent with this goal: The distance between Highland Place and proposed cul-de-sac would be approximately 330 feet.

Plan Proposals. The following policy relates to specific project proposals:

(4) Private drives providing access between the street and individual pads shall be built in accordance with Planning, Public Works and Fire Department standards.

The proposed project is consistent with this goal:. As stated above, the proposed circulation improvements would meet standards for both pre-existing private ways upon the approval of the CUP and Minor Determination. This would avoid impacts associated with additional grading and related ground disturbance impacts that would result from widening existing streets to accommodate additional right of way. Further, the distance from Highland Place to the cul-de-sac would be less than the 800-foot maximum allowed by Specific Plan Vehicular Circulation Policy (3) addressed above. As noted, the pre-existing private way would accommodate fire apparatus and desilting basin maintenance trucks.

The Project would be inconsistent with various Specific Plan land development standards including lot dimensions, setbacks, building separation, garage size and orientation recess requirements as identified herein. These inconsistencies would be addressed with the approval

of exceptions and administrative changes as described above and defined in Section IV, S*ingle-Family Development Standards, Subpart N. Exceptions* as described above. With respect to the yard and setback exceptions, these can be justified based on site topography and related development constraints associated with retaining, to the extent feasible, natural areas and related resources within hillside areas and the reduction of grading. Approval of these exceptions would result in a minor reduction in the overall development footprint relative to the area affected if the project were developed consistent with all yard and setback standards. The Specific Plan focuses on the premise of concentrating development in previously disturbed and non-sensitive areas. If the development was required to meet all the standards, the development footprint would be larger than proposed with more grading; and thus, have a greater impact to a currently undisturbed hillside.

The exceptions pertaining to development design details within the Specific Plan, if approved, would facilitate construction of the proposed project to maximize density within a constrained site consistent with the minimum lot size requirements per the Specific Plan designation. Development of the project consistent with the design exceptions would reduce the development footprint which would have a beneficial effect relative to the disturbance that would occur if the project were constructed consistent with the existing development standards in the Specific Plan. Thus, with approval of the proposed exceptions to the Specific Plan design standards and CUP and Minor Determination addressing the pre-existing private way, the project would be deemed consistent with Madison Specific Plan – "C Modified". As stated, the CUP is for the use of the pre-existing private way for Lots 1, 2 and 3 to reduce the amount of grading required.

City of Monrovia General Plan Land Use Element Consistency

The City of Monrovia General Plan was adopted in 2008 and updated in 2020. The Land Use Element establishes land use policy and land use patterns that will guide growth in the City until 2030. The land use goals and policies applicable to the proposed Project and Project consistency with these goals and policies are addressed as follows:

Goal 3: Preserve the integrity of residential neighborhoods.

Policy 3.1: Ensure the adequacy of on-site parking for all residential developments.

The proposed project is consistent with this policy: The proposed Project would provide on-site parking for each of the three proposed residential units and two visitor spaces on the pre-existing private driveway segment between Highland Place and the cul-de-sac. As noted, an Administrative Change would allow two-car versus three-car garages for Lots 2, 3 and 4.

Goal 4: Promote land use patterns and development which contribute to community and neighborhood identity.

Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed project.

The proposed project is consistent with this policy: The proposed Project would be developed within an existing and established single-family residential neighborhood in the foothills located north of downtown Monrovia. The Project would be developed consistent with the Madison Specific Plan – "C Modified" as stated herein, with the approval of design exceptions and administrative changes to the development standards for the purpose of reducing grading related impacts. The architectural style would be "mountain modern" as described in the project description which incorporates design features, massing, materials and colors that blend into the existing topography and native vegetation occurring on the site. The density (1 du/2.5 acres) would be also consistent with the Madison Specific Plan and existing development with surrounding area.

Goal 5: Encourage new development that is compatible with and complements existing land uses.

Policy 5.1: Consider the impacts of new development on infrastructure.

The proposed project is consistent with this policy: The proposed Project, with approval of the design exceptions referenced herein, would be consistent with the Madison Specific Plan – "C Modified" and related single-family residential design standards. The Project would be compatible with and complementary to existing single-family residential development along Highland Place. The project was evaluated relative to existing utility infrastructure (see Section XIX, *Utilities and Service Systems*) and determined to have a less than significant impact on water/sewer and solid waste infrastructure. Further, the net increase of two units on the site would have no adverse effects on the adjacent transportation infrastructure (see Section XVII, *Transportation*). Further, the Project would provide a new desilting basin as a condition of approval in accordance with the standards of the Madison Specific Plan –"C Modified." The new basin would minimize runoff and manage downslope erosion from adjacent hillsides above the canyon floor where the Project is located. The debris basin would reduce uncontrolled runoff that flows through the Project site to the west and into the canyon; thus, reducing related impacts to downslope areas.

Goal 10: Ensure that new development is sensitive to the City's natural and open space resources and constraints.

Policy 10.1: Adhere to the Hillside Development Policies and Standards designed to regulate development in the foothills so as to maximize preservation of open space and ridgelines and minimize disruption of plant and animal life.

The proposed project is consistent with this policy: As stated, the Project applicant is proposing exceptions and Administrative Changes to the Madison Specific Plan – "C Modified" single-

family residential development and design standards. The design exceptions are being requested, in part, to create a smaller development footprint within the site which would in turn result in less grading and encroachment into existing hillsides and related impacts to plant and animal life and retain more adjacent open space than what would otherwise occur if all design standards were met.

