Draft Environmental Impact Report

Delaney Square Residential Project

STATE CLEARINGHOUSE NO. 2025110727

AUGUST 2026

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CITY OF AZUSA

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
°F	Degrees Fahrenheit
µg/m3	Micrograms per Cubic Meter
µPa	Micro-Pascal
AB	Assembly Bill
ACC	Advanced Clean Cars
ACL	Azusa City Library
ACM	Asbestos-Containing Material
ACSD	Azusa City School District
ACT	Advanced Clean Trucks
ADT	Average Daily Traffic
ADU	Accessory Dwelling Unit
AED	Automated External Defibrillator
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AF	Acre-Foot
AFCI	Arc-Fault Circuit Interrupter
AFY	Acre-Feet per Year
AHMP	All-Hazards Mitigation Plan
ALW	Azusa Light and Water Department / Azusa Light & Water
AMC	Azusa Municipal Code
AMI	Area Median Income
amsl	Above Mean Sea Level
ANSI	American National Standards Institute
API	Area of Potential Impacts
APN	Assessor Parcel Number
APU/Citrus Station	Azusa Pacific University / Citrus College Station
AQMP	Air Quality Management Plan
ARD	Azusa Recreation Division
ASCE	American Society of Civil Engineers
ASTM	American Society for Testing and Materials
AUSD	Azusa Unified School District
AZPD	Azusa Police Department
BenMAP	Benefits Mapping and Analysis Program
bgs	Below Ground Surface
BMP	Best Management Practice
BTU	British Thermal Unit
BUG	Backlight, Uplight, and Glare
C&D	Construction and Demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards

Acronym/Abbreviation	Definition
Cal EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBTP	Community-Based Travel Planning
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEHC	California Essential Habitat Connectivity
CEOC	County Emergency Operations Center
CEQA	California Environmental Quality Act
CEQA Guidelines	California Environmental Quality Act Guidelines
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CF	Cubic Feet
CFC	California Fire Code
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CFS	Cubic Feet per Second
CGS	California Geological Survey
CH4	Methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
City	City of Azusa
CIWMB	California Integrated Waste Management Board
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
County	County of Los Angeles
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources

Acronym/Abbreviation	Definition
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DA	Drainage Area
dB	Decibel
dBA	A-Weighted Decibel
Development Code	Chapter 88 of the Azusa Municipal Code
DHS	Department of Health Services
DOC	California Department of Conservation
DOF	California Department of Finance
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DPR 523	California Department of Parks and Recreation 523 Form
DTSC	Department of Toxic Substances Control
DTSC-SL	DTSC-Modified Screening Level
DU	Dwelling Unit
du/ac	Dwelling Units per Acre
DWR	California Department of Water Resources
EDD	Employment Development Department
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EV	Electric Vehicle
EWMP	Enhanced Watershed Management Program
FAA	Federal Aviation Administration
FAR	Floor Area Ratio
FCEB	Fuel Cell Electric Bus
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
F-gases	Fluorinated Gases
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FTA	Federal Transit Administration
GAMA	Groundwater Ambient Monitoring and Assessment
General Plan	City of Azusa General Plan
GFCI	Ground-Fault Circuit Interrupter
GHG	Greenhouse Gas
GPA	General Plan Amendment
GPCD	Gallons Per Capita Per Day
GPD	Gallons Per Day

Acronym/Abbreviation	Definition
GSA	Groundwater Sustainability Agency
GSF	Gross Square Feet
GSP	Groundwater Sustainability Plan
GWP	Global Warming Potential
H2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutant
HARP2	Health Risk Assessment Reporting Program 2
HCD	California Department of Housing and Community Development
HCP	Habitat Conservation Plan
HERO	Human and Ecological Risk Office
HFCs	Hydrofluorocarbons
HIC	Chronic Hazard Index
HOA	Homeowner's Association
HOV	High-Occupancy Vehicle
hp	Horsepower
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Condition
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
Hz	Hertz
I-210	Interstate 210
I-605	Interstate 605
IBC	International Building Code
IEPR	Integrated Energy Policy Report
IFC	International Fire Code
INS	Institutional/School Zone
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
ips	Inches per Second
IRP	Integrated Resources Plan
ISO	International Organization for Standardization
ITE	Institute of Transportation Engineers
kBTU	Thousand British Thermal Units
kHz	Kilohertz
Kizh Nation	Gabrieleño Band of Mission Indians – Kizh Nation
kWh	Kilowatt-hour
L10	Sound level exceeded 10% of the time
L50	Sound level exceeded 50% of the time
L90	Sound level exceeded 90% of the time
LA County Parks and Recreation	Los Angeles County Parks and Recreation
LACFCD	Los Angeles County Flood Control District
LACoFD	Los Angeles County Fire Department
LADPW	Los Angeles County Department of Public Works

Acronym/Abbreviation	Definition
LAFCO	Local Agency Formation Commission
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	Lead-Based Paint
LCFS	Low Carbon Fuel Standard
LCI	Governor's Office of Land Use and Climate Innovation
Ldn	Day-Night Level
Leq	Equivalent Sound Level
LEV	Low-Emission Vehicle
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
Little Dalton Wash	Tributary to Big Dalton Wash
Lmax	Maximum Sound Level
LOS	Level of Service
LRTP	Long Range Transportation Plan
LST	Localized Significance Threshold
LT	Long-Term Measurement Location
LTS	Less Than Significant
LTS-MM	Less Than Significant with Mitigation
LUST	Leaking Underground Storage Tank
Lxx	Percentile-Exceeded Sound Level
MBTA	Migratory Bird Treaty Act
MDO	Medium Density Overlay
MEIR	Maximally Exposed Individual Receptor
Metro	Los Angeles County Metropolitan Transportation Authority
mg/m3	Milligrams per Cubic Meter
MGD	Million Gallons per Day
MLD	Most Likely Descendant
MM	Mitigation Measure
MMAA	Master Mutual Aid Agreement
MMRP	Mitigation Monitoring and Reporting Program
MMT	Million Metric Tons
mph	Miles per Hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	Metric Tons
Mw	Moment Magnitude
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
N/A	Not Applicable
N2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan

Acronym/Abbreviation	Definition
NESHAP	National Emission Standards for Hazardous Air Pollutants
NETR	Nationwide Environmental Title Research
NF3	Nitrogen Trifluoride
NFHL	National Flood Hazard Layer
NFPA	National Fire Protection Association
NG3-MED	Neighborhood General 3 – Medium
NHTSA	National Highway Traffic Safety Administration
NO	Nitric Oxide
NO2	Nitrogen Dioxide
NO_2	Nitrogen Dioxide
NOA	Notice of Availability
NOP	Notice of Preparation
NOx	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NPMS	National Pipeline Mapping System
NRHP	National Register of Historic Places
NRPA	National Recreation and Parks Association
NSR	Noise-Sensitive Receptor
O_3	Ozone
OAERP	Operational Area Emergency Response Plan
OBCF	Octave Band Center Frequency
OEHHA	Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OSY	Operating Safe Yield
Pb	Lead
PCB	Polychlorinated Biphenyl
PCE	Passenger Car Equivalent
PFCs	Perfluorocarbons
PGA	Peak Ground Acceleration
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	Particulate Matter
PM10	Particulate Matter Less Than 10 Microns
PM2.5	Particulate Matter Less Than 2.5 Microns
Powell Elementary School	W.R. Powell Elementary School
ppb	Parts Per Billion
ppm	Parts Per Million
PPV	Peak Particle Velocity
PRC	Public Resources Code
Project	Delaney Square Residential Project
Project Applicant	Taylor Morrison
PRRP	Paleontological Resources Recovery Plan

Acronym/Abbreviation	Definition
PST	Pacific Standard Time
PV	Photovoltaic
PWL	Sound Power Level
R-1-6000	Single-Family Residential (minimum 6,000-square-foot lot size)
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RFS	Renewable Fuel Standard
RFS1	Original Renewable Fuel Standard Program
RFS2	Expanded Renewable Fuel Standard Program
RH/SGRWQG	Rio Hondo/San Gabriel River Water Quality Group
RHNA	Regional Housing Needs Allocation
RSL	Regional Screening Level
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan / Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SF	Square Feet
SF6	Sulfur Hexafluoride
SFD	Single-Family Dwelling
SGMA	Sustainable Groundwater Management Act
SGVCOG	San Gabriel Valley Council of Governments
SGVMWD	San Gabriel Valley Municipal Water District
SJCWRP	San Jose Creek Water Reclamation Plant
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLCPs	Short-Lived Climate Pollutants
SLF	Sacred Lands File
SLM	Sound Level Meter
SO2	Sulfur Dioxide
SO_2	Sulfur Dioxide
SO4	Sulfates
SO_4	Sulfates
SoCalGas	Southern California Gas Company
SOI	Sphere of Influence
SOx	Sulfur Oxides
SPL	Sound Pressure Level

Acronym/Abbreviation	Definition
SR-39	State Route 39
SRA	State Responsibility Area
SRTP	Short Range Transportation Plan
ST	Short-Term Measurement Location
STC	Sound Transmission Class
SUV	Sport Utility Vehicle
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone
TCP	Traffic Control Plan
TCR	Tribal Cultural Resource
TCRs	Tribal Cultural Resources
TDM	Transportation Demand Management
TE/DU	Trip Ends per Dwelling Unit
TE/Student	Trip Ends per Student
TL	Transmission Loss
TMDL	Total Maximum Daily Load
TOD	Transit-Oriented Development
TPA	Transit Priority Area
TTM	Tentative Tract Map
U.S. EPA	United States Environmental Protection Agency
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USG-8	Upper San Gabriel Valley Municipal Water District Connection No. 8
USGS	United States Geological Survey
USPS	United States Postal Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VCP	Vitrified Clay Pipe
VdB	Vibration Decibel
VES	Vapor Encroachment Screen
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VOCs	Volatile Organic Compounds
WDR	Waste Discharge Requirement
WEAP	Worker Environmental Awareness Program
WQCP	Water Quality Control Plan

Acronym/Abbreviation	Definition
WSDM	Water Surplus and Drought Management
ZEV	Zero-Emission Vehicle
Zone X	FEMA Flood Zone X (minimal flooding potential)

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Executive Summary

The purpose of this Executive Summary for this Draft Environmental Impact Report (Draft EIR) is to provide a summary of the proposed Delaney Square Residential Project (Project), its environmental consequences, mitigation measures, and alternatives to the Project. Per the requirements of CEQA Guidelines section 15123, a summary shall identify:

(1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect (see Sections ES.4 and ES.5);

(2) Areas of controversy known to the Lead Agency including issues raised by agencies and the public (see Section ES.6)

(3) Issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects (see Sections ES. 5 and ES.6)

ES.1 Introduction

This Draft EIR has been prepared by the City of Azusa (City) to evaluate potential environmental effects that would result from implementation of the proposed Project. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] § 2100 et seq., as amended) and its implementing guidelines (California Code of Regulations [CCR] Title 14, § 15000 et seq. [hereinafter referred to as the "CEQA Guidelines"). The Project constitutes a "project" as defined in CEQA Guidelines section 15378. Pursuant to CEQA Guidelines section 15367, the City is the lead agency for the Project.

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment, if they were to be implemented.

The basic purposes of CEQA are as follows (CEQA Guidelines § 15002):

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that impacts to the environment can be avoided or significantly reduced;
3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

In compliance with CEQA, this Draft EIR has been prepared to analyze the potential environmental impacts that may result from implementation of the Project. This Draft EIR identifies feasible mitigation measures and alternatives that would minimize or eliminate the potential significant impacts associated with the Project. This Draft EIR evaluates potential environmental impacts associated with implementation of the Project and provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Project. The Draft EIR must allow the City,

responsible agencies, and other interested parties to evaluate the environmental impacts of Project implementation and the environmental consequences of Project implementation, thereby enabling them to make informed decisions regarding the requested entitlements.

The following is a summary of discretionary actions the City of Azusa will consider taking:

- Certification of the EIR
- Adoption of a General Plan Amendment (GPA-2025-01) to change the Project site's Institutional/School land use designation to Medium Density Residential
- Adoption of a Zone Change (Z-2025-01) to change the Project site's Institutional/School zoning to Neighborhood General 3 – Medium (NG3-MED)
- Approval of Variances for Building Separation and Rear Yard Setback (V-2025-01)
- Approval of Design Review (DR-2025-19)
- Approval of a Tentative Tract Map (TTM-84887)

ES.2 EIR Document Organization

This Draft EIR is organized into seven chapters, including the Executive Summary. A list of the Draft EIR chapters and a brief description of their contents is provided below to assist the reader in locating information.

Executive Summary: This chapter provides a summary of the Project description, alternatives to the proposed Project, environmental impacts, mitigation measures, and determinations of significance.

Chapter 1, Introduction: This chapter briefly discusses an overview and the purpose of the Draft EIR and provides a summary of the relevant CEQA Guidelines that govern the preparation of this EIR. This chapter summarizes the scoping period and the comments received by the City on the Notice of Preparation (NOP) during the scoping process.

Chapter 2, Environmental Setting: In accordance with section 15125 of the CEQA Guidelines, this chapter includes a description of the physical environmental conditions of the Project site and vicinity, which will constitute as the baseline physical conditions. This chapter provides an overview and a discussion of cumulative projects considered in the cumulative impact analysis.

Chapter 3, Project Description: In accordance with section 15124 of the CEQA Guidelines, this chapter outlines the City's underlying purpose and objectives for the Project; includes a summary of the components of the Project; includes assumptions regarding the Project's short-term construction and long-term operations; and identifies off-site infrastructure improvements. A discussion of discretionary actions needed to approve the Project and a list of other public agencies expected to use the EIR in their decision making are also included.

Chapter 4, Environmental Analysis: This chapter contains Section 4.1, Aesthetics, through Section 4.17, Utilities and Service Systems. Each section includes the following: existing conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analyses, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references. Chapter 4 includes the following sections:

- Section 4.1, Aesthetics

- Section 4.2, Air Quality
- Section 4.3, Biological Resources
- Section 4.4, Cultural Resources
- Section 4.5, Energy
- Section 4.6, Geology and Soils
- Section 4.7, Greenhouse Gas Emissions
- Section 4.8, Hazards and Hazardous Materials
- Section 4.9, Hydrology and Water Quality
- Section 4.10, Land Use and Planning
- Section 4.11, Noise
- Section 4.12, Population and Housing
- Section 4.13, Public Services
- Section 4.14, Recreation
- Section 4.15, Transportation
- Section 4.16, Tribal Cultural Resources
- Section 4.17, Utilities and Service Systems

Chapter 5, Other CEQA Considerations: This chapter contains a summary discussion of any significant unavoidable impacts, potential growth-inducing impacts, energy impacts, and any significant irreversible environmental changes that would be caused by the Project. Additionally, this chapter includes an overview of Agriculture and Forestry Resources, Mineral Resources, and Wildfire, which were determined by the City to not have the potential to result in any significant effects on the environment.

Chapter 6, Alternatives: Pursuant to CEQA Guidelines section 15126.6, this chapter includes an analysis of a reasonable range of feasible alternatives to the Project. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project but would avoid or reduce any of the significant effects of the Project. The comparative merits of each alternative are evaluated when compared to the proposed Project, and an environmentally superior alternative is identified in compliance with CEQA Guidelines section 15126.6(e)(2).

Chapter 7, List of Preparers: This chapter lists the persons who directly contributed to preparation of the Draft EIR.

ES.3 Project Description

ES.3.1 Project Overview

The Project site, which totals approximately 9.77 acres, is located in the City within Los Angeles County, approximately 18 miles northeast of downtown Los Angeles. The Project site, located at 1035 East Mauna Loa Avenue on the eastern edge of the City, encompasses one parcel (Assessor Parcel Number [APN] 8628-004-900). The site is currently developed with a school, surface parking, and hardscape and landscaping, including trees. While the site has historically been used for school purposes, all buildings on site are currently vacant. In order to accommodate the Project, the existing buildings and surface parking lot would be demolished and single-family homes and townhomes would be constructed.

Figure 2-1, Regional Location and Vicinity, included in Chapter 2, Environmental Setting, of this Draft EIR, provides a regional location map with the Project boundaries shown on an aerial map to depict the context of the Project site including the surrounding community. Regional access to the Project site is provided by the eastbound/westbound Foothill Freeway (Interstate [I-] 210) to the south, with the Citrus Avenue freeway access ramps located approximately 1,600 feet southeast of the Project site and the South Grand Avenue freeway access ramps located approximately 0.81 miles southeast of the Project site. The I-210 freeway connects the San Gabriel Valley to the Crescenta and San Fernando Valleys to the north/northwest and Pomona Valley to the east. In addition, the I-210 freeway connects to the San Gabriel River Freeway (I-605) located approximately 4 miles west of the Project site. Direct access to the Project site is currently provided via East Mauna Loa Avenue to the south and North Calera Avenue to the east.

Figure 3-1, Conceptual Site Plan, included in Chapter 3, Project Description, of this Draft EIR, illustrates the conceptual site plan for the proposed Project. As shown, the Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units. The new residences would have a maximum height of 29 feet 10 inches, as two stories. In total, the proposed residential density on site would be approximately 13.1 dwellings units per acre (du/ac). All residential units would be for-sale units. On-site residential amenities would include private and common open space, parking, a tot lot, barbecue area, shaded gathering space, and a butterfly garden. The Project site would be accessible from East Mauna Loa Avenue and a new driveway on North Calera Avenue with internal circulation provided by internal streets, driveways, and alleyways. The Project would include a total of 326 parking spaces, including 256 covered parking spaces for residents and 70 uncovered parking spaces for guests.

As shown on Figure 3-1, Conceptual Site Plan, the property line for the Project site is located within street along North Calera Avenue and East Mauna Loa Avenue and includes sidewalks and street trees. Minor off-site improvements (i.e. utility connections) are proposed. Aside from the utility connections, there are no additional proposed off-site improvements.

ES.3.2 Project Objectives

CEQA Guidelines section 15124(b) requires an EIR to include a statement of objectives sought by the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The Project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives also includes the purpose of a project and may discuss a project's benefits. The Project's specific objectives are as follows:

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.

2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 – Medium (NG3-MED) zone.

3. Provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.

4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

ES.4 Summary of Impacts and Mitigation Measures

Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the impact analysis related to the Project. Table ES-1 identifies a summary of the significant environmental impacts resulting from the Project pursuant to CEQA Guidelines section 15123(b)(1). For more detailed discussion, please see Chapter 4 of this Draft EIR. Table ES-1 lists the applicable mitigation measures related to potentially significant impacts, as well as the level of significance after mitigation.

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.1 Aesthetics			
4.1a. Would the project have a substantial adverse effect on a scenic vista?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.1b. Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No mitigation measures are required.	No Impact
4.1c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.1d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on aesthetic resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.2 Air Quality			
4.2a. Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.2b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
non-attainment under an applicable federal or state ambient air quality standard?			
4.2c. Would the project expose sensitive receptors to substantial pollutant concentrations?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.2d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on air quality resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.3 Biological Resources			
4.3a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant Impact	**MM-BIO-1.** *Nesting Bird Avoidance.* All construction activities, including but not limited to demolition, site/vegetation clearing and grading activities shall avoid the migratory bird nesting season (February 1 through August 31), to reduce the potential for significant impacts to birds that may be nesting on the Project site. If construction activities must be initiated during the migratory bird nesting season, an avian nesting survey shall be conducted to identify protected migratory birds, raptors, and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist (i.e., a biologist with experience conducting avian nesting surveys and knowledgeable in the identification of regional bird species, nesting behaviors, and applicable federal and state regulations subject to approval by the City) no greater than 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code. The results of the survey shall be provided to the City of Azusa prior to the start of construction.	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate "no disturbance" buffer, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall also be demarcated in the field with flagging and stakes or construction fencing. No construction activities shall occur within the buffer area until the nest is vacated and the juveniles have fledged, as determined by the qualified biologist. The Project Applicant shall execute an agreement for a qualified biologist to provide periodic construction monitoring to determine when the nest is inactive and when construction activities can resume within the buffer area. The Project Applicant shall provide a copy of the agreement to the City prior to the start of construction.	
4.3b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No mitigation measures are required.	No Impact
4.3c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No mitigation measures are required.	No Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.3d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant Impact	**MM-BIO-1** (see above)	Less-Than-Significant Impact with Mitigation Incorporated
4.3e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.3f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No mitigation measures are required.	No Impact
Would the project have a cumulative effect on biological resources?	Potentially Cumulatively Considerable	**MM-BIO-1** (see above)	Not Cumulatively Considerable
4.4 Cultural Resources			
4.4a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	No Impact	No mitigation measures are required.	No Impact
4.4b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact	**MM-CUL-1**. *Inadvertent Discovery of Cultural Resources*. Prior to commencement of construction activities, the Project Applicant shall retain a qualified archaeologist to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of Azusa Planning	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		Division (City) for review and approval. All construction personnel that will be engaged in earthwork/grading and any monitors shall be presented the WEAP training prior to the start of earthwork activities. The WEAP shall provide specific details on the kinds of archaeological materials that may be identified during construction, explain the importance of and legal basis for the protection of significant archaeological resources, and outline the actions to be taken in the event of the discovery of cultural resources or human remains during ground-disturbing activities. The Project Applicant shall also retain a qualified archaeologist to be on call and available to respond to any inadvertent discoveries identified during initial excavation in native soils, which underly the 2 feet below ground surface of artificial fill soils. (excluding movement of sediments after they have been initially disturbed by project-related construction). If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities, the City's Planning Division and the retained qualified archaeologist shall be notified and all construction work occurring within 50 feet of the find shall immediately stop until the retained archaeologist can evaluate the significance of the find. The archaeologist shall be empowered to temporarily stop or redirect construction activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under CEQA (PRC § 21082; CEQA Guidelines § 15064.5(f)), the archaeologist may record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, shall be completed before work is allowed to continue in the area. The archaeologist shall also be required to curate any specimens discovered in a repository with permanent retrievable storage and submit a	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		written report to the City for review and approval. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).	
4.4c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on cultural resources?	Potentially Cumulatively Considerable	**MM-CUL-1** (see above)	Not Cumulatively Considerable
4.5 Energy			
4.5a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.5b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on energy resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.6 Geology and Soils			
4.6a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	No Impact	No mitigation measures are required.	No Impact.
ii. Strong seismic ground shaking?	Potentially Significant Impact	MM-GEO-1. *Geotechnical Evaluation and Recommendations*. The Project shall be designed in accordance with the recommendations from a final design-level site-specific geotechnical report. The final design-level site-specific geotechnical report shall address the recommendations as set forth in Chapter 4 of the Preliminary Geotechnical Evaluation and Recommendations Report, including Site Earthwork; Preliminary Foundation Recommendations; Soil Bearing and Lateral Resistance; Lateral Earth Pressures for Retaining Walls; Control Of Surface Water and Drainage Control; Subsurface Water Infiltration; Preliminary Asphalt Pavement Sections; Soil Corrosivity; Nonstructural Concrete Flatwork; Geotechnical Plan Review; and Geotechnical Observation and Testing During Construction. Prior to the issuance of a rough grading permit, the applicant shall submit the final design-level geotechnical report and rough grading plan for review and approval by the City's Economic and Community Development Department and/or the City Engineer.	Less-Than-Significant Impact with Mitigation Incorporated
iii. Seismic-related ground failure including liquefaction?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
iv. Landslides?	Potentially Significant Impact	**MM-GEO-1** (see above)	Less-Than-Significant Impact with Mitigation Incorporated
4.6b. Would the project result in substantial soil erosion or the loss of topsoil?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.6c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially Significant Impact	**MM-GEO-1** (see above)	Less-Than-Significant Impact with Mitigation Incorporated
4.6d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.6e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No Impact	No mitigation measures are required.	No Impact
4.6f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	**MM-GEO-2.** *Inadvertent Discovery Protocols*. Prior to commencement of construction activities, an inadvertent discovery clause, written by an paleontologist, shall be added to all construction plans associated with ground disturbing activities and the Project applicant shall retain a qualified paleontologist, meeting Society of Vertebrate Paleontology (SVP 2010) standards, to prepare a Worker Environmental	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		Awareness Program (WEAP). The WEAP shall be submitted to the City of Azusa Planning Division for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the Project about the paleontological sensitivity of the area, to provide specific details on the kinds of paleontological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant paleontological resources, and to outline the actions to be taken in the event of a discovery of paleontological resources. Each worker shall also learn the proper procedures to follow in the event that paleontological resources are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and paleontological monitor. The WEAP shall require that a qualified paleontological be retained and on-call to respond to and address any inadvertent discoveries identified during initial excavation in native soils, which underly the 5 feet below ground surface of artificial fill soils. As it pertains to paleontological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction. In the event that paleontological resources (e.g., fossils) are exposed during Project grading, construction will temporarily halt and/or divert grading activity in that area and wait to allow recovery of paleontological resources by a paleontological monitor. The area of discovery will be roped off with a 50-foot radius buffer. Grading will be allowed to recommence once a qualified paleontologist can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		significant, the paleontologist may document the find and allow work to continue. If significant paleontological resources are discovered during earthmoving activities, the qualified paleontologist shall prepare and submit a Paleontological Resources Recovery Plan (PRRP) to the City for review and approval. The recovery plan shall include, but is not limited to, sampling and fossil recovery procedures, museum curation for any scientifically significant specimen recovered, and a report of findings. Recommendations in the PRRP as approved by the City shall be implemented before construction activities can resume at the site where the significant paleontological resources were discovered. Any reports and plans resulting from implementation of this measure shall also be submitted to the City and filed with the Natural History Museum of Los Angeles County.	
Would the project have a cumulative effect on geology and soils resources?	Potentially Cumulatively Considerable	**MM-GEO-1 and MM-GEO-2** (see above)	Not Cumulatively Considerable
4.7 Greenhouse Gas Emissions			
4.7a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.7b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on greenhouse gas emissions?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.8 Hazards and Hazardous Materials			
4.8a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	**MM-HAZ-1.** *Hazardous Building Materials Survey.* Prior to the issuance of a demolition permit for any existing on-site structures, a qualified environmental specialist shall conduct a survey for asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury, and other hazardous building materials, such as universal wastes and refrigerants, to document the presence of any potentially hazardous materials within the structures. Certification/registration is required in the State of California for asbestos and lead-based paint inspectors and contractors; proof of licensure will be provided for all survey proposals and bids. Once complete, if survey results are positive, all potentially hazardous materials identified as part of this survey shall be handled and disposed in accordance with federal and state hazardous waste and universal waste regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the findings of the hazardous building materials survey and federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, California Occupational Safety and Health Administration (Cal/OSHA) Title 8 section 1529 (which regulates employee exposure during construction), the South Coast Air Quality Management District (SCAQMD) Rule 1403 (which requires an electronic notification to be submitted to SCAQMD ten days prior to any demolition or removal of more than 100 square feet of asbestos-containing material (ACM) with greater than one percent of asbestos), and the Metallic Discards Act of 1991 (Public Resources Code, §42160 et seq.), particularly Public Resources Code section 42175, Materials Requiring Special Handling, for the removal of mercury switches, PCB-containing ballasts, and refrigerants.	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		The hazardous building materials survey required by this measure together with the related plans and specifications specifying required abatement measures shall be provided to the City's Economic & Community Development Department for review and sign off prior to issuance of demolition permits. The Project's contractor shall ensure implementation of the abatement requirements specified in the plans through the contract specifications for all confirmed and suspected hazardous materials which require abatement. Upon completion of construction activities, proof of abatement and proper disposal shall be provided to the City's Economic & Community Development Department.	
4.8b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact	**MM-HAZ-1** (see above)	Less-Than-Significant Impact with Mitigation Incorporated
4.8c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	No mitigation measures are required.	No Impact
4.8d. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	No mitigation measures are required.	No Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.8e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No mitigation measures are required.	No Impact
4.8f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.8g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No Impact	No mitigation measures are required.	No Impact
Would the project have a cumulative effect on hazards or hazardous materials?	Potentially Cumulatively Considerable	**MM-HAZ-1** (see above)	Not Cumulatively Considerable
4.9 Hydrology and Water Quality			
4.9a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.9b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
may impede sustainable groundwater management of the basin?			
4.9c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			
i. result in substantial erosion or siltation on or off site;	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
iv. impede or redirect flood flows?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.9d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.9e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative effect on hydrology or water quality resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.10 Land Use and Planning			
4.10a. Would the project physically divide an established community?	No Impact	No mitigation measures are required.	No Impact
4.10b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on land use resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.11 Noise			
4.11a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact	**MM-NOI-1**. *Temporary Construction Noise Reduction for Noise Sensitive Receptors*. Prior to the issuance of a demolition permit, the Project applicant/developer shall ensure that the following measures are included in the construction contractor's contract specifications and that the following measures are implemented and monitored for compliance throughout construction. Proof of compliance with these measures (i.e. the Contractor's specifications) shall be logged by the contractor and made available to the City and County for inspection and confirmation of compliance throughout construction activities prior to issuance of a permit.	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ During construction, equipment must have supplier-approved sound muffling devices (e.g., engine air intake or exhaust treatment) installed and used in compliance with relevant industry standards and California Occupational Safety and Health (Cal/OSHA) regulations pertaining to construction noise, which shall be properly maintained and used at all times such equipment is in operation. ▪ During the building construction phase and at the nearest receptor distances (i.e. 20 feet from the construction equipment), operation of forklifts shall be limited to 6 hours per day. ▪ Stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors. ▪ Equipment staging areas shall be located so as to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest to the project site during the construction period. ▪ All noise-producing construction activities, including warming-up or servicing equipment and any preparation for construction, shall be limited to between 7:00 a.m. and 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays. ▪ A 12-foot-tall temporary noise barrier shall be erected along the western boundary for the entirety of construction. A 12-foot-tall temporary noise barrier shall be erected along the northern boundary for the Site Preparation & Grading, Paving, and Building Construction Phases. A ten (10) foot tall temporary noise barrier shall be erected along the eastern and southern project boundaries during the entirety of construction.	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Temporary solid noise barriers shall be constructed of 3/4-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility and appearance having a surface weight of 2 pounds per square foot or greater. Should a flexible barrier be used, the flexible acoustical barrier (a.k.a., "blanket", "curtain", or "partial enclosure") shall consist of durable, flexible single or composite material featuring a noise barrier layer optionally bonded to sound-absorptive material on the side intended to face the noise-producing equipment or activity of concern. The acoustical material used shall have a Sound Transmission Class (STC) of STC-25 or greater, based on certified sound transmission loss (TL) data taken according to American Society of Testing and Materials (ASTM) Test Method E90 and exhibited by the material supplier. ▪ Should building construction phase activities occur less than 110 feet but no closer than 30 feet horizontal distance to an on-site exterior first-floor noise-sensitive receptor (NSR), an eight (8) foot tall temporary noise barrier shall be erected on sufficient extent of the NSR property parcel boundary to block line of sight between the affected occupied home and the noise-producing activity. Should the NSR be located on the 2nd floor, a sixteen (16) foot-tall temporary noise barrier shall be erected.	
4.10b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.10c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has	No Impact	No mitigation measures are required.	No Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
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?			
Would the project have a cumulative effect on noise resources?	Potentially Cumulatively Considerable	**MM-NOI-1** (see above)	Not Cumulatively Considerable
4.12 Population and Housing			
4.12a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.12b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No mitigation measures are required.	No Impact
Would the project have a cumulative effect on housing and/or population resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.13 Public Services			
4.13a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
i. Fire protection?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
ii. Police protection?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
iii. Schools?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
iv. Parks?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
v. Other public facilities?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on public services?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.14 Recreation			
4.14a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.14b. Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on recreation resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable
4.15 Transportation			
4.15a. Would the project conflict with a program, plan, ordinance, or policy addressing the	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
circulation system, including transit, roadway, bicycle, and pedestrian facilities?			
4.15b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Potentially Significant Impact	**MM-TRA-1.** *Implement Community-Based Travel Planning*. The Project applicant shall prepare a community-based travel planning (CBTP) program for the City's review and approval. The CBTP shall include details about how residences within the Project will be provided with customized information and support to encourage the use of transportation alternatives such as transit, bike and pedestrian modes and available facilities, in place of single-occupancy vehicles. The CBTP shall include the frequency and duration of the CBTP implementation and the personnel/organization that would be responsible for implementing the CBTP programming for the Project, such as the Homeowner's Association (HOA). At a minimum, the CBTP shall be reviewed/updated annually to reflect changes in transit opportunities in the vicinity, provide clear guidance on available nearby transit services, as well as information of bike and pedestrian facilities that connect to important destinations in the area. The program shall require the annual disbursement of information to the residents via mailers, electronic mail, and/or meetings. The CBTP shall be approved by the City and ready for implementation prior to the issuance of the first Certificate of Occupancy.	Less-Than-Significant Impact with Mitigation Incorporated
4.15c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.15d. Would the project result in inadequate emergency access?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative effect on transportation resources?	Potentially Cumulatively Considerable	**MM-TRA-1** (see above)	Not Cumulatively Considerable
4.16 Tribal Cultural Resources			
4.16a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Potentially Significant Impact	**MM-TCR-1.** *Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities*. A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Grounddisturbing 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	Less-Than-Significant Impact with Mitigation Incorporated

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		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 grounddisturbing 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. **MM-TCR-2.** *Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)*. A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the	

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **MM-TCR-3.** *Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.* A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code section 7050.5 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	
Would the project have a cumulative effect on tribal cultural resources?	Potentially Cumulatively Considerable	**MM-TCR-1** (see above) **MM-TCR-2** (see above) **MM-TCR-3** (see above)	Not Cumulatively Considerable

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.17 Utilities and Service Systems			
4.17a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.17b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.17c. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
4.17d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact

Table ES-1. Summary of Project Impacts

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
4.17e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less-Than-Significant Impact	No mitigation measures are required.	Less-Than-Significant Impact
Would the project have a cumulative effect on utilities and/or service systems resources?	Not Cumulatively Considerable	No mitigation measures are required.	Not Cumulatively Considerable

ES.5 Summary of Project Alternatives

CEQA requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6(a). The CEQA Guidelines direct that the selection of alternatives be governed by "a rule of reason" (CEQA Guidelines §§ 15126.6(a), (f)).

As presented in this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. This Draft EIR includes the analysis of three alternatives to the proposed Project:

- Alternative A – No Project/No Development
- Alternative B – Adaptive Reuse of the Existing School
- Alternative C – Adaptive Residential Reuse of the Existing School and Multi-Family Residential

An EIR must identify an "environmentally superior" alternative; and, where the no project alternative is environmentally superior, the EIR is then required to identify an alternative from among the others evaluated as environmentally superior (CEQA Guidelines §15126.6(e)(2)). Alternative A would result in reduced impacts to all environmental topics in the short-term because construction activity would not occur. Alternative A would therefore eliminate all mitigation requirements for short-term construction activity. Similarly, Alternative A would result in reduced environmental impacts to most environmental topics in the long-term because no operational changes would occur. As required under CEQA Guidelines section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Between Alternatives B and C, Alternative B would result in the least environmental impacts. Thus, Alternative B would be considered the environmentally superior alternative.

E.S.5.1 Alternative A – No Project/No Development

CEQA Guidelines section 15126.6(e) requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As stated in CEQA Guidelines section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the no project alternative will be the continuation of the plan, policy, or operation into the future.

Accordingly, Alternative A assumes the proposed Project would not proceed, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be maintained. The current General Plan land use designation and zoning for the property allow for and are consistent with the operation of a school. Further, Powell Elementary School is owned by Azusa Unified School District and was operated as an elementary school until 2023. Because the property has been operational as an elementary school in recent years, it is still appropriate for use as an elementary school and could theoretically come back into operation at any point. The existing educational uses would remain in place and be operational, the existing surface parking lot would be retained, and no new buildings would be constructed. For the purposes of this Alternative A, no site improvements are assumed.

E.S.5.2 Alternative B – Adaptive Reuse of the Existing School

As presented in Chapter 4 of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Therefore, Alternative B considers an alternative design that would reduce the short-term construction-related environmental impacts of the Project as well as the long-term operational impacts that require mitigation. Specifically, Alternative B would reduce the impacts associated with demolition of the Powell Elementary School by proposing reuse of the school's seven buildings and developed areas as a residential complex, which constitutes approximately 50% of the property. Under Alternative B, the existing playground areas and open field area could be converted to common open space maintained by the Homeowner's Association (HOA) for the residential uses.

It is anticipated that approximately 21 single-level residential condominium units could be accommodated through the adaptive reuse of the existing buildings, which would be a substantial reduction of approximately 107 residential units when compared to the Project's proposed 128 units. Under Alternative B, the Project would generate approximately 66 residents, which is 331 fewer residents than the proposed Project. Alternative B would result in substantially reduced construction noise and emissions impacts to nearby sensitive receptors to the north and west of the Project site, as the construction equipment would be reduced and the distance to sensitive receptors would be greater with the reuse of the existing playground areas and open field area to common open space. This Alternative would also reduce operational impacts, such as reduced VMT, utility, and public service demands, due to the reduced unit count.

E.S.5.3 Alternative C – Adaptive Residential Reuse of the Existing School and Multi-Family Residential

As presented in Chapter 4 of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Therefore, Alternative C considers the development of Alternative B (i.e. adaptive reuse of the Powell Elementary School by proposing reuse of the school's seven buildings and developed areas as 21 single-level residential condominium units) but would also add the construction of new housing on the approximately 50% of the site that is currently an open field.

Under Alternative C, it is anticipated that approximately 70 two-story residential condominium units could be accommodated within open space field area, resulting in a total of approximately 91 units. This would be a reduction of approximately 37 units when compared to the Project's proposed 128 units. The 91 units would generate approximately 283 residents, which is a reduction in 104 residents compared to the proposed Project. On-site circulation improvements and off-site utility connections would still be necessary for the Project. This alternative would incrementally reduce the short-term construction related environmental impacts of the Project due to the elimination of the demolition of the Powell Elementary School buildings. This Alternative would also reduce operational impacts, such as reduced VMT, utility, and public service demands, due to the reduced unit count.

ES.6 Areas of Known Controversy/Issues to be Resolved

A Notice of Preparation for this EIR was released on November 20, 2025, beginning the 30-day public scoping period for the Draft EIR (Appendix A-1). During the public scoping period, input was obtained from public agencies and the general public regarding the environmental issues and concerns that may potentially result from the Project. Comments on the NOP were received from one agency and one individual, which are provided in Appendix A-2 of

this Draft EIR. The City hosted one Scoping Meeting that was held on December 3, 2025 at the Civic Auditorium from 6:30 p.m. Comments cards were made available for attendees to provide written comments for the record. The City did not receive any written comments/questions with environmental concerns during the scoping meeting, as no individuals attended the scoping meeting.

The primary areas of controversy identified by the public and agencies included the following potential issues (the Draft EIR section that addresses the issue raised is provided in parentheses):

- Tribal consultation requirements of SB 18 and AB 52 (Section 4.16, Tribal Cultural Resources)
- Potential for traffic and traffic safety concerns (Section 4.10, Land Use and Planning; Section 4.15, Transportation)

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1 Introduction

The purpose of this chapter is to introduce the proposed Delaney Square Residential Project (Project) and describe the applicable environmental review procedures and the organization of this Draft Environmental Impact Report (Draft EIR).

1.1 CEQA Overview and Purpose of an EIR

This Draft EIR has been prepared by the City of Azusa (City) to evaluate potentially significant environmental effects that could result from the construction and operation of the Project. This Draft EIR has been prepared in conformance with the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) § 21000 et seq., as amended), and its implementing guidelines (California Code of Regulations, Title 14, § 15000 et seq. [CEQA Guidelines]). The Project constitutes a "Project" as defined in CEQA Guidelines section 15378 and is thus subject to CEQA. Consistent with CEQA Guidelines sections 15051 and 15367, the City has the principal responsibility for carrying out or approving the project and is therefore the "Lead Agency" for the review of the Project.

The Project site totals approximately 9.77 acres and is located within the City, which is in Los Angeles County, approximately 18 miles northeast of downtown Los Angeles. The Project site is located at 1035 East Mauna Loa Avenue in the City of Azusa (at the northwest intersection of East Mauna Loa Avenue and North Calera Avenue) and sits on Assessor's Parcel Number (APN) 8628-004-900. The Project proposes the construction of 128 residential units, internal streets, parking, open space, and other associated site improvements. The 128 proposed residential units would consist of 65 single-family detached cluster homes and 63 two-story attached townhomes. The Project would also implement private and common open space and community amenities, including a tot lot, a barbeque area, a shaded gathering space, and a butterfly garden. Internal circulation on the Project site would be provided by new internal streets, driveways, and alleyways, and access to the site would be provided via two separate ingress/egress driveways, one on North Calera Avenue and one on East Mauna Loa Avenue. The existing school buildings and surface parking on the Project site would be demolished to accommodate construction of the Project. In addition, minor off-site improvements (i.e., utility connections) would also be required.

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. According to PRC section 21002.1(a):

> "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment if they were to be implemented.

The basic purposes of CEQA are as follows (CEQA Guidelines § 15002):

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;

2. Identify the ways that impacts to the environment can be avoided or significantly reduced;
3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

This Draft EIR was prepared in accordance with CEQA Guidelines section 15151, which defines the standards for EIR adequacy as follows:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

A detailed description of the Project is provided in Chapter 3, Project Description, and includes a list of the discretionary actions that must be considered by the City and other responsible agencies. This Draft EIR is intended to serve as a Project EIR under CEQA Guidelines section 15161, which states that a Project EIR should focus primarily on changes in the environment that would result from development of a project. A Project EIR must examine all phases of a project, including planning, construction and operation. This Project EIR is intended to provide the environmental information necessary for interested parties to understand the Project and its potential impacts and for the City to make a final decision on the requested discretionary actions to be considered as part of the Project. This Draft EIR is also intended to support discretionary review and decisions by other agencies in furtherance of and related to the Project.

1.2 Organization of this EIR

This Draft EIR is organized into seven chapters, including the Executive Summary. A list of the Draft EIR chapters and a brief description of their contents is provided below to assist the reader in locating information.

Executive Summary. This chapter provides a summary of the Project description, alternatives to the Project, an overview of environmental impacts, mitigation measures, and determinations of significance.

Chapter 1, Introduction. This chapter briefly discusses the purpose of the Draft EIR and provides a summary of the relevant provisions of CEQA and the CEQA Guidelines that govern the preparation of this EIR. This chapter summarizes the scoping period and the comments received by the City on the Notice of Preparation during the scoping process.

Chapter 2, Environmental Setting. In accordance with CEQA Guidelines section 15125, this chapter includes a description of the physical environmental conditions of the Project site and its vicinity, which constitute the baseline physical conditions, unless noted otherwise. This chapter provides an overview of the regulatory setting and a discussion of related projects considered in the cumulative impact analyses.

Chapter 3, Project Description. In accordance with CEQA Guidelines section 15124, this chapter outlines the City's underlying purpose and objectives for the Project, including a summary of the components of the Project, and a listing of the discretionary actions that must be considered by the City and other responsible agencies.

Chapter 4, Environmental Analysis. This chapter contains Sections 4.1, Aesthetics, through Section 4.17, Utilities and System Services. Each section includes the following information: existing conditions of the Project site and its vicinity, associated regulatory requirements, thresholds of significance, impact analyses, cumulative impacts, mitigation measures (if any), significance conclusions, and references. Chapter 4 includes the following sections:

- Section 4.1, Aesthetics
- Section 4.2, Air Quality
- Section 4.3, Biological Resources
- Section 4.4, Cultural Resources
- Section 4.5, Energy
- Section 4.6, Geology and Soils
- Section 4.7, Greenhouse Gas Emissions
- Section 4.8, Hazards and Hazardous Materials
- Section 4.9, Hydrology and Water Quality
- Section 4.10, Land Use and Planning
- Section 4.11, Noise
- Section 4.12, Population and Housing
- Section 4.13, Public Services
- Section 4.14, Recreation
- Section 4.15, Transportation
- Section 4.16, Tribal Cultural Resources
- Section 4.17, Utilities and Service Systems

Chapter 5, Other CEQA Considerations. This chapter contains a summary discussion of any significant unavoidable impacts, significant and irreversible environmental effects, potential growth-inducing impacts, potential secondary effects of mitigation, and effects found not to be significant that would be caused by the construction and operation of the Project. Additionally, this chapter includes an overview of Agriculture and Forestry Resources, Mineral Resources, and Wildfire, and demonstrates why the Project would not result in any significant impacts on these resources/topics.

Chapter 6, Alternatives. Pursuant to CEQA Guidelines section 15126.6, this chapter includes an analysis of a reasonable range of feasible alternatives to the Project. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project but would avoid or substantially reduce any of the significant environmental impacts of the Project. The comparative merits of each alternative are evaluated when compared to the Project, and an environmentally superior alternative is identified in compliance with CEQA Guidelines section 15126.6(e)(2).

Chapter 7, List of Preparers. This chapter lists the persons who directly contributed to preparation of this Draft EIR.

1.3 Public Review Process

CEQA Guidelines section 15051 identifies the Lead Agency as the public entity with the responsibility for carrying out or approving a project. The Project applicant (Taylor Morrison, Southern California Division) has applied for a General Plan Amendment and Zone Change, a Tentative Tract Map, Design Review, and Variances for Building Separation and Rear Setback from the City to allow for the proposed development. As such, the City is serving as the Lead Agency under CEQA and is responsible for complying with CEQA, as it relates to the environmental clearance for the Project.

The City, as the Lead Agency, has determined that an EIR is required for the Project and has authorized the preparation of this Draft EIR. The City will be reviewing and considering the findings of this EIR in its decision to approve, revise, or deny the Project.

Although this Draft EIR was prepared with consultant support, the analysis and findings in this document have been independently reviewed by the City and reflect the City's conclusions and independent judgment, as required by CEQA Guidelines section 15084.

1.3.1 Notice of Preparation

The City has complied with the relevant provisions of the CEQA Guidelines by providing opportunities for early responsible and trustee agency participation in the environmental review process, as well as the opportunity for early public consultation with bordering municipalities and interested organizations and individuals. Specifically, in accordance with CEQA Guidelines section 15082(a), the City circulated a Notice of Preparation (NOP) for a 30-day public review period. The NOP was published in the San Gabriel Valley Tribune on Thursday, November 20, 2025, and was sent to responsible and trustee agencies, the Office of Land Use and Climate Innovation (State Clearinghouse No. 2025110727), and the County Clerk for a public review period that began on Thursday, November 20, 2025, and ended on Monday, December 22, 2025 (CEQA Public Review and Scoping Period). The purpose of the NOP was to formally convey that the City, as the lead agency, is soliciting input regarding the scope and proposed content of the Draft EIR. A copy of the NOP was also made available for electronic download on the City's website and the State Clearinghouse's website (also known as CEQAnet) at:

https://azusaca.gov/2291/1035-E-Mauna-Loa-Avenue---Delaney-Square

https://ceqanet.lci.ca.gov/2025110727

The NOP includes a description of the Project, including the Project location; identification of potential environmental effects associated with Project approval and implementation; a list of the requested discretionary approvals; and an invitation to agencies and the public to review and comment on the NOP, which is provided in Appendix A-1, Notice of Preparation, of this Draft EIR. Comments on the NOP were received from one agency and one individual, which are provided in Appendix A-2, Notice of Preparation Comment Letters. The NOP comment letters, which contain environmental concerns, are listed in Table 1-1, along with a summary of the environmental issues raised and the Draft EIR section(s) where the environmental topics are addressed.

Table 1-1. Notice of Preparation Comment Letters Summary

Sender of Comments	Date Received	General Summary of Comments	Addressed in Section(s)
State Agencies			
Native American Heritage Commission	11/18/2025	Tribal consultation requirements of SB 18 and AB 52	Section 4.16, Tribal Cultural Resources
Individuals			
Nancy Dean	12/15/2025	Traffic and traffic safety concerns	Section 4.10, Land Use and Planning; Section 4.15, Transportation

Source: Appendix A-2 of this Draft EIR.

1.3.2 Scoping Meeting

Pursuant to PRC section 21083.9 and CEQA Guidelines section 15082(c), the lead agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance as outlined in CEQA Guidelines section 15206. The scoping meeting is for public agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed in the Draft EIR. In addition to the required notification of responsible and trustee agencies, the California Governor's Office of Land Use and Climate Innovation (formerly the California Governor's Office of Planning and Research (OPR)) and the Los Angeles County Clerk (CEQA Guidelines § 15082) received a copy of the NOP, and the City mailed courtesy notifications of the scoping meeting to properties within a 300-foot radius of the Project site. Scoping meeting information was also posted on the City's website at:

https://azusaca.gov/2291/1035-E-Mauna-Loa-Avenue---Delaney-Square

The Project's scoping meeting was held at the Civic Auditorium on Wednesday, December 3, 2025, at 6:30 p.m. Comments cards were made available for attendees to provide written comments for the record. The City did not receive any verbal or written comments/questions with environmental concerns during the scoping meeting, as no individuals attended the scoping meeting.

1.3.3 Public Review of the Draft EIR

Upon completion, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, bordering municipalities, interested parties, and all parties who requested a copy of the Draft EIR in writing in accordance with CEQA. A notice announcing the availability (Notice of Availability [NOA]) of the Draft EIR was published in the San Gabriel Valley Tribune. The 45-day public review period of the Draft EIR begins on Monday, August 3, 2026, and ends on Thursday, September 17, 2026. Comments on the Draft EIR from public agencies (including responsible and trustee agencies), bordering municipalities, interested parties, and the public are accepted during the 45-day public review period.

Written comments need to be received or postmarked by the City on or before 5:00 PM on September 17, 2026. Written comments can be provided via email to delaneysquareproject@azusaca.gov, or by mail to:

Mr. Anthony Alvarado, Senior Planner
City of Azusa Planning Division
213 East Foothill Boulevard
Azusa, CA 91702
Attn: Delaney Square Residential Project EIR

A hardcopy of the Draft EIR is available at the each of the following City locations:

Azusa City Hall – Planning Division
213 East Foothill Boulevard
Azusa, CA 91702

Azusa City Library (Temporary Location)
340 West Fifth Street
Azusa, CA 91702

The Draft EIR can be viewed at or downloaded from the City's website at:

https://azusaca.gov/2291/1035-E-Mauna-Loa-Avenue---Delaney-Square

1.4 Effects Found Not To Be Significant

The Project is not anticipated to result in significant impacts to the following topical areas: Agriculture and Forestry Resources, Mineral Resources, and Wildfire. These topics are briefly assessed in Chapter 5, Other CEQA Considerations of this Draft EIR. Further, as detailed in Sections 4.1, Aesthetics, through 4.17, Utilities and Service Systems, this Draft EIR has concluded that all of the Project's potential environmental impacts would be either less than significant or be able to be reduced to a less-than-significant level through mitigation measures.

1.5 Mitigation Monitoring Procedures

CEQA Guidelines section 15097 requires that the mitigation measures and revisions to the Project identified in the Final EIR are implemented. Therefore, CEQA requires that in conjunction with a decision to approve the Project the lead agency must adopt a program for monitoring or reporting on the required revisions and the measures it has found will and imposed to mitigate or avoid significant environmental effects. The Mitigation Monitoring and Reporting Program (MMRP) for the Project will be completed as part of the Final EIR, prior to consideration of the Project by the City's Planning Commission and City Council.

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2 Environmental Setting

2.1 Introduction

This chapter of the Draft EIR describes the environmental setting of the proposed Project and provides an overview of the environmental setting and planning context. As stated in CEQA Guidelines section 15125(a):

> "An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts."

CEQA generally requires that the lead agency describe the physical environmental conditions as they exist at the time the Notice of Preparation (NOP) is published. (CEQA Guidelines § 15125(a)(1).) The NOP for this Project was made available for public review from Thursday, November 20, 2025, through Monday, December 22, 2025. Even so, CEQA also authorizes the lead agency to define existing conditions "by referencing historic conditions" provided such decision is supported by substantial evidence. (CEQA Guidelines § 15125(a)(1).)

As stated in CEQA Guidelines section 15125(a)(1):

> "Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record."

The Supreme Court has held that lead agencies have significant discretion in determining the appropriate "existing conditions" baseline. (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 336 [finding that lead agencies have "discretion to decide, in the first instance, exactly how the existing physical conditions without the project can most realistically be measured, subject to review, as with all CEQA factual determinations, for support by substantial evidence"].) Courts have repeatedly upheld the use of historical conditions or conditions that predate the publication of the Notice of Preparation as the baseline provided such decision is supported by substantial evidence. (See, e.g., *North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94;[1] *Buena Vista Water Storage District v. Kern Water Bank Authority* (2022) 76 Cal.App.5th 576.)

[1] In *North County Advocates*, the project used an augmented traffic baseline based on historical traffic volumes from a vacated Robinsons-May store. The Court found that the City of Carlsbad's traffic baseline that assumed full occupancy of the Robinsons-May space was not merely hypothetical because it was not based solely on the entitlement to reoccupy the building at any given time, but also was based on the actual historical operation of the space at full occupancy for more than 30 years until 2006 and is further supported by substantial evidence consisting of San Diego Association of Governments data regarding traffic levels for the occupied space. As such, the Court ruled in favor of the City of Carlsbad and their decision to utilize an alternate traffic baseline.

As described in greater detail below, the lead agency's determination to reference historic conditions for purposes of establishing the baseline conditions for the analysis of the Project is supported by substantial evidence.

2.2 Project Location

2.2.1 Operational Baseline Conditions

The baseline conditions used in the impact analyses of this Draft EIR are the environmental conditions existing on the ground at the time of the issuance of the NOP, with the exception of the assumption that the W.R. Powell Elementary School (also referred to as Powell Elementary School), which is located on the Project site, is still occupied and operational. Powell Elementary School, currently vacant, is owned by Azusa Unified School District and was operated as an elementary school continuously from its opening in 1957 until 2023 (Appendix E-2). The Azusa Unified School District Board of Education voted to close Powell Elementary School as part of a reorganization effort due to declining enrollment (Patch 2022). Because the property operated as an elementary school until 2023, and is still appropriate and available for reoccupation and use as an elementary school consistent with its historic and permitted uses, it is appropriate to assume an operational school as part of the baseline conditions for the Project. It would be misleading to assume an undeveloped, vacant property as the baseline condition because the site is currently developed, and it is not reasonably foreseeable to assume the property would stay vacant in perpetuity. Consistent with CEQA Guidelines section 15125(a)(1), this Draft EIR uses the property's historic condition as an occupied, operational elementary school for purposes of determining the baseline in order to provide the most accurate picture practically possible of the proposed Project's impacts. As such, the baseline conditions and environmental analyses of the Project assume occupancy of the existing Powell Elementary School; the school's average student enrollment from the most recent five school years was used to establish the baseline conditions.

In accordance with this, the trip generation forecasts for the Project as detailed in the Project's Transportation Impact Study (Appendix K) were based on the Project's baseline: occupancy of the existing Powell Elementary School. During the most recent 5 school years of operation (i.e., 2018-2023), Powell Elementary School accommodated an average enrollment of 287 students. The trip generation forecasts for the occupied school included daily trips, and both AM and PM peak hour trips (Appendix K).