As described herein, the Project would be consistent with the Madison Specific Plan – "C Modified" as described herein, with approval of the proposed design exceptions. Further, the Project would be consistent with the applicable goals and policies within the City of Monrovia General Plan Land Use element. Impacts would be **less than significant**.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES -- 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?	☐	☐	☐	☒

a, b) In 1975, the California Legislature enacted the Surface Mining and Reclamation Act, which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into the following four Mineral Resource Zones (MRZ):

- MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated. MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

Of the four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the State of California Mining and Geology Board as being "regionally significant." Such designations require that a Lead Agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies and that it consider the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

There are no references to mineral resources occurring within the Madison Specific Plan – "C" Modified. The Project site has historically been used for low density residential development. According to the General Plan Conservation Element, the Project site does not contain any

known mineral deposits. The Project would not 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. There are no mineral resource extractions and or mining operations occurring in the vicinity. In addition, the City of Monrovia zoning precludes mining from occurring at the Project site. Therefore, **no impact** to mineral resources would occur as a result of the Project.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise levels (or volume) are generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, L_{eq} is summed over a one-hour period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise metrics – the Day-Night average level (L_{dn}) and the Community Noise Equivalent Level (CNEL) recognize this fact by weighting hourly L_{eq} over a 24-hour period. The L_{dn} is a 24-hour average noise level that adds 10 dB to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the L_{dn}, except it also adds a 5-dB penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called ground borne noise. Ground borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Ground-borne vibration related to human annoyance is generally related to velocity levels expressed in vibration decibels (VdB). However, construction-related groundborne vibration in relation to its potential for building damage can also be measured in inches per second (in/sec) peak particle velocity (PPV) (Federal Transit Administration, April 2018). Based on the FTA's *Transit Noise and Vibration Impact Assessment* and the California Department of Transportation's *Transportation-Related Earthborne Vibration, Technical Advisory* (September 2013) vibration levels decrease by 6 VdB with every doubling of distance.

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, libraries, and parks are most sensitive to noise intrusion; and therefore, have more stringent noise exposure standards than commercial or industrial uses that are not subject to impacts such as sleep disturbance. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. Therefore, the location, hours of operation, type of use, and extent of development warrant close analysis to ensure that noise sensitive receptors are not substantially affected by noise.

City of Monrovia Noise Standards

Construction Noise. Per Section 9.44.080 (F) of the Monrovia Municipal Code, construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays, is exempt from regulation.
Operation Noise. Per Section 9.44.040 (A) of the Monrovia Municipal Code, exterior noise levels at properties occupied for residential purposes, is limited to 55-dBA from 7:00 a.m. to 10:00 p.m. and 50 dBA from 10:00 p.m. to 7:00 a.m. Per Section 9.44.080 ((B) of the Monrovia Municipal

Code exempts noise from generated by activities of the federal, state or local jurisdiction while performing governmental duties which would include maintenance of the debris basin.
The City of Monrovia General Plan Noise Element defines land use/noise compatibility criteria for the purpose of assessing the appropriateness of establishing particular land uses in noise intensive environments. Single-family residential uses are identified as "normally acceptable" between 50 dBA and 70 dBA CNEL, "conditionally acceptable" between 60 to 70 dBA CNEL and "normally unacceptable" between 70 to 75 dBA CNEL unless noise reduction and installation are incorporated into the project design.

Vibration. The City of Monrovia Municipal Code Section 17.32.040 states that no vibration shall be permitted which causes a noticeable tremor beyond the boundary line of the property upon which the vibration exists. The Federal Transit Administration (FTA) has published guidelines for assessing the impacts of groundborne vibration associated with construction activities. The FTA measure of the threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec peak particle velocity (PPV). The threshold of perception of vibration is 0.01 in/sec PPV (Federal Transit Administration, Noise and Vibration Manual, September 2018).

The PPV thresholds are converted to decibels of vibration (VdB) for the purpose quantifying potential environmental impact. The FTA uses a threshold of 72 VdB for residences and buildings where people normally sleep (i.e., hotels and rest homes). A threshold of 75 VdB is used for institutional land uses where activities occur primarily during the daytime (i.e., churches and schools). The threshold used for the Project is 72 VdB (Federal Transit Administration, Noise and Vibration Manual, September 2018).

There are no state standards for traffic-related vibrations. California Department of Transportation's (Caltrans) position is that highway traffic and construction vibrations generally pose no threat to buildings or structures. For continuous (or steady-state) vibrations, however, Caltrans considers the architectural damage risk level to be between 0.2 and 2.0 inches/second PPV (California Department of Transportation, *Transportation and Construction Vibration Guidance Manual, September 2013).*

a) Construction Noise. Temporary, construction-related noise would occur during construction of the Project. The noise levels associated with the operation of common construction equipment are shown in Table 8. The noise levels are provided for reference purposes; not all equipment shown would be used for the Project. Noise levels are expected to occur within the ranges shown.

Table 8
Typical Maximum Construction Equipment Noise Levels

Equipment Onsite	Typical Maximum Level (dBA) 25 Feet from the Source	Typical Maximum Level (dBA) 50 Feet from the Source	Typical Maximum Level (dBA) 100 Feet from the Source
Air Compressor	84	79	73
Backhoe	84	79	73
Bobcat Tractor	84	79	73
Concrete Mixer	85	78	72
Bulldozer	88	82	76
Jack Hammer	95	89	83
Pavement Roller	86	80	74
Street Sweeper	88	82	76
Man Lift	81	75	69
*Dump Truck	82	76	70

Source: Noise levels based on FHWA Roadway Construction Noise Model (2006) Users Guide Table 1.
Noise levels based on actual maximum measured noise levels at 50 feet (Lmax).
Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.

Construction of the proposed improvements may utilize dozers, tractors, loaders, trucks and a variety of other types of equipment during each phase of the construction process. Noise levels associated with the equipment commonly used would range from 78 to 82-dBA Lmax at 50 feet from the source. A doubling of sound energy yields an increase of three decibels, so multiple pieces of equipment operating together may cause relatively small but noticeable increases in noise levels above that associated with one piece of equipment. Assuming two pieces of construction equipment, each producing a noise level of 82 dBA, are operating at one time on the Project site in proximity to one another, the worst-case combined noise level during the site preparation phase of construction is an estimated 85 dBA at a distance of 50 feet from the active construction area.

The nearest sensitive property is a single-family residence located adjacent to Lot 4. Construction in proximity to this residence would include clearing/grubbing and grading for the building pads and debris basin; installation of subsurface utilities, construction of the buildings, paving and related improvements. Off-site improvements would be limited to driveway improvements and utility connections at the property boundary.

Section 9.44.080 (F) of the Monrovia Municipal Code exempts noise from construction or demolition work provided it is conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays.
With implementation of the following standard conditions of approval, temporary construction noise would be less than significant:

Standard Condition NOI-1. All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

Standard Condition NOI-2. Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

Standard Condition NOI-3. All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

Standard Condition NOI-4. A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

As stated, the applicant has requested multiple exceptions to the Madison Specific Plan – C Modified design standards. The proposed Lot 4 is the closest lot to the existing single-family residence located at 349 Highland Place. With respect to Lot 4, exceptions would allow less than a 35-foot front yard setback (e.g., 19.8 feet), a minimum lot width that is less than 150 feet (average 200 feet); a reduction in the minimum building separation from 90 feet to 75 feet between Lots 3 and 4 and placement of the walled trash enclosure outside the front yard setback on Lot 4. With respect to construction noise, the side yard setback reduction (i.e., 25 feet to 18.9 feet) and narrower lot width could result in construction noise, particularly during building construction, occurring closer to the neighboring residence east of Lot 4. However, a reduction in a side yard setback of less than seven feet is not going to reduce the distance enough to have a noticeable effect on construction east of the development site. With implementation of Standard Conditions NOI-1 through NOI-4 above, construction noise would be **less than significant.**

Operational Noise

Exterior. Traffic is the primary noise source that would be generated by the Project. Highland Place is a residential collector street with no secondary outlet. All traffic using Highland Place is generated by the residences located generally north of West Hillcrest Boulevard. The Project would replace an existing single-family residence and add two new single-family residences. The Project would generate a total of 30 daily trips, of which 10 are existing based on a trip generation rate of 10 trips per single-family residence (Institute of Transportation Engineers,

Inc., Trip Generation Manual 10th Edition, September 2017). Thus, the project would add up to 20 new trips daily. Of the total, the Project would add two new peak hour trips, or one new trip every 30 minutes. The addition of two peak hour trips would not cause a noticeable increase in noise levels along Highland Place.

As stated, the debris basin would be maintained two to three times annually or as needed prior to or after storm events to ensure proper operation. Equipment used could include a 10-wheel vacuum service truck, a dump truck and bobcat tractor or related loading equipment. Some work would also be conducted using hand tools such as shovels. Noise levels generated by vacuum trucks are approximately 85 dBA Lmax at 50 feet (FTA 2018). As shown in Table 8 above, noise levels associated with the bobcat tractor is 79 dBA Lmax at 50 feet. Combined noise levels assuming simultaneous use of the two pieces of equipment would be 85 dBA Lmax. The closest residence to be debris basin would be Lot 2 which is located approximately 100 feet from the debris basin. Noise would attenuate to approximately 80 dBA Lmax during equipment use. As stated, Section 9.44.080 (B) of the Municipal Code would exempt noise generated during maintenance of the debris basin. While truck operation on Highland Place may be audible, periodic truck access and equipment operation within the debris basin area would not change overall ambient noise levels. Implementation of SC NOI-1 through NOI-4 would minimize temporary noise impacts associated with debris basin maintenance.

Mitigation Measure NOI-1 would be implemented to minimize noise impacts associated with maintenance of the debris basin. Impacts would be **less than significant with mitigation.**

> **Mitigation Measure NOI-1.** Routine maintenance of the debris basin shall be restricted to between 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. and 6:00 p.m. on weekends and holidays. This restriction shall not be applicable to emergency maintenance.

Interior Traffic Noise. California Energy Code Title 24 standards specify construction methods and materials that result in energy efficient structures and up to a 30-dBA reduction in exterior noise levels (assuming windows are closed). This includes operation of mechanical ventilation (e.g. heating and air conditioning), in combination with standard building construction that includes dual-glazed windows with a minimum Sound Transmission Class (STC) rating of 26 or higher. When windows are open, the insertion loss drops to about 10 dBA. The addition of two new peak hour trips would not cause noise levels at the nearest residence (i.e., adjacent to Lot 4) to noticeably change. Because the Project would not noticeably increase noise levels off-site over ambient conditions, a **less than significant** impact would occur.

b) Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise; e.g., the rattling of windows from truck pass-bys. This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as vibration rapidly diminishes in amplitude with distance from the source. In the U.S., the ground

motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

The vibration velocity level threshold of perception for humans is approximately 65 VdB (i.e., vibration velocity of 0.01 inches per second). A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. If a roadway is smooth, the groundborne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. No activites that generate vibration are known to occur in the area surrounding the Project site.

Construction activity on the Project site would be temporary with respect to overall duration and any vibration would not persist for long periods. Assuming vibration levels would be simlar to those associated with a large bulldozer, typical groundborne vibration levels could range from 87 VdB at a receptor distance of 25 feet, 81 VdB at 50 feet, and 75 VdB at 100 feet, based on the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment* (September 2018) as shown in Table 9 below.

Table 9
Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	91	85	83	82	79
Loaded Trucks	90	84	82	81	78
Jackhammer	94	88	86	85	82
Loader	86	80	78	77	74
Small Bulldozer	58	52	50	48	46

Source: FTA, 2018

Construction activities that typically generate substantial groundborne vibration include deep excavation and pile driving. Based on the proposed scope of improvements, this type of construction activity would not occur on the Project site. General construction associated with the Project would be confined to the Project site and surrounding road corridors and consist of grading, excavations for building footings and installation of subsurface infrastructure. It would be temporary in duration occurring periodically as subsurface work is required to construct the various phases of the project. The closest residence to the Project site is located approximately 30 feet southeast of Lot 4 at 349 Highland Place. Based on the information presented in Table 9, worst case vibration levels could be between 91 VdB and 85 VdB at this location during construction assuming a large bulldozer is the heaviest piece of equipment used during grading or site clearing.