2.2.2 Regional Location

The City of Azusa (City) is located in Los Angeles County approximately 18 miles northeast of downtown Los Angeles. The City is considered part of the San Gabriel Valley subregion of the greater Los Angeles metropolitan area. The City totals approximately 11.8 square miles, including 5,544 acres of land within the City, and another 1,368 acres within the City's Sphere of Influence (SOI) (City of Azusa 2004). Nearby regional points of interest such as Azusa Pacific University, Citrus College, and their respective community amenities are located near the Project site and within City limits. Nearby cities include the cities of Irwindale and Duarte to the west; the City of Covina and unincorporated Los Angeles County (County) land to the south; and the City of Glendora and unincorporated County land to the east.

Figure 2-1, Regional Location and Vicinity, provides a regional location map with the Project boundaries shown on an aerial map to depict the context of the Project site including the surrounding community. Regional access to the Project site is provided by the eastbound/westbound Foothill Freeway (Interstate [I-] 210) to the south, with the Citrus Avenue freeway access ramps located approximately 1,600 feet southeast of the Project site and the South

Grand Avenue freeway access ramps located approximately 0.81 miles southeast of the Project site. The I-210 freeway connects the San Gabriel Valley to the Crescenta and San Fernando Valleys to the north/northwest and Pomona Valley to the east. In addition, the I-210 freeway connects to the San Gabriel River Freeway (I-605) located approximately 4 miles west of the Project site. Direct access to the Project site is currently provided via East Mauna Loa Avenue to the south and North Calera Avenue to the east.

The nearest Los Angeles County Metropolitan Transportation Authority (Metro) A Line (formerly L/Gold Line) APU/Citrus Station is located approximately 0.72 miles north of the Project site, near the intersection of North Citrus Avenue and West Foothill Boulevard. The nearest bus routes include Foothill Transit Bus Lines 281, 488, 284, and 188.

2.2.3 Project Site

The Project site is designated for Institutional/School land uses in the General Plan Land Use Map and is zoned as Institutional/School as well (City of Azusa 2005, 2023). The Project site's zoning is therefore consistent with its existing General Plan land use designation.

The Project site is comprised of a single lot (Assessor Parcel Number [APN] 8628-004-900) totaling approximately 9.77 acres within the City. There are approximately 30,037 square feet of existing buildings and 14,000 square feet of surface impervious parking/asphalt areas on the Project site (Appendix E-2). The Project site is bound by existing commercial and moderate-density residential uses to the north; existing residential uses to the south, east, and west; and is bound by East Mauna Loa Avenue to the south, and North Calera Avenue to the east (see Figure 2-1).

2.2.4 Surrounding Land Uses

The City contains a diverse mix of land uses, including low- and moderate-density residential neighborhoods, commercial, commercial/residential mixed use, industrial and light industrial, hotel, and open space land uses. Figure 2-2, Existing General Plan Land Use Designation, and Figure 2-3, Existing Zoning, show the underlying land use designations and zoning for the Project site and surrounding land uses. The Project site is situated in a developed, urbanized area of the City and is surrounded predominantly by residential and commercial uses, as follows:

- **Land Uses to the North:** Azusa Park Apartments and other moderate-density residential uses, as well as commercial uses, are located directly north of the Project site. Azusa Pacific University and other uses designated as Institutional/School are located slightly farther north, across East Alosta Avenue. Current zoning north of the Project site includes University District – Mixed Use, University District – Residential Medium, and University District – Residential Moderate, as well as a Specific Plans zone for the Azusa Pacific Specific Plan.
- **Land Uses to the East:** Land uses east of the Project site include residential uses and Stanton Elementary School located approximately 0.38 miles east of the Project site. The Project site is adjacent to the City's eastern boundary with the unincorporated County; and, the neighboring City of Glendora boundary is approximately 0.40 miles east of the Project site. Current County zoning east of the Project site, across North Calera Avenue, includes Single-Family Residence (R-1-6000 [minimum lot size 6,000 square feet]) within the City's SOI and within the unincorporated County.

- **Land Uses to the South:** Immediately south of the Project site is East Mauna Loa Avenue and the City's southern boundary with the unincorporated County. Residences are located south of the Project site, within the City's SOI and within the unincorporated County. Dalton Park is located approximately 0.41 miles southeast of the Project site and Magnolia Elementary School is located approximately 0.5 miles south of the site. Current zoning south of the Project site includes R-1-6000 [minimum lot size 6,000 square feet]) within the City's SOI and within the unincorporated County.
- **Land Uses to the West:** Immediately west of the Project site are residential uses followed by mixed uses within the University District along North Citrus Avenue and East Alosta Avenue. Azusa Pacific High School and various other recreational and educational facilities are located approximately 0.5 miles to the west of the Project site. The current zoning west of the Project site includes Low Density Residential, University District – Commercial, University District – Commercial/Residential Mixed Use, and Institutional/School.

2.3 Existing Conditions

2.3.1 Regional Setting

The City is within the north-central San Gabriel Valley and lies at the southern flank of the San Gabriel Mountains. The San Gabriel Valley is an alluvium-filled valley bounded by the Sierra Madre Fault Zone and San Gabriel Mountains to the north, by the Puente Hills on the south, by the Covina and Indian Hills on the east, and by the Raymond Basin on the west. The nearest earthquake fault is the Duarte Fault (possibly active) located approximately 0.48 miles to the northwest of the Project site, and the nearest active fault is the Sierra Madre fault located approximately 1.37 miles to the north of the Project site (Appendix E-1; CGS 2025). The nearest surface body of water is the Little Dalton Wash (0.36 miles north of the Project site), which is a tributary to the Big Dalton Wash, located approximately 0.68 miles southeast of the Project site.

2.3.2 Project Site Setting

2.3.2.1 General Plan and Zoning

Figure 2-2 and Figure 2-3 show the Project site's Existing General Plan Land Use Designation and Existing Zoning, respectively. The Project site has an Institutional/School land use designation that allows for religious, community meeting, school, and governmental office uses where the floor area ratio (FAR) must be between 0.35 and 1.2, and where buildings must be constructed at a scale and intensity that respects the surrounding uses (City of Azusa 2004). The Project site is also zoned as Institutional/School, as shown in Figure 2-3. The existing zoning is consistent with the General Plan land use designation.

According to the City's Development Code, the Project site is located within the Central East Neighborhoods and surrounded by the "Neighborhood General 3 (NG3)" tract neighborhood to the west. The NG3 zone is characterized by neighborhoods of detached single-family homes primarily developed after 1960, and where the general plan anticipates maintaining and enhancing the existing character without significant changes to existing form (City of Azusa 2025).

At the time of the preparation of this Draft EIR, the City is in the process of updating its General Plan. The updated General Plan is not approved, so the City's current General Plan prepared in 2004 and the Housing Element update prepared in 2022 and updated in 2023 are the applicable governing documents.

2.3.2.2 Built Environment

As previously mentioned, the Project site is located in an urbanized and developed infill area of the City. There are many built features in the immediate vicinity of the Project site, including buildings, surface parking lots, and roadways. The Project site contains the now-vacant Powell Elementary School and associated paved parking lot and playground equipment.

Lighting

The Project site is located in an urban environment with many light sources located on the Project site and in the immediate vicinity. The Project site is surrounded by residences and businesses that emit light from their interior lighting, signage, and exterior safety lights. Roadways adjacent to the Project site, including East Mauna Loa Avenue and North Calera Avenue, contain overhead roadway lights that illuminate the roads and sidewalks. Within the Project site, there are a number of existing light sources associated with the vacant elementary school.

Circulation and Access

The Project site contains two driveways, one on East Mauna Loa Avenue and another on North Calera Avenue, that allow for access to the existing on-site parking lot. Both of the existing driveways allow for both ingress and egress. The Project site is also accessible to pedestrians as there are sidewalks along East Mauna Loa Avenue and North Calera Avenue.

2.3.2.3 Other Existing Project Site Setting Features

Geology and Hydrology

The elevation of the Project site ranges from approximately 633 to 618 feet above mean sea level (amsl) (Appendix H). The site currently slopes northeast to southwest and the property is relatively flat, with an estimated 15 feet of elevation differential across the site (Appendix H). The soils underlying the Project site generally consist of variable amounts of silty sand to sand with silt and clay, ranging from light to dark brown, dry to moist, and generally medium dense/medium stiff to very dense/very stiff to the maximum explored depth of approximately 51.5 feet below grade (Appendix F-1).

Surface water drainage at the site appears to infiltrate into the unpaved areas of the site or drain away from the property south towards East Mauna Loa Avenue (Appendix F-1). Historically, the highest groundwater level is approximately 175 feet below current grade per the Seismic Hazard Report for the Azusa 7.5-Minute Quadrangle (Appendix F-1).

The Project site is not within any state-designated Alquist-Priolo Earthquake Fault Zone or within a zone of required investigation for earthquake-induced landslides or liquefaction (CGS 2025). For a more detailed discussion of on-site geological and hydrological conditions, please refer to Sections 4.6, Geology and Soils, and 4.9, Hydrology and Water Quality, respectively, and Appendix F-1, Preliminary Geotechnical Evaluation, and Appendix H, Hydrology and LID Report of this Draft EIR.

Vegetation and Trees

On-site vegetation consists of isolated trees and shrubs in various planter areas which would be removed with Project implementation. There are a total of 38 trees with a diameter at breast height (DBH) of 6" or greater on or adjacent to the Project site, 13 of which are off-site and overhang the property line from neighboring properties. For a more detailed discussion of trees on the Project site, please refer to the arborist report prepared for the Project, which is provided as Appendix B of this Draft EIR.

2.3.3 Public Services and Utilities

2.3.3.1 Public Services

Fire protection services are provided by the Los Angeles County Fire Department (LACoFD), which has two stations within the City and within 1.5 miles of the Project site. Fire Station #32 is located at 605 North Angeleno Avenue, which is approximately 1.34 miles west of the Project site. Fire Station #97 is located at 846 Juniper Ridge, which is approximately 1.36 miles north of the Project site. The provision of water for fire suppression is provided by on-site fire hydrants and water connections.

Police services are provided by the Azusa Police Department, which is located within the City at 725 North Alameda Avenue, approximately 1.18 miles northwest of the Project site.

The Azusa Unified School District provides academic services to City residents for grades kindergarten through 12. The Project site is within Azusa Unified School District and would be served by Charles H. Lee Elementary School (grades TK–5), Gladstone Middle School (grades 6–8), and Azusa High School (grades 9-12) (AUSD 2025). The Project site is within approximately 0.71 miles of Lee Elementary School, approximately 1.95 miles of Gladstone Middle School, and approximately 0.5 miles of Azusa High School.

The Project site is near multiple parks. Dalton Park is the closest public park to the Project site, located approximately 0.41 miles southeast of the Project site. Slauson Park is located approximately 0.8 miles west of the Project site and Gladstone Park is located approximately 0.98 miles southwest of the Project site. In addition, a collection of parks, including Arroyo South Park, Olive Hill Park, and Alisal Park are located nearby to each other approximately 1.1 miles northwest of the Project site.

The City operates the Azusa City Library at 729 North Dalton Avenue, which provides library services to the City. The Azusa City Library has temporarily relocated to Slauson Middle School, located at 340 West Fifth Street, approximately 1.28 miles northwest of the Project site, while the main library undergoes a major renovation.

The Project's public service providers and the potential for the Project to generate environmental impacts associated with an increase in demand for public services, is discussed in Section 4.13, Public Services, of this Draft EIR.

2.3.3.2 Utilities

As stated in the General Plan Built Environment Element, the City owns and operates the Azusa Light and Water Department, which provides water to residents within the City. The City's main water supply sources include local groundwater from the San Gabriel Groundwater Basin and water obtained from the San Gabriel River that is treated at the Canyon Filtration Plant (City of Azusa 2004). The Canyon Filtration Plant has a production capacity of

approximately 10,100 acre-feet per year of treated water and recently has operated at an average capacity of approximately 55% between the years 2016-2020 (ALW 2021). In extreme conditions, when the main sources of water are not enough to meet demand, the City can also purchase replenishment water from the Metropolitan Water District or the San Gabriel Valley Municipal Water District (ALW 2021). Potable water pipelines accessible to the Project site include a 12-inch water pipe within East Mauna Loa Avenue and an 8-inch water pipe within North Calera Avenue (Appendix M-1, Azusa Delaney Square Sewer System Analysis Memorandum, of this Draft EIR).

Sewer/wastewater collection is provided by the City's Public Works Department and the Los Angeles County Sanitation Districts, specifically District 22, except for the northern areas of the City which rely on septic tank systems. The City owns, maintains, and operates all local sewer lines within the City, which connect to the Districts' main sewer trunk lines. Sewer lines are in streets surrounding the Project site, including an 8-inch sewer line within East Mauna Loa Avenue that would serve the Project (see Appendix M-1).

Natural gas is provided to the Project site by Southern California Gas Company (SoCalGas) and is currently available via an existing 3-inch gas line within East Mauna Loa Avenue and 2-inch gas line within North Calera Avenue which would be adequate to serve the Project (see Appendix M-1).

Electrical power is provided by Southern California Edison (SCE) and is currently provided to the Project site via overhead power lines on the south and east sides of the Project site along East Mauna Loa Avenue and North Calera Avenue, respectively (Appendix M-1).

There are existing telephone, telecommunication, and cable television lines and facilities throughout the City. Cable and telecommunication services for the Project site are available from private providers such as Spectrum, Frontier, and T-Mobile (HSI 2025).

The City contracts with a private hauler, Athens Services, for solid waste disposal services who disposes waste collected in the City at County landfills and/or other integrated waste management facilities (City of Azusa 2026a).

The Project's utility providers and the potential for the Project to generate environmental impacts associated with the utility infrastructure are discussed in Section 4.17, Utilities and Service Systems, of this Draft EIR.

2.3.3.3 Public Transit and Bicycle Routes

Public transit operating in the vicinity of the Project site includes the Metro A Line (formerly L/Gold Line) and multiple bus lines. The Metro A Line is a light rail line running between the cities within the San Gabriel Valley and Long Beach. The A Line runs northeast/southwest with the closest station to the Project site (APU/Citrus Station) located at North Citrus Avenue and West Foothill Boulevard approximately 0.71 miles north of the Project site. As discussed in Section 4.15, Transportation, the Project site is not located within a transit priority area (TPA) because the bus routes intersecting at the Citrus Avenue and Route 66 intersection do not have a service frequency of 20 minutes or less during the peak hours of operation (Appendix K).

There are four Foothill Transit bus lines that run within 0.25 miles of the Project site. Foothill Transit Line 188 provides service between Azusa and the City of Montclair and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025a). Foothill Transit Line 281 provides service between Glendora, Azusa, West Covina, and Puente Hills and runs along North Citrus Avenue, approximately 645 feet west of the Project site (Foothill Transit 2025b). Foothill Transit Line 284 provides service between Glendora, San Dimas, Covina, and West Covina and runs along East Alosta Avenue, approximately 640 feet north of the Project site

(Foothill Transit 2025c). Foothill Transit Line 488 provides service between Azusa, Glendora, West Covina, and El Monte Station and passes by the Project site along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025d). There are multiple bus stops near the Project site, including near the intersections of North Citrus Avenue and East Alosta Avenue, North Calera Avenue and East Alosta Avenue, and near North Citrus Avenue and East Mauna Loa Avenue. These stops provide access to Foothill Transit Bus Line 188, Foothill Transit Bus Line 281, Foothill Transit Bus Line 284, and Foothill Transit Bus Line 488.

As stated within the General Plan Built Environment Element, the City has few striped or exclusive bike routes in the City, many streets lack sidewalks, and there are few off-street pedestrian trails; although, the City has a vision to become a pedestrian-friendly, transit-oriented community where the congested, declining commercial strips become well-planned transit corridors that connect all neighborhoods and districts (City of Azusa 2004). Within the Project site's vicinity the General Plan indicates designated routes for planned bicycle facilities, including North Citrus Avenue approximately 650 feet west of the Project site and East Alosta Avenue approximately 640 feet north of the Project site for Class III bike routes, while East Baseline Road, approximately 0.5 miles south of the Project site, has a planned Class II bike lane (City of Azusa 2004). In addition, based on Los Angeles County's 2012 Bicycle Master Plan, a Class III bike route is planned along Mauna Loa Avenue, including along the frontage of the Project site (County of Los Angeles 2012).

2.4 Cumulative Impacts

CEQA Guidelines section 15130 requires that a project's cumulative impacts be discussed when the incremental effect is cumulatively considerable. According to CEQA Guidelines section 15065(a)(3), the term cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Specifically, CEQA Guidelines section 15355 defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. When addressing cumulative impacts, CEQA Guidelines section 15130(b) notes that the elements necessary to provide an adequate discussion of significant cumulative impacts encompass either:

a) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
b) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses under each environmental issue in Chapter 4 of this Draft EIR utilizes one of these two methods as further specified in each section.

CEQA Guidelines section 15130(b)(3) states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." Unless otherwise indicated in Chapter 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes

the City of Azusa. However, there are environmental issues whose relevant geographic scope for purposes of a cumulative impact analysis may be larger or smaller than the city, and may be defined by local, regional, or state agency jurisdiction or by other environmental factors. One example is the geographic scope of cumulative air quality impacts, defined by the South Coast Air Quality Management District to encompass the South Coast Air Basin. The basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Conversely, the geographic scope of cumulative aesthetic impacts is limited to anticipated growth and development in immediately adjacent areas that share a viewshed or line-of-sight with the Project site. Therefore, consideration of the effects of past projects, of other current projects, and of probably future projects near the Project site would provide a more relevant discussion of the cumulative aesthetic impacts of the Project.

The analysis in Sections 4.1 through 4.17 in Chapter 4 of this Draft EIR addresses whether, after adoption of Project-specific mitigation, the residual impacts of the Project would (1) contribute considerably to an existing/anticipated (without the Project) cumulatively significant effect or (2) cause a new cumulatively significant impact. A cumulative impact is not considered significant if the impact can be mitigated to less than significant through mitigation. If necessary, the Draft EIR examines "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (CEQA Guidelines § 15130(a)(3), (b)(5)).

Table 2-1 describes the geographic scope of the cumulative impact analysis for each environmental resource category.

Table 2-1. Geographic Scope for Cumulative Impacts

Environmental Resource		Geographic Area
Aesthetics		Immediate Vicinity and Local
Air Quality	Toxic Air Contaminants; Odors	Immediate Vicinity
	Construction/Mobile Sources	South Coast Air Basin
Biological Resources		Local and Regional
Cultural Resources		Local
Energy		Local and State
Geology and Soils		Immediate Vicinity and Local
Greenhouse Gas Emissions		Global
Hazards and Hazardous Materials		Immediate Vicinity and Local
Hydrology and Water Quality		Sub-Watershed; Groundwater Basin
Land Use and Planning		Local and Regional
Noise	On-Site Construction Noise	Immediate Vicinity
	Off-Site Truck Noise	Immediate Vicinity
Population and Housing		Local and Regional
Public Services		Local
Recreation		Local
Transportation		Local and Regional
Tribal Cultural Resources		Local and Regional
Utilities and Service Systems		Local and Regional

For environmental topics that utilize a list of past, present, and probable future projects for cumulative impacts analysis, Table 2-2, below, provides a list of the cumulative projects within a one-mile radius of the Project site (beyond the City limits), which are also illustrated in Figure 2-4, Cumulative Projects Location Map.

Table 2-2. List of Cumulative Projects

ID No.	Address	Use	Dwelling Units	Square Footage (GSF)	Status
City of Azusa					
A1	919 N. Sierra Madre Avenue	Senior Housing - Multi-family Senior Housing – Duplex and triplex General Light Industrial Golf course	230 Senior Housing Units	6 Industrial Warehouses (838,522 SF), 9-hole Golf Course	Plan Check
A2	120 N. Aspan Street	Residential	Single family subdivision consisting of 22 lots	—	Under Construction
A3	627 E. Sierra Madre Avenue	Multi-family residential	8 DU	—	Plan Check
A4	230 S. Irwindale	Industrial	—	6,380 SF (Industrial)	Plan Check
A5	300 W. Foothill Boulevard	Mixed Use	7 DU (Townhomes)	633 SF (Commercial)	Construction Completed
A6	326 N. Azusa Avenue	Residential	8 DU (Townhomes)	—	Under Construction
A7	333 N. Azusa Avenue	Mixed Use	4 DU	1,000 SF (Retail)	Plan Check
A8	573-577 E. Arrow Highway	Residential	10 DU (Attached Townhomes)	—	Construction Completed
A9	619 N. San Gabriel Avenue	Mixed Use	6 DU	888 SF (Retail)	Under Construction
A10	800 N. Azusa Avenue	Mixed Use	127 DU	12,000 SF (Retail)	Construction Completed
A11	807 E. Promenade	Single-family residential	23 DU	New Public Park	Construction Completed
A12	820 N. Soldano	Residential	6 DU (Townhome)	—	Construction Completed
A13	900 W. Foothill Boulevard	Light Industrial	—	138,454 SF (Self-storage facility)	Construction Completed
A14	1041-1043 W. Arrow Highway	Commercial	—	Express Carwash	Construction Completed

Table 2-2. List of Cumulative Projects

ID No.	Address	Use	Dwelling Units	Square Footage (GSF)	Status
A15	1303 Optical Drive	Industrial and Tenant Improvements	—	45,000 SF addition to an existing building, conference center, helipad and parking structure.	Construction Completed
A16	243 N. Azusa Ave	Residential	4 DU (Condo)	—	Entitlement Approved
A17	742 N. Todd Ave	Industrial	—	16,040 SF (Warehouse)	Preliminary Plan Review
A18	175 N. Azusa Ave	Residential	4 DU (Condo)	—	Entitlement Approved
A19	736-740 N. Angeleno Ave	Residential	4 Affordable housing units	—	Under Construction
A20	229 S. Azusa Ave	Hospitality	—	23 room addition to existing hotel	Entitlement Approved
A21	710 S. Azusa Ave	Retail	—	New drive-thru Starbucks Coffee	Construction Completed
A22	163 N. Azusa Ave	Retail	—	Remodel of restaurant	Construction Completed
A23	635 N. San Gabriel Ave	Mixed-Use	Mixed-Use Building with 16 Residential Units and 3 Live-Work Units	—	Plan Check
A25	628 N. Pasadena Avenue	Residential	6 DU (Condo)	—	Plan Check
A26	125 S. Peckham Ave	Industrial	—	Two New Industrial Buildings	Entitlement Approved
A27	630 N. Angeleno	Residential	4 DU	—	Plan Check
City of Glendora					
G1	501 W. Route 66	Mixed-use residential/ Commercial office	8 DU	1,004	Under construction
G2	210 S. Grand Avenue	Medical office building	—	20,292	Plan Check or Approved
G3	630 W. Foothill Boulevard	Medical office building	—	9,500	Plan Check or Approved
G4	1134 Barranca Avenue	Multi-family residential	163 DU	—	Proposed

Table 2-2. List of Cumulative Projects

ID No.	Address	Use	Dwelling Units	Square Footage (GSF)	Status
G5	363 W. Route 66	Multi-family residential	24 DU	—	Proposed
County of Los Angeles County (Unincorporated)					
LA1	6140 N Goodway Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA2	5832 Viceroy Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA3	18414 Citrus Edge Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA4	18012 E Bellefont Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA5	18353 E Bellefont Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA6	18720 Petunia Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA7	18706 E Chadley Street, Covina CA 91722	ADU	1 DU	—	Plan Check or Approved
LA8	18706 Glenlyn Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA9	6233 Galanto Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA10	18470 Renwick Road, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA11	5453 Traymore Avenue, Covina CA 91722	ADU	1 DU	—	Plan Check or Approved
LA12	18356 Fondale Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA13	5838 Cedarglen Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA14	6204 Oakbank Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA15	5751 N Rockvale Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA16	5539 N Barranca Avenue, Covina CA 91722	ADU	1 DU	—	Plan Check or Approved
LA17	18414 E Kirkwall Road, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA18	18855 Citrus Edge Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA19	6002 Galanto Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA20	18806 E Armstead Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA21	5515 Twintree Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved

Table 2-2. List of Cumulative Projects

ID No.	Address	Use	Dwelling Units	Square Footage (GSF)	Status
LA22	5460 Calera Avenue, Covina CA 91722	ADU	1 DU	—	Plan Check or Approved
LA23	18414 Ghent Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA24	18314 E Bellefont Drive, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA25	6003 N Briargate Lane, Glendora CA 91740	ADU	1 DU	—	Plan Check or Approved
LA26	18302 Citrus Edge Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA27	18467 Payson Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA28	18866 E Armstead Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA29	5421 Traymore Avenue, Covina CA 91722	ADU	1 DU	—	Plan Check or Approved
LA30	18336 Nearfield Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA31	5903 N Glenfinnan Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA32	6021 Factor Avenue, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA33	18018 Nearfield Street, Azusa CA 91702	ADU	1 DU	—	Plan Check or Approved
LA34	19065 E Linfield Street, Glendora CA 91740	ADU	1 DU	—	Plan Check or Approved

Notes: DU = dwelling units; SF = square feet; — = not applicable. The ID number corresponds with Figure 2-4, Cumulative Projects Location Map. Cumulative Project A24, located at 609 N. Azusa Ave, was withdrawn by the project applicant.
Source: Appendix K; City of Azusa 2026b; City of Glendora 2025; County of Los Angeles 2025.

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SOURCE: World Imagery; Los Angeles County

DUDEK

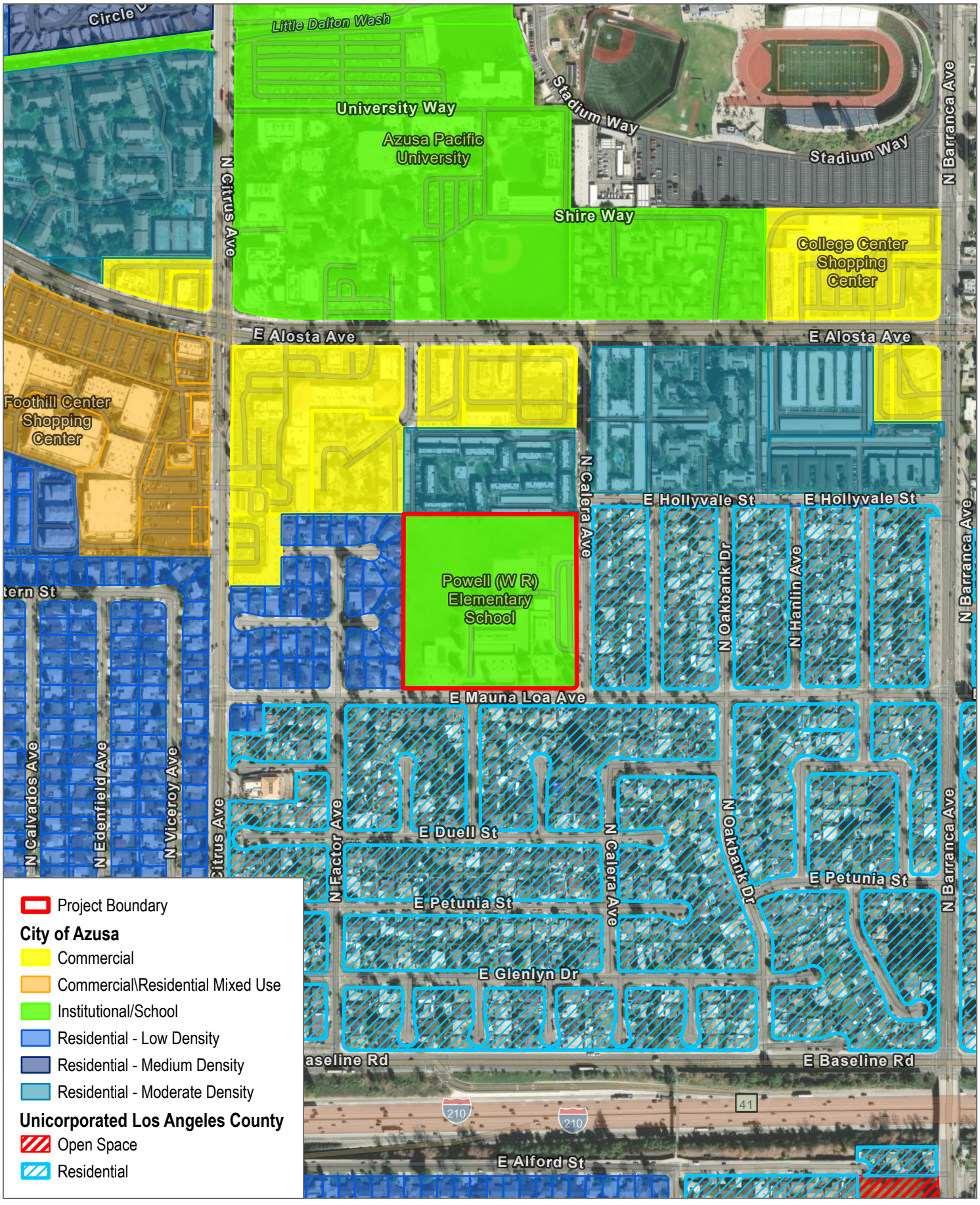
0 250 500 Feet

FIGURE 2-1

Regional Location and Vicinity

Delaney Square Residential Project

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SOURCE: City of Azusa; Los Angeles County; World Imagery

FIGURE 2-2

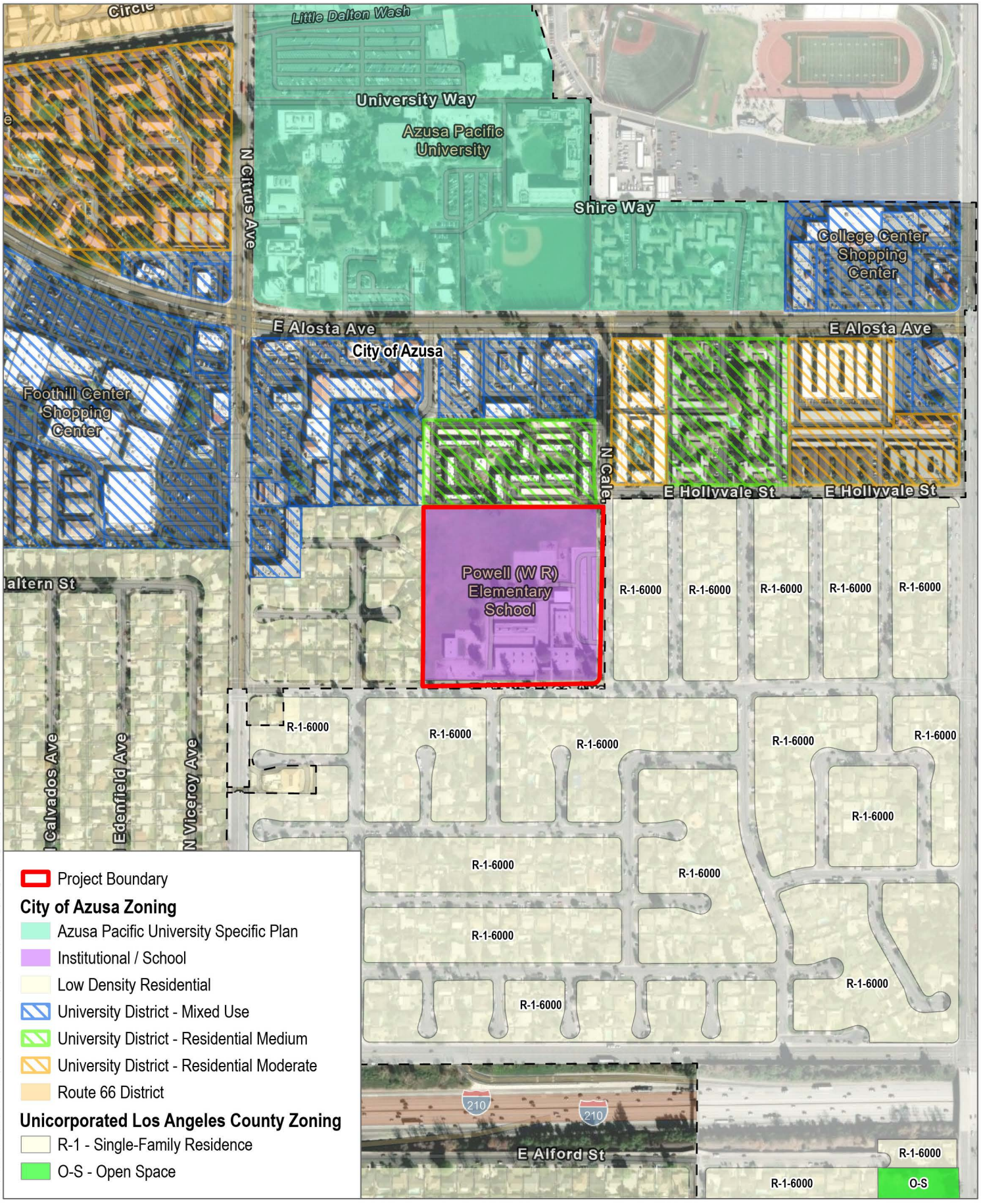
Existing General Plan Land Use Designation

Delaney Square Residential Project

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SOURCE: City of Azusa 2025; Los Angeles County Department of Regional Planning 2025; World Imagery

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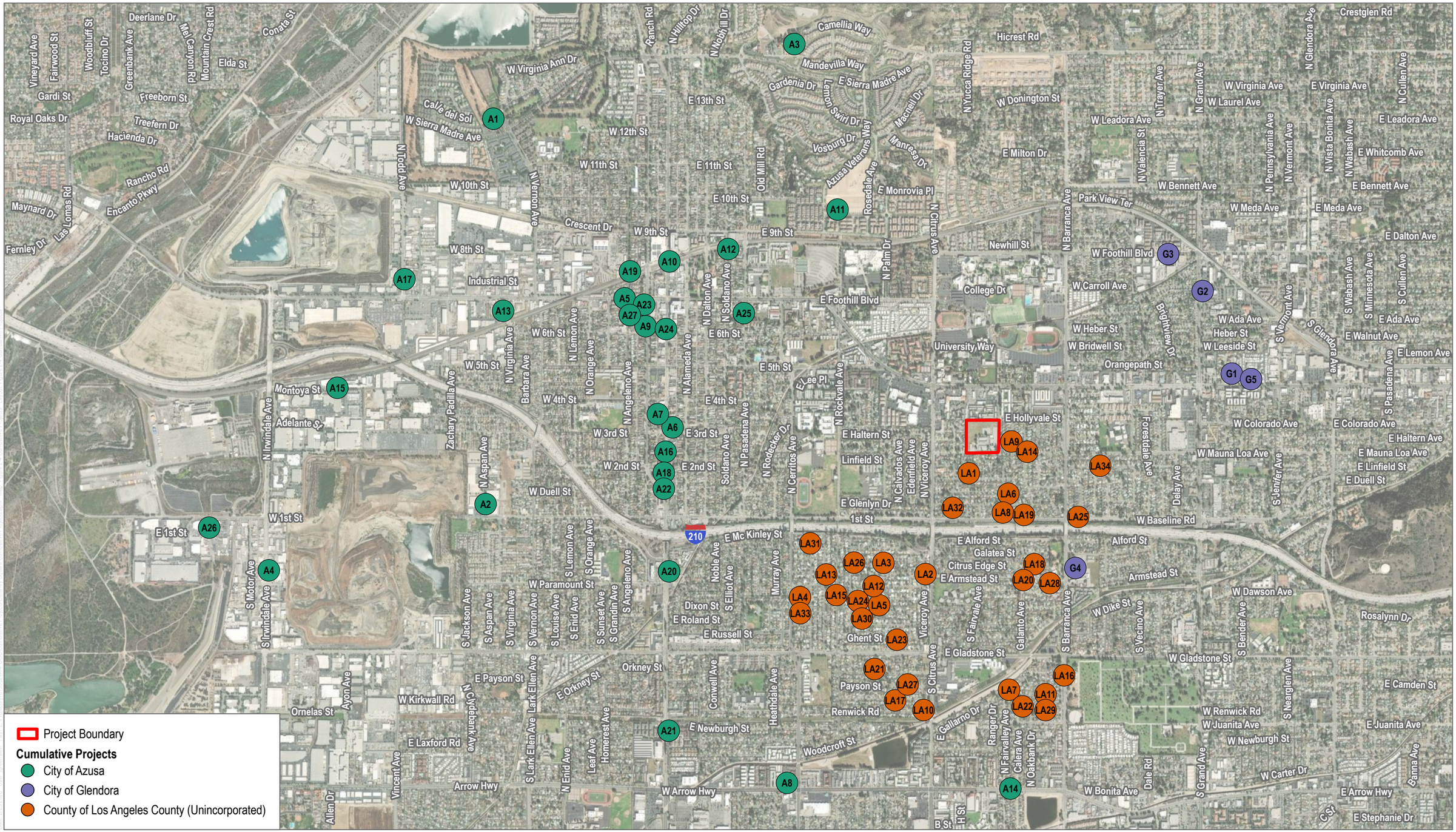
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FIGURE 2-3

Existing Zoning

Delaney Square Residential Project

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SOURCE: Los Angeles County; World Imagery

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FIGURE 2-4

Cumulative Projects

Delaney Square Residential Project

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3 Project Description

This chapter of the Draft EIR provides a description of the proposed Delaney Square Residential Project (Project). The purpose of this chapter is to describe the Project in a manner that will facilitate meaningful review by the public, reviewing agencies, and decision makers in accordance with CEQA and the CEQA Guidelines. Per the requirements of CEQA Guidelines section 15124, a complete project description must contain the following information:

(a) The precise location and boundaries of the proposed project, shown on a detailed map, along with a regional map of the project's location (see Section 3.1 and Chapter 2, Environmental Setting, Section 2.2, Project Location);

(b) A statement of the objectives sought by the proposed project, which should include the underlying purpose of the project (see Section 3.4);

(c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering documentation and supporting public service facilities (see Section 3.2); and

(d) A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits or other approvals required to implement the project, and a list of related environmental review and consultation requirements imposed by federal, state, or local laws, regulations, or policies (see Sections 3.5 and 3.6).

In accordance with CEQA Guidelines section 15124, the description of a project "should not supply extensive detail beyond that needed for evaluation and review of environmental impacts." This chapter of the Draft EIR includes the required information, as listed above.

As stated in CEQA Guidelines section 15126.2, an EIR must identify and focus on the significant effects of a project on the environment. In assessing the impacts of a proposed project, the lead agency "should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published." (CEQA Guidelines § 15126.2). The approval and implementation of the Project would result in physical changes to the environment, which are analyzed in this Draft EIR.

3.1 Project Summary

The Project site, which totals approximately 9.77 acres, is located in the City of Azusa (City) within Los Angeles County, approximately 18 miles northeast of downtown Los Angeles. The Project site, located at 1035 East Mauna Loa Avenue on the eastern edge of the City, encompasses one parcel (Assessor Parcel Number [APN] 8628-004-900). The site is currently developed with a school, surface parking, and hardscape and landscaping, including trees. While the site has historically been used for school purposes, all buildings on site are currently vacant. In order to accommodate the Project, the existing buildings and surface parking lot would be demolished and single-family homes and townhomes would be constructed.

Figure 2-1, Regional Location and Vicinity, included in Chapter 2, Environmental Setting, provides a regional location map with the Project boundaries shown on an aerial map to depict the context of the Project site including the surrounding community. Regional access to the Project site is provided by the eastbound/westbound Foothill

Freeway (Interstate [I-] 210) to the south, with the Citrus Avenue freeway access ramps located approximately 1,600 feet southeast of the Project site and the South Grand Avenue freeway access ramps located approximately 0.81 miles southeast of the Project site. The I-210 freeway connects the San Gabriel Valley to the Crescenta and San Fernando Valleys to the north/northwest and Pomona Valley to the east. In addition, the I-210 freeway connects to the San Gabriel River Freeway (I-605) located approximately 4 miles west of the Project site. Direct access to the Project site is currently provided via East Mauna Loa Avenue to the south and North Calera Avenue to the east.

The nearest Los Angeles County Metropolitan Transportation Authority (Metro) A Line (formerly L/Gold Line) Azusa Pacific University / Citrus College (APU/Citrus) Station is located approximately 0.72 miles north of the Project site, near the intersection of North Citrus Avenue and West Foothill Boulevard. The nearest bus routes include Foothill Transit Bus Lines 281, 488, 284, and 188.

Figure 3-1, Conceptual Site Plan, illustrates the conceptual site plan for the proposed Project. As shown, the Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units. The new residences would have a maximum height of 29 feet 10 inches, as two stories. In total, the proposed residential density on site would be approximately 13.1 dwellings units per acre (du/ac). All residential units would be for-sale units. On site residential amenities would include private and common open space, parking, a tot lot, barbecue area, shaded gathering space, and a butterfly garden. The Project site would be accessible from East Mauna Loa Avenue and a new driveway on North Calera Avenue with internal circulation provided by internal streets, driveways, and alleyways. The Project would include a total of 326 parking spaces, including 256 covered parking spaces for residents and 70 uncovered parking spaces for guests.

As shown on Figure 3-1, Conceptual Site Plan, the property line for the Project site is located within the street along North Calera Avenue and East Mauna Loa Avenue and includes sidewalks and street trees. Minor off-site improvements (i.e. utility connections) are proposed. Aside from the utility connections, there are no additional proposed off-site improvements.

3.2 Project Characteristics

The Project includes the demolition of existing on-site structures, surface parking lots, and landscaping to prepare the site for and enable development of new residential units and amenities, new landscaping, and minor off-site improvements in the adjacent sidewalk and roadways (i.e. utility connections). Further details of the Project's components are provided below.

3.2.1 Residential Development

The Project would consist of 128 for sale market-rate units, including 65 two-story single-family detached cluster homes and 63 two-story attached townhomes. The single-family detached unit mix would consist of 48 three-bedroom dwelling units and 17 four-bedroom dwelling units. The townhome unit mix would consist of 17 two-bedroom units and 46 three-bedroom units. The single-family detached homes would be oriented along the southern, eastern, and western frontages, and the townhomes would be oriented along the northern boundary and situated within the interior of the lot. An overview of the residential units, parking areas, and amenity spaces are illustrated in Figure 3-1. As shown, the townhomes would be attached in 17 attached triplexes and six attached duplexes.

Amenities

Various residential amenities would be provided throughout the Project including private and common open space, parking, a tot lot, barbecue area, shaded gathering space, and a butterfly garden. Most outdoor amenities would be located in the central paseo, including a nature playground, picnic area, hop rocks, and tire swing, in addition to the aforementioned amenities.

3.2.2 Design Features

The Project's design would consist of four architectural styles (Spanish Colonial, Traditional, Craftsman, and Western Ranch) with color palettes predominantly featuring neutral earthtones of brown, gray, beige, and off-white. Building materials would include stucco, fiberglass doors, concrete flat tiles, vinyl windows, and wood accent siding and fascia.

3.2.3 Landscaping, Walls, and Fences

Landscaped areas on the Project site would feature a combination of landscape planters with root barriers/root barrier panels along with free-standing trees, shrubs, and ground covers, as illustrated in Figure 3-2, Conceptual Landscape Plan. New plant materials would consist of climate adapted and/or medium-to-very-low water use species in compliance with Chapter 78, Article VI, Division 7, Landscaping and Irrigation Standards, of the City's Municipal Code. As shown on Figure 3-2, the Project anticipates planting 204 landscaping trees throughout the Project site. The tree palette would include Strawberry Tree, Western Redbud, Mediterranean Cypress, Blue Ice Yellowwood, Skyrocket Juniper, Crape Myrtle, Saratoga Hybrid Laurel, Little Gem Dwarf Southern Magnolia, Indian Hawthorn, Yellow Bells, Fruitless Olive, Coast Live Oak, St. Mary Southern Magnolia, Columbia London Plane Tree, and African Sumac. Examples of proposed shrubs and groundcover include variegated smooth agave, pink cloud pink muhly grass, iceberg rose, desert carpet bank catclaw, pigeon point coyote brush, and creeping juniper, among others.

Tree Plan

As detailed in the Arborist Report, provided as Appendix B of this Draft EIR, there are 38 trees with a diameter at breast height (DBH) of six inches or greater on or adjacent to the Project site. The Project proposes to remove all 25 on-site trees, none of which meet the definition of a "Heritage tree" or "City tree." The removal of these trees would be subject to City's Tree Preservation Ordinance, outlined in sections 62-191 through 62-201 of the Azusa Municipal Code (AMC). According to the ordinance, if trees with a DBH of six inches or greater are removed, the Director of Public Works determines the appropriate size, quantity, and planting locations for replacement trees. At a minimum, three replacement trees must be planted for every one tree removed (i.e. minimum of 75 trees). As stated above, the Project would exceed this minimum requirement with an anticipated 204 tree plantings.

The 13 existing off-site trees with branches that overhang the property line from the neighboring properties would be encroached upon during construction activities. In accordance with City requirements, all regulated trees that are not removed would be protected in a manner consistent with the standards outlined in the City's Tree Preservation Ordinance.

Open Space and Private Open Space

According to Table 4-3 of the City's Development Code (section 88.42.140 Multi-Family and Small Lot Single-Family Projects), projects containing 31 or more units are required to provide a minimum of 2,000 square feet of common open space and 150 square feet of private open space per dwelling unit. The open space proposed on site includes both community and private open space. As shown in Figure 3-2, Conceptual Landscape Plan, there are landscaped areas that would be managed privately (i.e., private open space) and landscaped areas that would be managed by the homeowner's association (HOA) (i.e., common open space, paseo, and site perimeter). The Project would provide 15,100 square feet of common area open space (inclusive of a central paseo, tot lot, barbecue area, shaded gathering space, and a butterfly garden) and 36,916 square feet of private residential open space in the form of yards for a total of 52,016 square feet of residential open space, which meets Table 4-3 and Section 88.42.140(F) of the Development Code. Table 3-1, below, details the Project's open space.

Table 3-1. Open Space Summary

Open Space Type	Calculation	Open Space (SF)
Open Space Required		
Common Open Space	2,000 SF	2,000
Private Open Space	150 SF per unit	19,200[1]
Open Space Provided		
Common Open Space	—	15,100
Private Open Space	—	36,916
	Total Open Space Provided	**52,016**

Source: Development Code Section 88.42.120 (Multi-Family and Small Lot Single-Family Projects).
Notes: SF = square feet; — = not applicable
[1] 150 SF per unit x 128 dwelling units = 19,200 SF.

Walls and Fences

As shown in Figure 3-3, Conceptual Wall and Fence Plan, the Project would construct various walls and fences throughout the site. One 3-foot-tall monument wall featuring the Project's name, "Delaney Square, a Taylor Morrison Community" is proposed on the left side of each entrance into the Project site. Overall, the Project is proposed with entrances to residences on both along North Calera Avenue and East Mauna Loa Avenue. Walls and fences are generally provided to separate the Project from adjacent uses and section off proposed open space. As such, in order to separate the Project site from the surrounding residences, a 5-foot, 6-inch-tall tan colored vinyl fence is proposed along the Project site's northern and western boundaries. Additionally, this vinyl fence is featured as the boundary of each private open space for the single-family residences. A 5-foot, 6-inch-tall slump block wall with white slurry finish and decorative brick cap is proposed on the edge of some proposed residences, including along the East Mauna Loa Avenue entrance and particularly along the edge of buildings proposed with an enhanced elevation (e.g., the eastern edge of the southwestern cluster of single-family residences, the northern edge of the cluster of single-family residences south of the North Calera Avenue entrance, and the southern edge of the cluster of single-family residences at the southeastern corner of the Project site). In addition, a 3-foot, 6-inch-tall vinyl patio fence with a vinyl gate is proposed at the entrance of each of the townhome residences.

3.2.4 Vehicle Parking

The Project would include on-site parking for guests and residents, including covered (i.e. garage) and non-covered spaces. The Project would provide a total of 326 parking spaces, including standard and standard accessible spaces, which are illustrated on Figure 3-1, Conceptual Site Plan.

As shown in Table 3-2, per the Development Code, the Project is required to provide a minimum of 299 required spaces total, including 43 spaces required for guest parking. The Project is proposing a total of 326 dedicated parking spaces (inclusive of 256 covered parking spaces for residents and 70 uncovered parking spaces for guest parking), thereby meeting and exceeding the required number of parking spaces per the City's Development Code.

Table 3-2. Required Parking Spaces by Use

Use	Land Use	Size (Units)	Metric	Spaces Required
Residential	Single-family detached	65 DU	2 spaces per unit (<4 bedrooms)	130
	Townhome	63 DU	2 spaces per unit (2-4 bedroom units)	126
	Guest Parking	128 DU	1 space per 3 units	43
			Total Units	**128 DU**
			Parking Spaces Required	**299 spaces**
			Parking Spaces Provided	**326 spaces**

Source: Development Code Section 88.36.050 (Number of Parking Spaces Required); Kevin L. Crook Architect Inc. 2025.
Notes: DU = dwelling units

3.2.5 Circulation Plan

The Project would support vehicular and pedestrian circulation throughout the Project site and the surrounding area. Primary vehicular access to the Project site would be via two driveways: one on East Mauna Loa Avenue and a new access point on North Calera Avenue, each providing both ingress to and egress from the Project site. Internal circulation within the Project site would be provided by new internal streets, driveways, and alleyways. The Project circulation is illustrated on Figure 3-1, Conceptual Site Plan.

The Project site would be accessible to pedestrians from existing sidewalks along East Mauna Loa Avenue and North Calera Avenue. As shown in Figure 3-1, the existing sidewalks would be re-built to provide the same access as under existing condition. Internal sidewalks and pedestrian walkways would be present throughout the Project site along internal roadways, featuring landscaping with drought-tolerant plantings, and up to proposed dwellings fronting East Mauna Loa Avenue and North Calera Avenue. In addition, pedestrians would have access to the northern townhomes along the northern boundary of the site via a sidewalk that would connect to the publicly-accessible sidewalk along North Calera Avenue, as shown in Figure 3-1, Conceptual Site Plan. The Project would also include a central paseo with a pathway for pedestrian connectivity.

3.2.6 Utilities and Infrastructure

The Project would require upgrades to utility infrastructure within the Project site, as illustrated in Figure 3-4, Preliminary Utility Plan. All on-site infrastructure would be constructed in accordance with City standards and applicable building codes. The Project site is currently served by existing water, sewer, storm drain, and electrical

infrastructure within or along the roadways of East Mauna Loa Avenue and North Calera Avenue that surround the site (see Chapter 2, Environmental Setting, for more details). The Project would not use natural gas consumption during construction or operations, as the Project is designed as all-electric housing units without any natural gas connections. The Project does not propose the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. The existing overhead power transmission lines (including the high voltage overhead power lines along North Calera Avenue and East Mauna Loa Avenue) and transformer units would be undergrounded as part of this Project. Minor off-site improvements are also proposed (i.e. utility connections) over existing City easements for the roadways surrounding the Project site (i.e., East Mauna Loa Avenue and North Calera Avenue, according to the Tentative Tract Map), and connections for new on-site private water mains are proposed to connect to existing water mains at the proposed entrances on East Mauna Loa Avenue and North Calera Avenue. The proposed private water mains and fire water lines would be located along the internal roadway network adjacent to the proposed residences. Private fire hydrants would be installed in the center of the Project site on the corner of the internal streets and the proposed townhomes. In addition, water meters would be installed on site to monitor water flow. Sewer connections would be available via the installation of private 8-inch VCP sewer mains along the internal roadway network with a lateral connection to the existing sewer main on North Calera Avenue and East Mauna Loa Avenue.

3.3 Project Construction

As discussed in Chapter 2, Environmental Setting, approximately 30,037 square feet of existing building and 14,000 square feet of surface parking/asphalt areas are proposed for demolition (Appendix C-1). As shown in Figure 3-5, Preliminary Grading and Drainage Plan, the Project would require approximately 4,600 cubic yards of cut and 4,600 cubic yards of fill, resulting in a 'balanced' grading that would not require any import or export of soils.

Demolition, grading, utility trenching, and paving of roadway circulation would be conducted prior to the construction of the residential buildings and application of architectural coating (i.e., painting) to the residential units. As determined in consultation with the Project Applicant, it is currently anticipated that development would start in November 2026 and would last approximately 36 months, ending in November 2029. The November 2026 start date represents the earliest possible start date. This Draft EIR assumes an overlap of the building construction and architectural coating phases, which is possible depending on market conditions and provides a more conservative analysis of short-term air quality, greenhouse gas, noise, and transportation impacts. Construction activities would include demolition, grading, utility trenching, paving, building construction, and application of architectural coating (see Table 3-3, below).

Table 3-3. Construction Phases and Duration

Construction Phases	Duration	Start and End Dates
Demolition	5 months	11/4/2026 – 3/25/2027
Grading	2 months	5/17/2027 – 7/14/2027
Onsite Utilities (Trenching)	9 months	7/15/2027 – 4/25/2028
Paving	1 month	4/26/2028 – 5/31/2028
Building Construction	16 months	6/8/2028 – 11/6/2029
Application of Architectural Coating	Occurs periodically at the end of phases	7/13/2028 – 11/8/2029

3.4 Project Objectives

CEQA Guidelines section 15124(b) requires an EIR to include a statement of objectives sought by the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR. The Project objectives also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives also includes the purpose of a project and may discuss a project's benefits. The Project's specific objectives are as follows:

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.
2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 – Medium (NG3-MED) zone.
3. Provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.
4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

3.5 Intended Uses of this EIR

In compliance with CEQA, this Draft EIR has been prepared to analyze the potential environmental impacts that may result from implementation of the Project. This Draft EIR identifies feasible mitigation measures and/or alternatives that would minimize or eliminate the potential significant impacts associated with Project construction and operation. Lead agencies, such as the City, are charged with the duty to substantially lessen or avoid significant environmental effects where feasible (CEQA Guidelines §§ 15002(a)(3) and 15021(a)(2)). Where a lead agency identifies significant and unavoidable adverse environmental effects of a Project, CEQA Guidelines section 15093 authorizes the agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its significant and unavoidable adverse environmental effects when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits outweigh the unavoidable adverse environmental effects, these effects may be deemed acceptable by the agency as substantiated in a statement of overriding considerations.

This Draft EIR evaluates potential environmental impacts associated with implementation of the Project and provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Project. The Draft EIR must allow the City, responsible agencies, and other interested parties, to evaluate the environmental impacts and environmental consequences of Project implementation, thereby enabling the decisionmakers to make informed decisions regarding the Project's requested entitlements, described below.