As discussed, 100 VdB is the threshold where minor damage can occur in fragile buildings. There are no fragile buildings located in proximity to the construction site. Further, vibration levels would be under the threshold associated with structural damage. Thus, structural damage is not expected to occur as a result of construction activities associated with the Project.

Given the distance between the construction area and the nearest residence, vibration levels may exceed 72 VdB when earth work occurs within 150 feet of the property line. This is the threshold at or above which vibration may be perceptible if a large bulldozer were used for grading at the construction area nearest the residence. Section 17.32.040 of the Monrovia Municipal Code states that no vibration shall be permitted which causes a noticeable tremor beyond the boundary line of the property upon which the vibration exists. Implementation of Mitigation Measure NOI-2 would reduce potential vibration impacts to less than significant.

> **Mitigation Measure NOI-2**: Use of equipment operating within 150 feet of the nearest residence shall be limited to a small bulldozer or similar equipment such as a bobcat loader with vibration levels less than 72 VdB.

As stated, maintenance of the debris basin would require the use of a vacuum service truck dump truck and small loader such as a bobcat tractor. Removal of material would be performed using hand tools in some cases; however, the primary method would be use of a vacuum truck. This method does not require impact tools or techniques that would create vibration. Thus, no vibration impacts associated with operation of the Project would occur.

c) San Gabriel Valley Airport is located approximately seven miles southwest of the site. The Project site is not located within the San Gabriel Valley Airport land use boundary. While some overflights may occur and be audible, residents would not be adversely affected by aircraft noise. **No impact** would occur.

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

a) The Project consists of three single-family units and related infrastructure improvements. The Project would require the removal of one single-family residence and associated outbuildings to accommodate the improvements. The net increase would be two units. The Project would be consistent with the Madison Specific Plan - "C Modified."

The Project would facilitate population growth directly as a result of new development; however, per the City's General Plan the property and surrounding areas are planned to accommodate the Project and other development at similar densities. Because the Project would not increase the population beyond what was anticipated in the Monrovia General Plan, no unplanned population growth would occur. The Project would not indirectly induce growth through the extension of utility infrastructure, roads or other services to a currently unserved area. All project improvements would occur on the Project site and adjacent Highland Place. Approval of the proposed Madison Specific Plan – "C Modified", design exceptions would have no effect on the unit count or the number of future residents potentially living on the site. **No impact** related to population growth would result from the Project .

b) The Project site is mostly vacant. As noted, the Project would result in the removal of one existing single-family residence and associated outbuildings. These buildings have been associated with long-term residential use of the property. One tenant is residing in the house. The tenant would not be involuntarily displaced nor would removal of the existing housing require the construction of replacement housing elsewhere. **No impact** would occur**.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

a) (i-v) The City of Monrovia Fire Department provides fire and emergency medical services to the project sites. Monrovia has two fire stations. The closest is Station 101 which is located at 141 East Lemon Avenue, approximately one mile southeast of the site. Given the nature of the Project, demand for fire and emergency service may increase over existing conditions. The Project is consistent with the zoning designation for the Project site and would not increase the population beyond what was anticipated in the Monrovia General Plan Housing Element (November 2022). Further, the Project would be designed and constructed consistent with applicable codes and standards for access, fire suppression infrastructure and fuel management. The payment of impact fees would fund any additional staffing required to maintain or improve the efficiency of department operations. Thus, the Project would not require the construction of a new fire station to maintain service ratios.

Law enforcement services are provided by the City of Monrovia Police Department. The Police Department operates from the local headquarters building located at 140 East Lime Avenue which is located approximately one mile southeast of the Project site. The Project may generate demand for police services beyond existing conditions. However, the Project is consistent with the land use designation for the Project site and would not increase the population beyond what

was anticipated in the Monrovia General Plan Housing Element. Thus, the Project would not require additional staffing or the construction of new or expanded law enforcement facilities.

School services in the City of Monrovia Unified School District. The Project would provide housing for school-aged children thus, increasing demand for school services. The specific schools that school-aged children would attend would be determined by the age of the children. Regardless, the applicant would be required to pay a developer fee of $4.79 per square foot of assessable residential space to the school district for the support of ongoing development and expansion of school facilities as required to serve the residents within the Monrovia Unified School District. The addition of new school-aged children as a result of the Project would increase demand for services. The Project is not expected to generate the need for new schools. The development of new school facilities occurs as part of an ongoing District-wide planning effort to ensure adequate facilities are available to serve the student population. Thus, while increase in demand for school services would occur, impacts would be less than significant with payment of developer fees.

The City of Monrovia Library is located in Library Park at 341 South Myrtle Avenue approximately one mile southeast of the site. The Project would increase the population of Monrovia; however, the addition of new residents is not expected to impact demand for library services to the extent that new facilities would be required.

Library Park is the nearest park to the project site. It is located at 341 South Myrtle Avenue approximately one mile southeast of the site. The Project would not provide community recreational amenities on-site; however, the size of the lots would allow use of open space for recreation. The payment of impact fees would fund a fair share portion of future park improvements in the City of Monrovia. The Project would not remove park or recreational facilities that would require replacement elsewhere and would not require the construction of new public park facilities.

The Project would not require the provision of new or physically altered governmental facilities to maintain acceptable levels of service. As noted, an incremental increase in demand for fire, law enforcement, school, library or other government services may occur. The Project would be subject to applicable developer impact fees to offset service demands. Demand for improved or new facilities would not be triggered by this Project or approval of the proposed Madison Specific Plan – "C Modified" design exceptions. Impacts would be **less than significant**.

The implementation of the following standard conditions would avoid or minimize impacts to Public Services associated with project implementation.

> **Standard Condition PS-1:** At final inspection or prior to the issuance of the Certificate of Occupancy, the Project Applicant shall pay a Fire Impact fee, as defined by Municipal Code Section 3.46.040, Schedule of Fees and Service Charges. This fee shall either be paid directly to the City by the applicant, as established through negotiations with the City of

Monrovia and to the satisfaction of the City. City Building staff shall confirm payment of development impact fees.

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

a-b) The Project would replace one single-family residence with three single-family residences. As stated in the City of Monrovia General Plan Open Space Element (April 2018), Monrovia has approximately 4,850 acres of open space within its corporate boundary. The acreage includes urban parks, Canyon Park, the Hillside Wilderness Preserve and a portion of the Angeles National Forest. This equates to approximately 131 acres of open space per 1,000 residents. In an effort to maintain the existing level of service provided by the City's current inventory of parks, additional acreage would need to be acquired or secured as the population grows into the future. Independent of specific numeric standards, to maintain the current ratio, an additional 6.8 acres of parkland would be needed by 2035 to serve that population at the current level of service.

The Project would include a net increase of two single-family residences on a site that abuts the HWP. No public on-site amenities would be provided by the Project; however, the lot size (i.e., one acre for each of the three lots where the residences will be located and 4.42 acres for the fourth lot) and proximity to the HWP, would lessen the impacts on existing neighborhood and regional parks and other recreational facilities generated by the residents living on-site. No additional off-site park land would be required to accommodate the Project.. **No impact** would occur.

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

a) Transit Service. Existing public transit facilities and routes in the Project vicinity are serviced by Foothill Transit. Route 270 provides north/south service via Primrose Avenue/Myrtle Avenue and Peck Road. Route 187 provides east/west service via Huntington Drive. Additionally, the City runs Monrovia Transit, a service for residents and visitors that does not follow fixed routes or schedules. Monrovia Transit is a shuttle service that provides on-demand curb-to-curb trips within the service area. Trips to medical facilities are accommodated within a three-mile perimeter of the service area. The Project would have no impact on transit services or conflict with implementation of a transit plan. **No impact** would occur.

Bicycle Facilities. The City of Monrovia has Class II bicycle lanes are striped along portions of Olive Avenue and Evergreen Avenue. Bicycle lane signs are located along the western segment of Colorado Boulevard. No Class I or Class IV bicycles lanes are located in the City. As shown in the Monrovia Bicycle Master Plan (June 2018), there are no existing or planned bicycle facilities in proximity to the Project site. The Project would not impact bicycle facilities. **No impact** would occur.

b) CEQA Guidelines, specifically Section 15064.3, identify Vehicle Miles Travelled (VMT) as the most appropriate measure for the evaluation of transportation impacts and states that a project's effect on automobile delay shall not constitute a significant environmental impact.

While vehicle delay may cause an inconvenience to motorists traveling through an area, it does not constitute an environmental impact. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project. All agencies and projects statewide are required to utilize the updated CEQA guidelines recommending use of VMT for evaluating transportation impacts as of July 1, 2020. Accordingly, the City of Monrovia adopted the *Transportation Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (September 2020) (VMT Guidelines).

The City of Monrovia VMT Guidelines include screening thresholds for certain types of projects that may be presumed to cause a less than significant VMT impact. These criteria are based on substantial evidence provided in the OPR Technical Advisory or are defined as projects that are local serving; and thus, by definition, reduce VMT by decreasing the number or distance of trips. The following three screening steps were evaluated: 1) Transit Priority Area (TPA) Screening; 2) Low VMT Area Screening; and 3) Project Type Screening. As a result of the screening analysis, it was determined that the Project meets Screening Criteria (3). Projects generating less than 110 trips daily are assumed to have less than significant VMT impact.

The Project would result in a net increase of two single-family residences. Based on Institute of Transportation Engineers, 10th Edition, a single-family residence generates approximately 10 trips daily. The Project would result in a net increase of 20 daily trips. This would be below the screening threshold. Thus, VMT impacts would be **less than significant.**

c) Road improvements would consist of widening the pre-existing driveway to 24 feet and adding a two-vehicle pocket parking area on the south side of the street. A cul-de-sac would be constructed at the west end of the pre-existing driveway to accommodate a fire apparatus turnaround. The common driveway would be widened to 16 feet from the cul-de-sac to provided access to Lots 1, 2 and 3. The proposed width of both the pre-existing driveway and common driveway has been approved by the City of Monrovia Fire Department. The Project design would not increase hazards. **No impact** would occur.

d) The Project would provide access to the site for use by emergency vehicles; however, the Project would not alter emergency access routes. Highland Place provides emergency evacuation for residents living along the street; however, it is not a designated evacuation route. The 24-foot wide pre-existing driveway and 16-foot wide Common Driveway would provide access for residents, delivery, vendor and emergency service vehicles. Road improvements constructed by the Project would improve overall access to the project site. Mitigation Measure TR-1 would ensure construction of the proposed project would not impair emergency access to the area. With implementation of Mitigation Measure TR-1, impacts would be **less than significant.**

> **Mitigation Measure TR-1. Prepare Traffic Control Plan.** Prior to project construction initiation, the Project applicant shall prepare a Traffic Management Plan for approval by the City Traffic Engineer. The Traffic Management Plan shall specify that one direction

of travel in each direction on adjacent roadways must always be maintained during project construction activities. If full lane closures are required and one direction of travel in each direction cannot be maintained, the Traffic Management Plan shall identify planned detours. The Traffic Management Plan shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and use of construction flag person(s) to direct traffic during heavy equipment use. The Traffic Management Plan shall be incorporated into project specifications for verification prior to final plan approval by the City Traffic Engineer.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:				
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource 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 Historic Places, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k), or	☐	☐	☐	☒
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 Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires that Lead Agencies evaluate a Project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources (PRC Section 21074).

AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside of the definition stated above nonetheless qualifies as a "tribal cultural resource." Also, per AB 52 (specifically Public Resources Code [PRC] 21080.3.1), a CEQA Lead Agency must consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project and have previously requested that the Lead Agency provide the tribe with notice of such projects.