3.6 Discretionary Actions

3.6.1 City of Azusa

The City of Azusa, as lead agency for the Project, has the responsibility for reviewing, processing, and approving the Project. If subsequent project changes are proposed or new information comes to light and an additional discretionary approval is required, the City will evaluate the need for supplemental CEQA review pursuant to CEQA Guidelines sections 15162-15164. The following is a summary of the discretionary actions/approvals the City of Azusa will consider taking for this Project:

- Certification of the EIR
- Adoption of a General Plan Amendment (GPA-2025-01) to change the Project site's Institutional/School land use designation to Medium Density Residential
- Adoption of a Zone Change (Z-2025-01) to change the Project site's Institutional/School zoning to Neighborhood General 3 – Medium (NG3-MED)
- Approval of a Variances for Building Separation and Rear Yard Setback (V-2025-01)
- Approval of Design Review (DR-2025-19)
- Approval of a Tentative Tract Map (TTM-84887)

The discretionary actions required for the Project are further described below.

General Plan Amendment to Change the Site's Land Use Designation to Medium Density Residential

The Project requires a General Plan Amendment to change the land use designation from Institutional/School to Medium Density Residential. The General Plan's Medium Density Residential designation allows for residential uses at a density of up to 15 dwelling units per acre. The Project's proposed land use would provide a density transition between adjacent residential uses, including the Moderate Density Residential designation on the parcels to the north of the Project site (up to 27 dwelling units per acre) and the Low Density Residential parcels to the west of the Project site (up to 8 dwelling units per acre), as illustrated in Figure 2-2, Existing General Plan Land Use Designations.

Zone Change to Change the Site's Zoning to Neighborhood General 3 – Medium (NG3-MED)

The current Institutional/School (INS) zoning does not allow for residential use. Thus, a Zone Change is required to rezone the Project site to Neighborhood General 3 – Medium (NG3-MED), which would allow for the Project's proposed residential development. The Project's proposed zoning would conform with the NG3-MED zone to the east, south, and west of the Project site, as illustrated in Figure 2-3, Existing Zoning.

Variances for Building Separation and Rear Yard Setback

As shown on Figure 3-1, Conceptual Site Plan, the Project proposes single-family residences to be separated by 3.6 feet instead of the minimum of 5 feet for building separation. In addition, the Project would provide a 15-feet setback instead of the minimum of 25 feet for the Project site's rear setback. As such, a variance is required to

deviate from the design standards required in the Project site's proposed NG-3 zone (see Development Code section 88.22.070(D)(3)).

Design Review

The Project is subject to design review by the City's Planning Commission and City Council. In accordance with the AMC, an application for design review is required pursuant to Section 88.51.032 (Design Review) of the Development Code. The required design review application is subject to major review by the Review Authority and subject to the following criteria (Development Code Section 88.51.032[E]):

- Provides architectural design, building massing and scale appropriate to and compatible with the site surroundings and the community;
- Provides attractive and desirable site layout and design, including, but not limited to, building arrangement, exterior appearance and setbacks, drainage, fences and walls, grading, landscaping, lighting, signs, etc.;
- Provides efficient and safe public access, circulation and parking;
- Provides appropriate open space and landscaping, including the use of water efficient landscaping;
- Is consistent with the general plan any applicable specific plan, development agreement, and/or any previously approved planning permit; and
- Complies with all applicable requirements of this Development Code, and any other adopted city design standards, guidelines, and policies.

Tentative Tract Map

According to Chapter 66, Article I, section 66-1 (Subdivisions) and Article IV, Division 2 (Tentative Maps) of the Development Code, a tentative tract map is required for development of the proposed Project. As shown in TTM No. 84887, the proposed Project would subdivide the Project site into two parcels to accommodate the proposed single-family residences and condominiums. See Figure 3-6, Tentative Tract Map, for details.

3.6.2 Responsible Agencies

A public agency, other than the lead agency, that has discretionary approval over a project is known as a "responsible agency," as defined by CEQA Guidelines section 15381. There are no known public agencies beyond the lead agency that have discretionary approval authority over the proposed Project.

3.6.3 Other Permits and Approvals

Other permits and approvals are required for Project implementation that are not subject to discretionary review, but nevertheless require actions by the applicant and/or the City to obtain the necessary approvals to implement the proposed Project. Other permits and approvals required include but are not limited to the following:

- City of Azusa
  - Grading Permit, Demolition, Building and other construction permits
- California Water Resources Control Board

- Coverage under National Pollutant Discharge Elimination System Permit No. CAS000002, General Construction Activity Storm Water Permit and Stormwater Pollution Prevention Plan

3.7 References

Kevin L. Crook Architect Inc. 2025. Delaney Square. Second Submittal. September 24, 2025.

Site Summary

Total Site Area: 9.77 Ac

Total Homes: 128 Units

Product	Units
Cluster SFD	65
Townhomes	63

Density: 13.10 DU/AC

Cluster SFD

Plan	Type	Sq.Ft.	#Units	%
1	3 BR/ 2.5 BA	1,563	30	46
2	3 BR/ 2.5 BA	1,598	18	28
3	4 BR/ 3 BA	1,780	17	26
			65	100

Townhomes

Plan	Type	Sq.Ft.	#Units	%	Patios	Total Private O.S.
1	2 BR/ 2.5 BA	1,358	17	27	168	2,856
2	3 BR/ 2.5 BA	1,476	23	37	168	3,864
3	3 BR/ 2.5 BA	1,575	23	37	168	3,864
			63	100		10,584

Provided Open Space

Common Open Space: 15,100

Private Open Space:
Cluster SFD: 26,332 (Min. 10' Dimension)
Townhomes: 10,584 (Min. 8' Dimension)
Total Private Open Space: 36,916

Provided Parking

Covered Parking: 256
Uncovered Parking: 70 (9'x20' Head-in)
Total Provided Parking: 326 (2.5:1)

Lot Coverage: 34.8 %

Notes:
1. Site plan is for conceptual purposes only.
2. Site plan must be reviewed by planning, building, and fire departments for code compliance.
3. Base information per parcel map.
4. Civil engineer to verify all setbacks and grading information.
5. Building Footprints may change due to the final design elevation style.
6. Open space area is subject to change.
7. Building setbacks are measured from property lines to building foundation lines.



CONCEPTUAL SITE PLAN

taylor morrison
Homes Inspired by You

Delaney SQUARE
AZUSA, CALIFORNIA

CLUSTER

09.24.2025
A-1

Kevin L. Crook Architect Inc #24085
PLANNING + ARCHITECTURE

SOURCE: Kevin L. Crook Architect Inc, 2025

DUDEK

FIGURE 3-1
Conceptual Site Plan
Delaney Square Residential Project

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LANDSCAPE CONCEPT NOTE:

THIS LANDSCAPE WILL CONSIST OF CALIFORNIA-FRIENDLY, LOW AND MEDIUM WATER USE PLANT MATERIAL. ALL PLANTS HAVE BEEN CHOSEN FROM THE LOW OR MEDIUM WATER USE CATEGORY ACCORDING TO WUCOLS. PLANTS HAVE BEEN CHOSEN TO CREATE A UNIFORM THEME ACROSS THE SITE CONSISTING OF MEDITERRANEAN AND CALIFORNIA FRIENDLY PLANT MATERIAL. MAINTENANCE AND LONGEVITY OF PLANT MATERIAL HAS BEEN TAKEN INTO CONSIDERATION. ROOT PANELS AND BARRIERS WILL BE UTILIZED ON ALL TREES NECESSARY, CONSISTENT WITH ALL STANDARDS AND SPECIFICATIONS. A 3" LAYER OF BARK MULCH WILL BE USED IN ALL LANDSCAPE AREAS. ALL LANDSCAPE AREAS WILL CONFORM TO ALL CURRENT LANDSCAPE GUIDELINES.

IRRIGATION CONCEPT NOTE:

THE IRRIGATION DESIGN WILL INCORPORATE THE LATEST IN SMART IRRIGATION TECHNOLOGIES. ALL NEW LANDSCAPE AREAS WILL INCLUDE HIGH EFFICIENCY, LOW WATER USE IRRIGATION EQUIPMENT AND METHODS. A SMART IRRIGATION CONTROLLER WITH A RAIN SHUT OFF DEVICE WILL ALSO BE INCORPORATED. BARK MULCH WILL BE USED TO RETAIN MOISTURE AND REDUCE EVAPORATION AND AN IRRIGATION SCHEDULE WILL BE PROVIDED TO PROGRAM THE CONTROLLER. TWO IRRIGATION SCHEDULES SHALL BE PREPARED, ONE FOR PLANT ESTABLISHMENT AND ONE FOR MAINTENANCE. ALL NEW IRRIGATION SYSTEMS WILL COMPLY WITH ALL CURRENT LANDSCAPE GUIDELINES.

WATER EFFICIENT LANDSCAPE WORKSHEET

PROJECT: DELAENY SQUARE CONCEPTUAL LANDSCAPE PLAN - OVERALL DATE: 6/12/2025

This worksheet is filled out by the project applicant and it is a required element of the Landscape Documentation Package.

Reference Evapotranspiration (ETo) 53.1
Conversion Factor 0.62

Hydrozone # /Planting Description[a]	Plant Factor (PF)	Irrigation Method[b]	Irrigation Efficiency (IE)[c]	ETAF (PF/IE)	Landscape Area (sq. ft.)	ETAF x Area	Estimated Total Water Use (ETWU)[d]
Regular Landscape Areas							
Low water use plantings	0.3	Drip	0.81	0.37	42041	15571	512,620
Medium water use plantings	0.5	Drip	0.81	0.62	28027	17301	569,571
High water use turf	0.7	Drip	0.81	0.86	2962	2560	84,272
Low use plantings	0.3	Rotary Nozzles or Rotors	0.75	0.40	0	0	0
Med use plantings	0.5	Rotary Nozzles or Rotors	0.75	0.67	0	0	0
High water use turf	0.7	Rotary Nozzles or Rotors	0.75	0.93	0	0	0
				TOTALS	73,030	35431	1,166,463
Special Landscape Areas							
Turf areas parks				1	0	0	0
Irrigated w/ recycled water				1	0	0	0
Water features				1	0	0	0
				TOTALS	0	0	0
						ETWU Total (Gallons/year)	1,166,463
						Maximum Allowed Water Allowance (MAWA)[e] (Gallons/year)	1,322,362

MAWA

ETAF for residential areas is .55 or .45 for commercial areas

MAWA =	ETO *	Conv Factor *	((ETAF	*	LA)	+	(1-ETAF)	*	SLA))
	53.1	0.62	0.55		73,030		0.45		0
MAWA=	**1,322,362**								

ETAF Calculations

Regular Landscape Areas	
Total ETAF x Area	35,431
Total Area	73,030
Average ETAF	**0.49**

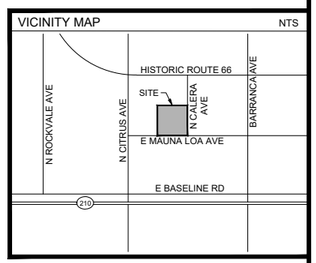
All Landscape Areas	
Total ETAF x Area	35,431
Total Area	73,030
Sitewide ETAF	**0.49**

Average ETAF for Regular Landscape Areas must be 0.55 or below for residential areas, and 0.45 or below for non-residential areas.

HOA LANDSCAPE AREAS

PRIVATE LANDSCAPE AREAS

SHEET INDEX	
Sheet Description	Sheet Title
L-1	OVERALL CONCEPTUAL LANDSCAPE PLAN
L-2	OPEN SPACE ENLARGEMENT
L-3	AMENITIES & CONCEPTUAL PLANTING PALETTES
L-4	OVERALL CONCEPTUAL SITE ENLARGEMENT
L-5	OVERALL CONCEPTUAL SITE ENLARGEMENT
L-6	OVERALL CONCEPTUAL SITE ENLARGEMENT
L-7	OVERALL CONCEPTUAL SITE ENLARGEMENT
L-8	CONCEPTUAL WALL & FENCE PLAN
L-9	PEDESTRIAN CONNECTIVITY



DELANEY SQUARE

L-1

bmla LANDSCAPE ARCHITECTURE
310 NORTH JOY STREET | CORONA, CA 92879
T: 951.737.1124 | F: 951.737.6551

OVERALL CONCEPTUAL LANDSCAPE PLAN

PREPARED FOR TAYLOR MORRISON
4695 MACARTHUR COURT, 8TH FLOOR NEWPORT BEACH, CA 92660 PH:(714) 783-1804
9/23/2025

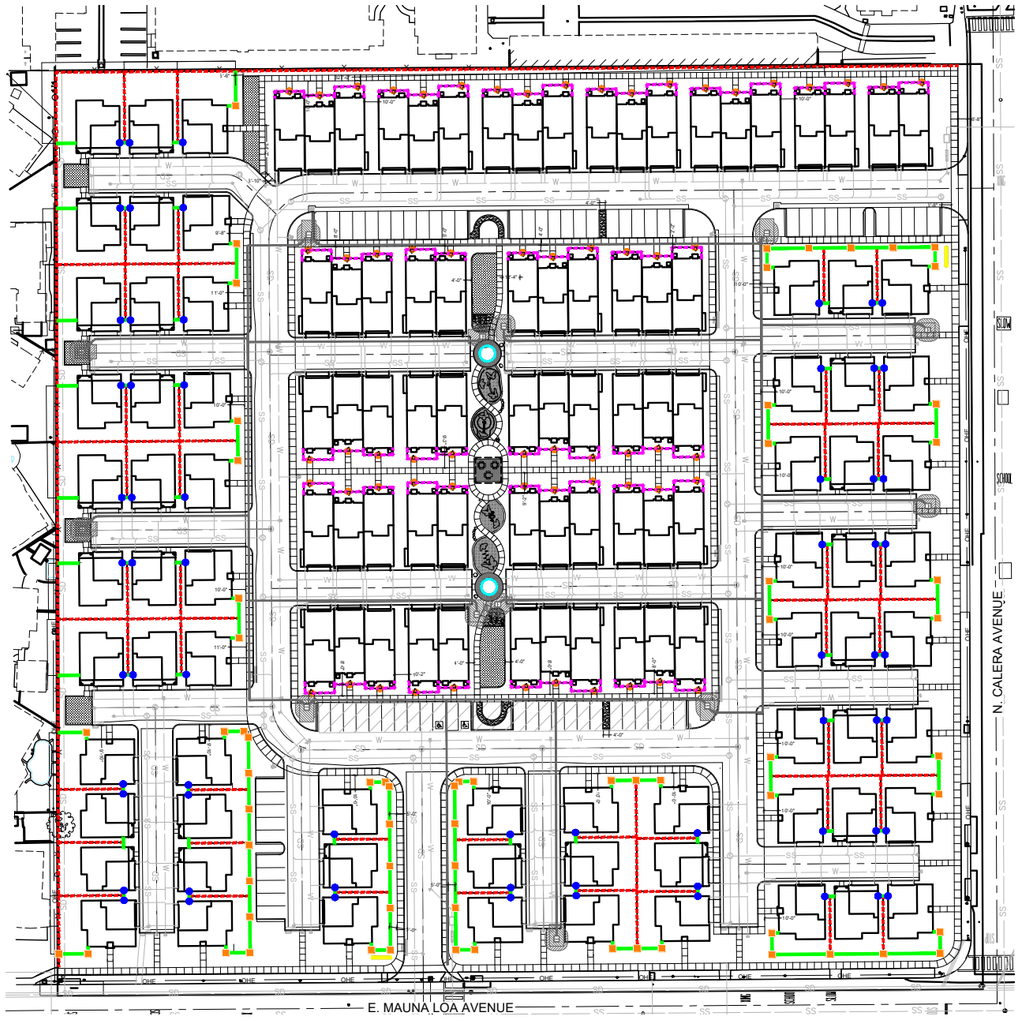
NORTH 0' 40' 80' 120'

SOURCE: bmla Landscape Architect 2025

FIGURE 3-2
Conceptual Landscape Plan
Delaney Square Residential Project

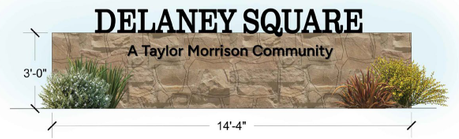
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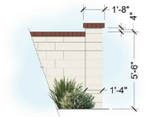
WALL AND FENCE LEGEND	
CODE/SYMBOL	DESCRIPTION
W-01	5'-6" TALL SLUMP BLOCK WALL WITH WHITE SLURRY FINISH AND DECORATIVE BRICK CAP
W-02	6'-0" TALL SLUMP BLOCK PILASTER WITH WHITE SLURRY FINISH AND DECORATIVE BRICK CAP
W-03	3'-6" TALL VINYL PATIO FENCE W/ VINYL GATE
W-04	3'-0" WIDE VINYL GATE, COLOR TAN
W-05	5'-6" TALL VINYL FENCE, COLOR TAN
W-06	18" TALL GABION WALL
W-07	3'-0" TALL MONUMENT WALL

MONUMENT ELEVATION



WALL: W-07
3'-0" TALL MONUMENT WALL

WALL AND FENCE ELEVATIONS



WALL: W-01
PILASTER: W-02
5'-6" TALL SLUMP BLOCK WALL WITH WHITE SLURRY FINISH AND 6'-0" DECORATIVE BRICK CAP



PATIO FENCE: W-03
3'-6" TALL VINYL GATE AND FENCE



GATE: W-04
3'-0" WIDE VINYL GATE ON BLOCK WALL



WALL: W-05
5'-6" TALL VINYL FENCE



WALL: W-06
18" TALL GABION WALL

DELANEY SQUARE

L-8

NORTH 0' 40' 80' 120'

CONCEPTUAL WALL & FENCE PLAN

PREPARED FOR TAYLOR MORRISON
4695 MACARTHUR COURT, 8TH FLOOR NEWPORT BEACH, CA 92660 PH:(714) 783-1804
9/23/2025

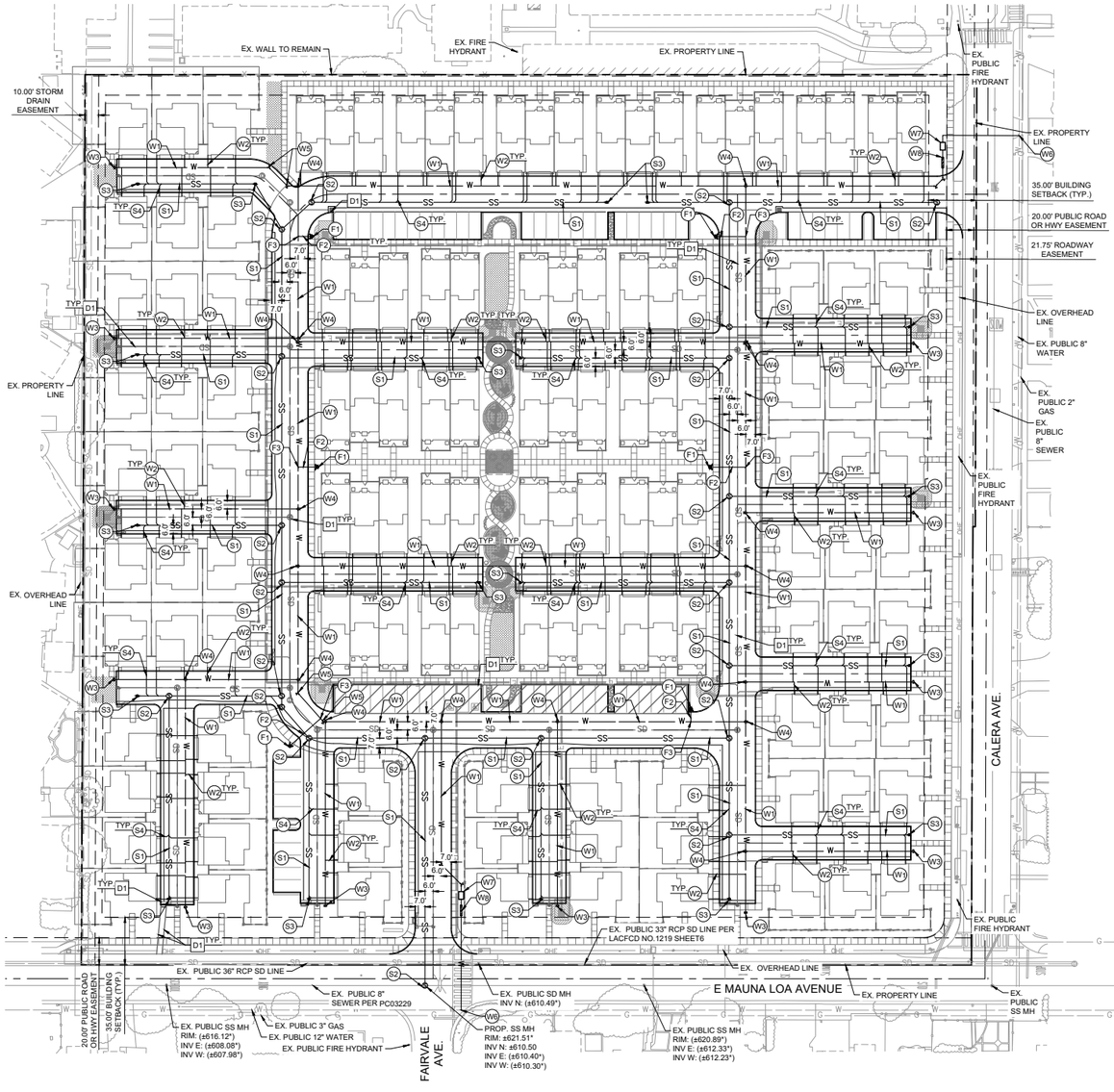
bmla LANDSCAPE ARCHITECTURE
310 NORTH JOY STREET | CORONA, CA 92879
T: 951.737.1124 | F: 951.737.6551

SOURCE: bmla Landscape Architecture 2025

FIGURE 3-3
Conceptual Wall & Fence Plan
Delaney Square Residential Project

DUDEK

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LEGEND

- PROPERTY LINE
- CENTER LINE
- EASEMENT OR SETBACK LINE
- SS — PROPOSED SANITARY SEWER PIPE
- SD — PROPOSED STORM DRAIN PIPE
- W — PROPOSED WATER PIPE
- E — PROPOSED ELECTRICAL LINE PER OTHERS. SHOWN FOR REFERENCE ONLY.
- SS — EXISTING SANITARY SEWER PIPE
- SD — EXISTING STORM DRAIN PIPE (> 12"Ø)
- G — EXISTING GAS LINE
- W — EXISTING WATER PIPE
- OHE — EXISTING OVERHEAD LINE

EXISTING UTILITY NOTE

1. THE EXISTING UTILITIES SHOWN ON THE PLAN ARE BASED ON AVAILABLE RECORDS. THE CONTRACTOR MUST FIELD DETERMINE THE LOCATION AND DEPTH OF ALL UTILITIES PRIOR TO ANY CONSTRUCTION. REPORT DISCREPANCIES AND POTENTIAL CONFLICTS WITH PROPOSED UTILITIES TO ENGINEER PRIOR TO INSTALLATION OF ANY PIPING.
2. EXISTING UTILITIES ARE APPROXIMATE AND SCALED BASED ON THE FOLLOWING RECORD DRAWING(S):
   - 2.1. LOS ANGELES COUNTY FLOOD CONTROL DISTRICT - COUNTY PROJECT NO.1219 UNIT I, LINE D PLAN AND PROFILE.
   - 2.2. LOS ANGELES COUNTY PUBLIC WORKS PROFILE, ALIGNMENT, AND GRADE OF SANITARY SEWERS TO BE CONSTRUCTED IN TRACT NO. 20498 - PRIVATE CONTRACT NO.3229

*INVERT ELEVATIONS ARE BASED ON RECORD PLAN PC NO. 3229 DATED OCTOBER 1954 AND ADJUSTED TO SURVEY DATUM BY VERTEX SURVEY, INC. DATED DECEMBER 18, 2024. EXISTING INVERTS SHOULD BE VERIFIED IN THE FIELD.

DOMESTIC WATER

- W1 INSTALL PRIVATE WATER MAIN.
- W2 INSTALL WATER LATERAL HOUSE CONNECTION.
- W3 INSTALL WATER BLOW-OFF VALVE PER ALW WATER STANDARD W-17.
- W4 INSTALL 90° BEND AND THRUST BLOCK PER ALW WATER STANDARD W-7.
- W5 INSTALL 45° BEND AND THRUST BLOCK PER ALW WATER STANDARD W-7.
- W6 CONNECT TO EXISTING WATER MAIN.
- W7 INSTALL WATER METER PER ALW WATER STANDARD W-4.
- W8 INSTALL WATER BACKFLOW PER ALW WATER STANDARD W-15.

FIRE WATER

- F1 INSTALL PRIVATE FIRE HYDRANT ASSEMBLY PER ALW WATER STANDARD W-11.
- F2 INSTALL FIRE WATER LINE.
- F3 CONNECT TO PROPOSED WATER MAIN.

SEWER

- S1 INSTALL PRIVATE 8" VCP SEWER MAIN. SLOPE 1.0%
- S2 INSTALL SEWER MANHOLE.
- S3 INSTALL SEWER CLEANOUT.
- S4 INSTALL SEWER LATERAL HOUSE CONNECTION.
- S5 CONNECT TO EXISTING SEWER MAIN.

STORM DRAIN

- D1 PROPOSED STORM DRAIN PIPING AND APPURTENANCES. REFER TO DRAINAGE PLAN FOR DESIGN INFORMATION.

NORTH

GRAPHIC SCALE IN FEET
0 20 40 80

No.	REVISIONS	DATE	BY

Kimley»Horn
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25152 SPRINGFIELD COURT, SUITE 200, SANTA CLARITA, CA 91355
PHONE: 213-261-4040
WWW.KIMLEY-HORN.COM

KHA PROJECT 194439012
DATE 9/23/2025
SCALE AS SHOWN
DESIGNED BY BC
DRAWN BY CB
CHECKED BY CY

DELANEY SQUARE
PREPARED FOR
TAYLOR MORRISON
CITY OF AZUSA CALIFORNIA

PRELIMINARY
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NOT FOR CONSTRUCTION
Kimley»Horn
Kimley-Horn and Associates, Inc.

PRELIMINARY UTILITY PLAN

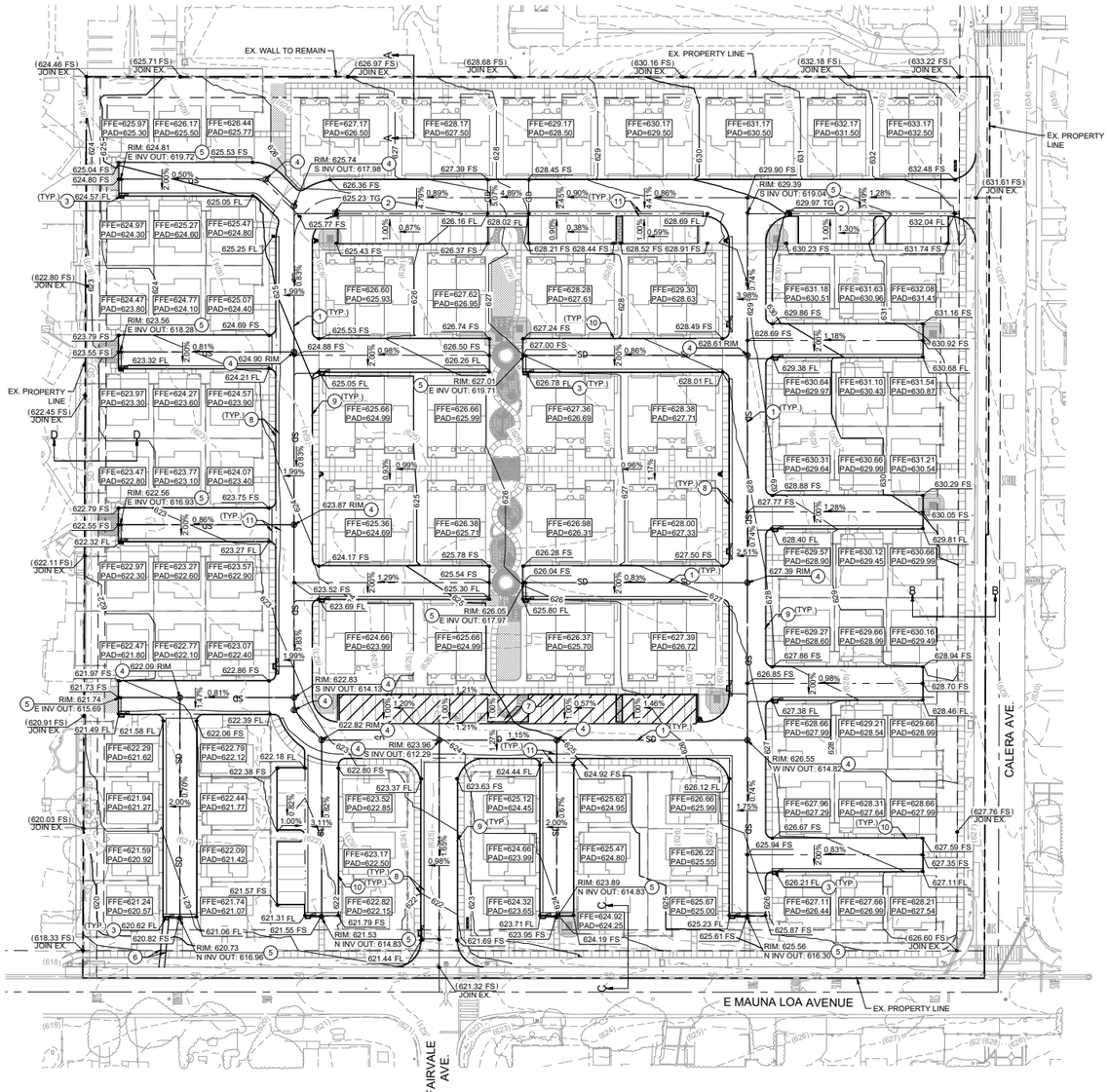
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C3.0

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SOURCE: Kimley Horn 2025

FIGURE 3-4
Preliminary Utility Plan
Delaney Square Residential Project

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LEGEND

- PROPERTY LINE
- CENTER LINE
- EASEMENT OR SETBACK LINE
- EXISTING STORM DRAIN PIPE
- SD — PROPOSED STORM DRAIN PIPE
- FLOW LINE
- GB — GRADE BREAK
- CATCH BASIN INLET
- (XXX.XX) XX — EXISTING SPOT GRADE
- XXX.XX XX — PROPOSED SPOT GRADE
- (X.XX)% — EXISTING FLOW (DIRECTION AND SLOPE)
- X.XX% — PROPOSED FLOW (DIRECTION AND SLOPE)
- (XXX) — EXISTING CONTOUR
- XXX — PROPOSED CONTOUR

ESTIMATED EARTHWORK QUANTITIES

CUT:	4600 CY
FILL:	4600 CY
NET:	0 CY

NOTE: THE ABOVE QUANTITIES ARE APPROXIMATE IN PLACE VOLUMES CALCULATED FROM THE EXISTING GROUND TO THE PROPOSED FINISHED GRADE. EXISTING GROUND IS DEFINED BY THE CONTOURS AND SPOT GRADES ON THE BASE SURVEY. PROPOSED FINISHED GRADE IS DEFINED AS THE FINAL GRADE AS INDICATED ON THE GRADING PLAN(S).

THE EARTHWORK QUANTITIES ABOVE ARE FOR PERMIT PURPOSES ONLY. THEY HAVE NOT BEEN FACTORED TO ACCOUNT FOR CHANGES IN VOLUME DUE TO BULKING, CLEARING AND GRUBBING, SHRINKAGE, OVER- EXCAVATION AND RE-COMPACTION, AND CONSTRUCTION METHODS. NOR DO THEY ACCOUNT FOR THE THICKNESS OF PAVEMENT SECTIONS, FOOTINGS, SLABS, REUSE OF PULVERIZED MATERIALS THAT WILL UNDERLIE NEW PAVEMENTS, ETC. THE CONTRACTOR SHALL RELY ON THEIR OWN EARTHWORK ESTIMATES FOR BIDDING PURPOSES.

GENERAL NOTES

1. ALL WALKWAYS TO HAVE A MINIMUM SLOPE OF 0.5% AND MAXIMUM SLOPE OF 2.0% IN ANY DIRECTION.

CONSTRUCTION NOTES

1. INSTALL STORM DRAIN MAIN. SLOPE 1% UNLESS OTHERWISE STATED.
2. INSTALL CATCH BASIN.
3. INSTALL CURB INLET CATCH BASIN.
4. INSTALL STORM DRAIN MANHOLE.
5. INSTALL STORM DRAIN CLEAN OUT.
6. INSTALL PARKWAY DRAIN.
7. INSTALL STORM DRAIN INFILTRATION CHAMBERS PER PRINSCO.
8. CONSTRUCT CURB AND GUTTER.
9. CONSTRUCT 6" CURB.
10. CONSTRUCT 4" ROLLED CURB.
11. CONSTRUCT LONGITUDINAL GUTTER.

NORTH

GRAPHIC SCALE IN FEET
0 20 40 80

No.	REVISIONS	DATE	BY

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DELANEY SQUARE
PREPARED FOR
TAYLOR MORRISON
CITY OF AZUSA CALIFORNIA

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PRELIMINARY GRADING AND DRAINAGE PLAN

SHEET NUMBER
C2.0

Plotted By:Crump, Brenno Sheet Set:Taylor Morrison – Delaney Square Layout:GRADING AND DRAINAGE PLAN September 23, 2025 01:08:45pm K:\SDG_LDEV\194439012\design\cad\GRADING AND DRAINAGE PLAN.dwg
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SOURCE: Kimley Horn 2025

FIGURE 3-5

Preliminary Grading & Drainage Plan

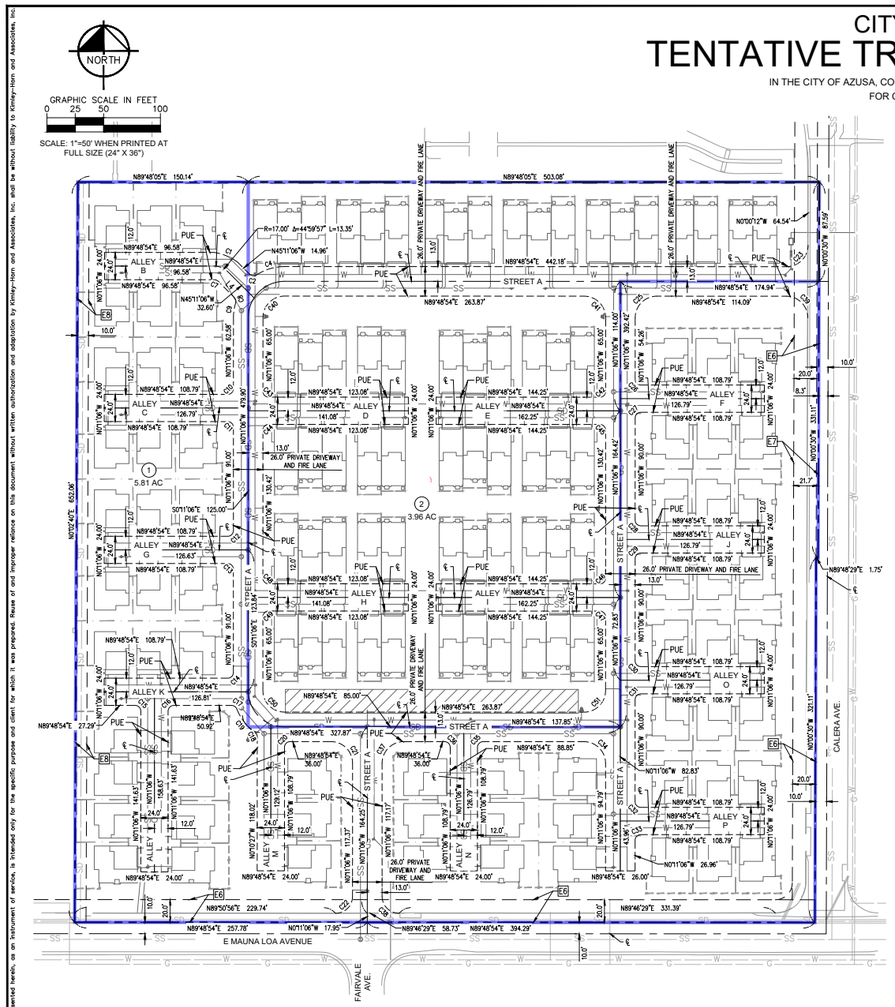
Delaney Square Residential Project

DUDEK

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CITY OF AZUSA
TENTATIVE TRACT MAP NO. 84887

IN THE CITY OF AZUSA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
FOR CONDOMINIUM PURPOSES



OWNER/DEVELOPER

TAYLOR MORRISON
ATTN: MATTHEW MAEHARA
PHONE: 714-783-1804
EMAIL: MMAEHARA@TAYLORMORRISON.COM

SURVEYOR

VERTEX SURVEY, INC.
28348 CONSTELLATION ROAD, SUITE 800
SANTA CLARITA, CA 91355
ATTN: RICK ESTRADA
PHONE: (661) 312-4642
EMAIL: RICK@VERTEXSURVEYINC.COM

ENGINEER

KIMLEY HORN & ASSOCIATES, INC.
25152 SPRINGFIELD COURT, SUITE 200
SANTA CLARITA, CA 91355
ATTN: CHRIS YOUNG, PE
PHONE: (213) 261-4100
EMAIL: CHRIS.YOUNG@KIMLEY-HORN.COM

BENCHMARK

DATE OF SURVEY: DECEMBER 25, 2024

ELEVATION (FT): 610.69
LOCATION DESCRIPTION: LS TAG 7699 W. CURB CITRUS AVE, 15' S/O PROD MAUNA LOA AVE
BM NUMBER: NG5621

BASIS OF BEARINGS

THE BEARINGS SHOWN HEREON ARE BASED ON THE CENTERLINE OF MAUNA LOA AVENUE N 89° 48' 54" E AS SHOWN ON TRACT NO. 20498, FILED IN BOOK 525, PAGES 18 TO 21 MAPS, IN THE OFFICE OF THE LOS ANGELES COUNTY RECORDER, STATE OF CALIFORNIA.

ADDRESS

1035 E MAUNA LOA AVENUE
AZUSA, CA 91702

LEGAL DESCRIPTION

REAL PROPERTY IN THE CITY OF AZUSA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 36, TOWNSHIP 1 NORTH, RANGE 10 WEST, SAN BERNARDINO BASE AND MERIDIAN, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND FILED IN THE DISTRICT LAND OFFICE ON APRIL 6. 1876.

EXCEPTING THEREFROM THE EASTERLY 8.25 FEET OF THE NORTH HALF OF THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SAID SOUTHWEST QUARTER, THE EAST 10 FEET OF SAID LAND AND THE SOUTH 10 FEET OF SAID LAND HAS BEEN RESUBDIVIDED AND ARE SHOWN AS A PORTION OF CALAREA AVENUE MAUNA LOA AVENUE RESPECTIVELY, ON THE MAP OF TRACT NO. 20498, RECORDED IN BOOK 525 PAGE 18, 19, 20 AND 21 OF MAP, RECORDS OF SAID COUNTY

EXISTING EASEMENTS

E6 AN EASEMENT FOR PUBLIC ROAD OR HIGHWAY AND INCIDENTAL PURPOSES, RECORDED JULY 28, 1959 AS INSTRUMENT NO. 3113 OF OFFICIAL RECORDS, IN FAVOR OF CITY OF AZUSA. THIS ITEM AFFECTS THE SUBJECT PROPERTY AND IS PLOTTED HEREON.

E7 AN EASEMENT FOR ROADWAY AND INCIDENTAL PURPOSES, RECORDED APRIL 22, 1964 AS INSTRUMENT NO. 4793 OF OFFICIAL RECORDS, IN FAVOR OF CITY AZUSA. THIS ITEM AFFECTS THE SUBJECT PROPERTY AND IS PLOTTED HEREON.

E8 AN EASEMENT FOR STORM DRAIN AND INCIDENTAL PURPOSES, RECORDED SEPTEMBER 1, 1978 AS INSTRUMENT NO. 977006 OF OFFICIAL RECORDS, IN FAVOR OF COUNTY OF LOS ANGELES. THIS ITEM AFFECTS THE SUBJECT PROPERTY AND IS PLOTTED HEREON.

ABBREVIATIONS

EX. -	CENTERLINE
N.T.S.-	EXISTING
P.U.E -	NOT TO SCALE
R/W -	PUBLIC UTILITY EASEMENT
TYP -	RIGHT OF WAY
	TYPICAL

ASSESSOR'S PARCEL NO

8628-004-900

LEGEND

PROPERTY LINE
RIGHT OF WAY
CENTERLINE
EASEMENT LINE
EX. EASEMENT LINE
LOT LINE
LOT NUMBER (X)
AREA X.XX AC

EARTHWORK QUANTITIES

CUT = 4600 CY (RAW)
FILL = 4600 CY (RAW)
NET = 0 CY

AREA SUMMARY

TOTAL AREA: 9.77 ± AC
TOWNHOUSE UNITS: 63 (ATTACHED)
65 (DETACHED)
OPEN SPACE AREA: 1.19 ± AC

ZONING / LAND USE

EXISTING ZONING: INSTITUTIONAL/SCHOOL
PROPOSED ZONING: SINGLE FAMILY RESIDENTIAL
EXISTING LAND USE: ELEMENTARY SCHOOL
PROPOSED LAND USE: RESIDENTIAL

UTILITY PROVIDERS

AZUSA LIGHT & WATER
FABIAN LUCARELLI
729 N. AZUSA AVENUE,
AZUSA, CA 91702
(626) 812-5209

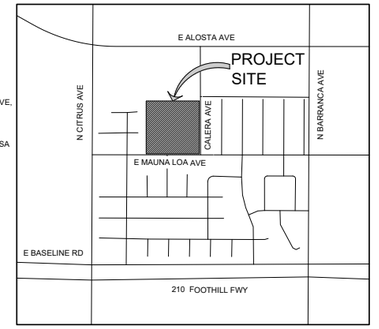
FRONTIER
(323) 342-5552

CROWN CASTLE
FIBER DIG TEAM SCN NOC
(888) 632-0931

SCE DIST. METRO EAST REG
GILBERT AVECES
14005 S. BENSON AVE,
CHINO, CA 91710
(909) 548-7249

SO. CAL. GAS DISTRIBUTION AZUSA
ADAM AL-RAYESS
(818) 701-3360

CITY OF AZUSA
PUBLIC WORKS
RICHARD GARDEA
(626) 733-3147



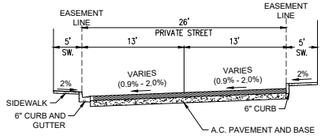
VICINITY MAP
NOT TO SCALE

SURVEYOR'S NOTES

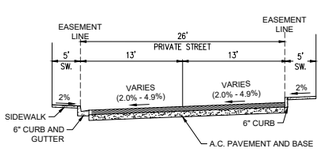
- THERE IS NO VISIBLE EVIDENCE THAT THE SITE WAS USED FOR AS SUMP, DUMP OR SANITARY LANDFILL.
- THERE IS NO VISIBLE EVIDENCE OF CEMETERIES ON SUBJECT PROPERTY.
- AT THE TIME OF SURVEY NO EVIDENCE OF RECENT EARTH MOVING WORK WAS OBSERVED, THE SUBJECT PARCEL IS BRAND NEW CONSTRUCTION.
- NO RECENT CHANGES IN STREET RIGHTS-OF-WAY WERE OBSERVED AT THE TIME OF SURVEY.
- UNLESS THIS PLAN HAS THE SEAL AND SIGNATURE OF THE SURVEYOR AND/OR ENGINEER RESPONSIBLE FOR ITS PREPARATION, THIS IS NOT AN AUTHENTIC COPY OF THE ORIGINAL SURVEY AND SHALL NOT BE DEEMED RELIABLE.
- COVENANTS, CONDITIONS, RESTRICTIONS, TERMS OF AGREEMENTS AND MATTERS PROPERTY, CONTENTS MUST BE REVIEWED TO DISCERN SPECIFICS.
- THE UTILITIES SHOWN HEREON WEE BASED ON OBSERVED EVIDENCE ONLY. THE SUBJECT PROPERTY APPEARS TO CONTAIN THE NECESSARY UTILITIES TO PERFORM NORMAL OPERATION.
- AS OUTLINED IN SECTION 8770.6 OF THE BUSINESS AND PROFESSIONS CODE "THE USE OF THE WORD "CERTIFY" OR "CERTIFICATION" BY A LICENSED LAND SURVEYOR OR REGISTERED CIVIL ENGINEER IN THE PRACTICE OF PROFESSIONAL ENGINEERING OR LAND SURVEYING OR THE PREPARATION OF MAPS, PLATS, REPORTS, DESCRIPTIONS, OR OTHER SURVEYING DOCUMENTS ONLY CONSTITUTES AND EXPRESSION OF PROFESSIONAL OPINION REGARDING THOSE FACTS OR FINDINGS WHICH ARE THE SUBJECT OF THE CERTIFICATION, AND DOES NOT CONSTITUTE A WARRANTY OR GUARANTEE, EITHER EXPRESSED OR IMPLIED."
- THE SURVEYED PROPERTY IS THE SAME AS THE PROPERTY DESCRIBED IN THE TITLE COMMITMENT.
- THE SURVEYED PROPERTY CREATES A MATHEMATICALLY CLOSED FIGURE, WITH NO GAPS, GORES, OVERLAPS OR HIATUS INHERENT TO THE SURVEYED PROPERTY BASED ON THE FIELD SURVEY PERFORMED AND THE TITLE COMMITMENT PROVIDED.

CURVE TABLE			
NO.	LENGTH	RADIUS	DELTA
C1	22.42'	45.74'	28°05'04"
C2	6.82'	5.00'	78°06'37"
C4	26.00'	45.00'	33°06'37"
C7	3.93'	5.00'	45°00'00"
C8	5.38'	5.00'	61°42'27"
C9	13.12'	45.00'	16°42'27"
C10	7.85'	5.00'	90°00'00"
C11	7.85'	5.00'	90°00'00"
C12	7.85'	5.00'	90°00'00"
C13	7.85'	5.00'	90°00'00"
C14	7.85'	5.00'	90°00'00"
C15	7.85'	5.00'	90°00'00"
C16	7.85'	5.00'	90°00'00"
C17	6.00'	5.00'	68°42'18"
C18	4.79'	4.85'	56°37'17"
C19	26.17'	45.00'	33°19'07"
C20	7.85'	5.00'	90°00'00"
C21	29.85'	19.00'	90°00'00"
C22	23.47'	15.00'	89°37'18"
C23	29.79'	19.00'	89°49'08"
C25	29.85'	19.00'	90°00'00"
C26	7.85'	5.00'	90°00'00"
C27	7.85'	5.00'	90°00'00"
C28	7.85'	5.00'	90°00'00"
C29	7.85'	5.00'	90°00'00"

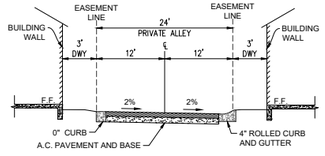
CURVE TABLE			
NO.	LENGTH	RADIUS	DELTA
C30	7.85'	5.00'	90°00'00"
C31	7.85'	5.00'	90°00'00"
C32	7.85'	5.00'	90°00'00"
C33	7.85'	5.00'	90°00'00"
C34	29.85'	19.00'	90°00'00"
C35	7.85'	5.00'	90°00'00"
C36	7.85'	5.00'	90°00'00"
C37	29.85'	19.00'	90°00'00"
C38	23.62'	15.00'	90°13'46"
C39	29.91'	19.00'	90°10'54"
C40	29.85'	19.00'	90°00'00"
C41	29.85'	19.00'	90°00'00"
C42	7.85'	5.00'	90°00'00"
C43	7.85'	5.00'	90°00'00"
C44	7.85'	5.00'	90°00'00"
C45	7.85'	5.00'	90°00'00"
C46	7.85'	5.00'	90°00'00"
C47	7.85'	5.00'	90°00'00"
C48	7.85'	5.00'	90°00'00"
C49	7.85'	5.00'	90°00'00"
C50	29.85'	19.00'	90°00'00"
C51	29.85'	19.00'	90°00'00"



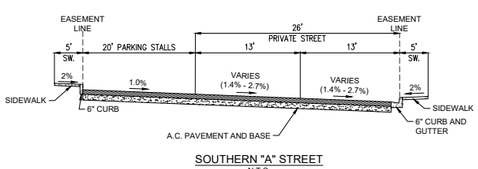
ENTRANCES
N.T.S.



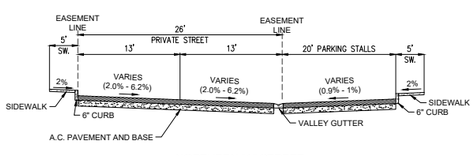
EASTERN AND WESTERN "A" STREETS
N.T.S.



TYPICAL 24' RESIDENTIAL DRIVE
N.T.S.



SOUTHERN "A" STREET
N.T.S.



NORTHERN "A" STREET
N.T.S.

MAP PREPARATION DATE
JUNE, 2025

No.	REVISIONS	DATE	BY

Kimley»Horn
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PHONE: 213-261-4040
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KHA PROJECT 194439012
DATE 9/23/2025
SCALE AS SHOWN
DESIGNED BY BC
DRAWN BY CB
CHECKED BY CY

DELANEY SQUARE
PREPARED FOR
TAYLOR MORRISON
CITY OF AZUSA CALIFORNIA

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TENTATIVE TRACT MAP

SHEET NUMBER
C1.0

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SOURCE: Kimley Horn 2025

DUDEK

FIGURE 3-6
Tentative Tract Map
Delaney Square Residential Project

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4 Environmental Analysis

Chapter 4, Environmental Analysis, includes the following sections, which contain an analysis, by issue area, of the potential environmental effects due to implementation of the Project and identifies feasible mitigation measures to address potentially significant adverse impacts. The environmental issue areas analyzed in this chapter are as follows:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Section 4.4)
- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Land Use and Planning (Section 4.10)
- Noise (Section 4.11)
- Population and Housing (Section 4.12)
- Public Services (Section 4.13)
- Recreation (Section 4.14)
- Transportation (Section 4.15)
- Tribal Cultural Resources (Section 4.16)
- Utilities and Service Systems (Section 4.17)

The discussion within each of the environmental issue areas includes the following subsections:

- Existing Conditions
- Regulatory Requirements
- Thresholds of Significance
- Impacts Analysis
- Cumulative Impact Analysis
- Mitigation Measures
- Significance Conclusion
- References

As stated in the Notice of Preparation (see Appendix A-1), it was determined that the Project would have either no impact or a less-than-significant impact relative to the following environmental issue areas. As such, these issue areas are not included as stand-alone sections in this Draft EIR, but are discussed further in Chapter 5, Other CEQA Considerations, under Section 5.5, Effects Found Not to be Significant.

- Agriculture and Forestry Resources

- Mineral Resources
- Wildfire

Where an existing legal or regulatory requirement compels mandatory and prescriptive actions that provide environmental protections, with little or no discretion required for their implementation and with the effect of avoiding an impact or maintaining an impact at a less-than-significant level, it is assumed that such requirements will be complied with and thus the environmental protections afforded thereby are considered prior to determining impact significance and will not be identified as mitigation. In contrast, where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that afford substantial discretion in their implementation, the impact significance is determined prior to consideration of the environmental protections afforded by those types of regulatory requirements. In such circumstances, impacts may be potentially significant or significant, and those regulatory requirements may then be included as mitigation measures.

Impacts are evaluated in terms of changes due to the project as compared to "baseline" existing conditions. For each environmental issue area, the conditions anticipated as the result of Project implementation are compared to baseline conditions to characterize the anticipated change. Generally, the baseline consists of the physical environmental conditions as they exist at the time the Notice of Preparation (NOP) was published, but the lead agency may use historical conditions or conditions that predate the publication of the NOP as the baseline if such decision is supported by substantial evidence. It should be noted that existing conditions do not constitute a significant impact for the purposes of CEQA. "[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project" (*Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455, 473 and California Building Industry Association v. Bay area Air Quality Management District (2015) Cal.App 4th.).* Additional details regarding the Project's Environmental Setting, including the applicable baseline conditions, are provided in Chapter 2 of this Draft EIR.

CEQA Guidelines section 15130 requires that a project's cumulative impacts be discussed when the incremental effect is cumulatively considerable. According to CEQA Guidelines section 15065(a)(3), the term cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Specifically, CEQA Guidelines section 15355 defines cumulative impacts as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Additional details regarding the approach to the cumulative analysis are provided in Chapter 2, Environmental Setting of this Draft EIR.

4.1 Aesthetics

This section describes the existing visual and aesthetic conditions of the Project site and its vicinity, and identifies associated regulatory requirements; thresholds of significance; analysis of potential impacts related to scenic views and vistas, scenic highways, consistency with regulations governing scenic quality, and light and glare; cumulative impacts; mitigation measures; level of significance after mitigation; and references. The information contained in this section is based on Project site reconnaissance, satellite imagery from Google Earth, the City's General Plan (General Plan), the AMC, including AMC Chapter 88 (Development Code), the California Department of Transportation (Caltrans) Scenic Highway System, conceptual site plans prepared by the Project applicant, and the following:

- **Appendix B** Arborist Report, Delaney Square Residential Project City of Azusa, California, prepared by Dudek, dated October 29, 2025.

Other sources consulted are listed in Section 4.1.8, References.

4.1.1 Existing Conditions

This section describes the existing visual and aesthetic conditions in the Project area and identifies the resources that could be affected by Project implementation.

4.1.1.1 Regional and Local Aesthetics

Regional and Local Conditions

Figure 2-1, Regional Location and Vicinity Map, included in Chapter 2, Environmental Setting, of this Draft EIR provides the Project boundaries in the context of the surrounding community. The Project site is located in the City of Azusa, which is within the Los Angeles County, in the north-central portion of the San Gabriel Valley, approximately 18 miles northeast of downtown Los Angeles. The City lies at the southern flank of the San Gabriel Mountains. The San Gabriel Valley is an alluvium-filled valley bounded by the Sierra Madre Fault Zone and San Gabriel Mountains to the north, by the Puente Hills on the south, by the Covina and Indian Hills on the east, and by the Raymond Basin on the west. The City is bound by the San Gabriel Mountains to the north; the City of Glendora and an area of unincorporated County land to the east; the City of Covina and an area of unincorporated County land to the south; and the cities of Duarte and Irwindale to the west.

As stated in the General Plan Built Environment Element, approximately three-quarters of the City is developed with a mix of residential, commercial, industrial, institutional, and public uses, as well as associated streets and highways; the remainder is natural open space. The City offers a wide range of housing options, including single-family homes, secondary units, apartment buildings, townhomes, condominiums, and mobile home parks, as well as specialized housing for seniors, congregate care, and students. The industrial uses in the City are concentrated in the West End Industrial District on both sides of Interstate (I-) 210, while the public and institutional uses include school campuses associated with Azusa Unified School District and Azusa Pacific University, as well as governmental offices concentrated in the historic Civic Center, including the Azusa City Library, Azusa City Hall, and the Azusa Police Department (City of Azusa 2004).