The City of Monrovia currently maintains a list of tribal councils based on a list of councils and corresponding Native American representatives provided to the City of Monrovia by the Native American Heritage Commission (NAHC) on September 8, 2016. The City of Monrovia sent AB 52 noticing letters to Native American tribal representatives on the list as required per the AB 52 consultation process.

a) As discussed in Section V, Cultural Resources, the existing residence within the Project site (347 Highland Place) was constructed in 1920 (Los Angeles County Office of the Assessor, 2022). The single-family home appears to have undergone multiple additions and alterations in various styles resulting in a somewhat dilapidated condition today. The residence is not identified in the City's 1985 historic survey nor identified in the City's Resolution No. 95-15 regarding potential historic landmarks. Similarly, the residence at 347 Highland Place was not identified in the Monrovia Historic Preservation Group lists of current or potential landmarks. Further, in 2018, the Monrovia Historic Preservation Commission conducted a Determination of Historic Significance for the existing residence and found that it did not meet any of the eligibility criteria. The residence was determined ineligible for listing. These findings suggest the residence is not eligible for the California Register of Historic Resources (CRHR) or local listing. **No impact** to historical resources would occur.

b) Pursuant to California Assembly Bill 52 the *Gabrieleño Band of Mission Indians – Kizh Nation (Tribe)* requested to and did consult with the City of Monrovia with respect to the project. As discussed during the consultation process, the Project site is located within the boundaries of Kizh ancestral territory. Thus, the Tribe stated that without mitigation, potentially significant and adverse impacts to Kizh historical landscapes, ceremonial places, subsurface artifacts, and other Kizh tribal cultural resources ("TCR") would occur with the Project. Implementation of the following mitigation measures provided by the Tribe as part of the AB 52 consultation process would reduce potential impacts to Tribal Cultural Resources to less than significant.

Mitigation Measure 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 TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

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

E. 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.

Mitigation Measure TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects

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

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 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. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

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

Mitigation Measure TCR-3: Procedures for Burials and Funerary Remains:

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

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

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

With implementation of Mitigation Measures TCR-1 through TCR-3, potentially significant impacts to Tribal Cultural Resources would be **less than significant.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing 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?	☐	☐	☒	☐

a, c) The Project is proposing to demolish and existing single-family residence and construct three new residences and a new debris basin on a 7.8-acre site. The City of Monrovia would provide potable water and sewer services via an existing line located on Highland Place. The

City, through its Public Works Department owns, operates, and maintains a sanitary sewer collection system including approximately 92 miles of City sewers with sewer pipe sizes varying in diameters from 6 inches to 24 inches. The majority of City wastewater flows are conveyed to a 24-inch trunk sewer in Peck Road in the southern area of the City of Monrovia. The City operates its wastewater collection system under the jurisdiction of the Los Angeles Regional Water Quality Control Board, the State Water Resources Control Board, and the U.S. Environmental Protection Agency. The sewers are primarily constructed of vitrified clay pipe with majority of the pipes sized at 6- inch to 10-inch in diameter.

According to the City of Monrovia 2020 Urban Water Management Plan (July 2021), wastewater generated by the City is treated by the Los Angeles County Sanitation Districts (LACSD). Wastewater is collected within the City's local sewer collection system. The City's local sewers tie into one of LACSD's regional trunk sewers which deliver wastewater to one or more water reclamation plants owned by LACSD for treatment. The Whittier Narrows Water Reclamation Plant (WNWRP), the San Jose Creek Water Reclamation Plant (SJCWRP) and Joint Water Pollution Control Plant (JWPCP). Combined, these facilities have a daily treatment capacity of 415 million gallons per day (MGD). LACSD estimates approximately 69 gallons per person per day of wastewater is generated within LACSD's service area. Based on a 2020 population of 40,541, the City of Monrovia generates approximately 2.8 million gallons per day (about 3,100 AFY). Assuming a total of nine people live in the proposed residences, the Project would generate approximately 621 gallons of wastewater daily (or a net increase of 414 gallons) or 0.0001 percent of the daily wastewater volume generated in the City. The Project density is consistent with the Madison Specific Plan – "C Modified" density; thus, wastewater volumes have been considered in the overall projections for the City. The construction and operation of the three proposed residences would not require the expansion of the existing wastewater treatment plants or conveyance systems.

The City of Monrovia provides water service to the City of Monrovia and encompasses an area of approximately 14 square miles. The City currently obtains water from groundwater wells that produce water from the Main San Gabriel Basin. The City is also a sub-agency of Upper District, a wholesale water agency. The City's water distribution system consists of seven pressure zones, twelve reservoirs, 111 miles of water pipelines, two water treatment facilities and five active wells.

The Project may require the relocation of water and sewer lines to accommodate driveway improvements between Highland Place and the driveway extension to Lots 1 and 2; however, these improvements would occur within the area already disturbed. The Project with approval of the proposed Madison Specific Plan – "C Modified": design exceptions, would not relocate or construct new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which would cause significant environmental effects. Impacts related to the provision of utility services would be **less than significant**.

b) During preparation of the 2020 Urban Water Management Plan, the City reviewed the current and projected land uses within its service area. The existing land uses within the City's service area include residential (single-family and multi-family), commercial, industrial, institutional, and open space. The projected land uses within the City's service area are expected to remain similar to the existing land uses. In addition, although mostly built-out, the projected population within the City's service area is anticipated to increase.

The Project is estimated to generate a water demand of 1,657 gallons per day and a net increase of 1,105 gallons per day. This would equate to approximately 1.2 acre feet per year. The City's current and projected water demands are provided in five-year increments over the next 25 years (through calendar year 2045). The City's total water demands were projected based on a review of the SB X7-7 calculations (which are also assumed for future project demand), current water use factors based on recent water demands and the total population projections based on land use trends within the City of Monrovia. As stated in the UWMP, in 2020, the City provided 3,613 acre-feet of water to single-family residences with a total city-wide demand of 6,976 acre-feet. The single-family residential demand is projected to increase to 3,793 acre-feet in 2025 with a city-wide demand of 7,469 acre-feet and 3,988 acre-feet in 2030 with a city-wide demand of 7,855 acre-feet. As shown in Tables 7-2 through 7-4 of the 2020 UWMP, adequate supplies are available to meet projected demand, including the Project, with approval of the Madison Specific Plan – C Modified design exceptions, through the planning horizon. A **less than significant** impact would occur.

d) CalRecycle's Disposal Reporting System (DRS) indicated that the City of Monrovia generated about 41,667 tons of disposed solid waste in 2019; this translates to an average of 4.2 pounds per person per day, or 1,535 pounds per person per year. According to the DRS, waste generated in the City was sent to numerous landfills in the region. The Mid Valley landfill received the most of any facility (18,251 tons), followed by the El Sobrante Landfill (5,875 tons), San Timoteo Sanitary Landfill (5,8274) and Azuza Land Reclamation County Landfill (4,132 tons). The Mid Valley Landfill is stated to have disposal capacity through 2033.