Scenic resources within the City include mountain ridgelines, foothills, parks, open spaces such as Azusa Wilderness Park, and college campuses such as Azusa Pacific University and Citrus College.

Project Site and Surrounding Conditions

According to Appendix H, Hydrology and LID Report, the elevation of the Project site ranges from approximately 633 to 618 feet above mean sea level. The school is relatively flat. However, there is an estimated 15 feet of elevation differential across the site whereas the school and open space are separated by a slope that runs northeast to southwest. The approximately 9.77-acre Project site is developed with seven one-story buildings topped with HVAC units associated with the Powell Elementary School, as well as playground equipment, a surface parking lot, ornamental landscaping, and an open field. The existing buildings are clustered within the southeastern portion of the site, with large setbacks from the adjacent street frontages. In addition, a chain-link fence bounds the southern and eastern perimeter of the Project site. The Project site is surrounded by moderate-density residential uses (an apartment building complex) to the north and existing commercial along Historic Route 66; East Mauna Loa Avenue to the south, with existing one-story single-family residential uses further south; North Calera Avenue to the east, with existing one-story single-family residential uses further east; and one-story single-family residential uses and mixed uses to the west (see Figure 2-1). All surrounding uses include ornamental landscaping and exterior lighting, and surrounding non-residential uses are also improved with surface parking lots. Along North Calera Avenue and East Mauna Loa Avenue, the sidewalks abutting Powell Elementary School include overhead utility poles, street lights, and school-related signs regarding student loading and drop-off. In addition, there are three stop signs located at the intersection of North Calera Avenue and East Mauna Loa Avenue.

Existing Land Use and Zoning Designations

The Project site is designated as Institutional/School in the General Plan. The Institutional/School designation allows for religious, community meeting, school, and governmental office uses with a permitted floor area ratio (FAR) between 0.35 and 1.2, and where buildings must be constructed at a scale and intensity that respects the surrounding uses (City of Azusa 2004). The Project site is also zoned as Institutional/School. Per Development Code section 88.28.020(A), the Institutional/School designation is applied to sites within the City that are occupied by or reserved for public facilities and utilities, meeting facilities, public and private schools, libraries, government offices, etc. (City of Azusa 2025). A more detailed discussion of surrounding land uses, as well as figures depicting current conditions can be found in Chapter 2, Environmental Setting of this Draft EIR.

Landscaping

The undeveloped portions of the Project site are heavily disturbed, with paved areas as well as sparse landscaping that consists of mature trees, ornamental shrubs/groundcover, and a grassy playing field that encompasses the northwestern half of the property.

Within the City, the planting, maintenance, removal, and preservation of an existing “Heritage tree” or “Public tree” is governed under Chapter 62, Article VI, Tree Preservation, of the AMC. According to a site survey conducted as part of the Arborist Report (see Appendix B), there are 25 on-site trees and 13 off-site trees that overhang the property line from neighboring properties. None of the 38 trees surveyed meet the City definition of a Heritage Tree or Public Tree.

4.1.1.2 Scenic Vistas

Landforms and varied topography such as mountain ranges and foothills allow for a variety of long-range views in the City. These landforms not only create scenic backdrops against urban development but also provide environmental and public benefits to residents. The General Plan does not officially identify any designated scenic vistas within the City, although the General Plan does include goals and policies to provide a unique system of natural areas that provide a multitude of uses including scenic beauty as well as protection of the canyons, foothills, and river (e.g., the San Gabriel River) as open space and environmental resources (City of Azusa 2004). Distant, partially obstructed views of the San Gabriel Mountains to the north can be seen from the Project site and surrounding areas, including along adjacent roadways. Additionally, views to the east, south, and west of the Project site from the public vantagepoints along North Calera Avenue and East Mauna Loa Avenue are characterized by single-family residences, mature trees, and utility poles.

4.1.1.3 Scenic Highways

According to Caltrans, the County has one national scenic byway, two officially designated state scenic highways, and 11 eligible scenic highways (Caltrans 2019). The Arroyo Seco Parkway, a designated California Historic Parkway and part of the state scenic highway system, is located approximately 14.8 miles west of the Project site where it traverses the City of Pasadena (Streets and Highway Code section 283). Route 2 and Route 27, the County's two designated state scenic highways, are approximately 12.4 miles northwest and 40.2 miles west of the Project site, respectively. Due to distance, topography, and intervening development/vegetation, the Project site is not visible from the Arroyo Secco Parkway, Route 2, Route 27, or any officially designated state or national scenic highway segments (Caltrans 2019). As such, there are no officially designated state scenic highways within or adjacent to the Project site.

Caltrans classifies a segment of I-210 as an eligible state scenic highway, including where it traverses through the City of Pasadena approximately 15.45 miles west of the Project site. However, I-210 is not eligible as a scenic highway where it traverses the City of Azusa or the neighboring cities of Monrovia, Duarte, and Glendora (Caltrans 2019). In addition, Caltrans also classifies a segment of State Route (SR-) 39 as an eligible state scenic highway, specifically where it begins at Route 2 and ends approximately 2.61 miles northwest of the Project site. However, due to distance, topography, and intervening development/vegetation, the Project site is not visible from I-210 or SR-39. There are no other eligible state scenic highway segments within the City boundaries (Caltrans 2019).

4.1.1.4 Light and Glare

The Project site is located in a developed area of the City, which includes businesses, educational campuses, and homes that produce light sources associated with a typical suburban setting, including interior and exterior building lighting, security lighting in surface parking lots, and glare from illuminated signage and glass windows. Additional lighting sources in the area include streetlights, security lighting in parking lots and along walkways, and lights from vehicle headlights. Buildings and structures that contain large expanses of glass, metal, and/or polished exterior materials also contribute to localized sources of glare.

4.1.2 Regulatory Requirements

4.1.2.1 Federal

There are no federal regulations pertaining to aesthetics and visual resources that would apply to the Project.

4.1.2.2 State

California Scenic Highway System

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated by Caltrans as scenic. The purpose of the program is to protect the scenic beauty of California highways and adjacent corridors through conservation and land use regulation.

California Code of Regulations

The California Code of Regulations is the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The California Code of Regulations is compiled into titles, and includes Title 24, California Building Standards Code (discussed below).

Title 24 – California Building Standards Code

Title 24, California Building Standards Code, consists of regulations to control building standards throughout the state. The following components of Title 24 include standards related to lighting:

Title 24, Part 2 – California Building Code / Title 24, Part 3 – California Electrical Code. These sections of the California Building Standards Code stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

Title 24, Part 6 – California Energy Code. The California Energy Code (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment.

Section 130.2 sets forth requirements for outdoor lighting controls and luminaire cutoff requirements. All outdoor luminaires of 6,200 initial luminaire lumens or greater shall comply with the backlight, up light, and glare (BUG) ratings in accordance with ANSI/IES TM-15-20, Annex A. Automatic scheduling controls shall be installed for all outdoor lighting, which may be installed in combination with motion sensing or other outdoor lighting controls. Automatic scheduling controls shall be capable of reducing outdoor lighting power by at least 50% and no more than 90%, and separately capable of turning the lighting off, during scheduled unoccupied periods.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the California Administrative Code. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

Section 130.3 stipulates that sign lighting controls with any outdoor sign that is on during both day and nighttime hours must include a minimum 65% dimming at night. Section 140.8 of the California Energy Code sets forth lighting power density restrictions for signs.

California Vehicle Code

Chapter 2, Article 3 of the California Vehicle Code establishes limits to the location of light sources that may cause glare and impair the vision of drivers.

4.1.2.3 Regional and Local

The following provides a summary of local regulatory requirements and guidance documents applicable to the Project and the topic of aesthetics. For a complete discussion of all local plans, policies, and ordinances applicable to the Project (both unrelated to and including aesthetics) please refer to Section 4.10, Land Use and Planning.

City of Azusa 2004 General Plan

Goals and policies related to aesthetics and scenic resources in the General Plan Built Environment Element that may be applicable to the Project are identified below (City of Azusa 2004).

Land Use Goals and Policies

Goal 1: Provide for a complete and integrated mix of residential, commercial, industrial, recreational, public and open space meeting the needs of existing and future residents and businesses.

> Policy 1.1: Establish the urban form of neighborhoods, corridors, districts, and recreation/ open space as shown on Urban Form Diagram, Figure CD-2. Figure CD-2 indicates the location of neighborhoods, districts, corridors in the urban form structure. Figure CD-3 indicates the proposed land uses for those areas within the urban form structure as well as all other areas of the City and Sphere of Influence.

Goal 2: Azusa is a renewed community of beautiful homes and stable neighborhoods providing a safe environment, green space, and a broad community life.

> Policy 2.1: Establish Azusa as a “community of neighborhoods”. Using a scale of a fi ve-minute walk, each interconnected neighborhood will develop its own unique character, but all neighborhoods will share common elements:
>
> - a “neighborhood center” that provides a place for neighbors to gather. The center can be located in the middle of the neighborhood or at its edge. The center might include a school, a park, a neighborhood store, or perhaps, all three;
> - high-quality new and renovated homes available to a broad range of buyers;
> - single family homes will be the predominate type of housing within the neighborhood, but a mix of other housing types will be permitted if they currently exist or if they are compatible in scale and character as the surrounding neighborhood.
>
> Policy 2.4: Preserve and protect established, stable residential neighborhoods.

Policy 2.5: Enhance neighborhoods by adding traditional elements such as pedestrian oriented, street lighting, street trees, landscaped parkways, traffic calming measures, and neighborhood centers.

Policy 2.7: Accommodate the development of single-family housing in all neighborhoods in accordance with Table CD-2.

Policy 2.9: Require both single family residential and multifamily units and sites be designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but not limited to:

Single Family and Multifamily

- using "living space forward" design concepts;
- modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures");
- incorporating well-defined roof lines;
- using extensive site landscape to complement the architectural design of the structure; and
- minimizing the amount and width of paving in front and side yards for driveway and garage access.

Multifamily

- conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures;
- including separate, well-defined entries for each residential unit;
- locate the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and
- siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.

Policy 2.10: Require new residential development in existing traditional residential neighborhoods to be compatible with existing structures, including the:

- maintenance of the predominant existing front yard setback; and
- use of complementary building materials, colors, and forms, while allowing for flexibility for distinguished design solutions.

Policy 2.11: Require the design of new residential developments to include the following:

- greenbelts, sidewalks, landscaped parkways, parks, recreation amenities, and other community amenities;
- minimizing the width of streets to encourage pedestrian activity and to slow traffic, as appropriate;
- potentially, include well designed and lighted alleys to minimize the dominance of garages along street frontage;
- siting of development to avoid disturbances of sensitive areas and maintain important environmental resources, including topographical formations and habitat; and accommodate the development of recreational, community meeting, educational, and day care facilities in all residential areas, provided that they are compatible with the intended residential function and character of the neighborhood, and subject to City review and approval.

Goal 3: Azusa's corridors will be transformed into well-planned transit corridors, providing some retail and commercial opportunities in mixed-use settings, providing opportunities for new homes, and connecting all our neighborhoods and districts.

Policy 3.2: Multifamily and mixed-use units and sites are designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but is not limited to:

- using "living space forward" design concepts;
- modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures");
- incorporating well-defined roof lines;
- using extensive site landscape to complement the architectural design of the structure;
- conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures;
- including separate, well-defined entries for each residential unit;
- locating the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and
- siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.

Policy 3.3: Require new developments to provide for on-street landscaping, landscaped parkways, and other streetscape as specified in the Urban Form Element and Development Code.

Goal 4: Azusa will have a thriving and wellbalanced business sector located within three pedestrian oriented districts that provide dining, retail, office, and entertainment experiences, and one industrial/technology district that provides "tech–driven" manufacturing, warehousing, and other industrial uses along with supporting commercial uses.

Goal 11: Ensure the proper maintenance of buildings and properties.

Policy 11.1: Require all structures to be constructed in accordance with City building and other pertinent codes and regulations, including all new, adaptively re-used, and renovated buildings; allowing appropriate exceptions for historically-significant buildings.

Urban Form Goals and Policies

Goal 4: Improve the visual appeal of the city.

Policy 4.3: Continue the underground overhead utilities.

Policy 4.4: Require signage to be designed considering the scale and materials of adjacent buildings, the desired character of the neighborhood, district, or corridor where the site is located, and pedestrian orientation.

Goal 5: Maintain the visual character and scale of existing neighborhoods.

Policy 5.1: Encourage new residential projects to be built in a form and scale compatible with and appropriate to their surroundings.

Goal 8: Encourage a variety of housing types and sizes to accommodate the diverse needs of the population.

Policy 8.1: Support the development of multiple housing types in corridors and the districts, require high quality design, construction methods, materials, and maintenance.

Goal 9: Encourage private landscape design specific to Azusa and the character of each street it faces.

Policy 9.1: Improve the character of streets through landscape standards that govern private property facing public right-of-ways.

City of Azusa Municipal Code

The California Building Code, published at Title 24, Part 2, of the California Code of Regulations, including relevant Appendices, is adopted by reference pursuant to Chapter 14, Article I, section 14-1 of the AMC.

Tree Preservation

Chapter 62, Article VI, Tree Preservation, governs the planting, maintenance, removal, and preservation of public trees within all public property and new developments within the City. All living trees having a diameter at breast height (DBH) of six inches or more shall be preserved when so directed by Director of Public Works, and no grading shall be done to endanger them. If said trees are destroyed, applicants must replace them with trees whose size, number, and planting location must be determined by the Director of Public Works before final occupancy is granted to any new residents. The size and age of the tree will determine how many new trees may be substituted for the destroyed tree, but as a minimum three new trees will replace one tree removed.

Landscaping Standards

The landscape and irrigation standards are contained in Chapter 78, Article VI, Division 7, Landscape and Irrigation Standards. The purpose of these standards is intended to be minimum requirements of development, and property enhancements beyond these standards are encouraged as they will further the goal of a more beautiful overall environment in which to live and work. Pursuant to section 78-531, the Project, as a multiple-unit residential development, must adhere to these standards. No building permit shall be issued for buildings until the public works superintendent, or designee, reviews and approves a landscape plan for the project. The required landscape must include the following elements: a calculation of water consumption for the landscaped area, a planting scheme, an irrigation plan, and a grading plan if found to be necessary by the community development director. In addition to these standards, section 78-539, Street Trees, requires every development project to install one specified minimum gallon size tree for every 35 feet of property road frontage.

Chapter 88 - Development Code

The Development Code carries out the policies of the General Plan by regulating development and land uses within the City, consistent with the General Plan. This Development Code is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents, and businesses in the City.

Section 88.22.040. Central East Neighborhoods. This section outlines the general plan goals and development guidelines within the central-east neighborhoods of Azusa. It is a guideline to assist present and future residents, developers and city staff in evaluating the evolving character and potential of these neighborhoods. This section includes development standards that would regulate aesthetic quality, such as limitations regarding streets and landscaping, setbacks, and building design.

Section 88.30.020, Fences, Walls, Hedges, and Screening. This section applies to all fences and walls within the city. The intent of these standards is to ensure that proposed development is compatible with existing and future development on neighboring properties, and produces an environment of stable and desirable character, consistent with the general plan and any applicable specific plan. This section includes development standards that would regulate aesthetic quality, such as limitations to wall and fence height and materials.

Section 88.31.030, Outdoor Lighting. This section applies to any exterior lighting on private property. Outdoor lighting fixtures are limited to a maximum height of 14 ft or the height of the nearest building, whichever is less, and lighting shall not produce levels greater than one footcandle on any adjacent properties. Other requirements are the utilization of energy-efficient fixtures and lamps and installing shielded or recessed light fixtures to reduce light bleed to adjoining properties, by ensuring the light source is not visible from off-site and confining glare and reflections within the boundaries of the site to the maximum extent feasible. Each light fixture shall be directed downward and away from adjoining properties and public rights-of-way, so that no on-site light fixture directly illuminates an area off the site.

Section 88.31.020 (Noise Standards) (and AMC section 46-409 (Construction). The AMC prohibits construction activities during the nighttime hours of 6:00 p.m. to 7:00 a.m. Monday through Saturday and 5:00 p.m. to 9:00 a.m. on Sundays and National Holidays if approved by review authority through conditions of approval. Extended construction hours may only be allowed by the review authority through conditions of approval between 6 p.m. and 10 p.m. Monday through Saturday.

Section 88.34, Landscaping Standards. The purpose of these standards is to establish requirements for landscaping to enhance the appearance of development projects, reduce heat and glare, control soil erosion, conserve water, screen potentially incompatible land uses, preserve the integrity of neighborhoods, improve air quality, and improve pedestrian and vehicular traffic and safety. As a new single-family and multi-family residential project, the Project would be subject to section 88.34.040, Landscape and Irrigation Plans, requiring preparation and submittal of a landscape plan prepared by a California licensed landscape architect, licensed landscape contractor, certified nurseryman, or other professional determined by the director to be qualified, based on the requirements of state law. Landscaping plans must be designed to integrate all elements of the project (e.g., buildings, parking lots, and streets) to achieve their aesthetic objectives, desirable microclimates, and minimize water and energy demand; and must adhere to standards that regulate aesthetic quality, including plant selection, dimensions, material, trees, groundcover, turf, soil, and maintenance. All residential development projects must provide street trees in compliance with section 88.34.060.B.2.d(3), and all development must adhere to the California State Model Water Efficient Landscape Ordinance (codified at California Code of Regulations, Title 23, Division 2, Chapter 2.7, § 490 et seq.), adopted by reference as the City's Water Efficient Landscaping Ordinance (Section 88.34.080).

Section 88.38, Signs. This section provides regulations for all signs in all zoning districts. The purpose of these regulations is to appropriately limit the placement, type, size, and number of signs allowed within the city, and require the proper maintenance of signs. Sign regulations promote the aesthetic and environmental values of the community by providing signs that do not impair the attractiveness of the city as a place to live, work, and shop,

and provide for signs as an effective channel of communication, while ensuring that signs are aesthetically proportioned in relation to adjacent structures and the structures to which they are attached.

Section 88.42.140, Multi-Family and Small Lot Single-Family Projects. This section applies to new or remodeled multi-family projects, and subdivisions of detached single-family homes on parcels smaller than 6,000 square feet, and thus this Project must comply with the standards of this section. This section includes development standards that would regulate aesthetic quality, including standards related to site and building design (e.g., unit access, facades, windows, stairways, and roofs), parking, open space, lighting, storage, and television antennas.

Section 88.51.032, Design Review. This section applies to new single-family dwellings and multi-family projects, among others. Design review is intended to ensure that the design of proposed development and new land uses assists in maintaining and enhancing the attractive appearance of the City. Design review ensures the interdependence of land values and aesthetics and encourage the orderly and harmonious appearance of development within the community, encourages that new uses and structures enhance their sites and are compatible with the highest standards of improvement in the surrounding neighborhoods, retains and strengthens the visual quality and attractive character of the community, assists project developers in understanding the City's concerns for the aesthetics of development, and ensures that development complies with all applicable City standards and guidelines, and does not adversely affect community health, safety, aesthetics, or natural resources.

88.51.050, Variance and Minor Variance. This section of the Development Code provides a process for the City to consider requests to waive or modify certain standards of this Development Code when, because of special circumstances applicable to the property, including location, shape, size, surroundings, topography, or other physical features, the strict application of the development standards otherwise applicable to the property denies the property owner privileges enjoyed by other property owners in the vicinity and in the same zoning district.

4.1.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to aesthetics are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to aesthetics would occur if the Project would:

a) Have a substantial adverse effect on a scenic vista.
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, 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.

4.1.4 Impacts Analysis

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

Construction

Less-Than-Significant Impact. Scenic vistas are generally defined as an expansive view of a highly valued landscape (e.g., mountain range, lake, or coastline) or a built environment feature observable from a publicly accessible vantage point. The General Plan does not identify any officially designated scenic vistas within City boundaries, although the General Plan does include goals and policies to provide a unique system of natural areas that provide a multitude of uses including scenic beauty and to protect the canyons, foothills, and river as open space and environmental resources. For example, the Natural Environment Element of the General Plan identifies the San Gabriel Mountains as a component of the City's vision wherein the city is a major gateway (City of Azusa 2004). Distant partially obstructed views of the San Gabriel Mountains can be seen to the north from the Project site and surrounding areas, including along adjacent roadways For the purposes of this analysis, views of the San Gabriel Mountains are considered a scenic vista in the city although not officially designated by the City. As such, a project that substantially blocks or alters an existing, unobstructed view of the San Gabriel Mountains from a public vantagepoint would constitute a potentially significant impact.

Project-related construction activities would require the use of construction equipment and storage of materials on the Project site. As discussed in Section 3.3, Project Construction, of Chapter 3, Project Description, site activities include (but are not limited to) building and surface parking lot demolition (including tree and vegetation removal), site preparation and grading for internal roads, utility trenching, paving, signage and flagging, and building forms and frames. Anticipated construction equipment, which includes dozers, tractors, backhoes, and pavers, is listed in Table 4.2-6, Construction Scenario Assumptions of Section 4.2, Air Quality of this EIR. Additionally, during construction, the Project Applicant or the construction contractor would implement temporary security features including security fencing, lighting, and a locked entry.

Due to the nature of construction, vehicles and equipment would only be stationary for limited amounts of time. As a result, views of construction equipment and related activities throughout the Project grading footprint would only be intermittently available during the construction period. Pedestrians and vehicles traveling adjacent to the Project vicinity on public sidewalks and roads are not limited to a single viewshed from a single vantagepoint; as such, temporary views of construction equipment would be fleeting as viewers move away from the site. Furthermore, the existing views of the San Gabriel Mountains are already obstructed by features such as existing mature trees, buildings, and utility infrastructure (e.g., HVAC units and electrical poles/lines). Project construction equipment, materials, and activities would similar in size and scale to other common visual elements in the viewshed; further, construction activities are typical within urban areas. Overall, Project construction would not be substantially incompatible within the context of the viewshed, or significantly impact an unobstructed public view. Construction impacts would be less than significant.

Operation

Less-Than-Significant Impact. The Project site is currently developed with seven one-story school buildings, located within a highly urbanized and relatively flat portion of the City, and immediate views from the Project site and views of the Project site from adjacent and nearby parcels are limited to single-family residences to the east, south, and west. Distant, partially obstructed views of the San Gabriel Mountains to the north can be seen from the Project site and surrounding areas, including along adjacent roadways. The General Plan does not identify any

officially designated scenic vistas within City boundaries, although the General Plan does include goals and policies to provide a unique system of natural areas that provide a multitude of uses including scenic beauty and the protection of canyons, foothills, and river (e.g., San Gabriel River) as open space and environmental resources (City of Azusa 2004). For the purposes of this analysis, views of the San Gabriel Mountains are considered a scenic vista in the City although not officially designated by the City. As such, a project that substantially blocks or alters an existing, unobstructed view of the San Gabriel Mountains from a public vantagepoint would constitute a potentially significant impact.

The Project would include the development of two-story duplexes and triplexes and two-story detached single-family homes in an area where surrounding development generally ranges between one and two stories. Northerly mountain views visible from the public streets and sidewalks surrounding the Project site (including from East Mauna Loa Avenue to the south and Calera Avenue to the east) would be partially obstructed by the Project due to the proposed height of the buildings, which would be one story taller than the existing one-story school buildings on-site. However, the limited views from the public streets are not themselves designated scenic vistas by the General Plan. Also, the existing views of the San Gabriel Mountains to the north are already obstructed by features such as existing mature trees, buildings, and utility infrastructure (e.g., HVAC units and electrical poles/lines) on-site and along adjacent roadways, as well as other residential and commercial uses in the vicinity that are similar in height to the proposed Project. As such, although the Project would partially block and/or alter existing views of the San Gabriel Mountains, the Project would not significantly impact an unobstructed public view.

In summary, due to the increased height of the proposed residential buildings, the Project would result in visual changes to the Project site, including partial view obstructions of the mountains to the north. However, due to the currently developed character of the existing viewshed from a public vantagepoint, and the fact that the view of the San Gabriel Mountains is already partially obstructed, the Project would not have a substantial adverse effect on a scenic vista. Therefore, Project impacts related to a scenic vista would be less than significant.

Threshold 4.1b **Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?**

No Impact. As discussed above in Section 4.1.1.3, there are no eligible or designated state scenic highways that traverse or are adjacent to the Project site. The Arroyo Seco Parkway, a designated California Historic Parkway, and Route 2 and Route 27, the County's two designated scenic highways, are 14.8 miles west, 12.4 miles northwest, and 40.2 miles west of the Project site, respectively. The segments of I-210 that are eligible state scenic highway segments are not located within the City (Caltrans 2019). In addition, Caltrans classifies a segment of SR-39 as an eligible state scenic highway, specifically where it begins at Route 2 and ends approximately 2.61 miles northwest of the Project site. However, there are miles of urban development and tall trees between the SR-39 and the Project site; therefore, the Project would not have the potential to impact views in the vicinity of SR-39. Due to distance, topography, and intervening development/vegetation, the Project site is not visible from any eligible or officially designated state scenic highway segments (Caltrans 2019). Therefore, the Project would have no impact on any scenic resources (i.e., trees, rock outcropping, historic buildings) within a state scenic highway.

Threshold 4.1c **If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?**

Because the Project site is located in an urbanized area, an analysis of the potential change in visual character or quality of public views of the site is not applicable and is not addressed in the analysis below.

Less-Than-Significant Impact. California Public Resources Code section 21071 defines an "urbanized area" as, "(a)n incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As further discussed in Section 4.12, Population and Housing, there were an estimated 48,393 residents in the City in 2024 (U.S. Census Bureau 2024). However, the City, along with the City of Glendora to the east and the City of Covina to the south have combined population that is well over 100,000 persons.[1] Therefore, the Project site is located in an urbanized area and the following analysis considers whether the Project would conflict with applicable zoning or other regulations governing scenic quality.

The policy documents and other regulations applicable to the Project site, as they relate to scenic quality, are listed above in Section 4.1.2, Regulatory Requirements. With regards to local plans and policies, under existing conditions, the Project site is subject to the General Plan and the AMC, the latter of which includes the Development Code addressing applicable zoning. Zoning is used as a tool to regulate development, including components that affect the visual quality of development, such as building height, massing and scale, setbacks, and the comprehensive groupings and arrangements of land use types. By demonstrating compliance with applicable zoning, conflicts related to aesthetics are less likely to occur, as zoning regulations indicate the extent and type of suitable development permitted by the City "protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents, and businesses in the city" (Development Code section 88.10).

Under existing conditions, the Project is zoned for Institutional/School (INS) use. Thus, a Zone Change is required to rezone the Project Site to Neighborhood General 3 - Medium (NG3-MED). NG3-MED would allow for residential use to accommodate the proposed Project, which would be subject to the Development Code. Additionally, Chapter 88.22, Neighborhoods, of the Development Code, and specifically, Section 88.22.040, Central East Neighborhoods, guide the General Plan's goals and development guidelines. As discussed in Section 3.6, Discretionary Actions, of Chapter 3, Project Description of this Draft EIR, the Project also requires a General Plan Amendment to change the General Plan land use designation of the Project site from Institutional/School to Medium Density Residential (15 dwelling units per acre). Upon approval of the General Plan Amendment, the Project site would be consistent with the density limits of the residences to the west (designated as Medium Density Residential). The maximum height for the proposed zone is two and one-half stories or 35 feet, whichever is less. The Project involves development of two-story duplexes and triplexes and two-story detached single-family which would have a maximum height of approximately 30 feet. Thus, the proposed height of the building is within the maximum height allowable under the NG3-MED zone.

In addition to the proposed General Plan Amendment and Zone Change, the Project proposes single-family residences to be separated by 3.6 feet instead of the minimum of 5 feet for building separation. In addition, the Project would provide a 20-21 foot- setback instead of the minimum of 25 feet for the Project site's rear setback. As such, a variance is required to deviate from the design standards required in the Project site's proposed NG3-MED zone (see Development Code section 88.22.070(D)(3)). Implementation of the proposed deviations would represent nominal differences in length, and would not substantially change the scenic quality of the proposed Project. Moreover, upon approval of the proposed variance, the Project's deviation in development standards would be in compliance with the City's Development Code. See Section 4.10, Land Use and Planning, of this Draft EIR, for more discussion. For these reasons, impacts would be less than significant.

[1] Azusa (48,383 residents) + Covina (49,404 residents) + Glendora (49,245 residents) = 147,032 residents (U.S. Census Bureau 2025).

As detailed in Table 4.1-1, Aesthetics Consistency Analysis, the Project would comply with all other applicable policies and regulations related to aesthetics, as well as all design and development guidelines, set forth in General Plan, AMC, and Development Code.

Figure 3-2, Landscape Plan, provided in Chapter 3 of this Draft EIR, depicts the Project's proposed ground level landscaping features within the central paseo, parking lots, and along the perimeters of the Project site, including trees, shrubs, and grasses. There are a total of 38 trees on or adjacent to the Project site. The 25 on-site trees would be removed to accommodate development of the Project, none of which meet the City definition of "Heritage tree" or "Public tree." See Appendix B of this Draft EIR for additional details regarding tree removal, replacement, and maintenance requirements. The Project would include the installation of approximately 73,010 square feet of landscaping, and would plant an estimated 204 trees (mandatory planting of a minimum 75 trees [three trees for every one tree removed]) in accordance with the Tree Preservation Ordinance. The final number of trees to be planted would be determined by the Director of Public Works. The Project is also subject to section 88.34.040 of the AMC, which states that landscape and irrigation plans prepared by a licensed landscape contractor, certified nurseryman, or other professional determined by the director to be qualified, must submitted to the City for all new residential projects. Therefore, the Project applicant is required to prepare a Landscape Package and indicate the name, size, and precise location of all materials, as well as the precise location and technical description of the irrigation system and its individual components. Further, in alignment with the City's Water Efficient Landscaping Ordinance, all landscaping would be comprised of drought-tolerant trees and plants. The Landscape Plan, included as Figure 3-2, satisfies these requirements.

As noted in Section 3.6, Discretionary Actions, in Chapter 3, Project Description, of this Draft EIR, the Project requires a discretionary Design Review entitlement to allow the proposed site plan and architectural design for the implementation of the Project. Figure 4.1-1a and 4.1-1b, Single-Family and Townhome Architectural Styles, depict the proposed architectural elements and materials (see further discussion in Table 4.1-1). The City's Design Review entitlement would ensure that the Project conforms to the requirements and preferences of City staff as it relates to all structures, landscape and hardscape areas, parking areas, walkways, internal circulation, access, adjacent streets, signs, and fence or wall type/placement.

The General Plan policies specific to scenic quality, as well as the applicable AMC requirements related to scenic quality, are listed and analyzed in Table 4.1-1 below.

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
General Plan	
Goal LU-1: Provide for a complete and integrated mix of residential, commercial, industrial, recreational, public and open space meeting the needs of existing and future residents and businesses.	**No Conflict.** The Project proposes a residential development that would promote the City's goal of providing a balance of land uses. The Project proposes the development of 128 new dwelling units on an existing school site, which is surrounding by a mix of other residential uses. The Project would provide open space amenities that would support the needs of future residents. Thus, the Project's proposed redevelopment would enhance an existing balance of residential land uses.
Goal LU-2: Azusa is a renewed community of beautiful homes and stable neighborhoods providing a safe	**No Conflict.** The Project would redevelop a school site with new single-family detached cluster homes and townhomes with

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
environment, green space, and a broad community life.	landscaping on site, which would complement the existing residential neighborhood surrounding the Project site.
Policy LU-2.1: Establish Azusa as a "community of neighborhoods". Using a scale of a five-minute walk, each interconnected neighborhood will develop its own unique character, but all neighborhoods will share common elements: • a "neighborhood center" that provides a place for neighbors to gather. The center can be located in the middle of the neighborhood or at its edge. The center might include a school, a park, a neighborhood store, or perhaps, all three; • high-quality new and renovated homes available to a broad range of buyers; • single family homes will be the predominate type of housing within the neighborhood, but a mix of other housing types will be permitted if they currently exist or if they are compatible in scale and character as the surrounding neighborhood.	**No Conflict.** The Project would redevelop the existing Powell Elementary School to residential uses consisting of single-family detached cluster homes and townhomes. As such, upon approval of the proposed General Plan Amendment and Zone Change, the Project would support the City's policy of establishing a community of neighborhoods, with a focus on single family homes as well as a mix of housing types that are compatible in scale and character to the surrounding neighborhood.
Policy LU-2.4: Preserve and protect established, stable residential neighborhoods.	**No Conflict.** The Project would redevelop the existing Powell Elementary School to residential uses consisting of single-family detached cluster homes and townhomes, both with a maximum height of two stories. The Project's proposed General Plan Amendment and Zone Change would provide a residential density transition between the adjacent residential land uses and surrounding vicinity, which would allow for neighborhood cohesion within an existing residential neighborhood. As such, the Project would maintain and complement surrounding residential uses.
Policy LU-2.5: Enhance neighborhoods by adding traditional elements such as pedestrian oriented, street lighting, street trees, landscaped parkways, traffic calming measures, and neighborhood centers.	**No Conflict.** The Project would redevelop the existing Powell Elementary School site to residential uses with circulation improvements that would enhance the surrounding neighborhood. As shown in Figure 3-1, Conceptual Site Plan, the Project site would be accessible to pedestrians from existing sidewalks along East Mauna Loa Avenue and North Calera Avenue. These sidewalks would connect to an internal sidewalk network on site. In addition, the Project would include a central paseo with a pathway for pedestrian connectivity, landscaping, shaded gathering space, and a butterfly garden.

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
Policy LU-2.7: Accommodate the development of single-family housing in all neighborhoods in accordance with Table CD-2.	**No Conflict.** The Project would result in residential development consisting of single-family detached cluster homes and townhomes, which would be allowed upon the approval of the proposed General Plan Amendment to Medium Density Residential. As stated in Table CD-2 of the City's Built Environment Element, the Medium Density Residential land use designation allows for a maximum density of 8.1-15 units per net acre. The proposed Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units on the 9.77-acre site. Given this, the proposed residential density would be approximately 13.1 dwellings units per acre.
Policy LU-2.9: Require both single family residential and multifamily units and sites be designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but not limited to: Single Family and Multifamily • using "living space forward" design concepts; • modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; • using extensive site landscape to complement the architectural design of the structure; and • minimizing the amount and width of paving in front and side yards for driveway and garage access. Multifamily • conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures; • including separate, well-defined entries for each residential unit; • locate the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.	**No Conflict.** The Project would result in residential development that would complement and be cohesive with surrounding uses. The General Plan Amendment and Zone Change required for implementation of the Project would provide consistency with the surrounding residential community, and would increase neighborhood cohesion by eliminating an institutional use within a residential neighborhood. The Project would include frontage improvements, such as street trees, to enhance the pedestrian experience. All buildings would incorporate window, balcony, and roof treatments that provide variation along each elevation, as well as contrasting garage doors. Architectural styles (see Figures 4.1-1a and 4.1-1b) would alternate between Spanish Colonial, Traditional, Craftsman, and Western Ranch, and building materials and color palettes would complement each other, thus maintaining the City's standard for architectural and aesthetic quality. Landscaping throughout the residential site would include a variety of trees, shrubs, and grasses that would complement the architectural design. Duplex and triplex buildings would be oriented around landscaped lawns with most garages at the rear or sides of the residences to reduce garage frontage domination. Lastly, as discussed above in Section 4.1.2, Regulatory Requirements, the City's required Design Review provides a process for the appropriate review of development projects. The Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the city (Development Code section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-2.10: Require new residential development in existing traditional	**No Conflict.** Upon approval of the proposed General Plan Amendment and Zone Change, the Project site would be

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
residential neighborhoods to be compatible with existing structures, including the: • maintenance of the predominant existing front yard setback; and • use of complementary building materials, colors, and forms, while allowing for flexibility for distinguished design solutions.	designated Medium Density Residential and zoned Neighborhood General 3 – Medium (NG3-MED). The General Plan Amendment and Zone Change required for implementation of the Project would provide a residential density transition between the adjacent residential properties and surrounding residential community, which would increase neighborhood cohesion within a residential neighborhood. Within this context, the Project would be appropriately scaled and massed. Single-family detached homes would be located adjacent to the existing single-family neighborhood on the west, south, and east property edge; and two-story triplexes and duplexes would be located adjacent to the existing multi-family community on the north property edge, thus blending the Project form and scale with the surrounding buildings. Furthermore, the proposed architectural styles would be appropriate with the buildings surrounding the Project site. As such, the Project's overall design and architectural treatment are compatible with the intended urban form and character of the NG3-MED zone. Moreover, the Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code Section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the city (Development Code Section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-2.11: Require the design of new residential developments to include the following: • greenbelts, sidewalks, landscaped parkways, parks, recreation amenities, and other community amenities; • minimizing the width of streets to encourage pedestrian activity and to slow traffic, as appropriate; • potentially, include well designed and lighted alleys to minimize the dominance of garages along street frontage; • siting of development to avoid disturbances of sensitive areas and maintain important environmental resources, including topographical formations and habitat; and accommodate the development of recreational, community meeting, educational, and day care facilities in all residential areas, provided that they are compatible with the	**No Conflict.** The Project site would incorporate pedestrian pathways, sidewalks, and landscaped common areas, including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. Shared outdoor spaces would occur between residences, with most garages located in drive aisles at the rear or sides of the residences; therefore, garage doors would not dominate any pedestrian-focused street frontages. Furthermore, the Project would be required to comply with AMC section 88.31.030, Outdoor Lighting, which sets the City's exterior lighting standards. In compliance with the AMC, the Project would balance safety and security needs for lighting and avoid light trespass (spillover light) onto surrounding properties with the requirement of all lights to be shielded and directed downward and away from adjoining properties and public rights-of-way. Internal roadways would contain sidewalks and landscaping for pedestrians, which would connect throughout the Project site and along East Mauna Loa Avenue and North Calera Avenue off-site. Additionally, the Project includes approximately 73,010 square feet of landscaping and would plant approximately 204 landscaping trees throughout (AMC requires a minimum of 75 trees) to enhance the aesthetic quality and pedestrian orientation of the public right-of-way. All

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
intended residential function and character of the neighborhood, and subject to City review and approval.	proposed landscaping would be required to comply with the City's Water Efficient Landscaping Ordinance. Lastly, the Project site is in a fully developed portion of the City and does not contain sensitive vegetation communities, and no riparian habitat areas were found on or adjacent to the Project site (see Section 4.3, Biological Resources).
Goal LU-3: Azusa's corridors will be transformed into well-planned transit corridors, providing some retail and commercial opportunities in mixed-use settings, providing opportunities for new homes, and connecting all our neighborhoods and districts.	**No Conflict.** The Project site is adjacent to existing transit corridors on North Citrus Avenue and Historic Route 66 to the west and north, respectively. Implementation of the Project's proposed redevelopment from a school to a mix of residential uses would add to the existing mixed-use setting within the Project site's vicinity as well as achieve the City's goal of providing opportunities for new homes.
Policy LU-3.2: Multifamily and mixed-use units and sites are designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but is not limited to: • using "living space forward" design concepts; • modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; • using extensive site landscape to complement the architectural design of the structure; • conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures; • including separate, well-defined entries for each residential unit; • locating the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.	**No Conflict.** The Project site would incorporate pedestrian pathways, sidewalks, and landscaped common areas, including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. Shared outdoor spaces would occur between residences, with most garages located in drive aisles at the rear or sides of the residences; therefore, garage doors would not dominate any pedestrian-focused street frontages. Internal roadways would contain sidewalks and landscaping for pedestrians, which would connect throughout the Project site and along East Mauna Loa Avenue and North Calera Avenue. Additionally, the Project includes approximately 73,030 square feet of landscaping and would plant approximately 204 trees in compliance with development standards, which would enhance the aesthetic quality and pedestrian experience. Moreover, the Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code Section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the city (Development Code Section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-3.3: Require new developments to provide for on-street landscaping,	**No Conflict.** See response to General Plan Policy LU-2.11, above. The Project would provide for on-street landscaping and

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
landscaped parkways, and other streetscape as specified in the Urban Form Element and Development Code.	street trees. All proposed landscaping would be required to comply with the City's Water Efficient Landscaping Ordinance. Further, through the City's Design Review process, the Project would adhere to the City's aesthetic quality standards.
Goal LU-4: Azusa will have a thriving and well balanced business sector located within three pedestrian oriented districts that provide dining, retail, office, and entertainment experiences, and one industrial/technology district that provides "tech–driven" manufacturing, warehousing, and other industrial uses along with supporting commercial uses.	**No Conflict.** The Project site is within the vicinity of existing commercial areas at the intersection of North Citrus Avenue and Historic Route 66 to the northwest. Implementation of the Project's proposed redevelopment from a school to a mix of residential uses would create new housing opportunities within walking distance of these existing commercial uses that provide dining, retail, office, and entertainment experiences.
Goal LU-11: Ensure the proper maintenance of buildings and properties.	**No Conflict.** The Project would be constructed in accordance with the California Building Code, the AMC, and the Development Code. Maintenance of buildings and properties would be the responsibility of the owners and the Homeowner's Association, as applicable.
Policy LU-11.1: Require all structures to be constructed in accordance with City building and other pertinent codes and regulations, including all new, adaptively re-used, and renovated buildings; allowing appropriate exceptions for historically-significant buildings.	**No Conflict.** The Project would be constructed in accordance with the California Building Code, the AMC, and the Development Code. Project plans would be reviewed and approved by the City prior to building permit issuance in accordance with the City's Design Review and plan check process. The Project would be built with the latest standards required for the public's health, safety, and welfare.
Goal UF-4: Improve the visual appeal of the city.	**No Conflict.** The Project would result in residential development that would complement surrounding uses. The General Plan Amendment and Zone Change required for implementation of the Project would provide a residential density transition between the adjacent residential properties and surrounding residential community, which would increase neighborhood cohesion by eliminating an institutional use within a residential neighborhood. Project plans would be subject to the City's Design Review to ensure that all approved site and structural development respects the physical and environmental characteristics of the site, exemplifies the best professional high quality design practices, maintains a distinct neighborhood and/or community identity, and minimizes or eliminates negative or undesirable visual impacts (Development Code section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards. As detailed above in the conflict analysis provided for General Plan Policy LU-2.9, the Project would employ several architectural strategies to achieve visual integration with its surroundings. These include façade articulation and changes in materials and colors. As such, the Project would enhance the visual character, quality, and uniqueness of the City's neighborhoods and districts and would not conflict with this policy.
Policy UF-4.3: Continue the underground overhead utilities.	**No Conflict.** Electrical utility lines would be converted to below-ground along East Mauna Loa Avenue and North Calera Avenue.

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
Policy UF-4.4: Require signage to be designed considering the scale and materials of adjacent buildings, the desired character of the neighborhood, district, or corridor where the site is located, and pedestrian orientation.	**No Conflict.** The Project features a three-foot tall monument wall and sign. Under Section 88.38, Signs, of the AMC, the Project would be required to comply with the City's regulations for signage within the NG3-MED zone, including sign review. As such, the Project would be required to meet the City's architectural and aesthetic quality standards for signs.
Goal UF-5: Maintain the visual character and scale of existing neighborhoods.	**No Conflict.** Upon approval of the proposed Zone Change, the Project would be zoned NG3-MED. Within this context, the Project would be appropriately scaled and massed. Single-family detached homes would be located adjacent to the existing single-family neighborhood on the west, south, and east property edge; and two-story triplexes and duplexes would be located adjacent to the existing multi-family community on the north property edge, thus blending the Project form and scale with the surrounding buildings. Furthermore, the proposed architectural styles (a mix of Spanish Colonial, Traditional, Craftsman, and Western Ranch) and building materials (stucco, concrete tile roofs, vinyl windows, wood, etc.) would be consistent with the buildings surrounding the Project site. As such, the Project's overall design and architectural treatment are compatible with the intended urban form and character of the NG3-MED zone.
Policy UF-5.1: Encourage new residential projects to be built in a form and scale compatible with and appropriate to their surroundings.	**No Conflict.** See response to General Plan Goal UF-5.
Goal 8: Encourage a variety of housing types and sizes to accommodate the diverse needs of the population.	**No Conflict.** See response to General Plan Policy LU-2.9. The Project would result in residential development of single-family standalone structures and multi-family attached duplexes and triplexes. Project plans would be subject to the City's Design Review to ensure that all approved site and structural development exemplifies the best professional high quality design practices, maintains a distinct neighborhood and/or community identity, and minimizes or eliminates negative or undesirable visual impacts (Development Code section 88.51.032).
Policy UF-8.1. Support the development of multiple housing types in corridors and the districts, require high quality design, construction methods, materials, and maintenance.	**No Conflict.** See response to General Plan Policy UF-8.1.
Goal UF-9: Encourage private landscape design specific to Azusa and the character of each street it faces.	**No Conflict.** The Project would include landscaping, on-site open space, and recreational amenities including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. In total, the Project would provide approximately 15,100 square feet of common open space (i.e. recreational community amenities and pathways) and 36,916 square feet of private open space (i.e. yards). Landscaping throughout the residential

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
	site would include a variety of trees, shrubs, and grasses that would complement the architectural design.
Policy UF-9.1: Improve the character of streets through landscape standards that govern private property facing public right-of-ways.	**No Conflict.** See response to General Plan Goal UF-9.
Municipal Code	
Chapter 62, Article VI, Tree Preservation	**No Conflict.** The Tree Preservation chapter of the City's Development Code regulates public, protected, and existing trees. There are 38 trees on or adjacent to the Project site. The 25 on-site trees would be removed to accommodate development of the Project, none of which meet the City definition of "Heritage tree" or "Public tree. Therefore, implementation of the Project would require replacement trees at a minimum of three trees for every one tree removed, or a minimum of 75 trees for the removal of the 25 on-site trees, in accordance with AMC Chapter 62, which the Project would comply with. The Director of Public Works would determine the size, number, and plating location of all replacement trees. As shown on Figure 3-2, the Project would plant an estimated 204 trees, the final size, number, and planting location of which would be approved by the Director of Public Works, and would thus comply with this requirement. As such, the Project would not conflict with Division 10 of the Development Code. See the Arborist Report, included as Appendix B of this Draft EIR, for additional details regarding tree removal, replacement, and maintenance.
Chapter 78, Article VI, Division 7, Landscape and Irrigation Standards	**No conflict.** The Project would include landscaping on-site. The final plant palate would include trees, shrubs, and grasses with low to medium water requirements selected based on aesthetic, water efficiency, and maintenance considerations. Examples of proposed tree species include marina strawberry tree, skyrocket juniper, Saratoga hybrid laurel, Swan Hill fruitless olive, and coast live oak. The project would be required to comply with the City's Landscape and Irrigation standards, which state that a Landscape Plan prepared by a licensed landscape architect, licensed landscape contractor, certified nurseryman, or other professional determined by the director to be qualified must be submitted to the City for review and approval. This would ensure that proposed Project landscaping demonstrates compliance with the Water Efficient Landscaping Ordinance and other landscaping requirements prior to implementation.
Development Code	
Section 88.22.070. Neighborhood Site Planning and Building Design.	**No Conflict.** The Project proposes single-family residences to be separated by 3.6 feet instead of the minimum of 5 feet for building separation. In addition, the Project would provide a 20-21-foot rear setback instead of the minimum of 25 feet for the Project site's rear setback. As such, a variance is required to

Table 4.1-1. Aesthetics Consistency Analysis

Applicable Policy/Regulation	Analysis of Potential to Conflict
	deviate from the design standards required in the Project site's proposed NG3-MED zone (see Development Code section 88.22.070(D)(3)). Implementation of the proposed deviations would represent nominal differences in length, and impacts would be less than significant. Moreover, upon approval of the proposed variance, the Project's deviation in development standards would be in compliance with the City's Development Code. See Section 4.10, Land Use and Planning, of this Draft EIR, for more discussion.
Section 88.30.020, Fences, Walls, Hedges, and Screening	**No Conflict.** The Project would be required to comply with the City's fences, walls, hedges, and screening standards to ensure the proposed development is compatible with existing and future development on neighboring properties.
Section 88.31.030, Outdoor Lighting	**No Conflict.** The Project would be required to comply with the City's exterior lighting standards to balance safety and security needs for lighting that also avoids light trespass (spillover light), light pollution, and glare onto surrounding properties by requiring all lights be shielded and directed downward and away from adjoining properties and public rights-of-way.
Section 88.34, Landscaping Standards	**No Conflict.** The Project would include approximately 73,010 square feet of landscaping on site. Landscaping would include trees, as well as additional shrubs and groundcover. The proposed landscape plan would be subject to City review and approval.
Section 88.38, Signs	**No Conflict.** The Project would be required to comply with the City's regulations for signage within the NG3-MED zone.
Section 88.42.140, Multi-Family and Small Lot Single-Family Projects	**No Conflict.** The Project would be required to comply with the City's multi-family and small lot single-family project standards, which regulate the Project's site and building design, parking, open space, and lighting.

Source: City of Azusa 2004, 2025

As described above in Table 4.1-1, the Project would not conflict with the General Plan policies, Development Code, or AMC sections that govern scenic quality (for a more complete analysis regarding the Project's potential to conflict with General Plan land use policies, please refer to Table 4.10-1, Potential to Conflict with Applicable General Plan, in Section 4.10, Land Use and Planning, of this Draft EIR). With approval of the proposed zoning and General Plan amendments, the Project would not conflict with applicable zoning and/or other regulations governing scenic quality, and impacts would be less than significant.

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

Construction

Less-Than-Significant Impact. AMC section 88.31.020 and section 46-409 prohibits construction activities during the nighttime hours of 6:00 p.m. to 7:00 a.m. Monday through Saturday and 5:00 p.m. to 9:00 a.m. on Sundays. As such, the Project would comply with the provisions of the AMC. During most of the year, nighttime lighting would

not be required during construction; however, during late fall and winter, lighting conditions in the local Project site area may require construction lighting during late-afternoon or evening (e.g., earlier than 6:00 p.m.) construction even when operating in compliance with the AMC. Such construction lighting could introduce a new source of lighting to the Project site.

Under this scenario, evening views of the Project area would potentially be affected by temporary use of lighting in the construction site. Any required construction related lighting use would be focused on active areas of construction (as opposed to full illumination of the site), shielded downward and away from adjacent residential uses, and would occur during allowable hours of construction. Use of construction night lighting would be infrequent and of short duration, and most construction activities would be completed during daylight hours. Thus, the temporary use of lighting in one particular area would not operate for an extended duration and construction lighting, if needed, would be directed to specifically illuminate active areas of construction. In addition, given the urban nature of the area and existing sources of interior and exterior lighting and glare, any temporary, incremental increase in new light or glare from Project construction would not adversely affect day or nighttime views. As such, the use of construction lighting at the Project site would not contribute to a substantial source of light-pollution.

During construction, windows and exteriors of construction vehicles and equipment would represent sources of potential localized glare capable of being received at off-site locations. Glare may be generated during hours of active construction and when vehicles and equipment are stored on site; however, due to the mobile nature of vehicles and equipment, glare is not anticipated to be received at any one location for a particularly long duration of time. Rather, glare generated by construction activities may be briefly experienced at off-site locations with views toward active areas of construction but would not be visible elsewhere in the visual landscape. In addition, given the urban nature of the area and existing sources of interior and exterior building lighting and vehicle glare, any temporary, incremental increase in new light or glare from Project construction would not adversely affect day or nighttime views. Due to the limited use of construction lighting, which would not result in a substantial source of lighting or glare, the Project would not adversely affect day or nighttime views in the area, and short-term construction impacts would be less than significant.

Operation

Less-Than-Significant Impact. Lighting is of most concern when it may spill over or trespass from a Project site onto sensitive surrounding land uses, such as residential properties, resulting in a potential nuisance. The Project is located within an urban, developed area of the City, which includes businesses, educational facilities, and homes that produce light sources from interior and exterior building lighting, security lighting in surface parking lots, and minor glare from illuminated signage and glass windows. Under current conditions, the existing school contains lighting sources on the buildings. Additional lighting sources in the area include streetlights, security lighting along walkways, and lights from vehicle headlights. The Project would contain lighting features similar to those that are currently present on-site and in surrounding developments.

As previously discussed in Section 4.1.2, Regulatory Requirements, the California Building Code has several development standards to control lighting. In accordance with the California Building Code, the Project would be required to adhere to minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress for safety and wayfinding. Project lighting would also adhere to the City's Development Code, section 88.31.030, which establishes standards for exterior lighting, including that lighting must be limited to a maximum height of 14 ft or the height of the nearest building, whichever is less; lighting must be shielded or recessed by ensuring the light source is not visible from off-site and confining glare and reflections within the boundaries of the site to the maximum extent feasible; lighting must be directed downward and away from adjoining properties and

public rights-of-way; no lighting shall produce an illumination level greater than one footcandle on any property within a Neighborhood; and lighting must not blink, flash, or be of unusually high intensity or brightness. The Project's lighting design would also be subject to California Vehicle Code section 21466.5, which regulates light and glare conditions that have the potential to impair a driver's vision. The City's required Design Review process would ensure that the Project adheres to these applicable code standards. In addition, the Project's proposed lighting condition would be similar to the existing school and surrounding residences. Compliance with existing regulations governing lighting would reduce potential impacts associated with the Project.

Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces such as window glass or reflective, mirror-like materials (e.g., polished steel or aluminum). The Project site, for example, is surrounded by uses that contain features that contribute to minor or negligible sources of glare, such as interior and exterior lighting, signage, and glass windows. The Project would include some potentially reflective building materials such as glass windows in a manner similar to the existing surrounding uses. These glass surfaces would be relatively small in size and typical of residential buildings and would not include highly contemporary designs with large walls of glass or otherwise create substantial glare. The Project would be designed and constructed in compliance with all applicable building code standards and must be consistent with Development Code section 88.31.030 which requires that proposed development that produces reflections and glare be confined within the boundaries of the site to the maximum extent feasible. In addition, the Project would adhere to the City's Development Code, which state that landscaping should be used with other features to reduce potential visual, light, and glare conflicts, as discussed in further detail below.

As illustrated in Figures 3-2, Landscape Plan, and 4.1-1a and 4.1-1b, Architectural Styles, the vinyl window frontages on the building frontages would be partially shielded by street trees, which would reduce potential glare impacts as viewed from sidewalk rights-of way on Calera Avenue and E Mauna Loa Avenue. Window placements throughout the building would be non-contiguous, which would reduce glare by reflecting smaller images of light rather than continuous, planar glass or window siding, which could magnify reflected light. The Project represents an intensification of use over existing conditions, and would create new sources of light on the Project site. However, the Project's lighting elements would comply with all applicable building and development code requirements, as well as the Design Review. In addition, given the urban nature of the area and existing sources of interior and exterior lighting and glare, any incremental increase in new light or glare from the Project would not adversely affect day or nighttime views. Thus, operational impacts would be less than significant, and no mitigation is required.

4.1.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from Project implementation including in combination with other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 (see Chapter 2, Section 2.4, Cumulative Impacts, and on Figure 2-5, Cumulative Projects Location Map, of this Draft EIR).