The Project is anticipated to have approximately 9 residents or a net increase of 6 residents. Assuming the per capita 1,535 pounds per person per year rate, this results in about 13,815 pounds (7 tons) of solid waste generated annually for the three single-family residences. It is likely that the actual waste generation rate would be lower, as additional solid waste strategies and policies are implemented over the term of the Project, which would also be subject to the City's construction and residential recycling programs. Overall, the amount waste produced is nominal in relation to landfill capacity.

The Project, with approval of the Madison Specific Plan – C Modified design exceptions, would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Nor would the Project result in a substantial increase in solid waste generation. Therefore, impacts would be **less than significant**.

e) The primary State legislation regarding solid waste is AB 939, The Integrated Waste Management Act, adopted in 1989. AB 939 requires local jurisdiction to achieve a minimum 50 percent solid waste diversion rate through 2020 and 75 percent beyond 2021. The Project would comply with local implementation requirements as well as federal, State, and local statutes related to the management of solid waste. This includes the City's construction and demolition disposal and recycling requirements. The City requires projects that include demolition and/or construction of structures of 1,000 square feet or greater to acquire a construction/demolition permit. A Waste Management Plan (WMP) would be included as a standard condition for Project approval. With preparation and implementation of a WMP and compliance with Standard Condition UT-1; impacts would be **less than significant**.

> **Standard Condition UT-1:** As applicable, Project Applicants shall comply with the City of Monrovia Construction and Demolition (C&D) Disposal and Recycling Program. The Program includes submitting a C&D Recycling Program Permit Application and a Waste Management Plan to the Public Works Department Environmental Services Division and diverting 50 percent of the total construction and demolition debris generated by the Project. Requirements and Timing: Applicants shall submit Waste Management Plans to the City Department of Public Works Environmental Services Division for review and approval prior to issuance of building permits. The Waste Management Plan shall be implemented and adhered to throughout construction. Monitoring: City Department of Public Works Environmental Services Division shall review and approve of Waste Management Plans prior to issuance of building permits; City Planning staff shall confirm approval of the Waste Management Plan prior to issuance of building permits and shall confirm compliance with the Waste Management Plan prior to sign off on construction.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRES – If located within 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?	☐	☐	☒	☐

a) The Project site is located within a Local Responsibility Area for fire services. It is located within a Very High Fire Hazard Severity Zone (VHFHSZ) as depicted in the Fire Hazard Severity Zone (FHSZ) viewer (https://egis.fire.ca.gov/FHSZ/) accessed December 2021. The Project site is currently accessed from Highland Place which serves as the primary evacuation route for residents living in the general area around the Project site. As referenced in Section IX, *Hazards and Hazardous Materials*, West Hillcrest Boulevard and West Foothill Boulevard for east-

west movement and multiple streets for north-south movement of traffic to SR-210.

The City of Monrovia Fire Chief and Monrovia Police Chief are the primary decision makers in evaluating what areas need to be evacuated in a wildfire incident. The evacuation procedures and plans are administered in a time of evacuation by the Emergency Operations Center located in the City of Monrovia Police Department. In the event of evacuation, the City would designate an Evacuation Center in the City where residents may evacuate to. The Fire Chief would monitor protocols such as the National Weather Service Red Flag warnings (warning indicating incidences of high sustained winds with dry conditions that precipitate wildfires) and coordinate with local government officials well as businesses to determine if an evacuation is warranted based on the conditions.

The Project would generate a net increase of two peak hour trips to the local street network. Emergency vehicle access would be provided via the existing driveway; however, the segment between Highland Place and the driveway extension to Lots 2 and 3 would be widened and improved to meet Fire Department standards. As referenced in Section XVII, *Transportation*, the Project would not adversely impact traffic operations; however, it would add vehicles to the local street network. The Project is not expected to impact use of the local streets as evacuation routes (See Section IX, *Hazards and Hazardous Materials*) should a wildfire or other emergency occur that would necessitate an evacuation. Impacts would be **less than significant.**

b) The Project site is located adjacent to single-family residences to the northeast, east and south/southeast and open space to the south. There are areas of native vegetation surrounding the Project site that could burn in the event a wildfire occurs. There is vegetation on the Project site as well as to the Hillside Wilderness Preserve to the north. Prevailing winds are from the west which would generally disperse pollutants from wildfire to the east. If a wildfire were to occur, the Project occupants could be exposed to smoke; however, the Project site could be evacuated via Highland Place which would minimize the risk of smoke exposure. Impacts would be **less than significant.**

c) The City of Monrovia Community Wildfire Protection Plan (MCWPP) identifies areas of wildfire risk in the City and safety zones. The intent of the MCWPP is to educate and manage properties in areas of wildfire risk. The Project is located within a *Very High Fire Hazard Severity Zone*; thus, compliance with the applicable elements of the MCWPP as well as Chapters 8.14 and 15.20 of the Monrovia Building and Fire Code would be required. This would include preparation and implementation of a Fire Protection Plan (FPP) that would provide detailed project site design and fuel management requirements to minimize fire risk.