The geographic context for the cumulative analysis as it relates to aesthetics is the regional and local area surrounding the Project site including the San Gabriel Valley, the City, and the immediate Project vicinity. The scope of the cumulative impact analysis for aesthetics includes the area that comprises the viewshed in which the Project site is visible, and the views of the Project site (which includes development in the immediately surrounding areas) for the duration of the Project's operation. This is considered the area within view of the Project site, and therefore, the area most likely to experience changes in visual character or experience light and glare impacts from the Project. The area immediately surrounding the Project site is characterized by urban development, including business,

educational campuses, and homes. The cumulative context for light would be other development in the surrounding area that could affect the same area as that affected by Project-generated light at the same time the Project is in operation.

Threshold 4.1a - Cumulative. Would the project have a substantial adverse effect on a scenic vista?

As stated above, the cumulative context for aesthetics includes the area that comprises the viewshed in which the Project site is visible, and the views of the Project site for the duration of the Project's operation. The General Plan does not identify any officially designated scenic vistas within the City boundaries, although the General Plan does include goals and policies to provide a unique system of natural areas that provide a multitude of uses including scenic beauty and to protect the canyons, foothills, and river as open space and environmental resources (City of Azusa 2004). While the San Gabriel Mountains are visible to the north of the Project site, there are no cumulative projects adjacent to the Project site that would combine to result in a view obstruction (nor is there an underlying cumulative impact that the Project could contribute to). The nearest cumulative Project visible from the Project site is approximately 0.65-mile to the southeast, located on the east side of Barranca Avenue (identified as "G4" on Figure 2-4). Other farther cumulative projects are not clearly visible from the Project site due to distance and intervening development (see Figure 2-4). Also, the existing views of the San Gabriel Mountains to the north are already obstructed by features such as existing mature trees, buildings, and utility infrastructure (e.g., HVAC units and electrical poles/lines). As such, although the Project would partially block and/or alter existing views of the San Gabriel Mountains, Project impacts related to scenic vistas of the San Gabriel Mountains would not be cumulatively considerable.

Threshold 4.1b - Cumulative. Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Due to distance, topography, and intervening development/vegetation, the Project site is not visible from any eligible or officially designated state scenic highway segments (Caltrans 2019). Therefore, the Project would have no impact and would not result in a cumulatively considerable impact.

Threshold 4.1c - Cumulative. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project, together with cumulative projects, would result in increased development activity and intensification of uses within urbanized areas of the City, which could increase the potential for a conflict to occur related to zoning and other regulations governing scenic quality. However, such conflicts are site specific and would not combine to result in a significant cumulative impact. Like the Project, the cumulative projects would be required to comply with the zoning of their respective sites and other applicable regulations governing scenic quality. For projects in the City, this would include mandatory compliance with Chapter 62, Article VI, Tree Preservation Chapter 78, and Article VI, Division 7, Landscape and Irrigation Standards of the AMC and sections 88.30.020 (Fences, Walls, Hedges, and Screening), 88.31.030 (Outdoor Lighting), 88.34 (Landscaping Standards), 88.38 (Signs), and 88.51.032 (Design Review) of the Development Code. Compliance with these regulations would be ensured through applicable building

permit[2] or Design Review processes within the City (see section 88.51.032, Design Review, of the Development Code). Therefore, Project impacts would not be cumulatively considerable.

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

The Project, together with the other cumulative projects, are located in a developed, urbanized environment with existing sources of light and glare (e.g., streetlights, exterior building lights, parking lot lighting, vehicle headlights, reflective glass and metal built-environment features, etc.). Therefore, while the Project and cumulative projects would incrementally contribute to additional lighting and glare sources, it would not introduce new light/glare sources in areas devoid of existing development or where light/glare does not previously exist. The Project and cumulative projects in the City would be required to comply with requirements set forth in section 88.31.030 (Outdoor Lighting) of the Development Code. All cumulative projects would also be subject to Chapter 2, Article 3 of the California Vehicle Code, regulating lighting sources with the potential to impair driver safety. Further, as with the Project, other cumulative multifamily, mixed-use, and commercial projects that are subject to the City's Design Review process would be required to display consistency with the applicable design guidelines to further reduce potential light and glare impacts (e.g., shielding, landscaping, cutoff timers, and compatible lighting design). For these reasons, Project impacts would not be cumulatively considerable.

4.1.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to aesthetics and no mitigation measures are required.

4.1.7 Significance Conclusion

Threshold 4.1a. The Project would result in a **less-than-significant impact** to scenic vistas.

Threshold 4.1b. The Project would result in **no impact** to scenic resources including trees, rock outcroppings, and historic buildings within a state scenic highway.

Threshold 4.1c. The Project would result in a **less-than-significant impact** regarding a conflict with applicable zoning and other regulations governing scenic quality.

Threshold 4.1d. The Project would result in a **less-than-significant impact** related to substantial light or glare that would adversely affect day or nighttime views in the area.

[2] California Code of Regulations, Title 24, Building Standards Code require that no building or structure may be erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted, or demolished unless a separate permit for each building or structure has been issued.

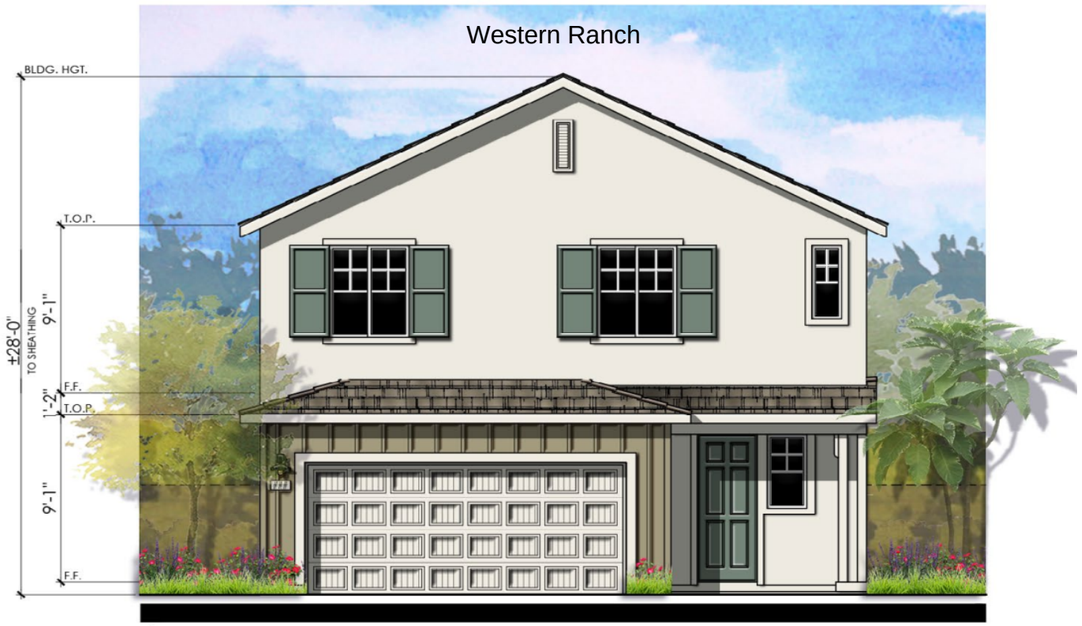
4.1.8 References

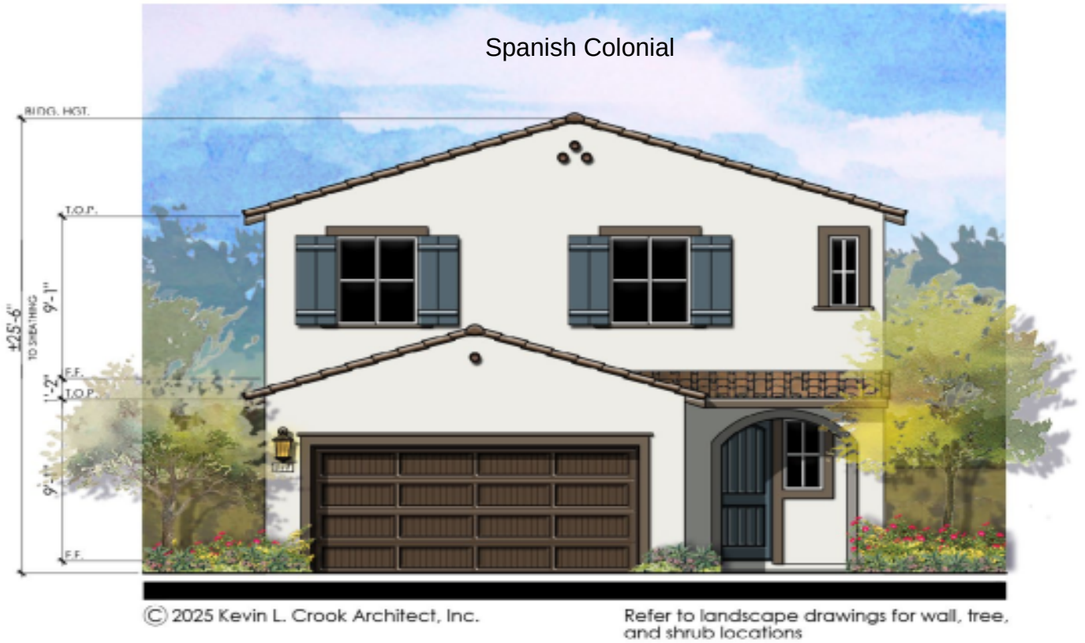
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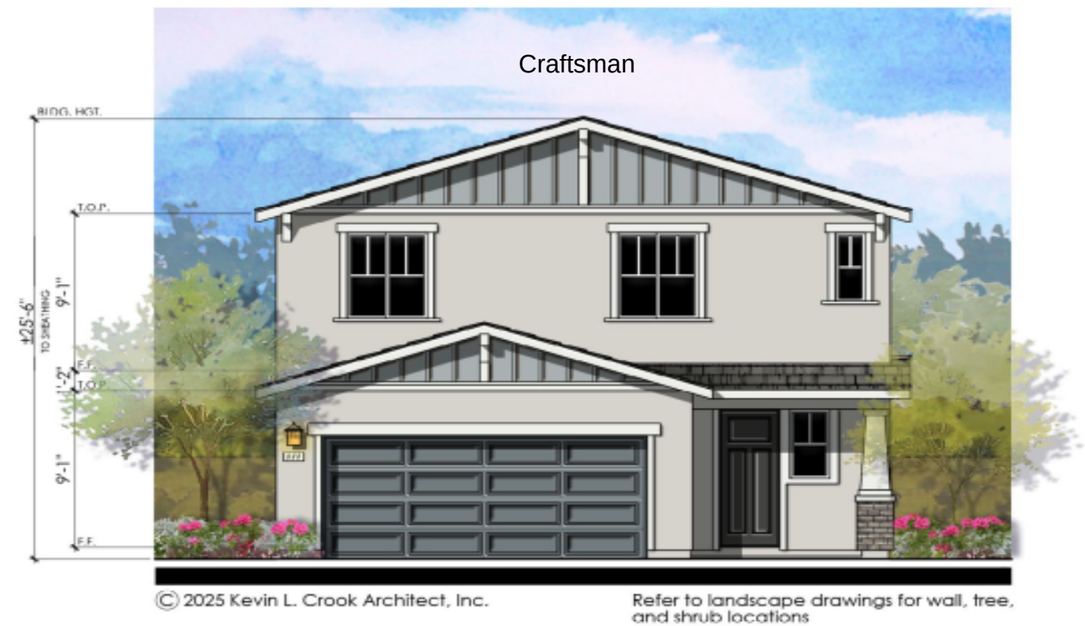
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SOURCE: Kevin L. Crook Architect Inc, 2025

FIGURE 4.1-1a

Architectual Styles - Single-Family

Delaney Square Residential Project

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Traditional



UNIT 2.0 UNIT 3.0

Spanish Colonial



UNIT 2.0 UNIT 3.0

SOURCE: Kevin L. Crook Architect Inc, 2025

FIGURE 4.1-1b

Architectual Styles -Townhomes

Delaney Square Residential Project

DUDEK

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4.2 Air Quality

This section describes the existing air quality conditions of the proposed Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, level of significance, and references. Information contained in this section is based on the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.44, to estimate the criteria air pollutant emissions from both Project construction and operation, as well as existing land use operation. For the relevant data, refer to the following appendices:

- **Appendix C-1** Air Quality and Greenhouse Gas Emissions CalEEMod Outputs, prepared by Dudek, dated June 2026
- **Appendix C-2** Construction Health Risk Assessment Outputs, prepared by Dudek, dated June 2026
- **Appendix K** Transportation Impact Study for the Mauna Loa Residential Project, prepared by LLG Engineers, dated May 2026

Other documentation used in this analysis includes the South Coast Air Quality Management District (SCAQMD) CEQA Handbook, the SCAQMD 2022 Final Air Quality Management Plan, and the SCAQMD Final Localized Significance Threshold Methodology, 2022 Final Air Quality Management Plan, and the SCAQMD Final Localized Significance Threshold Methodology. Other sources consulted are listed in Section 4.2.8, References.

4.2.1 Existing Conditions

The Project site is located in the City within the South Coast Air Basin (SCAB). The SCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB's air pollution problems are a consequence of the combination of emissions from the nation's second-largest urban area, meteorological conditions that hinder dispersion of those emissions, and mountainous terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2022). Meteorological and topographical factors that affect air quality in the SCAB are described below.

4.2.1.1 Climate and Meteorology

The SCAB generally lies in the semi-permanent, high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) as well as of human influences (e.g., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the SCAB.

Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the basin, averaging 75 degrees Fahrenheit (°F). However, with a less pronounced oceanic influence, the eastern inland portions of the basin show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures over 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in

the eastern part of the basin. Precipitation in the SCAB is typically 9 to 14 inches annually and is rarely in the form of snow or hail, due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the basin.

Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain "primary" pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO_X][1]) react to form "secondary" pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O_3) and a substantial portion of fine particulate matter ($PM_{2.5}$, particles less than 2.5 microns in diameter). In the SCAB, high concentrations of O_3 are normally recorded during the late spring, summer, and early autumn months, when more intense sunlight drives enhanced photochemical reactions. Because of the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet above mean sea level (amsl), the terrain prevents the pollutants from entering the upper atmosphere, resulting in pollutants settling in the foothill communities. Below 1,200 feet amsl, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours.

Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of O_3 observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight. The basin has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

As with other cities within the SCAB, the City is susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources. Elevated concentrations of particles less than 10 microns in diameter (PM_{10}) and of $PM_{2.5}$ can occur in the SCAB throughout the year, but they occur most frequently in fall and winter. Although there are some changes in

[1] NO_x is a general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO_2) and other oxides of nitrogen.

emissions by day of the week and by season, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

4.2.1.2 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The national and California standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. These pollutants, as well as toxic air contaminants (TACs), are discussed below.[2]

Ozone (O_3). O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors, such as hydrocarbons and NO_x. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere ozone layer (stratospheric O_3) as well as at the Earth's surface in the troposphere (ground-level O_3).[3] The O_3 that the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level ozone is a harmful air pollutant that causes numerous adverse health effect and is thus, considered "bad" ozone. Stratospheric ozone, or "good" ozone, occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the earth's atmosphere. Without the protection of the beneficial stratospheric ozone layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2025a). These health problems are particularly acute in sensitive receptors such as the sick, older adults, and young children.

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs breathe in and cause shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies of O_3's effects on children, the available studies show that

[2] The descriptions of each of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's Criteria Air Pollutants (EPA 2025b) and the California Air Resources Board's Glossary of Air Pollutant Terms (CARB 2024a).

[3] The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

children are no more or less likely to suffer harmful effects than adults. However, there are several reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2024b).

Nitrogen Dioxide (NO_2) and Oxides of Nitrogen (NO_x). NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2024c).

Carbon Monoxide (CO). CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental

effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2024d).

Sulfur Dioxide (SO_2). SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 part per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. The elderly and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2024e).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma. SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter (PM). Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory systems' natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also produce haze and reduce regional visibility and damage and discolor surfaces on which they settle.

A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital

admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2024f).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded particulate matter in outdoor air pollution causes lung cancer (CARB 2024f).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$ described above.

Volatile Organic Compounds (VOCs). Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to the formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

Non-Criteria Air Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a Toxic Air Contaminant (TAC). TACs are identified by federal and state agencies based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter (DPM). DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2016). DPM is typically composed of carbon particles ("soot," also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM) (17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several

studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and older adults who often have chronic health problems.

4.2.1.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). The SCAQMD identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest off-site sensitive receptors are residences located adjacent to the Project boundary, west of the Project site.

4.2.2 Regulatory Requirements

4.2.2.1 Federal

Federal Clean Air Act

The Federal Clean Air Act passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including the setting of National Ambient Air Quality Standards (NAAQS; federal standards) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emissions standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

Hazardous Air Pollutants (HAPs)

The 1977 federal Clean Air Act amendments required the EPA to identify national emission standards for HAPs to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

4.2.2.2 State

California Clean Air Act

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency (Cal EPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below these relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered “in attainment” if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.

California air districts have based their thresholds of significance for CEQA review purposes on the levels that scientific and factual data demonstrate that the air basin can accommodate without affecting the attainment date for the NAAQS or CAAQS. Since an ambient air quality standard is based on maximum pollutant levels in outdoor air that would not harm the public’s health, and air district thresholds pertain to attainment of the ambient air quality standard, this means that the thresholds established by air districts are also protective of human health.

The NAAQS and CAAQS are presented in Table 4.2-1, Ambient Air Quality Standards.

Table 4.2-1. Ambient Air Quality Standards

Pollutant	Average Time	CAAQS[a]	NAAQS[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 µg/m³)	N/A	Same as primary standard
	8 hours	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None

Table 4.2-1. Ambient Air Quality Standards

Pollutant	Average Time	CAAQS[a]	NAAQS[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	N/A
	3 hours	N/A	N/A	0.5 ppm (1,300 µg/m³)
	24 hours	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)[g]	N/A
	Annual	N/A	0.030 ppm (for certain areas)[g]	N/A
PM_{10}[i]	24 hours	50 µg/m³	150 µg/m³	Same as primary standard
	Annual arithmetic mean	20 µg/m³	N/A	
$PM_{2.5}$[i]	24 hours	No separate state standard	35 µg/m³	Same as primary standard
	Annual arithmetic mean	12 µg/m³	9.0 µg/m³	15.0 µg/m³
Pb[j,k]	30-day average	1.5 µg/m³	N/A	N/A
	Calendar quarter	N/A	1.5 µg/m³ (for certain areas)[j]	Same as primary standard
	Rolling 3-month average	N/A	0.15 µg/m³	
H_2S	1 hour	0.03 ppm (42 µg/m³)	N/A	N/A
Vinyl chloride[i]	24 hours	0.01 ppm (26 µg/m³)	N/A	N/A
SO_4	24 hours	25 µg/m³	N/A	N/A
Visibility-reducing particles	8 hours (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70%	N/A	N/A

Source: CARB 2024g.

Notes: CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; O_3 = ozone; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; N/A = not applicable; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³ = milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; Pb = lead; H_2S = hydrogen sulfide; SO_4 = sulfates; PST = Pacific standard time.

a CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, and suspended particulate matter—PM_{10}, $PM_{2.5}$, and visibility-reducing particles—are values that are not to be exceeded. All others are not to be equaled or exceeded. The CAAQS are listed in the Table of Standards in section 70200 of Title 17 of the California Code of Regulations.

b NAAQS (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
[g] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb, whereas California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
[h] In 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
[i] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 mg/m^3 to 9.0 mg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
[j] CARB has identified Pb and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
[k] The national standard for Pb was revised on October 15, 2008, to a rolling 3-month average. The 1978 Pb standard (1.5 µg/m^3 as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under Assembly Bill (AB) 1807 (Tanner). The California TAC list identifies more than 200 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, the CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines with the goal of effectuating an 80% decrease in statewide diesel heath risk by 2020 (CARB 2000). Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the InUse Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment Program. These regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 CCR §§ 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR § 2025).

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions, among many others. Specifically, section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location. In addition, section 93115 in Title 17 of the CCR states

that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

4.2.2.3 Regional and Local

South Coast Air Quality Management District

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the Project site is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain state and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

Air Quality Management Plan

The most recently adopted AQMP is the 2022 AQMP (SCAQMD 2022), which was adopted by the SCAQMD governing board on December 2, 2022. The 2022 AQMP is a regional blueprint for achieving air quality standards and healthy air. The 2022 AQMP was developed to address the requirements for meeting the U.S. EPA's NAAQS for ground-level O_3, for which the SCAB is classified as an "extreme" non-attainment area. The strategies of the 2022 AQMP include: wide adoption of zero-emissions technologies; low NO_x technologies where zero-emission technologies are not feasible; federal action; zero-emission technologies for residential and industrial sources; incentive funding in environmental justice areas; and prioritizing benefits on the most disadvantaged communities (SCAQMD 2022).

Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning

SCAQMD adopted its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in May 2005. Like the CARB Land Use Handbook, the SCAQMD Guidance Document provides recommendations for the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, gas dispensing facilities, etc.). In its Guidance Document, SCAQMD provides recommendations for when a Health Risk Assessment (HRA) should be prepared, such as for truck stops and warehouse distribution facilities, where more than 100 trucks per day or more than 40 trucks with truck refrigeration units are generated.

Applicable Rules

Emissions that would result from stationary and area sources during Project construction and operation may be subject to SCAQMD rules and regulations. The SCAQMD rules applicable to the Project may include the following:

Regulation IV – Prohibitions

- **Rule 401 – Visible Emissions:** This rule establishes the limit for visible emissions from stationary sources for a period or periods aggregating more than three minutes in any hour. This rule prohibits visible emissions dark or darker than Ringelmann No. 1 for periods greater than three minutes in any hour or such opacity which could obscure an observer's view to a degree equal or greater than does smoke.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule), which may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities.
- **Rule 431.2 – Sulfur Content of Liquid Fuels:** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of reducing the formation of SO_x and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile sources.
- **Rule 445 – Wood Burning Devices.** The purpose of this rule is to reduce the emission of PM from woodburning devices and establish contingency measures for applicable O_3 standards for the reduction of VOCs. The rule requires the installation of only gaseous-fueled fireplaces and stoves in any new residential or commercial development.

Regulation XI – Source Specific Standards

- **Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines**: This rule applies to stationary and portable engines rated at greater than 50 horsepower (hp). The purpose of Rule 1110.2 is to reduce NO_x, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.
- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_x emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

Regulation XIV – Toxics and Other Non-Criteria Pollutants:

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities:** This rule states that an owner or operator of any demolition or renovation activity is required to have an asbestos study performed prior to demolition and to provide notification to SCAQMD prior to commencing demolition activities.

SCAB Attainment Designation

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on CAAQS rather than the NAAQS. Table 4.2-2 depicts the current attainment status of the Project site with respect to the NAAQS and CAAQS.

Table 4.2-2. South Coast Air Basin Attainment Classification

Pollutant	Designation/Classification	
	Federal Standards	California Standards
Ozone (O_3), 1-Hour	No National Standard	**Nonattainment**
Ozone (O_3), 8-Hour	**Extreme Nonattainment**	**Nonattainment**
Nitrogen Dioxide (NO_2)	Unclassifiable/Attainment	Attainment
Carbon Monoxide (CO)	Attainment/Maintenance	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment	Attainment
Coarse Particulate Matter (PM_{10})	Attainment/Maintenance	**Nonattainment**
Fine Particulate Matter ($PM_{2.5}$)	**Serious Nonattainment**	**Nonattainment**
Lead (Pb)	Nonattainment	Attainment
Hydrogen Sulfide	No National Standard	Unclassified
Sulfates	No National Standard	Attainment
Visibility-Reducing Particles	No National Standard	Unclassified
Vinyl Chloride	No National Standard	No designation

Sources: EPA 2024a (national); CARB 2022 (California).
Notes: Bold text = not in attainment; Attainment = meets the standards; Attainment/Maintenance = achieves the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/Attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.

In summary, the SCAB is designated as a nonattainment area for federal and state O_3 standards and federal and state $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO_2 standards, and federal and state SO_2 standards. While the

SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (CARB 2022; EPA 2025b).

Despite the current nonattainment status, air quality within the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly a result of lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred in spite of continued population growth. Despite this growth, air quality has improved significantly over the years, primarily because of the impacts of the region's air quality control program.

Local Ambient Air Quality

The Project area's local ambient air quality is monitored by SCAQMD and CARB. CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations.

The Azusa Monitoring Station (060370002) at 803 North Loren Avenue, Azusa, and Source Area Receptor 9 data from SCAQMD are the air quality monitoring stations/data most representative of the existing air quality around the Project site that together provide a complete set of ambient air data. The data collected at these stations are considered representative of the air quality experienced in the Project vicinity due to proximity and availability of data. Air quality data from 2022 through 2024 are provided in Table 4.2-3. The number of days exceeding the ambient air quality standards is also shown in Table 4.2-3.

Table 4.2-3. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2022	2023	2024	2022	2023	2024
Ozone (O_3)										
2022: Azusa 803 N Loren Ave Monitoring Station; 2023&2024: Glendora-Laurel Monitoring Station	ppm	Maximum 1-hour concentration	California	0.09	0.111	0.155	0.145	6	57	82
	ppm	Maximum 8-hour concentration	California	0.070	0.080	0.110	0.114	11	72	96
			National	0.070	0.080	0.110	0.114	11	72	96
Nitrogen Dioxide (NO_2)										
2022: Azusa 803 N Loren Ave Monitoring Station; 2023&2024: Glendora-Laurel Monitoring Station	ppm	Maximum 1-hour concentration	California	0.18	0.047	0.088	0.048	0	0	0
			National	0.100	0.048	0.048	0.048	0	0	0
	ppm	Annual concentration	California	0.030	*	0.0079	0.0091	—	0	0
			National	0.053	*	0.0079	0.0079	—	0	0
Carbon Monoxide (CO)										
2022: Azusa 803 N Loren Ave Monitoring Station; 2023&2024: Glendora-Laurel Monitoring Station	ppm	Maximum 1-hour concentration	California	20	—	—	—	—	—	—
			National	35	1.3	0.8	1.4	0	0	0
	ppm	Maximum 8-hour concentration	California	9.0	—	—	—	—	—	—
			National	9	0.9	0.6	1.1	0	0	0
Sulfur Dioxide (SO_2)										
Signal Hill Monitoring Station	ppm	Maximum 1-hour concentration	National	0.075	0.0061	0.0232	0.0082	0	0	0
	ppm	Maximum 24-hour concentration	National	0.14	0.0015	—	—	0	—	—
	ppm	Annual concentration	National	0.030	0.005	—	—	0	—	—
Coarse Particulate Matter (PM_{10})[a]										
	µg/m³		California	50	96.1	126	82	*	3	1

Table 4.2-3. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2022	2023	2024	2022	2023	2024
2022: Azusa 803 N Loren Ave Monitoring Station; 2023&2024: Glendora-Laurel Monitoring Station		Maximum 24-hour concentration	National	150	98.2	126	82	*	0	0
	µg/m³	Annual concentration	California	20	33	22.4	27.5	—	—	—
Fine Particulate Matter ($PM_{2.5}$)[a]										
752 S. Wilson Avenue Monitoring Station	µg/m³	Maximum 24-hour concentration	National	35	22.1	52	117.2	0	3	9
	µg/m³	Annual concentration	California	12	9.1	9	11.7	—	—	—
			National	12.0	9.1	9	11.7	—	—	—

Sources: CARB 2025; EPA 2024b; SCAQMD 2025.

Notes: ppm = parts per million by volume; ND = insufficient data available to determine the value; — = not available; µg/m³ = micrograms per cubic meter.
Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and EPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year. Exceedances of national and California standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed national or California standards during the years shown. There is no national standard for 1-hour ozone, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored.

* Insufficient data available to determine the value.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

On April 4, 2024, SCAG's Regional Council adopted the Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2024). The updated growth projections from the 2024 RTP/SCS have not yet been incorporated into an adopted AQMP. As stated above, the SCAQMD adopted the 2022 AQMP, which incorporates previous regional growth projections (SCAG 2020a, SCAQMD 2022).

City of Azusa 2004 General Plan

The General Plan's Natural Environment Element (City of Azusa 2004) includes various policies related to improving air quality, . The air quality component of the Natural Environment Element includes planning and design goals to reduce vehicular and source emissions, and promotes the use of efficient operational practices to reduce emissions from quarries, on- and off-road vehicles, and industrial uses. Sources of pollution (including particulate matter) within the City include automobiles, heavy diesel trucks, and rock mining and quarrying. Applicable air quality goals and policies include the following:

Goal 1. Improve air quality in Azusa and reduce exposure to air pollutants.

Policy 1.1. Integrate air quality concerns into land use planning decisions.

Policy 1.2. Integrate air quality concerns into site design review.

Policy 1.3 Reduce pollutant emissions from quarry operations, off -road vehicle use areas, industrial uses, and vehicular traffic.

Policy 1.4. Participate in regional air quality planning strategies.

Policy 1.5. Consider encouraging the use of "green roof" construction technologies.

4.2.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to air quality are based on Appendix G of the CEQA Guidelines which states that a significant impact related to air quality would occur if the Project would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations.

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

4.2.3.1 Air Quality Significance Thresholds

Regional Emissions Thresholds

The SCAQMD has established Air Quality Significance Thresholds, most recently revised in March 2023, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality under existing and cumulative conditions. The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 4.2-4 to determine the potential for the Project to result in a significant impact under CEQA. A comparison to the thresholds listed in Table 4.2-4 is specifically used to address Threshold 4.2(b) in the analysis below.

Table 4.2-4. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	**Construction (pounds per day)**	**Operation (pounds per day)**
VOCs	75	55
NOx	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥ 10 in 1 million Chronic and acute hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	

Source: SCAQMD 2023.

Notes: µg/m³ = micrograms per cubic meter; CO = carbon monoxide; NO_2 = nitrogen dioxide; NO_x = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; ppm = parts per million; SCAQMD = South Coast Air Quality Management District; SO_x = sulfur oxides; TAC = toxic air contaminant; VOC = volatile organic compounds

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

Air Quality Management Plan Consistency

The evaluation of whether the Project would conflict with or obstruct implementation of the applicable air quality plan (Threshold 4.2[a], below) is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, sections 12.2 and 12.3. The first criterion of the SCAQMD CEQA Air Quality Handbook assesses if the Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new

violations or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP, which is addressed in detail in Section 4.2.4, Impact Analysis, below. The second criterion is if the Project would exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase, as discussed further in Section 4.2.4.

Localized Significance Thresholds

In addition to the above-listed regional emission-based thresholds, SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the proposed project as a result of construction activities. This analysis is used to support the analysis for Threshold 4.2(c), below. Such an evaluation is referred to as a localized significance threshold (LST) analysis. For construction phases with maximum peak day area disturbed equal to 5 or less acres, SCAQMD LST Methodology (SCAQMD 2008) includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO_2, CO, PM_{10}, and $PM_{2.5}$) without performing project-specific dispersion modeling. The modeled construction scenario of the modified project would disturb less than 5 acres per peak day, as discussed in the following paragraphs, so it is appropriate to use the lookup tables for the LST evaluation.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the following parameters:

- Source-receptor area in which the project is located
- Size of the project site
- Distance between the project site and the nearest receptor (any areas where persons can be situated for an hour or longer at a time)

The Project site is located in Source-Receptor Area 9 (East San Gabriel Valley). The SCAQMD provides guidance for applying CalEEMod to the LSTs for CEQA projects. LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances. The maximum number of acres disturbed on the peak day was estimated using the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (SCAQMD 2014). During grading activities, fugitive dust can be generated from the movement of dirt on the project site. CalEEMod estimates dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading dirt into haul trucks. Each of those activities is calculated differently in CalEEMod, based on the number of acres traversed by the grading equipment. Only some pieces of equipment generate fugitive dust in CalEEMod. The CalEEMod manual identifies various equipment and the acreage disturbed in an 8-hour day. For example:

- Crawler tractors, graders, and rubber-tired dozers: 0.5 acres per 8-hour day
- Scrapers: 1 acre per 8-hour day

The LST lookup tables that can be used to determine the maximum allowable daily emissions are provided at increments of 1 acre, 2 acres and 5 acres. Therefore, the analysis applies the LSTs for an interpolated 3.5-acre disturbance area (between lookup table 2 acres and 5 acres), which is presented in Table 4.2-5.

Per the SCAQMD's Final LST Methodology document, locations that an individual could remain in for 24 hours (i.e., a residence, hospital, convalescent facility, hotel, etc.) should be considered to determine the threshold for PM_{10} and $PM_{2.5}$ (SCAQMD 2008). The closest off-site receptors to the Project site's construction activity during peak activity are single-family residences adjacent to the west of the Project site. Per the SCAQMD's Final LST Methodology document, the minimum-recommended distance of 25 meters[4] has been used to determine LST receptor distance for emissions of NO_x, CO, PM_{10}, and $PM_{2.5}$. Emissions from peak construction are compared to LSTs for the on-site residential construction activities and represent the most conservative emissions, as construction activities at further distances would result in lower emissions due to increased distances.

In accordance with the SCAQMD *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, the modeled construction scenario would disturb a maximum of 3.5-acres per day during the grading phase. Based on equipment projections, the analysis applies the LSTs for an interpolated 3.5-acre disturbance area, which are presented in Table 4.2-5.

The LST values from the SCAQMD lookup tables for Source-Receptor Area 9 (East San Gabriel Valley) are shown in Table 4.2-5.

Table 4.2-5. Localized Significance Thresholds for Source-Receptor Area 9

Pollutant	Threshold by Acres Disturbed Per Day (Pounds per Day)
Localized Significance Thresholds for Peak Construction	
NO_2	165.50
CO	1,343.00
PM_{10}	10.50
$PM_{2.5}$	6.50

Source: SCAQMD 2008.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
For all pollutants, localized significance thresholds were determined based on the values for a distance of 25 meters (82 feet) from the nearest receptor for a disturbed acreage of 3.5 acres. In order to derive the disturbance acreage of 3.5 acres, acreage values were interpolated between the SCAQMD's defined thresholds of 1, 2, and 5 acres to align with the projected equipment requirements for the Project. Because the equipment projections result in acreage between 2 and 5 acres, a representative intermediate condition within the upper range, a 3.5-acre threshold was introduced between 2 and 5 acres. This intermediate value was derived using linear interpolation, ensuring that equipment quantities scale proportionally and consistently across the full acreage range without abrupt changes.

4.2.3.2 Approach and Methodology

Construction Emissions

Emissions from the construction phase of the Project were estimated using CalEEMod Version 2022.1.1.44. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on information

[4] SCAQMD's Final LST Methodology states that "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters" (SCAQMD 2008).

provided by the Project applicant and CalEEMod default values when Project specifics were not known. The assumptions used and results of the modeling calculations are included in Appendix C-1.

For purposes of estimating Project emissions, it was assumed that construction would start in November 2026 and would last approximately 36 months, ending in November 2029. The November 2026 start date represents the earliest possible start date. Assuming an earlier start date for Project construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be less due to more stringent standards for off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Demolition: 5 months (11/4/2026 through 3/25/2027)
- Grading: 2 months (5/17/2027 through 7/14/2027)
- Onsite Utilities: 9 months (7/15/2027 through 4/25/2028)
- Paving: 1 month (4/26/2028 through 5/31/2028)
- Building Construction: 16 months (6/8/2028 – 11/6/2029)
- Application of Architectural Coatings (occurs at the end of each phase of construction between 7/13/2028 through 11/8/2029)

The Project site is currently occupied by approximately seven school buildings associated with the existing Powell Elementary School and an associated surface parking lot. All existing development would be demolished to accommodate Project development. For the analysis, it was generally assumed heavy construction equipment would be operating at the site for approximately 8 hours per day, 5 days per week, during Project construction.

- Construction worker estimates and vendor truck trips by construction phase were based on information provided by the Project applicant and/or CalEEMod default values. Haul truck trips during the demolition and site preparation phases were based on demolition and vegetation quantities provided by the Project applicant. During demolition, up to 30,037 square-feet of school buildings would be removed as well as 85,971 cubic-feet of asphalt and hardscape. CalEEMod default trip length values were used for the distances for all construction-related trips. During grading activities, no import or export of soils would be required as materials would be balanced on-site. However, it is anticipated that 5,000 cubic yards of exported vegetation would be required during the site preparation phase.

The construction equipment mix and vehicle trips used for estimating Project-generated construction emissions are shown in Table 4.2-6.

Table 4.2-6. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Average Daily Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
Demolition	8	0	16	Tractors/Loaders/ Backhoes	1	8
				Excavators	1	8

Table 4.2-6. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Average Daily Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
				Concrete Industrial Saws	1	8
Site Preparation and Grading	28	0	14	Excavators	2	8
				Graders	6	8
				Rubber-Tired Dozers	1	8
				Tractors/Loaders/ Backhoes	2	8
Onsite Utilities	10	0	0	Trenchers	1	8
				Tractors/Loaders/ Backhoes	2	8
				Cement and Mortar Mixers	1	8
Paving	10	0	0	Pavers	1	8
				Paving Equipment	1	8
				Rollers	1	8
				Cement and Mortar Mixers	1	8
Building Construction	68	14	0	Forklifts	1	8
				Welders	1	8
				Trenchers	1	8
				Graders	1	8
				Skid Steer Loaders	1	8
				Tractors/Loaders/ Backhoes	3	8
Architectural Coating	14	0	0	Air Compressors	1	6

Notes: See Appendix C-1 for details.

It is anticipated that Project construction in 2029 would occur concurrently with operations of the dwelling units, which would be available for purchase starting in January 2029 through November 2029.

Operational Emissions

Emissions from the operational phase of the Project were estimated using CalEEMod Version 2022.1.1.30. The year 2029 is anticipated to be the first year of operation. In addition to the Project, baseline conditions were modeled for the existing school and associated surface parking lots to determine the net increase in operational emissions (i.e., Project emissions minus baseline emissions). The existing school was modeled to be operational in 2022 as 2022 was the last year that the school was operational. The existing school was closed in year 2023.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2022). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of residential and nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. For parking lot land uses, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of residential and nonresidential surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the residential surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating. For asphalt surfaces, the architectural coating area is assumed to be 6% of the total square footage, consistent with the supporting CalEEMod studies provided as an appendix to the CalEEMod User's Guide (CAPCOA 2022). As a conservative means of estimating operational emissions of garage space, a separate run was modeled with the surrogate unenclosed parking garage land use in CalEEMod. Construction emissions for all conditioned and unconditioned building spaces are accounted for using applicant provided project specific construction schedule combined with CalEEMod default construction equipment.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, shredders/grinders, and leaf blowers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per residential dwelling unit per day and grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days (CAPCOA 2022). Emissions associated with potential landscape maintenance equipment were included and no emission reduction features related to electric landscape equipment was assumed to capture potential Project operational emission sources.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity usage. Electricity use would contribute indirectly to criteria air pollutant emissions since criteria pollutant emissions occur at the site

of the power plant, which is typically off site. The Project does not propose the use of propane, natural gas or any other fossil fuels for space heating, water heating, or indoor cooking.

CalEEMod default values for energy consumption for each land use were applied for the Project analysis. The energy use from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Survey. Energy use from the non-residential land uses is based on various studies and assessments as described in section 7.3, *Estimating Energy Use from Other Land Uses*, of Appendix A of the CalEEMod User's Guide (CAPCOA 2021).

Mobile Sources

Mobile sources for the Project would be motor vehicles (i.e., automobiles and light-duty trucks) traveling to and from the Project site. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. Default vehicle trip generation rates included in CalEEMod for each of the analyzed land uses were adjusted to match the Project's trip generation rates, assuming reductions from internal capture, presented in the Transportation Impact Analysis (Appendix K). CalEEMod default data, including emissions factors were conservatively used for the model inputs to estimate daily emissions from proposed vehicular sources. Emission factors representing the vehicle mix and emissions for 2029 were used to estimate emissions associated with full build-out of the Project.

The potential for the Project to expose receptors to substantial pollutant concentrations includes an LST analysis, a quantitative construction HRA, and a qualitative CO hotspot analysis.

Construction Health Risk Assessment

A Health Risk Assessment (HRA) was performed to assess the health risk impacts of TACs from Project construction on proximate existing off-site and future on-site residential receptors. Because occupancy of homes will occur prior to completion of construction an onsite HRA was performed and includes modeled impacts to occupancy of the first phase of construction. The first phase of occupancy represents the worst-case impacts for onsite health risks as the duration of construction activities decreases with the completion of each subsequent phase. The following discussion summarizes the dispersion modeling and HRA methodology.

The dispersion modeling of DPM was performed using AERMOD, which is the model SCAQMD requires for quantifying atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain. For the Project, AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the "X/Q" values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations determined for the 1-hour and Period averaging periods. Principal parameters of this modeling are presented in Table 4.2-7.

Table 4.2-7. AERMOD Principle Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Azusa air monitoring station (AZUS) was used for the dispersion modeling (SCAQMD 2021b). A 5-year meteorological data set from 2017 through 2021 was obtained from the SCAQMD in a preprocessed format suitable for use in AERMOD.

Table 4.2-7. AERMOD Principle Parameters

Parameter	Details
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines.
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset dataset with resolution of 1 arc-second was used.
Source Release Characterizations	Air dispersion modeling of DPM emissions was conducted assuming the off-road equipment would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix C-1). The exposure duration set is equal to the total duration of construction for offsite and for the portion of construction remaining for onsite receptor analysis, see Appendix C-2 for details. The construction equipment and on-site operation of vendor and haul truck travel DPM emissions were modeled as a line of adjacent volume sources across the project site to represent project construction with a release height of 5 meters (based on SCAQMD LST Methodology modeling adjacent volume sources), plume height of 10 meters, and plume width of 10 meters (SCAQMD 2008).
Discrete Receptors	**Offsite**: The offsite HRA evaluates the risk to existing residential receptors located in proximity to the Project site. Two uniform Cartesian grids with approximately 38 by 18-meter and 17 by 9-meter spacing were placed over proximate sensitive receptors (residents) to the site. Additional discrete receptors (121) were placed over proximate residences. The closest off-site sensitive receptors to the Project include single-family residences adjacent and west of the site. **Onsite:** The onsite HRA evaluates the risk to residential receptors located on site during further Project construction. Discrete onsite receptors (8) were placed over potential future receptors based on the phased buildout of the Project.

Source: See Appendix C-2.

Dispersion model plot files from AERMOD were then imported into CARB's HARP2 model to determine health risk, which requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source. As described in SCAQMD Risk Assessment Procedures, dated October 2024, for the residential health risk, cancer risk is calculated in individual age bins starting in the third trimester of pregnancy (SCAQMD 2024), see Appendix C-2 for further details.

Cancer risk is an estimate of the chance that an individual will develop cancer during their lifetime. A cancer risk of 10 in a million indicates that a person has an additional risk of 10 chances in a million (0.001%) of developing cancer during their lifetime as a result of the air pollution scenario being evaluated. Hazard index is an estimate of the likelihood that an individual will experience non-cancer health effects (e.g., cardiovascular, neurological, respiratory, etc.). A chronic hazard index estimates the likelihood of non-cancer health effects when a person is exposed to a toxic pollutant concentration for a 1-year period or longer. A hazard index less than 1.0 indicates that people are not likely to experience any non-cancer health effects.

4.2.4 Impacts Analysis

Threshold 4.2a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Project site is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD administers

the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all CAAQS and NAAQS standards. The most recent adopted AQMP is the 2022 AQMP, which the SCAQMD Governing Board adopted in December 2022 (SCAQMD 2022).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

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

Consistency Criterion No. 1

Threshold 4.2b (below), evaluates the Project's potential impacts pursuant to CEQA Guidelines Appendix G (the potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard). As discussed under Threshold 4.2b, the Project would not result in construction or operational criteria air pollutant emissions that would exceed the SCAQMD mass daily thresholds. Because it would not exceed the SCAQMD criteria air pollutant mass thresholds, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and thus, the Project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993).

Consistency Criterion No. 2

The second criterion regarding the Project's potential to exceed the assumptions in the AQMP is primarily assessed by determining consistency between the Project's land use designations and potential to generate population growth. In general, a project would be consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for its RTP/SCS (SCAG 2020a). SCAG bases its growth forecasts on general plans for cities and counties in the SCAB. The SCAQMD uses these growth forecasts for the development of the AQMP emissions inventory (SCAQMD 2022).[5] SCAG's 2020–2045 RTP/SCS RTP/SCS, and

[5] Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2020 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

The Project would require a General Plan Amendment to change the General Plan land use designation of the Project site from Institutional to Medium Density Residential (15 dwelling units per acre). As such, the Project would introduce new residential land uses on existing institutionally designated property, which would not have been anticipated in the General Plan growth projections. Although the Project's proposed land use designation would be inconsistent with the General Plan land use designation for the Project site, the Project would be consistent with the nearby residential land uses and would be in compliance with the Land Use Element goals and policies of the General Plan, as detailed in Section 4.10, Land Use and Planning. Nonetheless, because the Project's proposed land use designation would not be consistent with the land use designation assumed for the 2022 AQMP, the Project may result in population (residents) not anticipated in the SCAG 2020-2045 RTP/SCS, and therefore, the 2022 SCAQMD AQMP. Accordingly, an evaluation of the Project's anticipated population in comparison to the population projections for the City is warranted.

As detailed in Section 4.12, Population and Housing, the Project's residential units are anticipated to accommodate 397 residents by 2029, which is the anticipated buildout year of the Project. The Final SCAG 2020-2045 RTP/SCS provides population estimates for the years 2016 and 2045 (SCAG 2020b). SCAG estimated that there were 49,600 residents in the City in 2016 and that there would be 56,200 residents by 2045 (SCAG 2020b), for a delta growth of 6,600 residents between 2016 and 2045. Current population estimates for 2025 place the City's population at 48,988 persons (DOF 2025), which is below the population of 49,600 residents in 2016 by 612 persons, as detailed by the SCAG 2020-2045 RTP/SCS (SCAG 2020b). Assuming linear growth from 2016 to 2045 of the SCAG's growth projections, there would be an increase of 2,959 residents by the operational year of the Project (2029), the City is projected to have 52,559 residents in 2029. However, assuming the most current population of City residents in 2025, with the same linear growth as SCAG's growth projections, the City would have 50,692 residents, including the Project's proposed residents, by 2029. Therefore, when linearly extrapolated for 2029, SCAG assumed that there would be 2,263 more residents than calculations based on current population estimates. As the Project's proposed resident population of 397 residents is less than the 2,263 residents anticipated in the City in 2029, the Project would be within the linear growth projection estimates (from 2016 to 2045), and the Project would not exceed the SCAG's population growth projections for 2029.

The Project would result in a net decrease in employees at the Project site, and as such, would be within the growth projections assumed within SCAG's projections.

Therefore, the Project would not conflict with the underlying assumptions used to develop SCAQMD's 2022 AQMP and future AQMP updates/revisions and would not conflict with Criterion 2 SCAQMD CEQA Air Quality Handbook.

As the Project would not conflict with Criterion No. 1 and No. 2 of the 2022 AQMP, there would be a less-than-significant impact with regard to the potential to conflict with an applicable AQMP.

Threshold 4.2b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used

to help determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

Construction Emissions

Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (e.g., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during the construction period spanning 2026 through 2029. Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the Project applicant and CalEEMod default values, and is intended to represent a reasonable scenario based on the best information available. This information is available under Section 4.2.3.2, Approach and Methodology, above.

Construction activities would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active site two times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions. The homes are designed to include air filtration, continuous whole house fans, and low VOC paints and adhesives. However, emissions reductions are not quantified for these design features, resulting in a conservative analysis.

Table 4.2-8 presents the estimated maximum daily construction emissions generated during construction of the Project. The values shown are the maximum summer and winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C-1.

Table 4.2-8. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

	VOCs	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Year	Pounds per Day					
Summer Emissions						
2027	3.27	27.5	36.25	0.06	5.59	2.76
2028	5.16	10.30	19.59	0.03	1.15	0.50
2029	5.01	9.88	19.36	0.03	1.11	0.46

Table 4.2-8. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOCs	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Winter Emissions						
2026	0.67	5.98	6.73	0.02	1.40	0.38
2027	0.64	5.62	6.70	0.02	1.38	0.36
2028	5.16	10.3	19.16	0.03	1.15	0.50
2029	5.10	9.92	18.94	0.03	1.11	0.46
Maximum daily emissions of Summer or Winter	**5.16**	**27.5**	**36.25**	**0.06**	**5.59**	**2.76**
SCAQMD threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: See Appendix C-1 for complete results.
Notes:
VOCs = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 4.2-8, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ in all construction years. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions.

Operational Emissions

Operation of the Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, and landscape maintenance equipment; and energy sources. As discussed above under Section 4.2.3.2, Approach and Methodology, pollutant emissions associated with long-term operations were quantified using CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on Project-specific trip rates. CalEEMod default values generated from Project-specific land use quantities were used to estimate emissions from area and energy sources for the proposed Project. The emissions from the existing operational land uses that would cease operation and would be demolished as part of the Project were also estimated and subtracted from the proposed project's emissions. Operational emissions, including the net emissions, are shown in Table 4.2-9.

Table 4.2-9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Project Emissions						
Project – Summer Emissions						
Mobile	2.52	1.81	22.2	0.06	5.55	1.43
Area	5.70	0.09	9.82	<0.005	0.01	0.01
Energy	0	0	0	0	0	0
Summer Project Emissions Total	*8.22*	*1.90*	*32.02*	*0.06*	*5.56*	*1.44*

Table 4.2-9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Project – Winter Emissions						
Mobile	2.50	1.98	20.41	0.05	5.55	1.43
Area	4.65	0	0	0	0	0
Energy	0	0	0	0	0	0
Winter Project Emissions Total	7.15	1.98	20.41	0.05	5.55	1.43
Maximum Daily Operational Project Emissions from Summer or Winter	**8.22**	**1.98**	**32.02**	**0.06**	**5.56**	**1.44**
Existing Emissions*						
Existing – Summer Emissions						
Mobile	2.78	2.71	27.48	0.06	4.75	1.23
Area	0.94	0.01	1.3	<0.005	<0.005	<0.005
Energy	0.01	0.17	0.14	<0.005	0.01	0.01
Summer Existing Emissions Total	3.72	2.89	28.93	0.06	4.76	1.25
Existing– Winter Emissions						
Mobile	2.74	2.97	25.08	0.05	4.75	1.25
Area	0.72	0	0	0	0	0
Energy	0.01	0.17	0.14	<0.005	0.01	0.01
Winter Existing Emissions Total	3.47	3.14	25.22	0.05	4.76	1.25
Maximum Daily Operational Existing Emissions	3.72	3.14	28.93	0.06	4.76	1.25
Net Change (Project – Existing Emissions)						
Total	**4.50**	**-1.16**	**3.09**	**0.00**	**0.80**	**0.19**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix C-1.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

The values shown for the project reflect the combined emissions from the proposed land uses, including emissions from a separate CalEEMod run for the garages.

[a] <0.005 = value less than reported 0.005 pounds per day.

* Existing Uses quantified include the baseline existing school buildings and surface parking lot. As detailed in Chapter 2, this analysis uses historic operations to establish an augmented baseline for existing conditions.

Table 4.2-9 presents the maximum daily area, energy, and mobile source emissions associated with operation (Year 2029) of the Project, existing land uses and net emissions. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C-1. As shown in Table 4.2-9, the net increase in emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. The Project would result in a net decrease in emissions for NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$, It should be noted that, as shown in Table 4.2-9, even without accounting for reductions from historical uses operating on-site, operational emissions would be well below the SCAQMD thresholds for all pollutants.

As detailed in Section 4.2.3.2, Project construction would be phased, and the residential uses would be operational in phases throughout 2029, during Project construction. However, construction is anticipated to continue through 2029, ending in November 2029, for the other areas of the Project site, and thus, there would be an overlap of construction and operation for the Project in 2029. The operational emissions would increase in 2029 as more dwelling units and Project uses become operational. While not established in written SCAQMD guidance including the 1993 Air Quality Handbook or the 2023 thresholds, the SCAQMD has recommended a calculation of combined construction and operational emissions, which is provided herein in Table 4.2-10, Estimated Combined Construction and Operational Criteria Air Pollutant Emissions – Unmitigated. To be conservative, 2029 construction emissions and total operational emissions were combined and compared to the SCAQMD's operational thresholds.

Table 4.2-10. Estimated Combined Construction and Operational Criteria Air Pollutant Emissions - Unmitigated

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Construction[1]						
Maximum Construction Emissions from Summer or Winter (2029)	*5.10*	*9.92*	*19.36*	*0.03*	*1.11*	*0.46*
Operational Emissions						
Full Buildout Operational Emissions[2] *(Table 4.2-9)*	*8.22*	*1.98*	*32.02*	*0.06*	*5.56*	*1.44*
Combined Construction and Operation Emissions	**13.32**	**11.90**	**51.38**	**0.09**	**6.67**	**1.90**
SCAQMD Operational Threshold (Table 4.2-4)	***55***	***55***	***550***	***150***	***150***	***55***
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management.

[1] This represents the higher of summer or winter emissions for emissions from Table 4.2-8, Estimated Maximum Daily Construction Criteria Air Pollutant Emissions – Unmitigated.

[2] This does not include net reductions from existing uses.

See Appendix C-1 for complete results.

The estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403.

As shown in 4.2-10, the combined (unmitigated) construction and operations scenario would not exceed the SCAQMD daily significance operational thresholds prior to mitigation during construction activities.

Air pollutant emissions associated with construction activity of future or cumulative projects (see Chapter 2, Section 2.5, Cumulative Impacts, and Figure 2-6, Cumulative Projects Location Map), would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. The maximum daily PM_{10} and $PM_{2.5}$ emissions would not exceed the significance thresholds during Project construction activities. Fugitive dust, as well as vehicle and equipment exhaust, generated during Project construction would contribute to the SCAB's nonattainment designation for PM_{10} and $PM_{2.5}$; however, this contribution would not be considered cumulatively considerable.

With regard to operational cumulative impacts associated with nonattainment pollutants, in general, if a project is consistent with the community and/or general plans, it has been accounted for in the attainment demonstration contained within the state implementation plan and would therefore not cause a cumulatively significant impact on the ambient air quality. As addressed in the first impact criterion, the Project would be consistent with the growth projections anticipated in SCAQMD's 2022 AQMP. Accordingly, the Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the SCAB and impacts would be less than significant

Threshold 4.2c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Significance Threshold

For purposes of analyzing LST, the closest off-site receptors to the Project site include residences adjacent to the west.

An LST analysis has been prepared to determine potential impacts to nearby receptors during Project construction. As indicated in the discussion of the thresholds of significance (Section 4.2.3, Thresholds of Significance), SCAQMD also recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ impacts as a result of construction activities to receptors in the immediate vicinity of the Project site. The impacts were analyzed using methods consistent with those in SCAQMD's Final LST Methodology (2008). According to the Final LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). As an all-electric single family and townhome project, operational emissions would be limited to minimal onsite area source emissions and a small portion of the total mobile source emissions that would be dispersed along various trip routes and are therefore not considered in the LST analysis.

Construction activities would result in temporary sources of on-site fugitive dust and construction equipment emissions. To account for onsite operation of vendor trucks, haul trucks, and worker vehicle trips a distance of 0.25 miles of on-site vehicle operation was included in the LST analysis. The LST values from the SCAQMD lookup tables for SRA 9 (East San Gabriel Valley) for a disturbed acreage of 3.5 acres and a receptor distance of 25 meters are presented in Table 4.2-11 and compared to the maximum daily on-site emissions generated during Project construction.

Table 4.2-11. Localized Significance Thresholds Analysis for Project Construction

	NO_2	CO	PM_{10}	$PM_{2.5}$
Year	Pounds per Day			
Summer Emissions				
2027	26.50	34.96	5.08	2.62

2028	9.91	16.76	0.34	0.30
2029	9.53	16.71	0.30	0.27
Winter Emissions				
2026	4.84	6.14	1.02	0.27
2027	4.53	6.14	1.01	0.25
2028	9.92	16.86	0.34	0.30
2029	9.54	16.81	0.30	0.27
Maximum of Summer and Winter Emissions	**26.50**	**34.96**	**5.08**	**2.62**
SCAQMD LST	*165.50*	*1,343.00*	*10.50*	*6.50*
LST exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2008.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix C-1, Construction (Summer) and Construction (Winter) output, for complete results.
Localized significance thresholds are shown for a 3.5-acre project site corresponding to a distance to a sensitive receptor of 25 meters. These estimates implementation of the Project's fugitive dust control strategies, including watering of an active site two times per day.

As shown in Table 4.2-11, construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific impacts during construction of the Project would be less than significant.

Carbon Monoxide Hotspots

Mobile source impacts occur on two scales of motion. Regionally, travel resulting from development allowed by the Project would add to regional trip generation and increase the vehicle miles traveled (VMT) within the local airshed and the SCAB. Locally, traffic generated due to the Project would be added to the area's roadway system near the Project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds and is operating on roadways already crowded with non-Project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[6] (Appendix V, Modeling and Attainment Demonstrations, of SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from

[6] The most recent adopted AQMP (2022) does not address CO because the SCAB has been in attainment for CO since 2002. Therefore, information from the 2003 AQMP is referenced.

2022 through 2024 at the local monitoring station (see Table 4.2-3, Local Ambient Air Quality Data) which was 1.4 ppm in 2024, the 1-hour CO would be 6.0 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO hotspot was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection (3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002). For the Project area, adding the 3.8 ppm to the maximum 8-hour CO concentration from 2022 through 2024 at the local monitoring station, which was 1.1 ppm in 2024, the 8-hour CO would be 4.9 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. As detailed in the Transportation Impact Study, the Project is expected to result in a total of 863 new daily trips and conservatively combined with the existing traffic volumes at nearby intersections as shown in Table 3-3, of the Transportation Impact Study would result in only a fraction of 100,000 vehicles per day. Therefore, the Project would not cause any intersection or roadway in the Project area to exceed 100,000 vehicles per day. As the Project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur, and associated impacts would be less than significant. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the Project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

A Health Risk Assessment (HRA) was performed to evaluate potential health risk associated with construction of the Project from TACs in the form of DPM. The analysis includes an evaluation of the Project impacts on offsite sensitive receptors and evaluation of the worst-case onsite impact analysis assuming first phase occupancy with ongoing construction of the remainder of the project. This scenario represents the worst onsite impact analysis, as each additional phased occupancy will occur during diminishing construction activities and therefore would be exposed to diminishing TAC emissions.

“Incremental cancer risk” is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard OEHHA risk assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. TACs that would potentially be emitted during construction activities would be DPM emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB’s Airborne Toxic Control Measures to reduce DPM emissions. According to the OEHHA, HRAs should be based on a 30-year exposure duration based on typical residency period; however, such assessments should be limited to the period/duration of activities associated with a project (OEHHA 2015). As such, the HRA analysis is based on a total 30-year exposure duration starting with the initiation of Project construction. Within the 30-year exposure, Project emissions would only occur for the duration of Project construction. The HRA methodology was described in Section 4.2.3.2, and the detailed assessment is provided in Appendix C-2. Table 4.2-12 summarizes the results of the HRA for Project construction.

Table 4.2-12. Construction Health Risk Assessment Results

Impact Parameter	Units	Project Impact	SCAQMD CEQA Threshold	Level of Significance
Off-Site Receptors				
Cancer Risk	Per million	9.28	10.0	Less than significant
HIC	Not applicable	0.0060	1.0	Less than significant
On-Site Receptors				
Cancer Risk	Per million	6.04	10.0	Less than significant
HIC	Not applicable	0.0057	1.0	Less than significant

Notes: SCAQMD = South Coast Air Quality Management District; CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.
See Appendix C-2.

As shown in Table 4.2-12, the results of the construction HRA for the Project demonstrate that the construction emissions would result in a potential incremental increase in cancer risk at the off-site maximally exposed individual receptor (MEIR) and on-site MEIR that would not exceed the 10 in a million cancer risk threshold; moreover, construction emissions would be below the Chronic Hazard Index threshold at the off-site MEIR and on-site MEIR. Overall, the Project would result in a less than significant impact in regard to cancer risk resulting from TAC emissions generated during construction.

Health Impacts of Other Criteria Air Pollutants

Currently, the SCAQMD, CARB, and EPA have not approved a quantitative method to reliably, meaningfully, and consistently translate the mass emission estimates for the criteria air pollutants resulting from the development of the Project to specific health effects. In addition, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days.

In connection with the judicial proceedings culminating in the issuance of the decision in the Friant Ranch case (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502), the SCAQMD and the San Joaquin Valley Air Pollution Control District (SJVAPCD) filed amicus briefs attesting to the extreme difficulty of correlating an individual project's criteria air pollutant emissions to specific health impacts. Both SJVAPCD and SCAQMD have among the most sophisticated air quality modeling and health impact evaluation capabilities of the air districts in California. The key, relevant points from the SCAQMD and SJVAPCD briefs are summarized herein for informational purposes.

In requiring a health impact type of analysis for criteria air pollutants, it is important to understand how O_3 and PM are formed, dispersed, and regulated. The formation of O_3 and PM in the atmosphere, as secondary pollutants,[7] involves complex chemical and physical interactions of multiple pollutants from natural and anthropogenic sources. The O_3 reaction is self-perpetuating (or catalytic) in the presence of sunlight because NO_2 is photochemically reformed from nitric oxide. In this way, O_3 is controlled by both NO_x and VOC emissions (NRC 2005). The complexity of these interacting cycles of pollutants means that incremental decreases in one emission may not result in proportional decreases in O_3 (NRC 2005). Although these reactions and interactions are well understood, variability in emission source operations and meteorology creates uncertainty in the modeled O_3 concentrations to which downwind populations may be exposed (NRC 2005). Once formed, O_3 can be transported long distances by wind,

7 Air pollutants formed through chemical reactions in the atmosphere are referred to as secondary pollutants.

and due to atmospheric transport, contributions of precursors from the surrounding region can also be important (EPA 2008a). Because of the complexity of O_3 formation, a specific tonnage amount of VOCs or NO_X emitted in a particular area does not equate to a particular concentration of O_3 in that area (SJVAPCD 2015). PM can be divided into two categories: directly emitted PM and secondary PM. Secondary PM, like O_3, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SO_x and NO_x (SJVAPCD 2015). Because of the complexity of secondary PM formation, including the potential to be transported long distances by wind, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area (SJVAPCD 2015). This is especially true for individual projects, where project-generated criteria air pollutant emissions are not derived from a single "point source," but from construction equipment and mobile sources (passenger cars and trucks) driving to, from, and around a project site.

Another important technical nuance is that health effects from air pollutants are related to the concentration of the air pollutant that an individual is exposed to, not necessarily the individual mass quantity of emissions associated with an individual project. For example, health effects from O_3 are correlated with increases in the ambient level of O_3 in the air a person breathes (SCAQMD 2015). However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O_3 levels over an entire region (SCAQMD 2015). The lack of link between the tonnage of precursor pollutants and the concentration of O_3 and $PM_{2.5}$ formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects; rather, it is the concentration of resulting O_3 that causes these effects (SJVAPCD 2015). Indeed, the ambient air quality standards, which are statutorily required to be set by EPA at levels that are requisite to protect the public health, are established as concentrations of O_3 and $PM_{2.5}$ based on duration of exposure and not as tonnages of their precursor pollutants (EPA 2025b). Because the ambient air quality standards are focused on achieving a particular concentration region-wide, the tools and plans for attaining the ambient air quality standards are regional in nature. For CEQA analyses, project-generated emissions are typically estimated in pounds per day or tons per year and compared to mass daily or annual emission thresholds. While CEQA thresholds are established at levels that the air basin can accommodate without affecting the attainment date for the ambient air quality standards, even if a project exceeds established CEQA significance thresholds, this does not mean that one can easily determine the concentration of O_3 or PM that will be created at or near a project site on a particular day or month of the year, or what specific health impacts will occur (SJVAPCD 2015).

In regard to regional concentrations and air basin attainment, the SJVAPCD emphasized that attempting to identify a change in background pollutant concentrations that can be attributed to a single project, even one as large as the entire Friant Ranch Specific Plan, is a theoretical exercise. The SJVAPCD brief noted that it “would be extremely difficult to model the impact on NAAQS attainment that the emissions from the Friant Ranch project may have” (SJVAPCD 2015). The situation is further complicated by the fact that background concentrations of regional pollutants are not uniform either temporally or geographically throughout an air basin but are constantly fluctuating based upon meteorology and other environmental factors. SJVAPCD noted that the currently available modeling tools are equipped to model the impact of all emission sources in the San Joaquin Valley Air Basin on attainment (SJVAPCD 2015). The SJVAPCD brief then indicated that, “Running the photochemical grid model used for predicting O_3 attainment with the emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent of the total NO_x and VOC in the Valley) is not likely to yield valid information given the relative scale involved” (SJVAPCD 2015).

SCAQMD and SJVAPCD have indicated that it is not feasible to quantify project-level health impacts based on existing modeling (SCAQMD 2015; SJVAPCD 2015). Even if a metric could be calculated, it would not be reliable because the models are equipped to model the impact of all emission sources in an air basin on attainment and

would likely not yield valid information or a measurable increase in O_3 concentrations sufficient to accurately quantify O_3-related health impacts for an individual project.

Nonetheless, following the Supreme Court's Friant Ranch decision, some EIRs have estimated criteria air pollutant emissions that exceeded applicable air district thresholds and have included a quantitative analysis of potential project-generated health effects using a combination of a regional photochemical grid model[8] and the EPA Benefits Mapping and Analysis Program (BenMAP or BenMAP–Community Edition).[9] The publicly available health impact assessments (HIAs) typically present results in terms of an increase in health incidences and/or the increase in background health incidence for various health outcomes resulting from the project's estimated increase in concentrations of O_3 and $PM_{2.5}$.[10] The five publicly available HIAs reviewed herein have concluded that the evaluated Project's health effects associated with the estimated Project-generated increase in concentrations of O_3 and $PM_{2.5}$ represent a small increase in incidences and a very small percentage of the number of background incidences, indicating that these health impacts are negligible and potentially within the models' margin of error. It is also important to note that while the results of the five available HIAs conclude that the Project emissions do not result in a substantial increase in health incidences, the estimated emissions and assumed toxicity are also conservatively inputted into the HIA and thus, overestimate health incidences, particularly for $PM_{2.5}$.

As explained in the SJVAPCD brief and noted previously, running the photochemical grid model used for predicting O_3 attainment with the emissions solely from an individual project like the Friant Ranch project or the Project is not likely to yield valid information given the relative scale involved. The five examples reviewed support the SJVAPCD's contention in its Friant Ranch amicus briefing that consistent, reliable, and meaningful results may not be provided by methods applied at this time. Accordingly, additional work in the industry and, more importantly, air district participation, is needed to develop a more meaningful analysis to correlate project-level mass criteria air pollutant emissions and health effects for decision makers and the public. Furthermore, at the time of writing, no HIA has concluded that health effects estimated using the photochemical grid model and BenMAP approach are substantial, provided that the estimated project-generated incidences represent a very small percentage of the number of background incidences, potentially within the models' margin of error.

VOCs and NO_x are precursors to O_3, for which the Project site, within the SCAB, are designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of reactive organic gases and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC

8 The first step in the publicly available HIAs includes running a regional photochemical grid model, such as the Community Multiscale Air Quality model or the Comprehensive Air Quality Model with extensions to estimate the increase in concentrations of O_3 and $PM_{2.5}$ as a result of project-generated emissions of criteria and precursor pollutants. Air districts, such as the SCAQMD, use photochemical air quality models for regional air quality planning. These photochemical models are large-scale air quality models that simulate the changes of pollutant concentrations in the atmosphere using a set of mathematical equations characterizing the chemical and physical processes in the atmosphere (EPA 2017).

9 After estimating the increase in concentrations of O_3 and $PM_{2.5}$, the second step in the five examples includes use of BenMAP or BenMAP-Community Edition to estimate the resulting associated health effects. BenMAP estimates the number of health incidences resulting from changes in air pollution concentrations (EPA 2023). The health impact function in BenMAP-Community Edition incorporates four key sources of data: (i) modeled or monitored air quality changes, (ii) population, (iii) baseline incidence rates, and (iv) an effect estimate. All of the five example HIAs focused on O_3 and $PM_{2.5}$.

10 The following CEQA documents included a quantitative HIA to address Friant Ranch: (1) California State University Dominguez Hills 2018 Campus Master Plan EIR (CSU Dominguez Hills 2019), (2) March Joint Powers Association K4 Warehouse and Cactus Channel Improvements EIR (March JPA 2019), (3) Mineta San Jose Airport Amendment to the Airport Master Plan EIR (City of San Jose 2019), (4) City of Inglewood Basketball and Entertainment Center Project EIR (City of Inglewood 2019), and (5) San Diego State University Mission Valley Campus Master Plan EIR (SDSU 2019).

emissions would occur because exceedances of the O_3 CAAQS/NAAQS tend to occur between April and October when solar radiation is highest.

Health effects that result from NO_2 and NO_x include respiratory irritation. Although construction of future development allowed for under the Project may generate NO_x emissions, it is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 because the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2 and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. As noted above, the Project would not exceed the applicable SCAQMD NO_x thresholds during construction and operation.

CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots is discussed above and is determined to be a less-than-significant impact. Thus, the Project's CO emissions would not contribute to significant health effects associated with this pollutant. Furthermore, the existing CO concentrations in the area are well below the NAAQS and CAAQS standards as shown in Table 4.2-3.

In summary, since the Project would not exceed the SCAQMD significance thresholds during construction and operation, the potential health effects associated with criteria air pollutants are considered less than significant. However, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, and there are currently no modeling tools that could provide reliable and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects within the SCAQMD jurisdiction. Therefore, the Project does not have the potential to violate an air quality standard or contribute substantially to an existing or projected air quality violation and the health effects associated with criteria air pollutants would be considered less than significant.

Summary

In summary, the Project would result in less than significant impacts related to LSTs, carbon monoxide hotspots, construction health risk, and health affects related to criteria air pollutants. Additionally, health risk assessment impacts related to TACs would be less than significant.

Threshold 4.2d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Based on available information, the Project is not anticipated to result in other emissions that have not been addressed under Thresholds 4.2a through 4.2c. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be a nuisance and cause distress among the public and generate citizen complaints.

Construction

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the Project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. In addition, Project construction and operation would be required to comply with SCAQMD Rule 402, Nuisance, which prohibits the discharge of air pollutants from a facility that could cause

injury, detriment, nuisance, or annoyance to the public or damage business or property. Therefore, impacts associated with odors during construction would be less than significant.

Operation

Land uses and industrial operations that typically are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The Project does not propose the aforementioned odor-generating land uses during the operational phase of the Project. The residences may emit odors outside associated with cooking or application of architectural coatings. These would be limited to the areas adjacent to the source and would not impact substantial numbers of people. These odors would also be short term in nature and would disperse rapidly. Furthermore, as stated above, the Project would comply with SCAQMD Rule 402, Nuisance, which prohibits the release of odors which may cause annoyance to a considerable number of persons. Therefore, the potential for the Project to generate an odor impact is considered less than significant.

4.2.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by section 15130 of the CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, of Chapter 2, Environmental Setting, and in Table 2-2, List of Cumulative Projects, of this Draft EIR. The geographic context for the cumulative analysis as it relates to air quality is the SCAB. Air quality impacts are generally considered to be a cumulative impact in the first instance because individual land development projects are typically not large enough to create a significant impact independent of the existing air quality conditions and other sources of air pollutant emissions in the region. The potential for cumulatively considerable impacts related to the topic of air quality (i.e., Thresholds 4.2a through 4.2d) is discussed in further detail below.

Threshold 4.2a - Cumulative **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

As discussed under Thresholds 4.2a and 4.2b, implementation of the Project would result in construction and operational emissions that would be below the SCAQMD's mass daily regional significance, and as such, would not conflict with the SCAQMD's consistency first criterion for consistency with the 2022 AQMP. Additionally, buildout of the Project would not exceed the growth projections for the City for population estimates, and as such, the Project would not conflict with the SCAQMD's second criterion for consistency with the 2022 AQMP. Cumulative impacts associated with the conflict or obstruction of the AQMP that could impede reducing air pollutants would be less than significant; thus, the Project would not contribute to an existing cumulative impact.

Threshold 4.2b - Cumulative **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

As discussed previously, air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implement plans for future attainment of ambient air quality standards. The potential for the Project to result in a cumulatively considerable impact, specifically, a cumulatively considerable new increase of any criteria pollutant for which the Project region

is nonattainment under an applicable NAAQS and/or CAAQS, is addressed under Threshold 4.2b. Consistent with the finding for the Project under Threshold 4.2b, the cumulatively considerable net increase of any criteria pollutant for which the SCAB is in nonattainment would be less than significant and the Project would not contribute to an existing cumulative impact.

Threshold 4.2c - Cumulative **Would the project expose sensitive receptors to substantial pollutant concentrations?**

As discussed above under Threshold 4.2c regarding sensitive receptors, the Project would result in a less-than-significant impact for construction and operation-related impacts. The Project would not exceed the ambient air quality standards for criteria air pollutants during construction. Similarly, emissions of TACs during construction would not exceed applicable thresholds during construction for off-site or on-site receptors. The Project would also not cause or create a CO hotspot. The Project would not emit substantial quantities of criteria pollutant emissions or TACs during operation. The impact of the Project, in addition to cumulative development within 1-mile of the Project site could further increase the exposure of air quality pollutants to sensitive receptors. However, the cumulative projects listed in Table 2-2 (see Chapter 2) would not result in substantial concentrations of TAC emissions during operation as the majority of their emissions (mobile sources) are offsite for the commercial, residential, and warehouse land uses proposed. Emissions during construction would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Consistent with the significance finding for the Project, during construction there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs. Consistent with the significance finding for the Project, during operation there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs. Therefore, the Project would result in a less than significant cumulatively considerable impact regarding exposure of sensitive receptors to substantial pollutant concentrations.

Threshold 4.2d - Cumulative **Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

Odor impacts are generally limited to the immediate area surrounding the source. Potential odors from the Project site would be temporary and limited (due to the type of land uses—residential and commercial) and the cumulative projects, among other development in the SCAB, would be subject to SCAQMD Rule 402. Therefore, cumulative impacts associated with odors would be less than significant; thus, the Project would not contribute to an existing cumulative impact.

4.2.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to air quality and no mitigation measures are required.

4.2.7 Significance Conclusion

Threshold 4.2a. The Project would result in a **less-than-significant impact** regarding the potential to conflict with or obstruct implementation of an applicable air quality management plan in the SCAQMD.

Threshold 4.2b. The Project would result in a **less-than-significant impact** regarding cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment.

Threshold 4.2c. The Project would result in a **less-than-significant impact** regarding exposure of sensitive receptors to substantial pollutant concentrations.

Threshold 4.2d. The Project would result in a **less-than-significant impact** regarding other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.2.8 References

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4.3 Biological Resources

This section describes the existing biological resources conditions of the Project site and its vicinity and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, significance conclusions, and references. The information contained in this section is based on Project site reconnaissance, satellite imagery from the Google Earth computer program, the City's General Plan, the City's Municipal and Development Code, conceptual site plans prepared by the Project Applicant, and the following:

- **Appendix B** Arborist Report, Delaney Square Residential Project City of Azusa, California, prepared by Dudek, dated October 29, 2025
- **Appendix D** Biological Resources Record Search, Delaney Square Residential Project City of Azusa, California, prepared by Dudek, dated September 19, 2025

Other sources consulted are listed in Section 4.3.8, References. Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1-1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, Introduction, of this Draft EIR. A copy of the NOP is included in Appendix A-1 and the comment letters received in response to the NOP are included in Appendix A-2 of this Draft EIR.

4.3.1 Existing Conditions

4.3.1.1 Regional Setting

The City is within the north-central San Gabriel Valley and lies at the southern flank of the San Gabriel Mountains. The San Gabriel Valley is an alluvium-filled valley bounded by the Sierra Madre Fault Zone and San Gabriel Mountains to the north, by the Puente Hills on the south, by the Covina and Indian Hills on the east, and by the Raymond Basin on the west. The nearest surface body of water is the Little Dalton Wash (0.35 miles north of the Project site), which is a tributary to the Big Dalton Wash, which is located approximately 0.68 miles southeast of the Project site. These washes are three-sided concrete channels and not natural riparian habitats.

4.3.1.2 Local Setting

Under existing conditions, the Project site is developed with buildings, paved surfaces (including sidewalks, play areas, and asphalt surfaces for parking lots and driveways), with no native or naturalized vegetation communities present. For the purposes of this analysis, the survey area included in Appendix B of this Draft EIR includes the Project site and adjacent trees with a canopy that overlap with the site's boundaries (see Appendix B, Tree Locations and Impacts, of Appendix B to this Draft EIR).

Vegetation

On-site vegetation consists of limited amounts of ornamental, mature trees and shrubs/grasses in various areas, and an open grass field, all of which would be removed with Project implementation. This vegetation is ornamental in nature and does not form a cohesive plant community that would provide quality suitable habitat for candidate, sensitive, or special status wildlife species, or that would support wildlife movement. A total of 38 trees with a diameter at breast height (DBH) of 6" or greater were inventoried during the site survey, 25 of the trees are located on the Project site, while the remaining 13 trees have overhanging branches from the property line of neighboring properties (Appendix B). None of the 38 trees surveyed meet the City definition of a "Heritage tree," or "Public tree."

As presented in Appendix A of the Arborist Report (Appendix B), 15.8% of the individually mapped trees (6 trees) exhibit good health, 71.1% (27 trees) are in fair health, 7.89% (3 trees) are in poor health, and 5.26% (2 trees) are dead. Structurally, 5.26% (2 trees) of the individually mapped trees are considered to exhibit good structure, 57.9% (22 trees) exhibit fair structure, 31.6% (12 trees) exhibit poor structure, and 5.26% (2 trees) are dead. Table 4.3-1 below provides a summary of the tree species and whether the tree is located on the Project site or on a neighboring property within the survey area (Appendix B).

Table 4.3-1. Tree Summary

Species	Project Site	Neighboring Properties	Total
Brazilian pepper (*Schinus terebinthifolius*)	1	0	1
Callery pear (*Pyrus calleryana*)	4	0	4
Carrotwood (*Cupaniopsis anacardioides*)	0	3	3
Coast live oak (*Quercus agrifolia*)	0	2	2
Coast redwood (*Sequoia sempervirens*)	6	0	6
Crape myrtle (*Lagerstroemia indica*)	1	0	1
Engelmann oak (*Quercus engelmannii*)	3	0	3
Evergreen ash (*Fraxinus uhdei*)	3	0	3
Jacaranda (Jacaranda mimosifolia)	2	0	2
'Little Gem' magnolia (*Magnolia grandiflora 'Little Gem'*)	1	0	1
Mexican fan palm (*Washingtonia robusta*)	1	4	5
Pink trumpet (*Handroanthus heptaphyllus*)	1	0	1
Plum (*Prunus domestica*)	0	1	1
Queen palm (*Syagrus romanzoffiana*)	0	1	1
Spotted gum (*Eucalyptus maculata*)	0	2	2
White mulberry (*Morus alba*)	2	0	2
Total for all Trees	**25**	**13**	**38**

Source: Appendix B

Special Status Species

A qualified Dudek Senior Biologist conducted electronic searches of California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), and the U.S. Fish and Wildlife Services (USFWS) databases, including the Information for Planning and Consultation (IPaC) Database. The database search results indicated that there were 90 special-status plant species and 111 special-status wildlife species with recorded occurrences in the U.S. Geologic Survey's Azusa, California 7.5-minute topographic quadrangle, in which the Project site is located, and surrounding eight quadrangles (Chilao Flat, Waterman Mtn, Crystal Lake, Mt. Wilson, Glendora, El Monte, Baldwin Park, and San Dimas) (CDFW 2025; CNPS 2025; Appendix D). The Project site is not located within any designated critical habitat. An assessment was made for the potential for each of the special-status plant and wildlife species to occur on the Project site. All of the plant species are associated with very distinct natural habitats that are not found on the Project site and surrounding area, such that these species would not be expected to occur on a developed and maintained property surrounded by an urban environment. Similarly, most of the wildlife species are not expected due to the lack of suitable habitat and the Project site's isolation from large, contiguous natural areas that could support a potential source population. Some of the special-status bird and bat species

have the potential to be transients on the site during foraging and migratory activities, but are not expected to occur on the Project site as residents or for breeding and would not be impacted by the Project.

Riparian Habitat/Sensitive Natural Communities

As stated above, the Project site is developed with paved surfaces and buildings and turf grass, with no native or naturalized vegetation communities present. No riparian or wetland features are present to support riparian habitat (Appendix D, USFWS 2025a). The nearest potential riparian area to the Project site is forest/shrub wetland adjacent to the San Gabriel River, located approximately 1.39 miles northwest of the Project site (USFWS 2025a).

Wetlands

No wetlands or jurisdictional waters are within the proposed Project site or the surrounding area (Appendix D, USFWS 2025a). The nearest potential riparian area to the Project site is forest/shrub wetland adjacent to the San Gabriel River, located approximately 1.39 miles northwest of the Project site (USFWS 2025a). Water from rainfall flows across the impervious surfaces found on the Project site and enters the municipal stormwater system.

Wildlife Movement/Nursery Sites

There are no on-site drainages or ponds that may serve as habitat for fish species, as determined in a biological records search completed by a qualified Dudek Senior Biologist (Appendix D). As noted above, the Project site is developed and surrounded by developed area, and it does not fall within any designated wildlife corridors and/or habitat linkages identified in the South Coast Missing Linkages Analysis project (South Coast Wildlands 2008) or California Essential Habitat Connectivity project (Spencer et al. 2010), so the Project would not affect the movement of any native resident or land-based wildlife species, nor would it affect established native resident or migratory wildlife corridors.

4.3.2 Regulatory Requirements

4.3.2.1 Federal

Federal Endangered Species Act (FESA)

The FESA of 1973 (16 USC 1531 et seq.), as amended, is administered by USFWS for most plant and animal species, and by the National Oceanic and Atmospheric Administration National Marine Fisheries Service for certain marine species. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing the extinction of plants and wildlife. FESA defines an endangered species as “any species that is in danger of extinction throughout all or a significant portion of its range.” Under FESA, it is unlawful to “take” any listed species; “take” is defined as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

FESA allows for the issuance of incidental take permits for listed species under section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under section 10, which provides for the approval of habitat conservation plans on private property without any other federal agency involvement.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the intentional and unintentional take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). Currently, the Migratory Birds office considers nests that support eggs, nestlings, or juveniles to be active. Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). The executive order requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect these species.

Clean Water Act (CWA)

The CWA provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project operator for a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. Regional Water Quality Control Boards (RWQCBs) administer the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. USACE implementing regulations are found at 33 Code of Federal Regulations (CFR) 320 and 330. Guidelines for implementation are referred to as the section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency in conjunction with USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

4.3.2.2 State

California Endangered Species Act (CESA)

CDFW administers CESA, which prohibits the take of plant and animal species designated by the Fish and Game Commission as endangered or threatened in California. Under CESA , "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA stipulates that state agencies may not approve projects that will "jeopardize the continued existence of any endangered species or threatened species, or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy."

CESA defines an endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." CESA defines a threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the Commission as rare on or before January 1, 1985, is a threatened species." A candidate species is defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the Commission has formally noticed as being under review by the department for addition to either the list of

endangered species or the list of threatened species, or a species for which the Commission has published a notice of proposed regulation to add the species to either list." CESA does not list invertebrate species.

California Fish and Game Code

Fully Protected Species. Fish and Game Code sections 3511, 4700, 5050, and 5515 protect specific mammals, birds, reptiles, amphibians, and fish. Species that are fully protected by these sections may not be taken or possessed at any time. CDFW cannot issue permits or licenses that authorize the "take" of any fully protected species, except under certain circumstances, such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock. Furthermore, it is the responsibility of the CDFW to maintain viable populations of all native species. Toward that end, the CDFW has designated certain vertebrate species as Species of Special Concern (SSC), because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

Nesting Birds. Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by California law. Fish and Game Code section 3503.5 protects all birds of prey (raptors) and their eggs and nests; Fish and Game Code section 3511 states that fully protected birds or parts thereof may not be taken or possessed at any time; Fish and Game Code section 3513 makes it unlawful to take or possess any migratory non-game bird as designated in the MBTA.

California Native Plant Protection Act

The Native Plant Protection Act of 1977 (Fish and Game Code section 1900, et seq.) directed CDFW to carry out the Legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The Native Plant Protection Act gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take. CESA expanded on the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with federal regulations, CESA created the categories of "threatened" and "endangered" species. It converted all "rare" wildlife into the act as threatened species but did not do so for rare plants.

4.3.2.3 Regional and Local

The following provides a summary of local regulatory requirements and guidance documents applicable to the Project and the topic of biological resources. For a complete discussion of all local plans, policies, and ordinances applicable to the Project (both unrelated to and including biological resources), please refer to Section 4.9, Land Use and Planning.

City of Azusa 2004 General Plan

The City adopted its General Plan in 2004. It represents a formal expression of community goals and desires, provides guidelines for decision making regarding future development, and fulfills the requirements of California Government Code section 65302 requiring local preparation and adoption of General Plans. The following goals, policies, and implementation programs related to biological resources in the City's Natural Environment Element are applicable to the Project (City of Azusa 2004):

Goal 1: Preserve, restore, and enhance the diversity of biological resources in the City's undeveloped hillsides, canyons, floodplains, and urban areas.

Policy 1.3: Strive for the long-term maintenance of all native wildlife species living in the City and the Sphere of Influence including common and sensitive species.

City of Azusa Municipal Code

Tree Preservation Ordinance. Chapter 62, Article VI, Tree Preservation, of the AMC governs the planting, maintenance, removal, and preservation of public trees within all public property and new developments within the City. All existing living trees with a diameter at breast height (DBH) of six inches or more shall be preserved when so directed by the Director of Public Works, and no grading shall be done to endanger them. If said trees are destroyed, applicants must replace them with trees whose size, number, and planting location must be determined by the director of public works before final occupancy is granted to any new residents. The size and age of the tree will determine how many new trees may be substituted for the destroyed tree, but as a minimum three new trees will replace one tree removed (City of Azusa 2025).

4.3.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to biological resources are based on Appendix G of the CEQA Guidelines, which state that a significant impact related to biological resources would occur if the Project would:

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 Wildlife or U.S. Fish and Wildlife Service.

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

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

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

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

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.3.4 Impacts Analysis

Threshold 4.3a **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less-Than-Significant Impact with Mitigation Incorporated. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or designated by the state or federal regulatory agencies (i.e., CDFW or USFWS). The Project site is located within an urbanized portion of the City and currently developed with vacant school buildings and with limited, ornamental landscaping consisting of isolated trees and shrubs and a playing field with turf grass which would be removed with Project implementation. As stated above in Section 4.3.1.2, Local Setting, a search of CDFW, the CNPS, and the USFWS databases, including the IPaC Database, was conducted. The database search results indicated that there were 90 special-status plant species and 111 special-status wildlife species with recorded occurrences in the U.S. Geologic Survey's Azusa, California 7.5-minute topographic quadrangle, in which the Project is located, and surrounding eight quadrangles (Chilao Flat, Waterman Mtn, Crystal Lake, Mt. Wilson, Glendora, El Monte, Baldwin Park, and San Dimas) (Appendix D). However, the Project site is not located within any designated critical habitat (Appendix D, USFWS 2025b).

While some special-status species are known to occur in the Project area and surrounding region, the Project site is currently developed and is located within an urban setting dominated by development and ornamental landscaping. Based on desktop research of the Project site and area, which included a review of the latest aerial and street view imagery (Google Earth 2025) and expertise in the Project vicinity, no native habitat is located on the Project site or on the adjacent properties. As such, no special-status species, including listed or rare species, are expected to occur on the Project site, due to the absence of suitable habitat. However, the Project site supports ornamental, non-native trees and shrubs that could provide nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. Vegetation removal and other construction activities could negatively affect individual birds or raptors that are nesting on or within the vicinity of the Project site. Vegetation removal could adversely affect or kill a nesting bird or raptor, and construction activities would also elevate noise levels and could cause disturbance to protected bird/raptor species nesting on site or adjacent to the construction areas. Construction could potentially occur during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (i.e., between February 1 and August 31). Thus, there is potential for construction activities and construction noise to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to Project site, resulting in a potentially significant impact. Therefore, implementation of mitigation measure MM-BIO-1 would be required.

MM-BIO-1 requires avoidance of construction during the migratory nesting season (February 1 through August 31). If construction must be initiated during this season, MM-BIO-1 requires that nesting bird surveys are performed by a qualified biologist, with implementation of avoidance buffers and monitoring if nests are discovered. With implementation of MM-BIO-1, construction impacts to candidate, sensitive, or special status species would therefore be less than significant with mitigation incorporated. Once the proposed Project has been constructed, construction-related disturbances would not occur, and landscaping trees would be planted throughout the Project site. As such, the Project site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, long-term impacts to nesting and migratory birds would be less than significant. With the implementation of MM-BIO-1, impacts would be less than significant with mitigation incorporated.

Threshold 4.3b **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. The Project site is currently occupied by vacant school buildings and surrounded by urban development. As stated under Section 4.3.1.2, Local Setting, there are no riparian habitat areas located on or within the vicinity of the Project site (Appendix D, USFWS 2025a). Limited amounts of landscaped areas are located on the Project site consisting of ornamental trees and shrubs, and a playing field with turf grass. This vegetation is ornamental in nature and does not form a cohesive plant community that would provide quality riparian habitat for sensitive natural communities. As described in Section 4.3.1.2, Local Setting, the nearest surface body of water is the Little Dalton Wash (0.35 miles north of the Project site), which is a tributary to the Big Dalton Wash, located approximately 0.68 miles southeast of the Project site. Both of these bodies of water are three-sided concrete channels and not natural riparian habitats. The nearest potential riparian area to the Project site is forest/shrub wetland adjacent to the San Gabriel River, located approximately 1.39 miles northwest of the Project site (USFWS 2025a). Due to the proximity of the nearest riparian habitat, located 1.39 miles away, no impact to riparian habitats or other sensitive natural communities would occur as a result of implementing the proposed Project, since no such resources are present on the Project site or in the near vicinity of the Project site.

Threshold 4.3c **Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. As previously stated under Section 4.3.1.2, Local Setting, there are no wetlands located on or adjacent to the Project site (Appendix D, USFWS 2025a). The nearest body of water is the Little Dalton Wash (0.35 miles north of the Project site), which is a tributary to the Big Dalton Wash, located approximately 0.68 miles southeast of the Project site; both of which are three-sided concrete channels and not natural riparian habitats. The nearest potential riparian area to the Project site is forest/shrub wetland adjacent to the San Gabriel River, located approximately 1.39 miles northwest of the Project site (USFWS 2025a). Since there are no existing state or federally protected wetlands on the Project site or in the near vicinity of the Project site, there would be no impact to such resources.

Threshold 4.3d. **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less-Than-Significant Impact with Mitigation Incorporated. As stated in Section 4.3.1.2, Local Setting, the Project site is almost entirely developed with paved surfaces and buildings and is surrounded entirely by urban development. A limited amount of landscaped area is located within the Project site and along the public rights-of-way, consisting of small areas of ornamental trees and shrubs, which do not form a cohesive plant community that would provide quality, suitable habitat for candidate, sensitive or special status wildlife species, or support wildlife movement. Further, any development activities would be required to comply with all applicable requirements set forth by the City, including Article VI (Tree Preservation) of the AMC. There are no wetlands or water bodies within the Project site, nor are there on-site drainages or ponds that may serve as habitat for fish species (Appendix D, USFWS 2025a). Therefore, the proposed Project would have no potential to affect the movement of migratory fish. However, there is landscaping on and adjacent to the Project site that would have the potential to provide nesting sites for birds and raptors that are protected under the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. As discussed in Section 4.3 a), proposed Project

construction has the potential to adversely affect nesting birds or raptors. For the reasons described in Section 4.3(a), impacts would be less than significant after implementation of MM-BIO-1. As such, impacts related to the movement of resident or migratory fish or wildlife species or the use of native wildlife nursery sites would be less than significant with mitigation incorporated.

Threshold 4.3e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. Any development activities associated with implementation of the Project would be required to comply with all applicable requirements set forth by the City, including adherence to tree preservation and maintenance requirements. As stated previously in Section 4.3.2, Regulatory Requirements, AMC Chapter 62, Article VI sets forth the provisions of the City's Tree Preservation Ordinance, which governs the planting, maintenance, removal, and preservation of trees within all public property and new developments within the City. All existing living trees with a DBH of six inches or more shall be preserved when so directed by the City's Director of Public Works, and no grading shall be done to endanger them. If said trees are destroyed, the Project applicant must replace them with trees whose size, number, and planting location must be determined by the Director of Public Works before final occupancy is granted to any new residents. The size and age of the tree will determine how many new trees may be substituted for the destroyed tree, but as a minimum three new trees will replace one tree removed.

As detailed in Figure 3-2, Landscape Plan, a total of 73,010 square feet of landscaping is proposed on site. This includes new shade trees, vertical accent trees, and accent flowering trees. 25 of the 38 trees on or adjacent to the Project site would be removed to accommodate development of the Project, none of which meet the City definition of "Heritage tree" or "Public tree". Therefore, implementation of the Project would require replacement trees at a minimum of three trees for every one tree removed, or a minimum of 75 trees for the removal of the 25 trees, in accordance with AMC Chapter 62. Further details are included in Appendix B, Arborist Report, of this Draft EIR. Due to the required adherence to City regulations, the proposed Project would not conflict with City policies or ordinances regarding biological resources, including trees, and impacts would be less than significant.

Threshold 4.3f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The proposed Project site is located in a highly urbanized area, and there is no adopted Habitat Conservation Plan or Natural Community Conservation Plan for the site or the surrounding area. No conflict with a Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project. Therefore, no impact would occur.

4.3.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from Project implementation including in combination with other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 (see Chapter 2, Section 2.4, Cumulative Impacts, and on Figure 2-5, Cumulative Projects Location Map, of this Draft EIR).

Threshold 4.3a - Cumulative. **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

As detailed in Section 4.3.4, Impact Analysis, the proposed Project is not located within any designated critical habitat and is currently developed with buildings and ornamental landscaping. As such, no special-status species are expected to occur. However, the ornamental, non-native trees and shrubs could provide nesting habitat for common birds and raptors. Construction activities and construction noise would have the potential to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to the Project site, resulting in a potentially significant impact. As discussed in the analysis above, within Section 4.3.4, Impact Analysis, implementation of MM-BIO-1 would reduce the Project's impacts to nesting and migratory birds to less than significant.

All of the cumulative projects within the City involve the development of previously disturbed or developed lands that contain limited native vegetation, many of which are isolated from naturalized areas by surrounding development. As such, these cumulative projects would not be expected to support habitat that would be suitable for most special-status plant and wildlife species; therefore, these cumulative projects' incremental effects on these resources are not anticipated to be cumulatively considerable. The cumulative projects within the County are primarily within undeveloped areas that could support similar habitat and have similar special-status species constraints as the Project. Therefore, the Project, in combination with these cumulative projects, could add to the cumulative loss of special-status species' habitat. Unless mitigated, these impacts could result in significant cumulative impact.

The Project's construction impacts to breeding or reproduction of bird and/or raptor species would be reduced to less than significant with implementation of MM-BIO-1. The Project's contribution to cumulative impacts to common birds and raptors protected under the Migratory Bird Treaty Act and California Fish and Game Code is primarily addressed through the Project-specific mitigation measure that would avoid construction during nesting and breeding season and require nesting bird surveys, avoidance buffers, and monitoring if nests are discovered during construction. With implementation of the mitigation measure discussed above, the Project's incremental effect on nesting birds or raptors would be less than significant when viewed in connection with the effects of the cumulative projects. Further, all cumulative projects would be subject to existing and/or future permit restrictions that satisfy regulatory/resource agency requirements in addition to the Migratory Bird Treaty Act and California Fish and Game Code. Therefore, the Project's incremental effect on nesting and migratory birds would not be cumulatively considerable and cumulative impacts on nesting and migratory birds would be less than significant with mitigation.

Threshold 4.3b - Cumulative. **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

As detailed in Section 4.3.4, Impact Analysis, the Project site is currently occupied by vacant school buildings and surrounded by urban development, and there are no riparian habitats located on or within the vicinity of the Project site. Therefore, the Project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No cumulatively considerable impacts would occur.

Threshold 4.3c - Cumulative. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As detailed in Section 4.3.4, Impact Analysis, there are no wetlands located on or within the vicinity of the Project site. Therefore, the Project would not result in a substantial adverse effect on state or federally protected wetlands. As such, no cumulatively considerable impacts would occur.

Threshold 4.3d - Cumulative. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As detailed in Section 4.3.4, Impact Analysis, the proposed Project has the potential to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to the Project site due to the removal of landscaping that would have the potential to provide nesting sites for birds and raptors. As discussed in the analysis above, within Section 4.3.4, Impact Analysis, implementation of MM-BIO-1 would reduce the Project's impacts to nesting and migratory birds to less than significant.

All of the cumulative projects within the City and County involve the development of previously disturbed or developed lands that contain limited native vegetation, many of which are isolated from naturalized areas by surrounding development. As such, development of these cumulative projects would not be expected to substantially reduce wildlife movement opportunities and are unlikely to serve as native wildlife nursery sites; as a result, these cumulative projects' incremental effects on these resources are not anticipated to be cumulatively considerable.

The Project's construction impacts to breeding or reproduction of migratory bird and/or raptor species would be reduced to less than significant with implementation of MM-BIO-1. The Project's contribution to cumulative impacts to common migratory birds and raptors protected under the Migratory Bird Treaty Act and California Fish and Game Code is primarily addressed through the Project-specific mitigation measure that would avoid construction during nesting and breeding season and require nesting bird surveys, avoidance buffers, and monitoring if nests are discovered during construction. With implementation of the mitigation measure discussed above, the Project's incremental effect on nesting and migratory birds and/or raptors would be less than significant when viewed in connection with the effects of the cumulative projects. Further, all cumulative projects would be subject to existing and/or future permit restrictions that satisfy regulatory/resource agency requirements in addition to the Migratory Bird Treaty Act and California Fish and Game Code. Therefore, the Project's incremental effect related to the movement of resident or migratory fish or wildlife species or the use of native wildlife nursery sites would not be cumulatively considerable and cumulative impacts on nesting and migratory birds would be less than significant with mitigation.

Threshold 4.3e - Cumulative. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As detailed in the Project-level analysis above, within Section 4.3.4, Impact Analysis, the proposed Project would not conflict with City policies or ordinances regarding biological resources, including trees, and impacts would be less than significant. If any of the cumulative projects were to impact trees with a DBH of six inches or more, these impacts would be subject to regulatory requirements under the City's Tree Preservation Ordinance, which governs the planting, maintenance, removal, and preservation of trees within all public property and new developments

within the City. Enforcement of City regulations effectively serves as a programmatic vehicle to keep cumulative impacts to trees below a level of significance, with the County typically requiring trees to be preserved. As stated above, the Project would comply with the AMC's requirement of three replacement trees for every one tree removed. The Project's contribution to cumulative impacts to trees is primarily addressed through adherence to this replacement ratio of 3:1. Further, the cumulative projects would be subject to existing and/or future permit restrictions that satisfy regulatory requirements. Therefore, the Project's incremental effect on trees would not be cumulatively considerable and cumulative impacts on this resource would be less than significant.

Threshold 4.3f - Cumulative. **Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

As detailed in Section 4.3.4, Impact Analysis, the Project site is located in a highly urbanized area, and there are no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plans for the site or the surrounding area. As such, the Project would not conflict with any adopted Habitat Conservation Plans or Natural Community Conservation Plans. Therefore, no cumulatively considerable impact would occur.

4.3.6 Mitigation Measures

MM-BIO-1 Nesting Bird Avoidance. All construction activities, including but not limited to demolition, site/vegetation clearing and grading activities shall avoid the migratory bird nesting season (February 1 through August 31), to reduce the potential for significant impacts to birds that may be nesting on the Project site. If construction activities must be initiated during the migratory bird nesting season, an avian nesting survey shall be conducted to identify protected migratory birds, raptors, and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist (i.e., a biologist with experience conducting avian nesting surveys and knowledgeable in the identification of regional bird species, nesting behaviors, and applicable federal and state regulations subject to approval by the City) no greater than 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code. The results of the survey shall be provided to the City of Azusa prior to the start of construction.

If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate "no disturbance" buffer, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall also be demarcated in the field with flagging and stakes or construction fencing. No construction activities shall occur within the buffer area until the nest is vacated and the juveniles have fledged, as determined by the qualified biologist. The Project Applicant shall execute an agreement for a qualified biologist to provide periodic construction monitoring to determine when the nest is inactive and when construction activities can resume within the buffer area. The Project Applicant shall provide a copy of the agreement to the City prior to the start of construction.

4.3.7 Significance Conclusion

Threshold 4.3a. The Project would result in a **less-than-significant impact with mitigation** (MM-BIO-1) related to substantial adverse effects, either directly or through habitat modifications, on any species identified as a

candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Threshold 4.3b. The Project would result in **no impact** related to substantial adverse effects on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Threshold 4.3c. The Project would result in **no impact** related to substantial adverse effects on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands) through direct removal, filling, hydrological interruption, or other means.

Threshold 4.3d. The Project would result in **a less than significant impact with mitigation** (MM-BIO-1) related to 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.

Threshold 4.3e. The Project would result in a **less-than-significant impact** related to potential conflicts with any local policies or ordinances protecting biological resources, including tree preservation policy or ordinance.

Threshold 4.3f. The Project would result in **no impact** related to the provisions of an adopted HCP, NCCP, or other approved state, regional, or local HCP.

4.3.8 References

16 USC 703–712. Migratory Bird Treaty Act, as amended.

16 USC 1531–1544. Endangered Species Act, as amended.

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California Fish and Game Code, Sections 3500–3516. Division 4: Birds and Mammals, Part 2: Birds.

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4.4 Cultural Resources

This section describes the existing cultural resources conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information contained in this section is based on publicly available data, survey and evaluation of cultural resources within the Project site and surrounding area including the following:

- **Appendix E-1** Archaeological Resources Inventory Report for the Delaney Square Residential Project, City of Azusa, California, prepared by Dudek, dated October 15, 2025
- **Appendix E-2** Built Environment Inventory and Evaluation Report for the Delaney Square Residential Project, City of Azusa, California, prepared by Dudek, dated October 28, 2025
- **Appendix F-1** Preliminary Geotechnical Evaluation and Recommendations, Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles, California, prepared by LGC Technical Inc., dated January 23, 2025

The Archaeological Resources Inventory Report and Built Environment Inventory and Evaluation Report include the results of a California Historical Resources Information System (CHRIS) records search at the South Central Coast Information Center (SCCIC); a pedestrian survey of the Project site by a qualified architectural historian and archaeologist; the development of an Area of Potential Impacts (API), an intensive-level survey of the API for built resources of historic age (45 years of age or older); building development and archival research, the creation of an appropriate historic context, and recordation and evaluation of historic-era properties located in the API under National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of Azusa Register of Historic Landmarks designation criteria. Both reports were prepared in conformance with the CEQA Guidelines and all applicable local guidelines and regulations and are summarized in this section of the Draft EIR.

Other sources referenced are listed in Section 4.4.8, References.

4.4.1 Existing Conditions

This section describes the existing conditions on the Project site, including its historical setting and the results of the CHRIS record search. This section also identifies and evaluates the existing built environment resources within the Project site in consideration of historical significance and integrity.

The Project site is located in the City within Los Angeles County, and encompasses one parcel located at 1035 East Mauna Loa Avenue (Assessor Parcel Number[APN] 8628-004-900).The API for archaeological and built environment resources encompasses the geographic area or areas within which the Project may directly or indirectly cause a substantial adverse change in the significance of a known or unknown historical resource. The API for this Project is horizontally confined to the Project area, which encompasses one on-site previously unevaluated historic-age property. The property includes the W.R. Powell Elementary School (also referred to as Powell Elementary School), composed of six buildings and three structures. Because of the geographically constrained nature of the Project-related activities, the API is horizontally confined to the parcel boundaries, which are identified in Figure 4.4-1, Built Environment Area of Potential Impacts.

4.4.1.1 Cultural Setting

Prehistoric Overview

Evidence of continuous human occupation in Southern California spans the last 10,000 years. The discussion below employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769). For an overview of Ethnohistoric setting, see Section 4.16, Tribal Cultural Resources.

Paleoindian Period (pre – 5500 BC)

Evidence for Paleoindian occupation in the region is tenuous. Knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego, through the Mojave Desert, and beyond. One of the earliest dated archaeological assemblages in the region, located in coastal Southern California (although contemporaneous sites are present in the Channel Islands), derives from a human burial found in La Jolla (site trinomial CA-SDI-4669/W-12). A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2006). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004). Termed San Dieguito (see also Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (see also Warren 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos's interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

San Dieguito sites are rare in the inland valleys, with one possible candidate, RIV-2798/H, located on the shore of Lake Elsinore. Excavations at Locus B at RIV-2798/H produced a toolkit consisting predominately of flaked stone tools, including crescents, points, and bifaces, and lesser amounts of ground stone tools, among other items (Grenda 1997). A calibrated and reservoir-corrected radiocarbon date from a shell produced a date of 6630 BC.

Grenda (1997) suggested this site represents seasonal exploitation of lacustrine resources and small game and resembles coastal San Dieguito assemblages and spatial patterning.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in Southern California deserts, where hunting-related tools were replaced by processing tools during the early Holocene (see Basgall and Hall 1990).

Archaic Period (8000 BC – AD 500)

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in Southern California. If San Dieguito is the only recognized Paleoindian component in the coastal Southern California, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (see Hale 2001, 2009).

The Archaic pattern, which has also been termed the Millingstone Horizon (among others), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (see Basgall and Hall 1990; Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow was adopted around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remained low. After the bow was adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decreased in proportion relative to expedient, unshaped ground stone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complemented only by the addition of the bow and ceramics.

Late Prehistoric Period (AD 500 – 1769)

The period of time following the Archaic and before Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004); however, several other subdivisions continue to be used to describe various shifts in assemblage composition. In general, this period is defined by the addition of arrow points and ceramics, as well as the widespread use of bedrock mortars. The fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall

1990); even then, weighing the economic significance of millingstone-hand stone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages.

Historical Overview of Azusa

The City of Azusa is located within the County of Los Angeles, situated against the base of the San Gabriel Mountains to the north. Present-day Azusa was part of Rancho Azusa de Dalton, a 4,431-acre Mexican land grant given in 1841 by Governor Juan Alvarado to Luis Arenas. In addition to Azusa, present-day cities located on the former land grant include Irwindale, Arcadia, Monrovia, and Baldwin Park. The land comprising Azusa, however, was not considered valuable due to an abundance of rocks and sand, which made farming and cattle grazing difficult (Appendix E-2).

The County of Los Angeles was established on February 18, 1850, one of 27 counties established in the months prior to California acquiring official statehood in the United States two years after the Mexican American War. Settlement of the Los Angeles region continued in the early American Period. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns. Nonetheless, ranching retained its importance, and by the late 1860s, Los Angeles County was one of the top dairy production centers in the country (Dumke 1944: 14–15). In the 1870s, the county was divided into townships comprised of subdivided ranchos, and by 1876, the county reportedly had a population of 30,000 people (Appendix E-2).

Los Angeles County maintained its role as a regional business center and the development of citriculture in the late 1800s and early 1900s further strengthened this status. These factors, combined with the expansion of port facilities and railroads throughout the county, contributed to the impact of the real estate boom of the 1880s in which many southern California towns were founded (Appendix E-2).

By 1887, Jonathan S. Slauson established the town of Azusa and on December 29, 1898 Azusa incorporated. Azusa Valley became the first public school for the local community and in 1891, Citrus, the first Union High School, was located at the corner of Citrus next to Broadway. By 1899, Azusa's population consisted of 865 inhabitants (Appendix E-2).

Government leaders recognized the need for water to sustain the growing population in the County of Los Angeles. Irish immigrant William Mulholland personified the City of Los Angeles's efforts for a stable water supply. By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile Los Angeles Aqueduct that brought the valley's water to the city. Access to water resulted in a population boom in the region; in the city of Los Angeles, for example, the population rose from 170,298 residents in 1900 to 936,455 by 1920 (Appendix E-2).

Increased population led to more available workers, which helped spur regional agricultural growth. Between 1900 and into the 1940s, Azusa's growth relied on its citrus and agricultural industry. The middle class shifted to mostly Anglo-Americans and the lower classes transitioned to mostly minority groups. Numerous American-born Hispanics worked in the citrus fields and packing structures. A Mexican barrio area developed in Azusa during this time (Appendix E-2).

The decline of the citrus industry and the impact of World War II, including the arrival of Aerojet in 1944, led to the end of Azusa's citrus markets. After World War II's conclusion in 1945, California experienced a massive wave of

migration and building boom. In Los Angeles County, the rise in wartime employment in aircraft factories and shipyards during World War II, as well as statewide post-war immigration/emigration patterns, increased the county's population from 2,208,492 residents in 1930 to 4,151,687 residents by 1950 (Appendix E-2).