The pre-existing driveway would be improved to 24 feet in width and a cul-de-sac constructed at the west end to facilitate fire apparatus access. Other than compliance with the City of Monrovia Fire Department requirements for access improvements and the FPP, which would stipulate fuel modification zone requirements surrounding each structure, construction of the Project would not require additional improvements including roads, fuel breaks, emergency

water sources, power lines or other utilities that could adversely affect the environment. Approval of the proposed Madison Specific Plan – C Modified design exceptions would reduce the development footprint and encroachment into undisturbed adjacent hillside areas. This may have a beneficial effect with respect to wildfire risk. Mitigation Measure WF-1 is provided herein to address potential wildfire impacts during construction. With building and fire code compliance, implementation of the FPP and Mitigation Measure WF-1, impacts would be **less than significant.**

> **Mitigation Measure WF-1**. During site clearing within the project site when any electrical construction equipment is in use, the construction crew shall have fire prevention equipment (such as fire extinguishers, emergency sandbags, etc.) accessible at all times to put out any accidental fires that could occur from the use of electrical construction equipment.

d) The Project site and surrounding area is located within a canyon surrounded to the north and south by steep canyon slopes. Vegetated open space as part of the Hillside Preserve Area is located north of the Project site. If the area were to burn, wildfires could occur proximal to and on the Project site. Preservation of defensible space required per the FPP would minimize direct impact to structures; however, it is possible that vegetation on the slopes surrounding the site could burn. Wildfires are not anticipated to damage the root structures that stabilize the soil; but some erosion on-site could occur after the fact. Retaining walls constructed for slope stabilization are recommended to have at least one foot of freeboard to accommodate soils that may runoff during a storm event.

The Project is not anticipated to expose people or off-site structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability or drainage changes. As stated, construction of the new debris basin is intended to reduce or avoid impacts on downstream properties by directing storm flows east to existing stormwater infrastructure located in Highland Place. Approval of the proposed Madison Specific Plan – C Modified design exceptions would reduce the development footprint and encroachment into undisturbed adjacent hillside areas. This may reduce the amount of vegetation impacted to create the required defensible space and height of the retaining walls. In turn, this may reduce the potential for slope instability, landslides and related impacts. Impacts would be **less than significant.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, 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 will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) The Project would be constructed on a portion of the 7.58-acre site. The Project would require removal of the existing residence, out buildings and related improvements including the flood control basin. Removal of ruderal vegetation species would be required in some areas prior to construction particularly along the site perimeter. There are no threatened, endangered or sensitive plant or animal species occurring on the Project site. Implementation of Standard Conditions SC-1 through SC-6 would reduce impacts to biological resources. Mitigation Measures BIO-1 and BIO-2 would reduce potential mountain lion impacts to less than

significant, Mitigation Measure BIO-3 would reduce potential migratory bird impacts to less than significant; and Mitigation Measures BIO-4, BIO-5, BIO-6 would reduce potential impacts to roosting bats to less than significant. Mitigation Measure BIO-7 would reduce impacts to non-wetland jurisdictional features to less than significant; and Mitigation Measures BIO-8 and BIO-9 would reduce direct impacts to oak trees to less than significant.

Implementation of Standard Condition CUL-1 and Mitigation Measures CUL-1, CUL-2 and CUL-3 would avoid or minimize potentially significant impacts to previously undiscovered cultural resources. Mitigation Measures TCR-1 through TCR-3 would reduce potential impacts to Tribal Cultural Resources to less than significant. Implementation of Standard Condition PAL-1 would reduce potential impacts to paleontological resources to less than significant. Potentially significant impacts to biological, cultural and tribal cultural resources would be avoided with the implementation of mitigation measures described herein.

b) As presented in Sections I through XX, the Project would have either no impact, a less than significant impact, or a potentially significant impact unless mitigation is incorporated with respect to all environmental issues. With the implementation of Standard Conditions AIR-1 and AIR-2, potential air quality impacts would be reduced to less than significant. With implementation of mitigation measures identified under threshold a) above, potentially significant biological resource, cultural resource and tribal cultural resource impacts would be reduced to **less than significant**. Further, with implementation of Standard Conditions GEO-1, NOI-1 through NOI-5, Mitigation Measure GEO-2, GEO-3, NOI-1 and NOI-2potentially adverse impacts caused by on-site geology/soil characteristics, construction-related noise and vibration and debris basin maintenance would be less than significant. Implementation of Mitigation Measure HAZ-1 would avoid potential impacts associated with lead, asbestos or other hazardous materials during removal of the existing residence and outbuildings. Implementation of Standard Condition HYD-1 would reduce potential impacts to hydrology and water quality to less than significant. Implementation of Mitigation Measure LU-1 would reduce potential land use impacts to less than significant. Implementation of Mitigation Measure TR-1 would reduce potential traffic impacts during construction to less than significant. Implementation of Standard Condition PS-1 and UT-1 would ensure potential impacts associated with public services and utilities (i.e., solid waste) are less than significant. Implementation of Mitigation Measure WF-1 would reduce or avoid potential impacts caused by construction-related wildfires are less than significant. Based on the limited scope of direct physical impacts to the environment associated with the Project, the impacts are project-specific in nature. Consequently, the Project along with other cumulative projects would result in a **less than significant** cumulative impact with respect to all environmental issues with mitigation incorporated.

c) The Project would provide a net increase of two single-family residences on a property currently developed with one single-family residence. With approval of the proposed Madison Specific Plan – "C Modified" design exceptions, the Project would be consistent with the City's zoning for the site and land use and planning thresholds of significance addressed herein. Furthermore, the Project would result in less than significant impacts to agriculture and forestry

resources; energy, greenhouse gas emissions, land use, mineral resources, population and housing and; recreation.,. The Project would also result in less than significant impacts to aesthetics, air quality, biological resources, cultural resources, geology/soils resources and paleontological resources; hazards and hazardous materials, hydrology/water quality, noise, public services, transportation, tribal cultural resources, utilities and wildfires with standard conditions and mitigation incorporated. Therefore, the Project would have a **less than significant** impact on human beings as all potentially significant impacts can be mitigated to less than significant.

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