The postwar decades saw much of the county transformed from ranches and farms into residential subdivisions surrounding commercial and industrial centers. Previous agricultural success and the booming oil and aerospace industries were key factors in the county's growth in the twentieth century. In response to the rise in population, developers built tract homes, and multi-family residences on former agricultural properties in Los Angeles County throughout the 1940s and 1950s. Throughout the post-World War II period, residential styles reflected a range of regional styles that often combined Regional Modernism with elements of the Ranch style. Inspired by new construction materials and techniques refined during the war, many architects focused on producing low-cost mass-produced designs. Prefabricated housing systems, also known as manufactured homes or modular homes, were introduced to the market during the post-war period (Appendix E-2).

With the advent of the state and federal highway systems during the 1950s and 1960s, automobiles allowed travelers to take themselves to places that were only previously accessible by railroads. The highway system encouraged tourism that propelled the county's economy and spurred growth in the area. Freeway systems replaced former Route 66, bringing new populations to Azusa who sought affordable homes and community. This automobile-oriented growth is reflected in the much of Azusa's present-day built environment that includes sprawling post-World War II suburbs characterized by concentrations of single-family residences with distinctive planning features such as street alignments, setbacks, curbs, sidewalks, and landscaping (Appendix E-2).

By 1965, Azusa Pacific (College) University was established, bringing academia to the city. The Los Angeles County region continued to grow, as its population reached 6,038,771 residents by 1960 and later increased to 8,863,164 residents by 1990 as the county continued to expand during the last half of the twentieth century and into the twenty-first century. As of 2020, the City of Azusa had 50,000 residents (Appendix E-2).

Development of Public Education in Azusa

In 1888, Azusa City School District (ACSD) is first noted in the *Los Angeles Tribune*. Azusa Valley became the first public school to serve the local Azusa community, and in 1891, Citrus opened as the first Union High School. By July 1, 1900, ACSD formally organized as its population reached 5,250. By 1948, ACSD received $164,593 in state funding to address the "tremendous influx of people" into Azusa. Most of the funding was allocated towards aiding strained classrooms with new construction to accommodate for population increase. A flyer that appears to be dated from c.1950s for Azusa states that the city had five existing elementary schools at that time, with two additional schools being planned, along with future Azusa High School expansions (Appendix E-2).

Today, Azusa Unified School District (AUSD) has approximately 7,000 enrolled students who attend one of the following AUSD schools: Dalton Elementary School, Hodge Elementary School, Lee Elementary School, Longfellow School, Magnolia Elementary School, Valleydale Elementary School, Murray Elementary School, Paramount Elementary School, Gladstone Middle School, Azusa High School, and Sierra High School (Appendix E-2).

Project Site History

The following context focuses on the properties evaluated as part of efforts to identify the presence of CEQA historical resources within the proposed Project site (Appendix E-2). According to available historic aerials, the subject property was used for agricultural purposes in the 1940s. By the mid-1950s, housing began to develop

adjacent to the site that would later become Powell Elementary School, while the future school site remained agricultural (Exhibit 1 in Appendix E-2). The area of the City where the Project site is located was relatively undeveloped with sparse residential neighborhoods emerging in the 1940s. Buildings on the Project site were not developed until 1950.

On September 16, 1957, the school first opened as part of the Azusa City Schools District. The elementary school was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell. The original school layout from 1957 consisted of Buildings A and B, which housed the administration building, along with a kindergarten and nine grade-level classrooms. By circa 1959, Building C was added to the school campus to house four additional classrooms, completed by architect Kistner, Wright, and Wright, and contactor K.F. Gantner, along with Custom Wood Products (Exhibit 2 in Appendix E-2).

Historic aerials from 1964 also show that the school expanded by that time, adding Classroom Building D and Multipurpose Building E to the north of the existing school buildings in circa 1964 (Exhibit 2 in Appendix E-2). From 1964 to the early 2000s, the school's footprint remained consistent with the exception of what appears to be portable or modular buildings that came and went beginning in the late 1990s. Portable Building 1 was added in 1999. In 2005, Building F was added to the parcel's southwest corner and in circa 2009 the canopy structure (Structure 3) was placed north of Building E (Exhibit 2 in Appendix E-2). Between 2009 and 2025, the subject school's footprint remained consistent, with the addition of new playground areas added to northeast and southwest in circa 2020 (Appendix E-2).

Project Site Architects and Architectural Styles

Kistner, Wright & Wright Firm

The architectural and engineering firm based in San Diego and Los Angeles known as Kistner, Wright & Wright, was active between circa 1952 to 1973. The firm was founded by the following three architects: Theodore C. Kistner, Henry Lyman Wright, and William Theodore Wright. After Kistner died, the firm closed in 1973. Their best known projects include large-scale designs, including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), as well as Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture (Appendix E-2).

Typology: Finger-Plan School Design (1940-1959)

By the 1950s, design ideas for schools that had been considered experimental in the 1930s had come to full maturity and became the national standard, including the finger-plan and the cluster-plan. Similar to the way in which architectural styles go in and out of popularity, as do building plans and designs. Post-World War II, schools exhibiting a unified campus design, buildings that accompanied a high degree of indoor and outdoor integration, ample outdoor spaces, and sheltered corridors became characteristics of the functionalist typology. Educational buildings were given a more domestic scale as opposed to the formality and monumentality that characterized earlier eras of school design. Elementary schools remained one-story in height, while middle and high schools went up to two-stories. Finger-plan schools are decentralized and pavilion-like, with "finger-like" wings, arranged on an axis. The plan was frequently utilized because it allowed for more students to fit on a smaller lot and allowed for easy expansion. During the 1940s and 1950s the finger-plan and the cluster-plan were the most popular school campus designs in the United States (Appendix E-2).

Characteristics of the Finger-plan design:

- Building plans and site design clearly express their function
- Classrooms "finger-like" wings arranged on an axis
- Buildings that accompanied a high degree of indoor and outdoor integration
- Large outdoor spaces
- Sheltered corridors
- Generous expanses of windows
- Flat roof or broken pediment roof used for lighting and acoustics
- One-story massing for elementary schools; up to two-stories for junior/high schools

Architectural Style: Mid-Century Modern (1933-1965)

Mid-century Modern style is reflective of International and Bauhaus styles popular in Europe in the early 20th century. This style and its living designers (e.g., Mies Van der Rohe and Gropius) were disrupted by World War II and moved to the United States. During World War II, the United States established itself as a burgeoning manufacturing and industrial leader, with incredible demand for modern buildings to reflect modern products in the mid-20th century. As a result, many industrial buildings are often "decorated boxes"—plain buildings with applied ornament to suit the era and appear more modern without detracting from the importance of the activity *inside* the building. Following WWII, the United States had a focus on forward thinking, which sparked architectural movements like Mid-Century Modern. Practitioners of the style were focused on the most cutting-edge materials and techniques. Architects throughout Southern California implemented the design aesthetics made famous by early Modernists like Richard Neutra and Frank Lloyd Wright, who created a variety of modern architectural forms throughout Southern California. Like other buildings of this era, Mid-century Modern buildings had to be quickly assembled, and use modern materials that could be mass-produced (Appendix E-2).

Key character-defining features of the Mid-century Modern style include:

- Low, boxy, horizontal proportions;
- Mass-produced materials;
- Flat, smooth sheathing;
- Flat roofed without coping at roof line; flat roofs hidden behind parapets;
- Lack of exterior decoration or abstract geometrical motif;
- Simple windows (metal or wood);
- Industrially plain doors;
- Large window groupings;
- Commonly asymmetrical; and
- Whites, buffs, and pale pastel colors.

4.4.1.2 Records Search Results

CHRIS Records Search Results

Dudek conducted a records search at the SCCIC for the Project API and a one-mile radius buffer around the Project API on July 15, 2025. The record search identified 21 previous cultural resources studies that have been performed within one mile of the Project area (refer to Table 1 in Appendix E-1). None of these studies intersect with the Project

area. A complete SCCIC records search results and associated documentation are included in Confidential Appendix A in Appendix E-1.

The SCCIC records search did not identify any cultural resources within the Project area, though it did identify 6 resources within the one-mile radius, listed in Table 4.4-1, below. All resources are characterized as historic-era cultural resources and include two canals, one leach pit, one commercial building, one single-family property, and one transmission line. The results of this records search and all California Department of Parks and Recreation (DPR) 523 site forms are included in Confidential Appendix A in Appendix E-1.

Table 4.4-1. Previously Recorded Cultural Resources within One Mile of Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility
Outside Project Area				
P-19-002777	CA-LAN-002777H	Historic	Canal/ditch and pipe	Not evaluated
P-19-003802	-	Historic	Canal/ditch	Not evaluated
P-19-004901	CA-LAN-004901H	Historic	Leach pit/Cistern	Not eligible
P-19-180677	-	Historic	Commercial Building	Eligible
P-19-188221	-	Historic	Single-family property	Eligible
P-19-188983	-	Historic	Transmission Line	Eligible

Source: Appendix E-1

Review of Historic Topographic Maps and Aerial Photographs

In addition to the SCCIC records search, Dudek conducted an online review of historic aerial photographs and historic topographic maps to better understand the development of the Project area and surrounding vicinity over time.

Historic aerial photographs (historic aerials) of the Project area are available from 1948 to 2022 (NETR 2025). The earliest historic aerial from 1948 depicts the entire Project area and the surrounding areas as agricultural land. On the 1954 historic aerial, the Project area continues to be used for agricultural purposes, however, the construction of residential houses immediately to the east and to the south of the Project area are now observed. On the 1964 historic aerial, construction of Powell Elementary School is observed. Residential development is also observed to the west, east, and south of the Project area, while to the north is an agricultural field. There are no substantial changes to the Project area until 2005. By 2005, some grading is observed and by 2009, an asphalt paved court is observed. There are no significant changes to the Project area and surrounding vicinity as evidenced in the historic aerials from 2009 to the last available in 2022 (Appendix E-2).

Historic topographic maps (historic topos) of the Project area are available for the years of 1897 to 2021 (USGS 2025). The earliest historic topo from 1897 depicts the Azusa Ditch running through the Project area in a north/south direction. There are no changes to the depiction of the Project area as evidenced in the historic topos until 1968. On the 1968 historic topo, the Azusa Ditch is no longer observed, and instead Powell Elementary School is shown. There are no significant changes to the Project area and surrounding vicinity as evidenced in the historic topos from 1968 to the last available in 2022 (Appendix E-2).

As evidenced by this archival review, the Project area has been subject to ground-disturbing activities associated with agricultural use, the construction of Powell Elementary circa 1964, and subsequent expansion circa 2005. As

detailed in Appendix E-2 of this Draft EIR, Powell Elementary School is considered a historic-era built environment resource.

NAHC and Tribal Correspondence

A search of the NAHC Sacred Lands File (SLF) was requested on July 17, 2025, for the Project API and a one-mile radius buffer. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on July 30, 2025, stating that the SLF search was completed with positive results (i.e., presence of Native American cultural resources within one mile of the Project area) and provided a list of tribal representatives who should be contacted (see Appendix B in Appendix E-1 of this Draft EIR). Refer to Section 4.16, Tribal Cultural Resources, of this Draft EIR for more information regarding tribal consultation and potential impacts to tribal resources.

4.4.1.3 Survey Area Existing Conditions

Archaeological Resources Pedestrian Survey

A qualified Dudek archaeologist conducted an intensive-level pedestrian survey of the Project area on July 28, 2025. Standard archaeological procedures and techniques consistent with the Secretary of the Interior's Standards and Guidelines for archaeology were employed during the pedestrian survey.

The Project area is developed as an elementary school and is covered by existing structures, playground equipment, turf grass, and extensive paved and hardscaped surfaces. Ground visibility was variable throughout the Project area. In the southeastern half of the Project area, ground visibility was poor (0%) and was largely obscured by existing structures and hardscape (Exhibit 1 in Appendix E-1). In the northwestern portion of the Project area, where turf grass is present, ground visibility was fair to good (70-80%) (Exhibit 2 in Appendix E-1). Overall, no native soils were observed, and no archaeological resources were identified during the pedestrian survey of the Project area.

Built Environment Pedestrian Survey

A pedestrian survey of the Project site was conducted on July 28, 2025 by a qualified Dudek architectural historian. The built environment survey entailed walking around the exteriors of each building within the subject property, documenting each with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. One resource over 45 years of age at the time of survey was recorded and evaluated for historical significance. Powell Elementary School, a multicomponent resource with multiple buildings and structures, is summarized below in Table 4.4-2.

Table 4.4-2. W.R. Powell Elementary School Buildings and Structures

Building/Structure	Building Type	Year Built
W.R. Powell Elementary School: 1035 East Mauna Loa Avenue/ (APN) 8628-004-900		
A	Administration and Kindergarten Classroom	1957
B	Classroom	1957
C	Classroom	Circa 1959
D	Classroom	Circa 1964
E	Multipurpose	Circa 1964
F	Classroom	2005
1	Portable	1999
2	Utility Structure	Circa 1960
3	Canopy Structure	Circa 2009

Notes: APN = Assessor's Parcel Number

The educational buildings are located on a large square parcel surrounded by single family residences to the west, east, and south; a multi-family apartment complex is to the north. The school buildings are primarily clustered to the parcel's southeast corner and face East Mauna Loa and North Calera Avenues, to the south and east respectively. Approximately half of the parcel remains as open green space to the north and west of the school buildings. Additional site features include three play areas as well as basketball and handball courts. Narrow front lawn buffers the school, fronting East Mauna Loa Avenue to the south and partially fronting North Calera Avenue to the east. The school's Mid-Century Modern Style buildings served educational purposes from its opening in 1957 until the school's closure in 2023.

The six permanent buildings are identified as Buildings A through F in this description, as well as shown in Figure 4.4-1. Three non-permanent buildings and structures are also identified in Figure 4.4-1 and discussed in the description below:

Building A: Administration and Kindergarten Building**.** Building A is a one-story Mid-Century Modern Style administration and kindergarten classroom building with a square plan, constructed in 1957 (Exhibit 4 in Appendix E-2). Located at the parcel's southeast corner, Building A fronts both East Mauna Loa and North Calera Avenues, serving as the school's primary street-facing building or "face" of the school, along with Building B which also fronts East Mauna Loa.

Building B: Classroom Building**.** Building B is a one-story Mid-Century Modern Style classroom building with a long and wide rectangular plan, constructed in 1957 (Exhibit 5 in Appendix E-2). Located to the west of Building A, the two buildings are connected by a covered walkway and see-through metal vertical fence to the north and south, with an internal courtyard between the two buildings.

Building C: Classroom Building**.** Building C is a one-story Mid-Century Modern Style classroom building with a long and narrow rectangular plan, constructed in circa 1959 (Exhibit 6 in Appendix E-2). Located to the north of Building B and south of Building D, the roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material.

Building D: Classroom Building. Building D is a one-story Mid-Century Modern Style classroom building with a rectangular plan, constructed in circa 1964 (Exhibit 7 in Appendix E-2). Located to the north of Building C, the roof

displays minimal pitch and primarily reads as a flat roof with the exception of the west where it reads as a gable roof.

Building E: Multipurpose Building. Building E is a combination one-and-two story Mid-Century Modern Style multipurpose building with an irregular-shaped plan, constructed in circa 1964 (Exhibit 8 in Appendix E-2). Its massing is composed of two primary volumes: a two-story rectangular footprint attached to an intersecting smaller one-story rectangular footprint. Building E faces the parking lot along North Calera Avenue to the east, serving as the school's secondary entrance or "face" of the school.

Building F: Classroom Building. Located at the southwest corner of campus, Building F is a one-story institutional classroom building that has a rectangular plan with stucco cladding, and was constructed in 2005 (Exhibit 9 in Appendix E-2).

Non-Permanent and Portable Buildings. The non-permanent buildings consist of one portable building (Building 1 in Figure 4.4-1), one utility structure (also referred to as a transformer vault in the 1960 as-built architectural plans) (Structure 2 in Figure 4.4-1), and one canopy structure (Structure 3 in Figure 4.4-1). All three lack architectural distinction and are utilitarian in design (Exhibits 10 through 12 in Appendix E-2).

As detailed in Appendix E-2, these evaluated buildings and structures do not meet any NRHP, CRHR, or City of Azusa Register of Historic Landmarks eligibility criteria, individually or as a contributing element to any known or potential historic district.

4.4.2 Regulatory Requirements

4.4.2.1 Federal

National Register of Historic Places (NRHP)

While there is no federal nexus for this Project, the property was evaluated in consideration of NRHP designation criteria. The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in NRHP guidance, "How to Apply the National Register Criteria," as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (Appendix E-2). NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed less than 50 years ago must be proven to be "exceptionally important" to be considered for listing.

A historic property is defined as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria" (36 Code of Federal Regulations [CFR] section 800.16(i)(1)).

Effects on historic properties under section 106 of the National Historic Preservation Act are defined in the assessment of adverse effects in 36 CFR section 800.5(a)(1):

> An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

To comply with section 106, the criteria of adverse effect are applied to historic properties, if any exist in the project site, pursuant to 36 CFR section 800.5(a)(1). If no historic properties are identified in the project site, a finding of "no historic properties affected" will be made for the project. If there are historic properties in the project site, application of the criteria of adverse effect will result in project-related findings of either "no adverse effect" or of "adverse effect," as described above. A finding of no adverse effect may be appropriate when the undertaking's effects do not meet the thresholds in criteria of adverse effect 36 CFR section 800.5(a)(1), in certain cases when the undertaking is modified to avoid or lessen effects, or if conditions were imposed to ensure review of rehabilitation plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (codified in 36 CFR Part 68).

If adverse effects findings were expected to result from the project, mitigation would be required, as feasible, and resolution of those adverse effects by consultation may occur to avoid, minimize, or mitigate adverse effects on historic properties pursuant to 36 CFR Part 800.6(a).

4.4.2.2 State

California Register of Historical Resources (CRHR)

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC § 5020.1(j)). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC § 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to PRC section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Section 7050.5 of the California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human grave. In the unlikely event that human graves are encountered, work should halt in the vicinity and the County Coroner should be notified immediately. At the same time, an archeologist should be contacted to evaluate the situation and grave. If the human remains are determined to be of Native American origin, the Coroner must contact the Native American Heritage Commission (NAHC) within 24 hours of identification.

California Environmental Quality Act

As described further below, the following CEQA statutory provisions and CEQA Guidelines are of relevance to the analysis of archaeological, and historic cultural resources:

- PRC section 21083.2(g) defines "unique archaeological resource."

- PRC section 21084.1 and CEQA Guidelines section 15064.5(a) define "historical resources." In addition, CEQA Guidelines section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource." It also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC section 5097.98 and CEQA Guidelines section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC §21084.1; CEQA Guidelines § 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC §n 5024.1(q)), it is a "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (PRC § 21084.1; CEQA Guidelines § 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC § 21084.1; CEQA Guidelines § 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (PRC § 5020.1(q);CEQA Guidelines § 15064.5(b)(1)). In turn, CEQA Guidelines section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC , unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a Project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in

an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC § 21083.2(a)-(c)).

PRC section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC § 21083.2(a); CEQA Guidelines § 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC §§ 21074(c) and 21083.2(h)), further consideration of significant impacts is required. CEQA Guidelines section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered.

4.4.2.3 Local

City of Azusa Municipal Code

Historic Preservation Ordinance of the City of Azusa

The Azusa Historic Preservation Ordinance, codified as Chapter 55, Article II, Historic Preservation in the AMC, applies to all cultural and historical resources within the corporate boundaries of the city. The City acknowledges the recognition, preservation, protection and use of all historical resources in the City are required in the interests of and to promote the public health, prosperity, safety, enrichment and general welfare. The Ordinance sets forth designation criteria for historic landmarks and districts (Sec. 55-41), designation procedures (Sec. 55-42), review procedures (Sec. 55-43 through 55-49), maintenance and care (Sec. 55-51), historic preservation incentive programs -- such as the Mills Act contracts (Sec. 55-52(3)) -- and enforcement and penalties (Sec. 55-53).

Section 88.30.012, Archaeological Resource Protection

The City's Development Code (AMC Chapter 88, Development Code) applies to all proposed development and new land uses. Section 88.30.012, Archaeological Resource Protection, regulates construction activities when archeological resources are unearthed or discovered. The following standards apply:

A. Construction activities shall cease, and the department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, approved by the city, and funded by the applicant, and disposition of artifacts may be accomplished in compliance with state and federal law.

B. In the event archeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the county coroner shall be notified in addition to the department so proper disposition may be accomplished.

City of Azusa 2004 General Plan

The City's Built Environment Element includes policies designed to protect and preserve cultural resources (City of Azusa 2004). The City recognizes the importance of its historical and cultural diversity, as represented by prehistoric sites, buildings, places, and activities, which must be preserved and enhanced. The policies presented in this section focus on the preservation of physical reminders of the past; the treatment of links with the past as important not only to understanding history but to forging a better future; promotion of cultural diversity, and encouragement of public participation in preserving the past while building for the future.

The following General Plan goals, policies, and implementation measures pertaining to cultural resources would be applicable to the Project:

Goal 1: Protect the historic and significant built and natural resources in the City.

> Policy 1.1: - Require development projects to establish the historicity of existing buildings and landscapes and require City review and permission to allow for their removal in accordance with CEQA and the Cultural and Historic Preservation Ordinance.

Goal 2: Acknowledge, preserve, and protect the City's Native American heritage.

> Policy 1.1: Determine early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.

Goal 3: Preserve and protect places, buildings, and objects that embody the city's social, commercial, architectural, and agricultural history.

4.4.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to cultural resources are based on Appendix G of the CEQA Guidelines, which state that a significant impact related to cultural resources would occur if the Project would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
c) Disturb any human remains, including those interred outside of dedicated cemeteries.

4.4.4 Impact Analysis

Threshold 4.4a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. As defined by CEQA Guidelines section 21084.1, a "historical resource" is considered to be a resource that is listed in or eligible for listing in the NRHR or CRHR, has been identified as significant in a historical resource survey, or is listed on a local register of historical resources. Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC § 21084.1; CEQA Guidelines § 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local

register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC § 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (PRC § 21084.1; CEQA Guidelines § 15064.5(a)).

As detailed in Section 4.2.1.2 in Appendix E-2 of this Draft EIR, the Powell Elementary School was evaluated for significance under NRHP, CRHR, and City designation criteria. None of the buildings were found eligible for listing under the NRHP, CRHR, or City of Azusa Register of Historic Landmarks eligibility criteria, individually or as a contributing element to any known or potential historic district; and are therefore not considered historical resources for the purposes of CEQA. As such, the proposed Project would have no impact on historical resources under CEQA.

Threshold 4.4b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact With Mitigation. As indicated in the Archaeological Resources Inventory Report (Appendix E-1), there is a low potential for the inadvertent discovery of intact subsurface archaeological deposits during Project implementation. As discussed in Section 4.4.1.2, the SCCIC records did not identify any cultural resources within the Project API. The Project would require trenching for utilities and minor grading, but no subterranean parking levels are required and therefore, substantial earthwork is not proposed. A NAHC SLF search was also requested for the Project, and results were positive for Native American cultural resources within one mile of the Project area, though the NAHC did not indicate where resources were in relation to the Project. Refer to Section 4.16, Tribal Cultural Resources for a discussion of tribal consultation and potential impacts to tribal resources.

The intensive-level pedestrian survey did not result in the identification of any archaeological resources although approximately half of the ground surface was obscured by structures, playground equipment, hardscape, and turf grass. An archival review of the historic aerial photographs also showed high ground disturbance of the Project API due to activities associated with agricultural use, the construction of Powell Elementary, and subsequent expansion. While alluvial soils are present within the Project area, any intact archaeological deposits that may have once existed have likely been disturbed or destroyed by years of agricultural activity and mass grading associated with the construction of the elementary school.

In consideration of all these factors, the potential to encounter unknown intact archaeological resources is considered low, but possible during ground disturbing activities within native soils (below 2 feet of existing grade). Due to the inability to observe native soils during the pedestrian survey, there is a potential for archeological resources to be present from 2 feet below ground surface to the maximum depths ground disturbance associated with the Project. In the event unanticipated archaeological resources are encountered during Project construction, impacts to these resources could be potentially significant. However, implementation of MM-CUL-1 would ensure that potential impacts related to the inadvertent discovery of archaeological resources would be less than significant. MM-CUL-1 requires an inadvertent discovery clause, written by an archaeologist, to be added to all construction plans associated with ground disturbing activities; preparation and implementation of a Worker Environmental Awareness Program (WEAP); retaining a qualified archaeologist to be on-call and available to respond to any inadvertent discoveries during Project construction; and all construction work occurring within 50 feet of any find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find. Therefore, potentially significant impacts to archaeological resources would be reduced to less-than-significant levels with MM-CUL-1 incorporated.

Threshold 4.4c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. No prehistoric or historic burials were identified within the Project site as a result of the CHRIS records search. However, in the unexpected event that human remains are found, those remains would require proper treatment, in accordance with applicable laws. Procedures of conduct following the discovery of human remains are mandated by California Health and Safety Code section 7050.5, PRC section 5097.98 and CEQA Guidelines section 15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with PRC section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendent (MLD) from the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with the City, of the human remains. Required compliance with California Health and Safety Code section 7050.5, PRC section 5097.98 and CEQA Guidelines section 15064.5(e) would ensure that potential impacts to human remains resulting from the Project would be less than significant. No mitigation is required.

4.4.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130. Cumulative impacts on cultural resources consider whether impacts of the Project together with other related projects identified within the vicinity of the Project site, when taken as a whole, substantially diminish the number of historic or archeological resources within the same or similar context or property type. The past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, and Figure 2-5, Cumulative Projects Location Map, of Chapter 2, Environmental Setting, of this Draft EIR. These cumulative projects consist of planned, pending, approved, or under construction projects within the City.

Threshold 4.4a- Cumulative Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

As previously discussed under Threshold 4.4a, the proposed Project would have no impact on historical resources. No adjacent off-site structures would be altered by the proposed Project. Therefore, the Project would not have any potential to contribute to cumulative impacts related to historical resources.

Threshold 4.4b- Cumulative Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

For archaeological resources, cumulative projects may require extensive excavation in culturally sensitive areas, and thus, may result in adverse effects to known or previously unknown, inadvertently discovered archaeological resources. Because all significant cultural resources are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base and is considered a significant cumulative impact. However, as previously discussed under Threshold 4.4b, there is low sensitivity for identifying intact subsurface archaeological

deposits during Project implementation and the SCCIC record search did not identify any cultural resources within the Project API. Nevertheless, there is the potential for inadvertent discovery of archaeological resources during construction of the Project. As described above under Threshold 4.4b, implementation of MM-CUL-1 would ensure that potential impacts related to the inadvertent discovery of archaeological resources would be less than significant.

Cumulative projects occurring in the vicinity of the Project site would also be subject to the same requirements of CEQA as the Project and any impacts to archaeological resources would be mitigated, as applicable. These determinations would be made on a case-by-case basis, and the effects of cumulative development on archaeological resources would be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. With implementation of MM-CUL-1, the Project's incremental contribution to cumulative impacts related to archaeological resources would not be cumulatively considerable. No additional mitigation is required.

Threshold 4.4c- Cumulative **Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

As discussed above under Threshold 4.4c, required compliance with California Health and Safety Code section 7050.5, PRC section 5097.98, and CEQA Guidelines section 15064.5(e) would ensure that potential impacts to human remains resulting from the Project would be less than significant. Cumulative projects occurring in the vicinity of the Project site would also be subject to the same state requirements related to procedures of conduct following the discovery of human remains. As such, the Project's incremental contribution to cumulative impacts related to human remains would not be cumulatively considerable.

4.4.6 Mitigation Measures

MM-CUL-1 Inadvertent Discovery of Cultural Resources. Prior to commencement of construction activities, the Project Applicant shall retain a qualified archaeologist to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of Azusa Planning Division (City) for review and approval. All construction personnel that will be engaged in earthwork/grading and any monitors shall be presented the WEAP training prior to the start of earthwork activities. The WEAP shall provide specific details on the kinds of archaeological materials that may be identified during construction, explain the importance of and legal basis for the protection of significant archaeological resources, and outline the actions to be taken in the event of the discovery of cultural resources or human remains during ground-disturbing activities. The Project Applicant shall also retain a qualified archaeologist to be on call and available to respond to any inadvertent discoveries identified during initial excavation in native soils, which underly the 2 feet below ground surface of artificial fill soils. (excluding movement of sediments after they have been initially disturbed by project-related construction).

If potential archaeological resources (i.e., sites, features, or artifacts) are exposed during construction activities, the City's Planning Division and the retained qualified archaeologist shall be notified and all construction work occurring within 50 feet of the find shall immediately stop until the retained archaeologist can evaluate the significance of the find. The archaeologist shall be empowered to temporarily stop or redirect construction activities to allow removal of abundant or large artifacts. Depending upon the significance of the find under CEQA (PRC § 21082; CEQA Guidelines § 15064.5(f)), the archaeologist may record the find and allow work to continue. If the

discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, shall be completed before work is allowed to continue in the area. The archaeologist shall also be required to curate any specimens discovered in a repository with permanent retrievable storage and submit a written report to the City for review and approval. Once approved, the final report shall be filed with the South Central Coastal Information Center (SCCIC).

4.4.7 Significance Conclusion

Threshold 4.4a. The Project would have **no impact** related to historical resources.

Threshold 4.4b. The Project would have a **less-than-significant impact with mitigation** related to archaeological resources.

Threshold 4.4c. The Project would result in a **less-than-significant impact** related to human remains.

4.4.8 References

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SOURCE: Open Streets; Maxar 2024

DUDEK

0 80 160 Feet

FIGURE 4.4-1

Built Environment Area of Potential Impacts

Delaney Square Residential Project

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4.5 Energy

This section describes the existing energy conditions of the Project, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance, and references. Information contained in this section is based on CalEEMod Version 2022.1.1.30, which was used to estimate the Project's energy consumption from both construction and operations. For the relevant data, refer to the following appendix:

- **Appendix C-1** Air Quality and Greenhouse Gas Emissions CalEEMod Outputs, prepared by Dudek, dated November 2025

Other sources consulted are listed in Section 4.5.8, References.

4.5.1 Existing Conditions

4.5.1.1 Electricity

The production of electricity requires the consumption or conversion of non-renewable energy resources, including oil, gas, coal, and nuclear resources, into electrical energy. Renewable energy resources are also used, including water, wind, solar, and geothermal sources. The delivery of electricity involves a number of system components, including power generation facilities, transmission lines, and substations and transformers that lower the voltage to a level appropriate for distribution lines to the end-user. Electrical power is generally measured in watts, while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours.

According to the U.S. Energy Information Administration (EIA), California used approximately 251,869 gigawatt-hours of electricity in 2022 (EIA 2024a). Electricity usage in California for different land uses varies substantially by the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. In 2023, California was the nation's top producer of electricity from solar, geothermal, and biomass energy (EIA 2024a). The state was second in the nation in conventional hydroelectric power generation and is consistently among the nation's four top hydropower producers (EIA 2024a).

Azusa Light and Water Department (ALW) provides electricity to City residents and businesses, including to the Project site. According to the 2024 ALW Power Content Label, eligible renewable energy accounts for 60% of SCE's overall energy resources, with wind power at 41%, eligible hydroelectric sources at 1%, and solar energy at 18% (ALW 2024). Within Los Angeles County, residential electricity use is approximately 675 billion kWh per year (CEC 2025a).

4.5.1.2 Natural Gas

Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) used as a fuel source. The majority of the natural gas consumed in California is obtained from sources located outside the state and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel. Natural gas is measured in terms of cubic feet.

According to the EIA, California used approximately 2,056,267 million cubic feet of natural gas in 2022 (EIA 2024b). Natural gas is used for cooking, space heating, generating electricity, and as an alternative transportation fuel. The majority of California's natural gas customers are residential and small commercial customers (core customers). These customers accounted for approximately 35% of the natural gas delivered by California utilities (CPUC 2022).

The Southern California Gas Company (SoCalGas) provides Los Angeles County with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas' service territory. Within Los Angeles County, annual residential natural gas consumption is approximately 46 billion therms (CEC 2025b) [1].

4.5.1.3 Petroleum

According to the EIA, California used approximately 660 million barrels of petroleum in 2024, with the majority used for the transportation sector (EIA 2026c). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 75.9 million gallons of petroleum among all sectors . In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 4.5.2, Regulatory Requirements.

4.5.2 Regulatory Requirements

4.5.2.1 Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon for new passenger cars and 23.5 miles per gallon for new light trucks. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the act includes other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

[1] One cubic foot of natural gas has approximately 1,020 BTUs of natural gas or 1.02 kBTUs of natural gas.

This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum (EPA 2025). The U.S. Environmental Protection Agency (EPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in greenhouse gas (GHG) emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the United States. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Motor Vehicle Fuel Economy Standards

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. On September 24, 2009, CARB adopted amendments to the Pavley regulations (see discussion on AB 1493, below) that reduced GHG emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHG emissions from 2012 through 2016. CARB's September 2009 amendments allowed for California's enforcement of the Pavley rule while providing vehicle manufacturers with new compliance flexibility. The amendments also prepared California to harmonize its rules with the federal rules for passenger vehicles. It was expected that the Pavley regulations would reduce GHG emissions from California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs.

In 2020, EPA and the National Highway Traffic Safety Administration approved the Trump administration's Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One and Two (SAFE-1 and SAFE-2), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California, and sought to reduce fuel economy standards. However, in March 2022, EPA reinstated California's authority under the Clean Air Act (CAA) to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

However, in 2025 the President of the United States signed an Executive Order (EO), *Unleashing American Energy*, which directed EPA to eliminate the social cost of carbon calculation from any federal permitting or regulatory decision and submit recommendations on the legality and continued applicability of the 2009 endangerment finding, among other directives (The White House 2025). On July 29, 2025, the EPA released its proposal to rescind the 2009 endangerment finding and repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines pursuant to CAA Section 202(a) . The proposed rule would remove GHG-related provisions from Title 40 of the Code of Federal Regulations (40 CFR), Part 600 (90 FR 36288–36365).

In May 2025, the U.S. Senate approved several bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). However, the U.S. Senate Parliamentarian and the Government Accountability Office concluded that that the bills were illegal (GAO 2025). Consequently, California filed a lawsuit challenging the revocations (see State of California et al. v. U.S.A et al. (2025) N.D. Cal Case No. 25-CV-04966, challenging disapproval of California's CAA waivers that allowed California to set its own vehicular fuel economy standards).

On February 12, 2026, the U.S. EPA Administrator rescinded the 2009 GHG Endangerment Finding and eliminated all subsequent federal GHG emission standards for motor vehicles and engines. The final rule rescinds EPA GHG emission standards and related regulatory provisions for light-. medium-, and heavy-duty vehicles and engines promulgated pursuant to the 2009 Endangerment Finding, including the following rulemakings (EPA 2026):

Light-Duty Vehicle Greenhouse Gas Standards:

- Model Year (MY) 2012–2016 Light-Duty Vehicle GHG Standards
  - Joint EPA–National Highway Transportation Safety Administration standards establishing federal GHG emission limits for passenger cars and light trucks.
- MY 2017 and Later Light-Duty Vehicle GHG Standards
  - EPA standards tightening GHG emission requirements beyond MY 2016.
- MY 2023–2026 Light-Duty Vehicle GHG Standards
  - Revisions to national GHG standards for passenger cars and light trucks beyond MY2022.
- MY 2027 and Later Light-Duty Multi-Pollutant Standards (GHG Provisions)
  - Tightening GHG emission requirements beyond MY 2027.

Medium- and Heavy-Duty Vehicle and Engine GHG Standards:

- Phase 1 Medium- and Heavy-Duty Vehicle GHG Standards
  - Initial federal GHG standards for heavy-duty engines and vehicles.
- Phase 2 Medium- and Heavy-Duty Vehicle and Engine GHG Standards (Through MY 2027)
  - Expanded GHG standards covering tractors, vocational vehicles, heavy-duty pickups and vans, and trailers.
- Phase 3 Medium- and Heavy-Duty Vehicle GHG Standards (MY 2027 and Beyond)
  - GHG standards applicable to later model years, including early phases extending into the 2030s.

4.5.2.2 State

California Environmental Quality Act

In accordance with Appendix F to the CEQA Guidelines concerning Energy Conservation, in order to ensure that energy implications are considered in project decisions, EIRs must include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F to the CEQA Guidelines provides a list of energy-related topics that should be analyzed in an EIR. In addition, while not described as significance thresholds for determining the significance of impacts related to energy, Appendix F provides the following topics that the lead agency may consider in an EIR's energy impact analysis, where topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; and,
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Warren-Alquist Act

The California Legislature passed the Warren–Alquist Act in 1974, which created the California Energy Commission (CEC). The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

AB 32 and SB 32

In 2006, the State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. In 2016, the Legislature enacted Senate Bill (SB) 32, which extended the horizon year of the state's codified GHG reduction planning targets from 2020 to 2030, requiring California to reduce its GHG emissions to 40% below 1990 levels by 2030. In accordance with AB 32 and SB 32, the California Air Resources Board (CARB) prepares scoping plans to guide the development of statewide policies and regulations for the reduction of GHG emissions. Many of the policy and regulatory concepts identified in the scoping plans focus on increasing energy efficiencies, using renewable resources, and reducing the

consumption of petroleum-based fuels (such as gasoline and diesel). As such, the state's GHG emissions reduction planning framework creates co-benefits for energy-related resources.

Senate Bills 1078 (2002), 107 (2006), X1-2 (2011), 350 (2015), 100 (2018), SB 1020 (2022)

SB 1078 established the California Renewable Portfolio Standard (RPS) Program and required that a retail seller of electricity purchase a specified minimum percentage of electricity generated by eligible renewable energy resources as defined in any given year, culminating in a 20% standard by December 31, 2017. These retail sellers include electrical corporations, community choice aggregators, and electric service providers. The bill relatedly required the CEC to certify eligible renewable energy resources, design and implement an accounting system to verify compliance with the RPS by retail sellers, and allocate and award supplemental energy payments to cover above-market costs of renewable energy.

SB 107 (2006) accelerated the RPS established by SB 1078 by requiring that 20% of electricity retail sales be served by renewable energy resources by 2010 (not 2017). Additionally, SB X1-2 (2011) required all California utilities to generate 33% of their electricity from eligible renewable energy resources by 2020. Specifically, SB X1-2 set a three-stage compliance period: by December 31, 2013, 20% had to come from renewables; by December 31, 2016, 25% had to come from renewables; and by December 31, 2020, 33% had to come from renewables.

SB 350 (2015) expanded the RPS because it requires retail seller and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030, with interim goals of 40% by 2024 and 45% by 2027.

SB 100 (2018) accelerated and expanded the standards set forth in SB 350 by establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

SB 1020 (2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources:

- 90% by December 31, 2035
- 95% by December 31, 2040
- 100% by December 31, 2045

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the RPS requirements described above. The Project's reliance on non-renewable energy sources would be reduced accordingly.

Assembly Bill 1007 (2005)

AB 1007 (2005) required the CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). The CEC prepared the plan in partnership with CARB and in consultation with other state agencies, plus federal and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative

fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Standards

Title 24, California Building Standards Code. Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, contains 12 parts. Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities and equipment. A summary of Parts 6 and 11 of Title 24, which are the parts of Title 24 most pertinent to this analysis, are detailed below.

Part 6 (also known as the California Energy Code) of Title 24 of the CCR was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies. The most recent Title 24 Part 6 standards are those in the 2025 Title 24 California Energy Code which went into effect on January 1, 2026 and thus will be applicable to the Project. The 2025 Title 24 Energy Code regulates the major systems that drive building energy use, including:

- Building envelope (insulation, walls, roofs, windows)
- HVAC systems (heating, cooling, ventilation)
- Lighting systems
- Water heating systems
- Renewables (e.g., solar PV requirements in some buildings

The 2025 California Title 24 Part 6 introduces several significant changes compared to the 2022 code, particularly in energy efficiency and insulation requirements for residential buildings. Here are the key updates:

- GFCI protection is now required in more areas beyond kitchens and bathrooms, and some circuits require both AFCI and GFCI protection.
- In climate zones 1-6, heat pumps are now required as the primary space heating system in newly constructed single-family and low-rise multifamily buildings.
- New requirements for battery system spacing, labeling, and fire safety design.
- All new residential construction must be EV-ready with conduit capable of supporting a Level 2 charger.

Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The 2025 CALGreen standards are the current applicable standards. For residential projects, the 2025 CALGreen standards require:
sustainable site and stormwater management, reduced water use (indoor and outdoor), compliance with energy efficiency (Part 6), construction waste reduction and material efficiency, healthy indoor air quality (ventilation and low-VOC), EV-ready infrastructure, and cleaner construction practices.

CCR Title 20. Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators,

refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low-voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Senate Bill 1. SB 1 (Murray) (August 2006) established a $3 billion rebate program to support the goal of the state to install rooftop solar energy systems with a generation capacity of 3,000 megawatts through 2016. SB 1 added sections to the PRC, including Chapter 8.8 (California Solar Initiative), that require building projects applying for ratepayer-funded incentives for photovoltaic systems to meet minimum energy efficiency levels and performance requirements. SB 1 also established various goals including a goal to establish a self-sufficient solar industry as well as a goal to establish solar energy systems as a viable mainstream option for both homes and businesses within 10 years of adoption, and placing solar energy systems on 50% of new homes within 13 years of adoption. SB 1, also termed "Go Solar California," was previously titled "Million Solar Roofs."

Assembly Bill 1470 (Solar Water Heating). This bill established the Solar Water Heating and Efficiency Act of 2007. The bill makes findings and declarations of the Legislature relating to the promotion of solar water heating systems and other technologies that reduce natural gas demand. The bill defines several terms for purposes of the act. The bill requires the commission to evaluate the data available from a specified pilot program, and, if it makes a specified determination, to design and implement a program of incentives for the installation of 200,000 solar water heating systems in homes and businesses throughout the state by 2017.

Integrated Energy Policy Report

The CEC is responsible for preparing integrated energy policy reports that identify emerging trends related to energy supply, demand, and conservation; public health and safety; and maintenance of a healthy economy. The CEC's 2023 Integrated Energy Policy Report discusses the state's policy goals of decarbonizing buildings, ensuring energy reliability, decarbonizing the state's gas system, the state's energy demand forecast, and quantifying the benefits of the clean transportation program (CEC 2024). SB 100 calls for California's electricity system to become 100% zero-carbon by 2045. The CEC, CPUC, and CARB are working together to identify pathways to deeply decarbonize the state's electricity system in response to SB 100. The aim is to leverage California's clean electricity system to decarbonize, or remove carbon from, other portions of the state's energy system. Over time these policies and trends would serve to beneficially reduce the Project's GHG emissions profile and energy consumption as they are implemented.

State Vehicle Standards

In response to the fact that the transportation sector accounts for more than half of California's CO_2 emissions, AB 1493 was enacted in 2002 to require CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009–2012 standards resulted in a reduction in

approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars, detailed below. The program was designed such that by 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions.

Although the focus of the state's vehicle standards is on the reduction of air pollutants and GHG emissions, one co-benefit of the implementation of these standards is a reduced demand for petroleum-based fuels.

Advanced Clean Car Program

The Advanced Clean Cars (ACC) I program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle (LEV) regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for zero-emission vehicles (ZEV) that contributes to both types of emission reductions (CARB 2025). The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. The program estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold in 2015. The ZEV program will act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The ACC II program, which was adopted in August 2022, is currently in development to establish the next set of LEV and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards (CARB 2025). The main objectives of ACC II are:

1. Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
2. Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

An ACC II rulemaking package, which considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts, was approved by the Office of Administrative Law (OAL) on November 30, 2022. This requires that, by 2035, all new passenger cars, trucks, and sports utility vehicles (SUVs) will be zero emissions. However, as detailed previously, EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which revokes California's authority to set its own GHG emissions standards and set ZEV mandates in California (EPA and NHTSA 2018). Since California and 22 other states, as well as the District of Columbia and four cities, filed suit against EPA and a petition for reconsideration of the SAFE Rule, the ACC II rulemaking's course may vary depending on the results of this ongoing litigation. In addition, and as discussed above, CARB's ability to enforce ACC II was eliminated by the May 2025 U.S. Senate approved bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). The implications of this federal resolution on the state's capability to enforce its independent fuel economy standards are uncertain at this time, as the California Attorney General filed a lawsuit against the federal government on June 12, 2025, to challenge House Joint Resolution 88. Whether this action will be successful is unknown, as is the possibility that a federal judge will issue a stay to halt the implementation of the

ACC II regulation during the legal process. Notably, the mobile source emissions calculations and estimates disclosed in this analysis do not account for this regulatory update as emissions factors have not been updated by the CARB and implemented in CalEEMod at this time.

Advanced Clean Trucks (ACT) Regulation

The purpose of the ACT regulation (June 2020) is to accelerate the market for zero-emission vehicles in the medium- and heavy-duty truck sector and to reduce emissions of nitrogen oxides, fine particulate matter, toxic air contaminants (TACs), GHGs, and other criteria pollutants generated from on-road mobile sources (CARB 2025). Requiring medium- and heavy-duty vehicles to transition to zero-emissions technology will reduce health risks to people living in and visiting California and is needed to help California meet established near- and long-term air quality and climate mitigation targets. The regulation has two components including: (1) a manufacturer sales requirement; and (2) a reporting requirement, as further discussed below:

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

However, in May 2025, the U.S. Senate approved several bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). The U.S. Senate Parliamentarian and the Government Accountability Office concluded that the bills were illegal (GAO 2025). Nonetheless, these actions impact CARB's Advanced Clean Trucks, Advanced Clean Cars II, and Heavy-Duty Omnibus authority, with the current result eliminating California's enforcement of these fuel standard regulations. By signing the resolutions, the administration nullified the CARB waivers and prohibited EPA from issuing similar waivers in the future.

Consequently, California filed a lawsuit challenging the revocations (see State of California et al. v. U.S.A et al. (2025) N.D. Cal Case No. 25-CV-04966, challenging disapproval of California's CAA waivers that allowed California to set its own vehicular fuel economy standards), which is currently pending. Despite the pending litigation, state regulations including CARB's Advanced Clean Trucks, Advanced Clean Cars II, and Heavy-Duty Omnibus are no longer in effect.

Executive Order N-79-20

EO N-79-20 (September 2020) requires CARB to develop regulations as follows: (1) Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs sold in the state towards the target of 100% of in-state sales by 2035; (2) medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission trucks and buses sold and operated in the state towards the target of 100% of the fleet transitioning to ZEVs by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035; and (3) strategies, in coordination with other state agencies, EPA, and local air districts, to achieve 100% zero emissions from off-road vehicles and equipment operations in the state by 2035. EO N-79-20 called for the development of a ZEV

Market Development Strategy, which was released February 2021, to be updated every 3 years, that ensures coordination and implementation of the EO and outlines actions to support new and used ZEV markets. In addition, the EO specifies identification of near-term actions and investment strategies to improve clean transportation, sustainable freight, and transit options and calls for development of strategies, recommendations, and actions by July 15, 2021, to manage and expedite the responsible closure and remediation of former oil extraction sites as the state transitions to a carbon-neutral economy.

4.5.2.3 Regional and Local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

In May 2020, SCAG's Regional Council adopted the Connect SoCal (2020–2045 RTP/SCS). In April 2024, SCAG approved its most recent RTP/SCS, Connect SoCal (2024-2050), which included updated GHG targets of an 8% per capita reduction below 2005 levels by 2020 and a 19% per capita reduction by 2035 (SCAG 2024). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura (SCAG 2020).

City of Azusa 2004 General Plan

The Azusa General Plan (City of Azusa 2004) includes various policies related to energy conservation (both directly and indirectly). Chapter 5 of the General Plan, Natural Environment, includes various policies related to reducing energy consumption. The Air Quality section of this chapter includes applicable policies from Chapter 3, the Built Environment, include the following:

Policy 1.1. Monitor the demands on the electrical system, manage development to mitigate impacts and/or facilitate improvements to the energy supply and distribution system, and maintain and expand energy supply and distribution facilities.

Policy 1.4. Minimize electrical consumption through site design, use of efficient systems, and other techniques.

Policy 1.6. Continue to require the incorporation of electrical conservation features in the design of all new construction and site development. Encourage the retrofit to existing buildings and development to include electrical conservation features, including, but not limited to, wireless technology and solar energy.

Policy 1.8. Ensure the costs of improvements to the existing electrical supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

An analysis of the Project's potential to conflict with General Plan policies is included in this EIR at Section 4.10, Land Use and Planning.

4.5.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to energy are based on Appendix G to the CEQA Guidelines which states that a significant impact related to energy would occur if the Project would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.5.3.1 Approach and Methodology

CalEEMod Version 2022.1.1.30 (CAPCOA 2022) was used to estimate the Project's energy consumption during construction and operation as well as the operation of the existing scenario, for comparison. Construction of the Project would result in petroleum consumption primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details specific to construction and operation are discussed in Section 4.2.3.2, Approach and Methodology (Construction Emissions and Operational Emissions), of Section 4.2, Air Quality, of this Draft EIR, and are also applicable to the estimation of construction-related energy consumption. Potential energy consumption from Project operations was estimated for area sources (landscape maintenance equipment), energy sources (electricity), mobile sources, solid waste, and water supply and wastewater treatment. Construction is anticipated to start in November 2026, and last for 36 months ending in November 2029. Additional details from each category are discussed in Section 4.2, Air Quality under Section 4.2.3.2, Approach and Methodology.

4.5.4 Impacts Analysis

Threshold 4.5a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Implementation of the Project would increase the demand for electricity, as well as petroleum consumption during construction and operation.

Electricity

Construction

Temporary electric power for lighting, heating/cooling, and electronic equipment, such as computers inside temporary construction trailers, as well as lighting for construction activities, would be required during short-term construction activities. The electricity demand at any given time would vary throughout the construction period

based on the construction activities being performed and would cease upon completion of construction. . All sources of electricity would be obtained from existing power lines that serve the site and no new infrastructure would be required. There is nothing unusual about Project construction activities that would result in a wasteful, inefficient, and unnecessary use of electrical energy. The electricity used for construction activities would be temporary and would have a negligible contribution to the Project's overall energy consumption. Impacts to electricity during construction would be less than significant.

Operations

Project operation would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As discussed in Section 4.2, Air Quality, under Section 4.2.3.2, Approach and Methodology (Operational Emissions), CalEEMod default values for electricity consumption for the Project's land uses were utilized which account for compliance with the 2019 Title 24 standards. This is conservative, as the Project would be required to comply with the 2025 Title 24 standards at a minimum. Table 4.5-1 presents the anticipated net electricity demand for the Project.

Table 4.5-1. Operational Net Electricity Demand

Land Use	kWh/Year
Existing Scenario Land Uses	
Elementary School	187,862
Parking Lot	12,396
Existing Uses Total	*200,258*
Proposed Project Land Uses	
Condo/Townhouse	291,249
Single Family Housing	452,145
Parking Garages – all homes	153,244
Parking Lot	25,757
Proposed Project Total	*922,395*
Net Electrical Demand for the Project (Proposed – Existing)	**722,136**

Source: Appendix C-1.
Note: kWh = kilowatt-hour.
Table 4.5-1, Proposed Project Land Uses, reflects the 'Mitigated' output shown in Appendix C-1 to account for the Project's inclusion of all-electric buildings design element.

As shown in Table 4.5-1, buildout of the Project is estimated to have a total electrical demand of approximately 922,395 kWh per year. When considering the existing scenario's estimated consumption, the net electrical demand would be approximately 722,136 kWh per year. The County's annual electricity use was approximately 65 billion kWh in 2024 (CEC 2026)[2]. Therefore, the Project's electrical consumption would be a negligible percentage (less than 0.001%) of the County's current annual use.

In addition, the Project would be built in accordance with the current California Building Standards Code (Title 24) in effect at the time of construction, which include robust requirements for energy efficiency. At this time, the most current California Building Standards Code is the 2025 Title 24 standards. Also, the provisions of the CALGreen

[2] https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0 Historical electrical demand information at the city level is not available from the CEC.

building code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure in the state. Therefore, due to the inherent increase in efficiency of building code regulations, the Project would not result in a wasteful, inefficient, or unnecessary use of energy. Impacts related to operational electricity use would be less than significant.

Natural Gas

Construction

Natural gas is not anticipated to be required during construction of the Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of Project construction would be substantially less than that required for the Project's operation and would have a negligible contribution to the Project's overall energy consumption.

Operations

Natural gas consumption during Project operation would not occur as the Project is designed as all-electric housing units without any natural gas connections. The Project does not propose the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. The project would therefore represent a net decrease in natural gas demand compared to the existing scenario.

Petroleum

Construction

Petroleum would be consumed throughout construction of the Project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and vehicle miles traveled (VMT) associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely primarily if not entirely on diesel fuel. Construction workers would travel to and from the Project site throughout the duration of construction. It was assumed that construction workers would travel in gasoline-powered vehicles.

Fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2025). The estimated diesel fuel use from construction equipment is shown in Table 4.5-2.

Table 4.5-2. Total Project Construction Petroleum Demand (Gallons)

Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
Gallons			
15,080	2,960	915	2,857

Source: See Appendix C-1 for outputs.

Notes: Fuel consumption from worker and vendor truck trips was estimated by converting the total CO_2 emissions from the construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled.

In summary, Project construction activities are conservatively anticipated to consume 18,955 gallons of diesel from off-road equipment, haul trucks, and vendor trucks, and 2,857 gallons of gasoline from worker vehicles. The Project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation does the following: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts adding older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements. Overall, the Project would not be unusual when compared to local and regional demand for other energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, impacts would be less than significant.

Operations

The fuel consumption resulting from the Project's operational phase would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the city during operation is a function of VMT. Trip generation rates for the Project and baseline operational uses were based on the transportation analysis prepared for the Project (Appendix K). The fuel use from the proposed Project's operational mobile sources is shown and compared to the existing scenario in Table 4.5-3.

Table 4.5-3. Annual Net Mobile Source Petroleum Demand

Fuel	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Existing Scenario Land Uses			
Gasoline	635.87	8.78	72,422
Diesel	24.37	10.21	
	2,387Existing Land Uses Total		*74,809*
Proposed Project Land Uses			
Gasoline	896.87	8.78	102,149
Diesel	35.07	10.21	3,435
		Proposed Project Total	*105,584*
		Net Total (Proposed Project – Existing Scenario)	**30,775**

Source: Trips and vehicle CO_2 (Appendix C-1); kg/CO_2/Gallon (The Climate Registry 2025).
Note: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

As depicted in Table 4.5-3, mobile sources from Project buildout would result in approximately 105,584 gallons of petroleum fuel usage per year. When compared to the existing scenario, the net demand for petroleum from operation of the proposed project would be approximately 30,775 gallons per year. For comparison, California as a whole consumes approximately 27 billion barrels gallons of petroleum per year (EIA 2024c).

Over the lifetime of the Project, the fuel efficiency of vehicles as well as the use of electric vehicles is expected to increase. As such, the amount of petroleum consumed due to vehicular trips to and from the Project site during operation would decrease over time. In addition, the Project would comply with the 2025 Title 24 Building Energy Efficiency Standards EV parking requirements for residential construction to be EV-ready with conduit capable of supporting a Level 2 charger. The required EV infrastructure would support the use of alternative -fuel vehicles and help in reducing operational fuel demand over time. As such, operation of the Project is expected to use decreasing amounts of petroleum over time due to advances in vehicle fuel economy standards.

In summary, the Project would increase petroleum use during operation, but due to efficiency requirements the amount of petroleum consumed would diminish over time. The consumption of energy resources (including electricity, natural gas, and petroleum) during the Project construction and operation would not be considered inefficient, wasteful, or unnecessary and would result in a less-than-significant impact.

Renewable Energy Potential

As part of the Project's planning process, the City considered how the Project could potentially increase its reliance on renewable energy sources to meet its anticipated energy demand. Consistent with the CEC's definition of eligible renewables, energy sources that were considered for their potential to power the Project include biomass, geothermal, solar, wind, and small hydroelectric facilities.

The Project would comply with the 2025 Title 24 Building Energy Efficiency Standards and Energy Code requirements that all new constructed residential buildings include solar photovoltaic (PV) systems. However, given the Project's location and the infill nature of the Project, there are considerable site constraints at a parcel level including incompatibility with onsite and surrounding land uses for utility-scale power generation facilities, unknown interconnection feasibility, compatibility with utility provider systems, and no known water or geothermal resources to harness, that would eliminate the potential for biomass, geothermal, and hydroelectric renewable energy to be installed within the Project area. Regarding wind power, due to the nature of the Project area parcels and surrounding land uses, wind turbines are generally anticipated to not be feasible as wind turbines represent an incompatible use due to the height of the turbine blades and the need to avoid nearby obstacles.[3]

As explained above, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum during Project construction or operation, and impacts would be less than significant.

Threshold 4.5b **Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Construction

The Project would use construction contractors who must demonstrate compliance with applicable state and local regulations. Construction equipment would be required to comply with federal, state, and regional requirements where applicable. In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of 5 minutes per occurrence. Off-road emissions standards would increase equipment efficiencies as they are phased-in overtime and less-efficient equipment is phased out of construction fleets. These limitations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-

[3] A general rule of thumb is to install a wind turbine on a tower with the bottom of the rotor blades at least 30 feet above anything within a 500-foot horizontal radius and to be sited upwind of buildings and trees (APA 2011, NREL 2015).

efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the more efficient use of construction-related energy. Thus, based on the information above, construction of the Project would comply with state or local plans for renewable energy or energy efficiency.

Per CEQA Guidelines Appendix F, the Project's construction equipment would be consistent with the current energy standards applicable to construction equipment including limiting idling fuel consumption and using contractors that comply with applicable CARB regulatory standards that affect energy efficiency. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency during Project construction, and impacts would be less than significant.

Operation

The Project would comply with all applicable regulatory requirements including Title 24 of the CCR which contains energy efficiency standards for residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs. Part 6 of Title 24 specifically establishes energy efficiency standards for residential buildings constructed in the State of California designed to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen building standards, which established mandatory minimum environmental performance standards for new construction projects. The Project would comply with the 2025 Title 24, Part 6 and Part 11, per state regulations, including residential solar PV and EV parking requirements.

Additionally, the Project would be an all-electric development, receiving electricity from ALW, which has a mandate to comply with SB 1020. This policy requires that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045, with 90% by 2035, and 95% by 2040, and that the zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling. Thus, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the Project would be less than significant.

4.5.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from the construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 . The geographic context for the cumulative analysis as it relates to energy is the SCE service area. The past, present, and reasonably foreseeable projects (i.e., cumulative projects) used for this analysis are presented in Chapter 2, Section 2.4, Cumulative Impacts, and on Figure 2-6, Cumulative Projects Location Map, of this Draft EIR. The potential for cumulatively considerable impacts related to the topic of energy (i.e., Thresholds 4.5a through 4.5b) is discussed in further detail below.

Threshold 4.5a - Cumulative **Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Cumulative projects that could exacerbate the Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, cumulative projects would be required by Los Angeles County

or the City, as applicable, to conform to current federal, state, and local energy conservation standards, including the California Energy Code (24 CCR Part 6), the CALGreen Code (24 CCR Part 11), and SB 743.

As a result, the Project, in combination with other cumulative projects, would not cause a wasteful use of energy or other non-renewable natural resources. Therefore, the energy demand and use associated with the Project and cumulative projects would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources and would not cause a significant cumulative impact on energy resources. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, less than significant.

Threshold 4.5b - Cumulative **Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

As discussed above under Threshold 4.5b, the Project in combination with other cumulative projects in the area would be subject to complying with state law and also any local plans. The Project would not conflict with applicable plans for renewable energy as it would be required to be solar-ready pursuant to Title 24. Further, other projects, including development throughout the SCE service area, would also be subject to the Title 24 standards in place at the time of construction. It is speculative whether other projects would conflict with a state or local plan for renewable energy. However, future projects requiring discretionary approval would be subject to CEQA and required to evaluate whether they would conflict with applicable plans. As such, the Project in combination with other cumulative projects, would not conflict with a state or local plans for renewable energy or energy efficiency. The Project's contribution to cumulative impacts related to energy or energy efficiency would not be cumulatively considerable and, thus, would be less than significant.

4.5.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to energy and no mitigation is required.

4.5.7 Significance Conclusion

Threshold 4.5a. The Project would result in a **less than significant impact** related to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation.

Threshold 4.5b. The Project would result in a **less than significant impact** regarding potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts from energy consumption as a result of implementing the Project would be less than significant.

4.5.8 References

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4.6 Geology and Soils

This section describes the existing geological conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, significance conclusions, and references. Information contained in this section is based on a survey and investigation of paleontological resources within the Project site and surrounding area, as well as the following:

- **Appendix F-1** Preliminary Geotechnical Evaluation and Recommendations, Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles, California, prepared by LGC Technical Inc., dated January 23, 2025
- **Appendix F-2** Paleontological Resources Assessment[1], prepared by Dudek, dated October 17, 2025
- **Appendix G** Phase I Environmental Site Assessment for Proposed Residential Development Former Powell Elementary School, 1035 East Mauna Loa Avenue, Azusa, Los Angeles County, CA 91702, prepared by EnviroApplications, Inc., dated January 9, 2024

Other sources consulted are listed in Section 4.6.8, References

4.6.1 Existing Conditions

This section describes the existing conditions in the Project area and identifies the known geologic and paleontological conditions and soils present at the Project site.

Regional and Local Setting

The City of Azusa (City) is located in the northern portion of the Peninsular Ranges geomorphic province within north-central San Gabriel Valley which is characterized by northwest-trending physiographic and geologic features, adjacent to the southern flank of the San Gabriel Mountains. The San Gabriel Valley is an alluvium-filled valley bounded by the Sierra Madre Fault Zone and San Gabriel Mountains on the north, the Puente Hills on the south, the Covina and Indian Hills on the east, and the Raymond Basin on the west. The alluvial deposits are derived from erosion of the San Gabriel Mountains to the north and subsequent deposition by the San Gabriel River, the Little Dalton Wash, and other local drainages. As stated in the Project's Preliminary Geotechnical Evaluation and Recommendations (Appendix F-1), the region has a history of seismic activity with the nearest known active fault within the Sierra Madre Fault zone, the Sierra Madre Fault, trending approximately east-west which passes approximately 1.4 miles north of the Project site, within the foothills of the range front. Regional topography was shaped by streams draining from the mountains to deposit alluvial fans across the valley, including the San Gabriel River, the largest watershed and alluvial fan in the area which trends southwest approximately 3 miles north-west of the Project site (Appendix F-1).

Topography

The topography at the Project site and in the general site vicinity is relatively level and slopes gently downwards to the south, according to the Phase I Environmental Site Assessment prepared for the Project (Appendix F-1). The

[1] Appendix F-2, which contains sensitive information related to the location of paleontological sites, is on file with the City and is available for review by eligible individuals.

Project site is not located in a "hillside area" or an area identified as having a potential for slope stability hazards (CGS 2025).

Seismicity and Faulting

The Project site is located in a seismically active region with numerous active faults that are capable of producing seismic events; however, no active faults are identified on the Project site and the potential for damage from ground rupture is low (Appendix F-1). Figure 4.6-1, Regional Faults, and Figure GEO-2, Regional Fault and Earthquake Epicenter Map, from the General Plan Natural Environment Element identifies the faults considered to most influence the seismic exposure of the region, including faults relatively close to the Project site that could produce secondary effects, such as the Sierra Madre Fault (Appendix F-1; CGS 2010; City of Azusa 2004a). Prominent Holocene-active faults in the region include the Whittier, Walnut Creek, San Jose, San Andreas, and Puente Hills Faults, among others (CGS 2010). The CGS classifies faults as follows (CGS 2018):

- **Holocene-active faults:** faults that have moved during the past approximately 11,700 years (i.e., Holocene time). These faults exhibit signs of geologically recent movement, are most likely to experience movement in the near future, and are capable of surface rupture, and are considered "active faults."
- **Pre-Holocene faults:** faults that have not moved in the past 11,700 years but have moved in the past two million years (i.e., Quaternary time). These faults are considered "potentially active faults" and may be capable of surface rupture but are less likely than Holocene-active faults to cause surface rupture. These faults are also capable of generating future earthquakes.
- **Age-undetermined faults:** faults where the recency of fault movement has not been determined. These faults are considered "inactive faults."

Holocene-active faults have been responsible for large historical earthquakes in southern California, including the 1971 San Fernando earthquake (moment magnitude [Mw] 6.7), the 1992 Landers earthquake (Mw 7.3), the 1952 Kern County earthquake (Mw 7.5), the 2019 Searles Valley (Ridgecrest) earthquake (Mw 7.1), and the 1933 Long Beach earthquake (Mw 6.4). Moment magnitude is a widely accepted method of describing the size of earthquakes by measuring the amount of energy released and amount of movement of bedrock. The Southern California region also includes blind thrust faults, which are faults that do not rupture at the surface but are capable of generating substantial earthquakes. Examples of earthquakes caused by blind thrust faults include the 1987 Whittier Narrows earthquake (Mw 5.9) and the 1994 Northridge earthquake (Mw 6.7). Both of these earthquakes occurred on previously unidentified blind thrust faults (CGS 2018).

In accordance with the Alquist-Priolo Earthquake Hazards Act, Holocene-active faults in California must be delineated with fault hazard zones. Fault hazard zones, as opposed to a fault trace, which represents a fracture or fractures that define displacement of bedrock, can also refer to a zone of related faults that may be braided and subparallel but may be branching and divergent. A fault zone can vary significantly in width, ranging from a few feet to several miles. For example, the San Andreas Fault Zone is a region of crushed and broken rock, varying in width from a few hundred feet to a mile wide. Many smaller faults branch from and join the San Andreas Fault Zone (USGS 2016). Not all segments of a Holocene-active fault zone are included in Alquist-Priolo Fault Zones (see the discussion under the "Surface Rupture" subheading below for more information on Alquist-Priolo Fault Zones). Rather, Alquist-Priolo Fault Zones consist of fault segments that are well defined and present sufficient evidence for geologists to conclude that the faults are active.

Duarte Fault

The Duarte Fault passes through the City and is thought to connect to the Raymond Fault to the west (City of Azusa 2004b). An Alquist-Priolo Earthquake Fault Zone has been established along the entire segment, which extends approximately 500 feet on each side of the fault. Figure 4.6-1, Regional Faults, depicts the location of the Duarte Fault where it bisects the City. This fault (within the Sierra Madre Fault Zone) is the nearest to the Project site approximately 0.52 miles northwest of the Project site. The Duarte Fault is thought to be capable of a 6.0-7.0 magnitude earthquake (CGS 2025; CIT 2025).

Sierra Madre Fault

The Sierra Madre Fault crosses the northern end of the City, following the base of the San Gabriel Mountains in a southeast-northwest direction. The Sierra Madre Fault is thought to be capable of a Mw 7.2 magnitude earthquake and is located approximately 1.4 miles to the north of the Project site. The Sierra Madre is not a continuous fault and is comprised of several different segments or strands. Although these segments are not considered independent faults, they could theoretically rupture independently of one another. It has also been suggested that a large event along the San Andreas Fault could trigger all segments of the Sierra Madre to rupture simultaneously (Bayarsayhan 1996; CIT 2025).

Puente Hills Thrust Fault

This fault is a blind thrust fault associated with the Lower Elysian Park Thrust Fault. Blind thrust faults have no surface expression and the displacement occurs beneath the earth's surface, which can be at relatively great depths; as such, they are not considered under the Alquist-Priolo Earthquake Fault Zoning Act. The Puente Hills Fault, which extends from northern Orange County under downtown Los Angeles and into Hollywood, was most recently responsible for the 2014 magnitude Mw 5.1 earthquake, centered in La Habra, and indirectly (in conjunction with the Lower Elysian Park Fault) the 1987 magnitude Mw 6.0 Whittier Narrows earthquake, centered in Whittier. This fault is capable of a maximum probable magnitude of Mw 6.5 to 7.1 (Shaw et al. 2002; USGS 2025).

San Andreas Fault

The Holocene-active San Andreas Fault is California's most prominent structural feature, trending in a generally northwest-southeast direction for almost the entire length of the state. The southern segment of the fault is approximately 280 miles long, extending from the Mexican border into the Transverse Ranges west of Tejon Pass. Along this segment, there is no single traceable fault line; rather, the fault is composed of several branches. The fault is located approximately 19.8 miles to the northeast of the Project site and is likely capable of producing a Mw 6.8 to 8.0 earthquake (CGS 2010; CIT 2025).

Surface Rupture

Surface rupture involves the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. Surface rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow. The Alquist-Priolo Earthquake Fault Zoning Act of 1972 regulates development near Holocene-active faults to address the hazard of surface fault rupture and provide protection of any development that may consider these zones. This Act

requires the State Geologist to establish regulatory zones (known as Alquist-Priolo Special Study Fault Zones or fault hazard zones) around the surface traces of Holocene-active faults and to issue appropriate maps (CGS 2018). The Project site is not located within an Alquist-Priolo Earthquake Fault Zone (Appendix F-1; CGS 2025).

Ground Shaking

Ground shaking is the movement of the earth's surface as a result of an earthquake. Ground motion produced by seismic waves emanates from a slow or sudden slip on a fault. The degree of ground shaking felt at a given site depends on the distance from the earthquake source, the magnitude of the earthquake, the type of subsurface material on which the site is situated, and topography. Generally, damage from ground shaking is less severe on rock than on alluvium or fill, but other local phenomena may override this generalization. Ground shaking can produce significant ground horizontal and vertical movement that can result in severe damage to structures that are generally not equipped to withstand it. The Project site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The Project site lies in close proximity to several seismically active faults; therefore, during the life of the Project, the site could experience moderate to very high ground shaking from a regional fault. The soils underlying the Project site generally consist of variable amounts of silty sand to sand with silt and clay, ranging from light to dark brown, dry to moist, and generally medium dense/medium stiff to very dense/very stiff to the maximum explored depth of approximately 51.5 feet below grade (Appendix F-1). The Project site falls within the characteristics of Class C (i.e., "Very Dense Soil and Soft Rock" profile), as defined in Chapter 20 of the American Society of Civil Engineers (ASCE) 7-16. The site has the potential to experience a Peak Ground Acceleration (PGA) of approximately 0.852g (Appendix F-1). As a point of reference, areas near the 1994 Northridge earthquake, which caused extensive damage, experienced ground accelerations of up to approximately 1.0g.

Subsurface Soils

The Project site is underlain by native Holocene age alluvium comprised of alluvial channel and outwash deposits consisting of varying amounts of sand, silt, and clay (Appendix F-1). The site is specifically on the southeastern extent of the young alluvial fan deposits emanating from the San Gabriel Canyon area at the base of the San Gabriel Mountains (Appendix F-1). A thin veneer of artificial fill associated with the now-vacant elementary school on the Project site is expected to exist across the site but was not differentiated on the boring logs. Deeper amounts of undocumented fill may exist in other portions of the site that were not directly explored. Holocene age alluvium was encountered beneath the artificial fill and consists primarily of medium brown, moderately consolidated, with silt and sand to boulder sized clasts. The alluvium is characterized as dry to moist and medium dense/medium stiff to very dense/very stiff (Appendix F-1).

Groundwater

The historically highest groundwater level in the immediate area is approximately 175 feet below the ground surface (bgs). Groundwater was not encountered in the borings drilled to a maximum depth of 51.5 feet bgs. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall (Appendix F-1).

Liquefaction/Lateral Spreading

Liquefaction is a process in which loose, saturated granular soils lose strength as a result of cyclical loading (i.e., seismic ground shaking). The strength loss is a result of a decrease in granular sand frictional forces and positive increase in pore pressures. Generally, liquefaction can occur if all of the following conditions apply: liquefaction-susceptible soil, groundwater within a depth of 50 feet or less, and strong seismic ground shaking occurs. Soils that are most susceptible to liquefaction are poorly consolidated, fine to medium-grained, primarily sandy soil. In addition, lateral spreading, a hazard associated with liquefaction, is the finite, lateral movement of gently to steeply sloping, saturated soil deposits caused by earthquake-induced liquefaction.

The Project site is not within a liquefaction hazard zone and site soils are generally not susceptible to liquefaction due to the lack of groundwater and on-site soils' relatively dense nature (Appendix F-1). The liquefaction evaluation conducted for the Project site was completed under the guidance of Special Publication 117A: Guidelines for Evaluating and Mitigating Seismic Hazards in California. Historical high groundwater is anticipated at a depth of greater than 50 feet below the site (estimated at 175 feet below ground surface). Therefore, the potential for liquefaction to occur beneath the site is considered to be very low (Appendix F-1). However, the presence of groundwater conditions cannot be ruled out due to local zones of perched groundwater from local seepage caused by precipitation. In the unlikely event that perched groundwater is encountered during earthwork and trenching for utilities, resulting in the need for dewatering, the Project applicant/developer would be required to obtain a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering is controlled in compliance with the Waste Discharge Requirements for the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). Temporary dewatering, if required, would be short-term and would not substantially interfere with groundwater supplies.

Slope Instability/Landslides

A landslide is the downhill movement of masses of earth material under the force of gravity. The factors contributing to landslide potential are steep slopes, unstable terrain, and proximity to earthquake faults. The Project site and adjacent areas are located on relatively flat to gently sloping ground, with no potential for landslides. The Project site is not located with an earthquake-induced landslide zone as designated by the CGS or by General Plan Figure GEO-4 (CGS 2025; City of Azusa 2004b).

Subsidence

Subsidence is the permanent collapse of the pore space within soil or rock and downward settling of the earth's surface relative to its surrounding area. Subsidence can result from the extraction of water or oil, liquefaction, the addition of water to the land surface (a condition called "hydrocompaction"), or from the placement/construction of new loadings (e.g., new structures). The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. According to mapping from the U.S. Geological Survey (USGS), the Project site is not located within an area of known ground subsidence due to groundwater pumping, or oil extraction (USGS 2025). There appears to be little or no potential for ground subsidence due to the withdrawal of fluids or gases at the Project site. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity (CalGEM 2025).

Expansive Soils

Expansive soils are soils that experience volumetric changes (i.e., expanding and shrinking) during cyclic changes in wetting and drying periods. Over time, this continuous change in soil volume can cause foundations to move unevenly and crack. Soils encountered at the Project site are considered to have a "low" expansive potential (Appendix F-1).

Paleontological Resources

Paleontological resources are the remains or traces of plants and animals that are preserved in Earth's crust, and per the Society of Vertebrate Paleontology ([SVP] 2010) guidelines, are older than written history or older than approximately 5,000 years. They are limited, nonrenewable resources of scientific and educational value and are afforded protection under state laws and regulations.

The Project site is located at the northern boundary of the Peninsular Ranges geomorphic province (Norris and Webb 1990; CGS 2002; Harden 2004). This geomorphic province is characterized by northwest trending mountain ranges and valleys that extend over 900 miles from the tip of the Baja California Peninsula to the Transverse Ranges (e.g., the San Bernardino and San Gabriel Mountains in southern California). Regionally, the Peninsular Ranges are bounded to the east by the Colorado Desert and the west by the continental shelf and offshore islands (Santa Catalina, Santa Barbara, San Nicholas, and San Clemente) (CGS 2002; Harden 2004). Regional mountain ranges in the Peninsular Ranges geomorphic province include the Santa Ana, San Jacinto, and Santa Rosa Mountains. Geologically, these mountains are dominated by Mesozoic, plutonic igneous and metamorphic rocks that are part of the Peninsular Ranges batholith (Southern California batholith) (Harden 2004).

The Project site is underlain by native Holocene age alluvial deposits. In addition, a thin veneer of artificial fill associated with the now-vacant elementary school on the Project site is expected to exist across the site but was not differentiated on the boring logs. Holocene alluvial deposits consisted primarily of medium brown, moderately consolidated, with silt and sand to boulder sized clasts. Overall, the Holocene alluvium persisted to a depth of 51.5 feet bgs where the boreholes stopped (Appendix F-1). The Holocene alluvial fan/alluvial deposits have low paleontological resource sensitivity at the surface that increases to high sensitivity with depth where the sediments become older.

No localities were reported or found within a one-mile radius buffer, but there are several localities nearby, from the same or similar sediments that likely underly the Project at depth; and the project site is not anticipated to be underlain by a unique geological feature.

4.6.2 Regulatory Requirements

4.6.2.1 Federal

Earthquake Hazards Reduction Act

The United States Congress passed the Earthquake Hazards Reduction Act in 1977 to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program. This program was substantially amended in November 1990 by the National

Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

The mission of the National Earthquake Hazards Reduction Program includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The National Earthquake Hazards Reduction Program Act designates the Federal Emergency Management Agency as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities. Other National Earthquake Hazards Reduction Program Act agencies include the National Institute of Standards and Technology, National Science Foundation, and the U.S. Geological Survey.

Occupational Safety and Health Administration Regulations

Excavation and trenching are among the most hazardous construction operations. Occupational Safety and Health Administration (OSHA) Excavation and Trenching Standard, Title 29 of the Code of Federal Regulations, Part 1926, Subpart P, covers requirements for excavation and trenching operations. OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

International Building Code

The international Building Code (IBC) is published by the International Conference of Building Officials. The 2024 IBC is the most recent iteration, and issues performance standards for the design and installation of structures and building systems. The IBC issues codes governing structural and safety provisions, including those aimed at preventing and/or addressing seismic hazards and is intended to provide consistency in building standards across the world.

4.6.2.2 State

California Building Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or those standards are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability, by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The CBC is updated and revised every 3 years. The 2025 version of the CBC will be effective January 1, 2026. It is anticipated that the Project will be subject to the most current CBC at the time of building permit issuance. The 2025 edition of the CBC is based on the 2024 IBC, published by the International Code Conference.

Chapters 16 and 16A of the 2025 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include the

requirements for foundation and geotechnical soil investigations, and geohazard reports (Section 1803A); excavation, grading, and fill (Section 1804A); damp-proofing and water-proofing (Section 1805A); allowable load-bearing values of soils (Section 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Section 1807A); foundations (Section 1808A); and design of shallow foundations (Section 1809A) and deep foundations (Section 1810A). Chapter 33 of the 2025 CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (CCR Title 8) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. The Project would be required to employ these safety measures during excavation and trenching.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Act (PRC §§ 2621–2630) was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning efforts. Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. The Project site is not located in an Alquist-Priolo Earthquake Fault Zone.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC §§ 2690–2699.6) addresses earthquake hazards from non-surface fault rupture, including liquefaction and seismically induced landslides. The act established a mapping program for areas that are considered to be highly susceptible to liquefaction and landslides. The act also specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils. The Project site is not located within an identified zone of required investigation for liquefaction or landslides (CGS 2025).

National Pollutant Discharge Elimination System Permit

In California, the State Water Resources Control Board (SWRCB) administers regulations promulgated by the U.S. Environmental Protection Agency (55 CFR § 47990), requiring the permitting of stormwater-generated pollution under the National Pollutant Discharge Elimination System (NPDES). In turn, the SWRCB's jurisdiction is administered through nine Regional Water Quality Control Boards. Under these federal regulations, an operator must obtain an NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002), also known as the Construction General Permit, through the NPDES Stormwater Program, for all construction activities with ground disturbance of an acre or more. The Construction General Permit requires the implementation of best management practices (BMPs) to reduce sedimentation into surface waters and to control

erosion. One element of compliance with the NPDES permit is preparation of a Stormwater Pollution Prevention Plan (SWPPP) that addresses control of water pollution, including sediment, in runoff during construction.

Paleontological Resources

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value and are afforded protection under state laws and regulations. Paleontological resources are explicitly afforded protection by CEQA, specifically in section VII(f) of the CEQA Guidelines Appendix G "Environmental Checklist," which addresses the potential for adverse impacts to "unique paleontological resource[s] or site[s] or … unique geological feature[s]." This provision covers fossils of importance – remains of species or general new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that generally, a resource shall be considered "historically significant" if it has yielded or may be likely to yield information important in prehistory (PRC § 15064.6 (a)(3)(D)). Paleontological resources would fall within this category. PRC sections 5097.5 and 30244 also regulate removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

4.6.2.3 Regional and Local

City of Azusa Municipal Code

The California Building Code, 2025 edition, published at CCR Title 24, Part 2, including Appendix J, issuing grading requirements, is adopted by reference pursuant to Chapter 14, Article I, section 14-1 of the AMC.

Chapter 88, Article III, Section 88.34.080 – Water Efficient Landscaping

According to Chapter 88, Article 3, Chapter 34, section 88.34.080, Adoption of Model State Water Efficient Landscaping Ordinance, the Project would be subject to the City's Water Efficient Landscaping Ordinance. The City adopts by reference the California State Model Water Efficient Landscape Ordinance (codified at California Code of Regulations, Title 23, Division 2, Chapter 2.7, section 490 et seq.) and any amendments thereto, as the law of the City.

Chapter 60 – Stormwater and Urban Runoff Pollution Prevention

Chapter 60 of the AMC requires that all development comply with the provisions of this section for NPDES compliance and that BMPs must be installed as instructed by the City.

Section 60-9 – Stormwater and Runoff Pollution Mitigation for Construction Activity. Section 60-9 requires that construction activity for which a permit is required does not commence without implementing all stormwater and runoff pollution mitigation measures required by such a permit.

Chapter 88 – Development Code

The City's Development Code is intended to regulate the use and development of land within the City consistent with the General Plan. The intent of the Development Code is to protect and to promote public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City; provide standards for continuing ordering growth and development; create a comprehensive and stable pattern of development upon which to plan

transportation, water supply, sewerage, and more; to ensure that proposed development is of human scale, pedestrian-oriented, energy conserving and designed to create attractive streetscapes; and to minimize automobile congestion.

Section 88.34.040 – Landscape and Irrigation Plans. Part A, Preliminary Landscape Plan, of section 88.34.040 of the AMC requires that a preliminary landscape plan be prepared by a California licensed landscape architect, licensed landscape contractor, certified nurseryman, or other professional determined by the director to be qualified for all applicable projects. This includes preparation of a preliminary landscape plan and a final landscape plan.

4.6.3 Thresholds of Significance

The significance criteria used to evaluate a Project's impacts to geology and soils are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to geology and soils would occur if the Project would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.
   ii. Strong seismic ground shaking.
   iii. Seismic-related ground failure, including liquefaction.
   iv. Landslides.
b) Result in substantial soil erosion or the loss of topsoil.
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water.
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.6.4 Impacts Analysis

Threshold 4.6a **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42?

No Impact. The Project site is not within an Alquist-Priolo Earthquake Fault Zone[2] and no known Holocene-active or pre-Holocene faults pass directly beneath the site (CGS 2018, CGS 2025). The Project site is located in a

[2] The Puente Hills Thrust Fault is a blind thrust fault, which are not considered under the Alquist-Priolo Earthquake Fault Zoning Act.

seismically active region with numerous active faults that are capable of producing seismic events; however, no active faults are identified on the Project site and the potential for damage from ground rupture is low (Appendix F-1). As shown on Figure 4.6-1, Regional Faults, the nearest Holocene-active fault with surface expression and associated Alquist-Priolo Earthquake Fault Zone is the Duarte Fault within the Sierra Madre Fault Zone, which is located approximately 0.52 miles to the northwest of the Project site (CGS 2025). Because no faults traverse the site, the Project site would not be subject to rupture of a known earthquake fault. Furthermore, the Project would not directly or indirectly cause or exacerbate existing fault rupture risks from the construction of new buildings and associated infrastructure on the Project site because no Project-related activities would occur within the Sierra Madre Fault zone. Therefore, no impact related to surface rupture of a known earthquake fault would occur.

ii Strong seismic ground shaking?

Less Than Significant Impact With Mitigation. The Project site is located in the seismically active Southern California region. The Sierra Madre Fault have been mapped in the vicinity of the Project site. These Holocene-active faults, as well as other regional faults (e.g., Puente Hills Thrust Fault and San Andreas Fault) are capable of producing moderate to strong earthquakes that could cause substantial ground shaking at the Project site. The severity of ground shaking would depend on the magnitude of the earthquake, the distance to the Project site, the duration of shaking, and on-site geologic conditions. Ground shaking could lead to substantive damage to structures and infrastructure, personal injury and death, utility service disruption, fire explosion, and hazardous material spills, if not engineered appropriately.

The soils underlying the Project site fall within the characteristics of Class C (i.e., "Very Dense Soil and Soft Rock" profile), as defined in Chapter 20 of the American Society of Civil Engineers (ASCE) 7-16. This information was used to calculate the anticipated ground motions on the Project site, using the U.S. Geological Survey U.S. Seismic Design Maps tool (Appendix F-1) in the preliminary geotechnical investigation. The Project site has the potential to experience ground accelerations of 0.852g[3], which is substantive and capable of causing significant damage if not designed appropriately. The geotechnical evaluation prepared for the Project provides the seismic parameters to be used in the structural (building) design of the Project, based on the materials and soils encountered during subsurface exploration at the site and provides for design measures that are consistent with CBC requirements (Appendix F-1). The CBC provides procedures for earthquake-resistant structural design that includes considerations of on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Although conformance with CBC seismic design requirements does not guarantee that significant structural damage or ground failure would not occur in the event of a large earthquake, the proposed structures would be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life.

As previously discussed, the current edition of the CBC (2025) is based on the 2024 International Building Code, and all construction must be conducted in compliance with the CBC. Chapters 16 and 16A of the 2025 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Project construction would be completed in accordance with the latest version of the CBC at the time of construction. As with all development within the City, development within the Project site would also be required to comply with the seismic safety requirements of the CBC. Standards provided in CBC section 1803 require preparation of a geotechnical evaluation and that all recommendations set forth in a final site-specific

[3] Peak ground acceleration can be expressed in fractions of "g" (the standard acceleration due to Earth's gravity, equivalent to g-force) as either a decimal or percentage.

design-level geotechnical report be incorporated into all applicable phases of Project excavation, grading and construction. Therefore, the site-specific recommendations set forth in a final site-specific design-level geotechnical report are required to be incorporated into all applicable phases of the Project in accordance with MM-GEO-1, Geotechnical Evaluation and Recommendations. Upon compliance with the CBC section 1803 and MM-GEO-1 aimed at minimizing geologic hazards, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking, and impacts would be less than significant with mitigation.

iii Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. As previously stated, according to the preliminary geotechnical evaluation, the historical high groundwater levels for the general area have been interpreted at 175 feet below the ground surface in the vicinity of the Project site. The potential for liquefaction to occur beneath the Project site is considered to be very low due to the lack of groundwater in the upper 50 feet and relatively dense on-site soils (Appendix F-1). Furthermore, as shown in General Plan Figure GEO-4, the Project site is not located within a mapped California Geologic Survey liquefaction hazard zone (Appendix F-1; CGS 2025; City of Azusa 2004b). As such, seismic-related ground failure due to liquefaction would not be expected to occur on the Project site and impacts would be less than significant.

iv Landslides?

Less Than Significant Impact With Mitigation. As previously discussed, the topography of the Project site and adjacent areas is relatively flat to gently sloping; therefore, the Project site is not susceptible to landslides. In addition, the Project site is not located within an earthquake-induced landslide zone, as designated by the CGS (also see General Plan Figure GEO-4). Because the Project site is not located within an area as having the potential for seismic slope instability, geologic hazards associated with landslides are not anticipated to occur at the site (Appendix F-1).

Existing Project site soils at the following depths would need to be excavated and properly compacted for foundation and slab support: five feet below existing grade or three feet below the base of the foundations, whichever is deeper, for building structures; three feet below existing grade or two feet below proposed footings, whichever is greater, for minor site structures; and two feet below existing grade or below the bottom of the pavement section, whichever is deeper, for pavement and hardscape areas. In the absence of proper engineering, over steepened temporary slopes could be susceptible to failure, potentially resulting in adverse effects, including the risk of loss, injury, or death. As indicated in the preliminary recommendations of the geotechnical evaluation (Appendix F-1), excavations are expected to expose site soils within the upper 5 to 15 feet, which are anticipated to be OSHA Type “B” soils, that are subject to excessive caving and would require shoring or other sloping control measures. Where proposed improvements would be adjacent to property lines, impacts would be reduced by performing “ABC” slot cuts during earthwork removal and recompacting, where any given slot would be backfilled immediately with properly compacted fill to finish grade prior to excavation of the two adjacent slots. A temporary shoring parameter would be provided for excavation that extends below a 1:1 (horizontal to vertical) projection of an existing foundation. Therefore, the site-specific recommendations within the preliminary geotechnical evaluation are required to be complied with for Project construction activities in accordance with MM-GEO-1. With incorporation of MM-GEO-1, these slope stability measures, consistent with building code and OSHA requirements, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides (Appendix F-1), and these impacts would be less than significant with mitigation.

Threshold 4.6b Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Less Than Significant Impact. The Project site is not located in a hillside development area or agricultural zone that could be susceptible to loss of topsoil due to site development (CGS 2025). The Project site is currently developed with buildings, with only a negligible amount of soil exposed in areas of ornamental landscaping.

Project construction would entail demolition and grading of portions of the Project site as well as excavation and compaction of fill soils, followed by construction of the building foundation and proposed buildings. As shown in Figure 3-5, Preliminary Grading and Drainage Plan, the Project would require approximately 4,600 cubic yards of cut and 4,600 cubic yards of fill, resulting in a 'balanced' grading that would not require any import or export of soils. These construction activities could result in temporary, short-term periods where soils are exposed to potential erosion during ground disturbing activities.

As previously discussed, Chapter 60 of the AMC requires that all grading plans and permits must comply with the provisions of the NPDES Construction General Permit and implement erosion control BMPs before grading begins to prevent erosion and loss of topsoil from the site. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document with the SWRCB, in order to obtain coverage under the NPDES Construction General Permit. No grading permit would be issued unless the plans for such work include a SWPPP that specifies details of BMPs, including erosion control measures to minimize the transport of sediment and protect public and private property from the effects of erosion. The required SWPPP would establish site-specific erosion and sediment control BMPs for all construction activities. Typical examples of erosion-related construction BMPs include the following:

- Silt fences and/or fiber rolls installed along with the limits of work and/or the Project construction site
- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed)
- Runoff control devices (e.g., fiber rolls, gravel bag barriers/chevrons, etc.) used during construction phases conducted during the rainy season
- Wind erosion (dust) controls
- Tracking controls at the site entrance, including regular street sweeping and tire washes for equipment
- Regular inspections and maintenance of BMPs

These BMPs would be refined and/or added to as necessary by a qualified SWPPP professional to meet the performance standards in the Construction General Permit. Compliance with the Construction General Permit would ensure that soil erosion would be minimized.

Although the Project would require excavation activities related to excavation and compaction of artificial fill, this would not result in a substantial loss of topsoil. The Project site is currently developed and paved and likely does not contain substantive quantities of native topsoil. The Project site is not used and is not zoned for agricultural uses or other activities that require the use of topsoil (City of Azusa 2004c). Therefore, with compliance of the NPDES General Construction Permit, potential impacts associated with soil erosion and/or loss of topsoil would be less-than-significant during construction.

Operations

No Impact. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil, as the majority of the Project site would be covered by structures and paving, while the remaining portions of the site would contain irrigated landscaping. All proposed improvements would include required post-construction drainage control features to manage stormwater runoff consistent with current drainage control requirements (see further discussion in Section 4.9, Hydrology and Water Quality). No exposed areas subject to erosion would be created or affected by the Project. In addition, the majority of the area surrounding the Project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. With implementation of the Project's impervious and landscaped areas as well as the drainage infrastructure, there would be no impacts related to erosion or loss of topsoil during operation of the Project.

Threshold 4.6c **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Landslides

Less Than Significant Impact With Mitigation. As previously discussed under Threshold 4.6a (i-iv), the Project site is relatively level and the topography in the site vicinity slopes slightly downward toward the south. Additionally, the Project site is not located within a zone of required investigation for earthquake-induced landslides, as identified by the CGS (Appendix F-1). There are no known landslides near the Project site, nor is the site in the path of any known or potential landslides. Therefore, the Project would not be located on a geologic unit that is unstable with respect to landslides.

Excavations up to 15 feet in vertical height are anticipated for excavation and compaction of artificial fill. In the absence of proper engineering, over steepened temporary slopes could be susceptible to failure. However, with incorporation of excavation and shoring measures recommended in the preliminary geotechnical evaluation (Appendix F-1), construction activities would not result in landslides or collapse. Therefore, the recommendations within the preliminary geotechnical evaluation are required to be complied with for Project construction activities in accordance with MM-GEO-1 and the City's Grading Permit application (City of Azusa 2026). As a result, the recommendations from the geotechnical evaluation would be incorporated into the final design and construction plans, and impacts would be less than significant with mitigation incorporated.

Liquefaction/Lateral Spreading

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. The Project site is not located in an area potentially susceptible to liquefaction or lateral spreading, as discussed in the preliminary geotechnical evaluation (Appendix F-1). Potential impacts concerning liquefaction are evaluated under Threshold 4.6a(iii) above. Due to the lack of nearby river channels or embankments that could cause a fluid mass to move downslope, the lack of groundwater in the upper 50 feet of the Project site, and very low potential for liquefaction of the Project site [see Threshold 4.6a(iii)], the potential for lateral spreading is considered very low (Appendix F-1). Impacts associated with liquefaction and lateral spreading would therefore be less than significant.

Subsidence

Less Than Significant Impact With Mitigation. Subsidence is expected as a result of the Project's earthwork operations, including compaction of onsite soils (Appendix F-1). The preliminary geotechnical evaluation (Appendix F-1) estimates a shrink of 5 to 15 percent in volume of near-surface (approximate upper 5 feet) soils and subsidence on the order of 0.1 feet. These values are typical for construction activities and are not expected to result in unstable ground conditions. In accordance with the CBC section 1804A, any use of compacted fill shall comply with the provisions of an approved final design level geotechnical report, which is also required by CBC section 1803, as discussed above. The Project would be required to meet the most recent building safety criteria and construction design recommendations of the site-specific final design level geotechnical report that would be prepared for the Project, in accordance with MM-GEO-1. There appears to be little or no potential for ground subsidence due to the withdrawal of fluids or gases at the site. As such, potential impacts related to subsidence would be less than significant with mitigation.

Collapsible/Compressible Soils

Less Than Significant Impact With Mitigation. The preliminary geotechnical evaluation indicated that near-surface loose and compressible soils, including artificial fill, are unsuitable to support the proposed improvements in their present condition (Appendix F-1). If such materials are left in the current condition, excessive settlement of structures and site improvements could result due to the weight of new foundations. Excessive settlement from such materials would be prevented through excavation and re-compaction, as recommended by the preliminary geotechnical evaluation, prepared consistent with building code requirements. For building structures, the preliminary geotechnical evaluation recommends that soils within building pads are removed and re-compacted to a minimum of 5 feet below existing grade or 3 feet below the base of the foundations, whichever is deeper. For minor site structures, such as free-standing walls and retaining walls, temporary removal and re-compaction should extend a minimum of 3 feet below existing grade or 2 feet below proposed footings, whichever is greater. Additionally, within pavement and hardscape areas, temporary removal and re-compaction should extend to a depth of at least 2 feet below existing grade or 2 feet below the bottom of the pavement section, whichever is deeper. During Project construction activities, site-specific conditions may be encountered during excavation that could require additional over-excavation beyond the noted minimum in order to obtain an acceptable subgrade. The actual depths and lateral extents of grading would be determined by the geotechnical consultant, based on subsurface conditions encountered during grading.

A final design-level geotechnical investigation report is required in accordance with the CBC. As previously discussed, the 2025 edition of the CBC, including Appendix J, pertaining to grading requirements, is adopted by reference pursuant to section 14-1 of the AMC. In accordance with section 1803 of the CBC, a geotechnical investigation is required to include soil testing, laboratory testing or engineering calculations to evaluate soil types, soil expansion, depth of groundwater, deep foundations, rock strata, excavation, compacted fill, soil strength, seismic design criteria and other soil characteristics that need to be considered in the structural design and construction of buildings and infrastructure. Geotechnical investigations must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations from final design level geotechnical investigations would be incorporated into the design and construction specifications of the Project, in accordance with MM-GEO-1. As such, impacts related to collapsible/compressible soils would be less than significant with mitigation.

In summary, upon Project compliance with the CBC and implementation of MM-GEO-1, the recommendations set forth in the final design level geotechnical report would reduce the Project's potential to directly or indirectly

exacerbate existing conditions related to on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. As a result, impacts would be less than significant with mitigation.

Threshold 4.6d **Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Less Than Significant Impact. Expansive soils are typically clay-rich soils that experience volumetric changes with changes in moisture content (i.e., they shrink when dry and swell when wet). These cyclical changes in volume over time can exert substantial pressure on foundations, resulting in structural distress and/or damage. According to the preliminary geotechnical evaluation, the site is underlain by a thin veneer of undocumented fill, associated with the previous school property development, and middle-Holocene-age, young alluvial fan deposits comprised of sand with varying amount of silt and clay (Appendix F-1). Based on the results of laboratory soil testing, site soils are anticipated to have low expansion potential, and the preliminary geotechnical evaluation assumes that proposed building foundations and slabs would be constructed with non-expansive materials. As such, the Project would not create substantial direct or indirect risks to life or property with respect to expansive soils and impacts would be less than significant.

Threshold 4.6e **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact. The Project site is located in the City and is currently served by existing sewer infrastructure, and any new development would require connecting to the City's existing sewer infrastructure system (see Section 4.17, Utilities and Service Systems, of this Draft EIR for more discussion). The Project would not require septic tanks or alternative wastewater disposal systems; therefore, implementation of the Project would result in no impact related to septic systems or alternative wastewater disposal systems.

Threshold 4.6f **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Less Than Significant Impact With Mitigation. No paleontological resources were identified within the Project site as a result of the paleontological resources assessment (Appendix F-2). No localities were reported or found within a one-mile radius buffer, but there are several localities nearby, from the same or similar sediments that likely underly the Project site at depth; and the Project site is not anticipated to be underlain by a unique geological feature. While the Project site has been disturbed by development over the years, intact paleontological resources may be present below the original layer of fill and Holocene alluvial fan deposits. However, since Holocene alluvial fan deposits were recorded to at least a depth of 51.5 feet, it is unlikely that any excavations will be deep enough in this area to impact older (Pleistocene) alluvial deposits that may contain significant paleontological resources. Given this, the Project site has low paleontological sensitivity that increases with depth, where sediments become older.

Despite this, the records search and map and literature review results indicate that the Project site has high potential to produce paleontological resources during planned construction activities that occur below the level of fill and previously disturbed sediments and/or below 5 feet. In the event that intact paleontological resources are discovered on the Project site, ground-disturbing activities associated with construction of the Project, such as grading and large diameter drilling during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. In the event that intact paleontological resources are present within the

Project site at depth, ground-disturbing activities associated with construction of the Project have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. As such, MM-GEO-2, Inadvertent Discovery Protocols, is required. MM-GEO-2 is consistent with Implementation Program HR2, Archaeological Surveys, from the General Plan. Per MM-GEO-2, if paleontological resources (e.g., fossils) are exposed during Project construction, all construction work occurring within 50 feet of the find must immediately stop until a qualified paleontologist evaluates the significance of the find and completes documentation and collection of the find. Thus, upon implementation of MM-GEO-2, the potential for impacts to a unique paleontological resource or site would be reduced to below a level of significance. Construction impacts of the Project are therefore less than significant with mitigation incorporated.

4.6.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by section 15130 of the State CEQA Guidelines. The geographic context of the past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Chapter 2, Section 2.4, Cumulative Impacts, and on Figure 2-4, Cumulative Projects Location Map, of this Draft EIR. Due to the site-specific nature of geologic conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geological and soils impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. The Project's site-specific impacts would not combine to create cumulative impacts with other projects occurring elsewhere in the City.

Threshold 4.6a- Cumulative **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42?**

ii. **Strong seismic ground shaking?**

iii. **Seismic-related ground failure, including liquefaction?**

iv. **Landslides?**

The geographic context for seismic hazards is a 50-mile radius of the Project site, where there is a general risk of experiencing a substantive earthquake on any of the regional Holocene-active faults in the area. However, seismic risks tend to be site-specific rather than cumulative in nature because the effects are so dependent on site-specific conditions and do not combine from site to site. For current and future projects, any development occurring within the County of Los Angeles, City of Azusa, or other nearby municipalities would be subject to site development and seismic construction standards and code requirements to ensure protection from substantive damage or injury in the event of a seismic event. As with the Project, cumulative projects would be subject to the same local, regional, and state regulations pertaining to seismic safety, including the CBC, County of Los Angeles Building Code, City of Azusa Development Code, and building codes of other nearby municipalities. Adherence to these existing seismic building code requirements would ensure that adverse effects related to fault rupture, ground shaking, liquefaction, and landslides are minimized. Therefore, the impacts related to fault rupture, ground shaking, liquefaction, and landslides would be less than significant and not cumulatively considerable.

Threshold 4.6b- Cumulative **Would the project, in combination with past, present, and reasonably foreseeable future projects contribute to substantial soil erosion or the loss of topsoil?**

The geographic context considered in the cumulative analysis of soil erosion and loss of topsoil is the San Gabriel River Watershed and upper San Gabriel River subwatershed, which includes cumulative projects identified on Figure 2-4, Cumulative Projects Location Map, of Chapter 2 of this Draft EIR, and any activities in the watershed that have the potential to result in soil erosion or loss of topsoil. Similar to the Project, all cumulative projects would be subject to existing regulations, policies, and plans established by the County of Los Angeles, City of Azusa, or other nearby municipalities within the Santa Gabriel Watershed, as well as the Los Angeles RWQCB, that relate to erosion control requirements to protect water quality. While these regulations are primarily designed to protect water quality of receiving waters, they are also effective in minimizing soil erosion or loss of topsoil. Regulations and plans that the cumulative projects would likely be subject to include NPDES permitting and associated SWPPPs and BMPs; Los Angeles RWQCB Basin Plan Water Quality Objectives for Inland Surface Waters; the City of Azusa Development Code, Los Angeles County Code, and development codes of other municipalities within the watershed; and applicable General Plan goals and policies. In addition, as noted above under Threshold 4.6b, due to previous development and the known presence of artificial fills onsite, the Project site likely does not include substantive quantities of native topsoil. Therefore, because there is not an underlying cumulative impact that the Project could contribute to, as discussed above, the Project would not result in a cumulatively considerable contribution associated with soil erosion and loss of topsoil (see also discussion in Section 4.9, Hydrology and Water Quality).

Threshold 4.6c- Cumulative **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Geotechnical hazards tend to be site-specific because conditions can change over relatively short distances and do not combine with other planned development. The City's Building Division would review applications for building permits for compliance with the CBC, which contains universal standards for site preparation (e.g., fill compaction standards) and grading practices, foundations design, and guidelines for the appropriate foundation design to ensure that improvements are located on stable materials and do not cause underlying materials to become unstable. In accordance with the local building code requirements and CBC, the Project as well as the cumulative projects would be required to prepare and implement recommendations provided in a comprehensive geotechnical engineering investigation report (via implementation of MM-GEO-1) that would be conducted by a California licensed geotechnical engineer or engineering geologist that further evaluates the underlying soils to evaluate the potential for landslides, lateral spreading, subsidence, liquefaction or collapse and provide geotechnical engineering improvements in site preparations and/or foundation design consistent with building code requirements that ensure stability. Therefore, the impacts related to unstable soils would be less than significant and not be cumulatively considerable.

Threshold 4.6d- Cumulative **Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Impacts related to expansive soils tend to be site-specific rather than cumulative in nature, because hazards associated with expansive soils are solely dependent on the expansive properties of project specific underlying materials which can vary significantly over relatively short distances. Regardless, cumulative projects occurring within the City would be subject to, at a minimum, building code requirements which include minimum standards

for expansive properties. As with the Project site, cumulative projects would be subject to the same local, regional, and State regulations pertaining to expansive soil hazards, including CBC and local building code requirements. Therefore, as discussed above, because there is not an underlying cumulative impact that the Project could contribute to, the impacts related to expansive soils would not be cumulatively considerable.

Threshold 4.6e- Cumulative **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

The Project would not include the use of septic or alternative wastewater disposal systems and as a result cannot contribute to a cumulative impact. There would be no cumulative impact related to this criterion.

Threshold 4.6f- Cumulative **Would the project, in combination with past, present, and reasonably foreseeable future projects contribute to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Potential cumulative impacts to paleontological resources would result from projects that combine to create an environment where fossils, exposed on the surface, are vulnerable to destruction by earthmoving equipment, looting by the public, and natural causes such as weathering and erosion. However, since Holocene alluvial fan deposits were recorded to at least a depth of 51.5 feet, it is unlikely that any excavations will be deep enough in this area to impact older alluvial deposits that may contain significant paleontological resources. Given this, the Project site has low paleontological sensitivity that increases with depth, where sediments become older. Potential cumulative impacts to paleontological resources considers whether the impacts of the Project together with the cumulative projects would substantially diminish the number of paleontological resources within the same or similar context or property type. The majority of impacts to paleontological resources are site-specific and are therefore generally mitigated on a project-by-project basis. As described above, the Project would result in a potentially significant impact associated with loss of paleontological resources, but this impact would be reduced to a less-than-significant level with implementation of MM-GEO-2. Thus, the Project does not propose construction (including grading/excavation) or design features that could directly or indirectly contribute to an increase in a cumulative impact to paleontological resources, as with implementation of MM-GEO-2, any significant paleontological resources uncovered during Project excavations would be properly analyzed and salvaged by a qualified paleontologist.

Cumulative projects would also be required to assess impacts to paleontological resources. Additionally, as needed, projects would incorporate individual mitigation for site-specific geological units present on each individual project site. Therefore, the Project, in combination with the past, present, and reasonably foreseeable future projects in the Project vicinity, would result in less-than-significant cumulative impacts to paleontological resources, and no further mitigation measures are required. As such, the Project's incremental contribution to impacts related to paleontological resources would not be cumulatively considerable.

4.6.6 Mitigation Measures

MM-GEO-1 Geotechnical Evaluation and Recommendations. The Project shall be designed in accordance with the recommendations from a final design-level site-specific geotechnical report. The final design-level site-specific geotechnical report shall address the recommendations as set forth in Chapter 4 of the Preliminary Geotechnical Evaluation and Recommendations Report, including Site Earthwork; Preliminary Foundation Recommendations; Soil Bearing and Lateral Resistance; Lateral

Earth Pressures for Retaining Walls; Control Of Surface Water and Drainage Control; Subsurface Water Infiltration; Preliminary Asphalt Pavement Sections; Soil Corrosivity; Nonstructural Concrete Flatwork; Geotechnical Plan Review; and Geotechnical Observation and Testing During Construction. Prior to the issuance of a rough grading permit, the applicant shall submit the final design-level geotechnical report and rough grading plan for review and approval by the City's Economic and Community Development Department and/or the City Engineer.

MM-GEO-2 Inadvertent Discovery Protocols. Prior to commencement of construction activities, an inadvertent discovery clause, written by an paleontologist, shall be added to all construction plans associated with ground disturbing activities and the Project applicant shall retain a qualified paleontologist, meeting Society of Vertebrate Paleontology (SVP 2010) standards, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City of Azusa Planning Division for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of construction activities. The WEAP shall be prepared to inform all personnel working on the Project about the paleontological sensitivity of the area, to provide specific details on the kinds of paleontological materials that may be identified during construction, to explain the importance of and legal basis for the protection of significant paleontological resources, and to outline the actions to be taken in the event of a discovery of paleontological resources. Each worker shall also learn the proper procedures to follow in the event that paleontological resources are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and paleontological monitor.

The WEAP shall require that a qualified paleontological be retained and on-call to respond to and address any inadvertent discoveries identified during initial excavation in native soils, which underly the 5 feet below ground surface of artificial fill soils. As it pertains to paleontological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction.

In the event that paleontological resources (e.g., fossils) are exposed during Project grading, construction will temporarily halt and/or divert grading activity in that area and wait to allow recovery of paleontological resources by a paleontological monitor. The area of discovery will be roped off with a 50-foot radius buffer. Grading will be allowed to recommence once a qualified paleontologist can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not significant, the paleontologist may document the find and allow work to continue. If significant paleontological resources are discovered during earthmoving activities, the qualified paleontologist shall prepare and submit a Paleontological Resources Recovery Plan (PRRP) to the City for review and approval. The recovery plan shall include, but is not limited to, sampling and fossil recovery procedures, museum curation for any scientifically significant specimen recovered, and a report of findings. Recommendations in the PRRP as approved by the City shall be implemented before construction activities can resume at the site where the significant paleontological resources were discovered. Any reports and plans resulting from implementation of this measure shall also be submitted to the City and filed with the Natural History Museum of Los Angeles County.

4.6.7 Significance Conclusion

Threshold 4.6a. The Project would have **no impact** related to surface rupture of a known earthquake fault. The Project would not directly or indirectly be affected by substantial adverse effects involving strong seismic ground shaking, and impacts would be **less than significant with mitigation incorporated**. The Project would result in a **less-than-significant** impact related to seismic-related ground failure, including liquefaction. The Project would result in a **less-than-significant mitigation incorporated** impact related to potential substantial adverse effects, including the risk of loss, Injury, or death involving landslides. Implementation of MM-GEO-1 would reduce potentially significant impacts to during construction to less than significant.

Threshold 4.6b. The Project would result in a **less-than-significant impact** related to erosion or loss of topsoil.

Threshold 4.6c. The Project would result in a **less-than-significant impact with mitigation incorporated** related to on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Implementation of MM-GEO-1 would reduce potentially significant impacts to during construction to less than significant.

Threshold 4.6d. The Project would result in a **less-than-significant impact** related to expansive soils.

Threshold 4.6e. The Project would have **no impact** related to septic tanks or alternative wastewater disposal systems.

Threshold 4.6f. The Project would have a **less-than-significant impact with mitigation incorporated** related to the destruction of a unique paleontological resource or site or geologic feature. Implementation of MM-GEO-2 would reduce potentially significant impacts to paleontological resources during construction.

4.6.8 References

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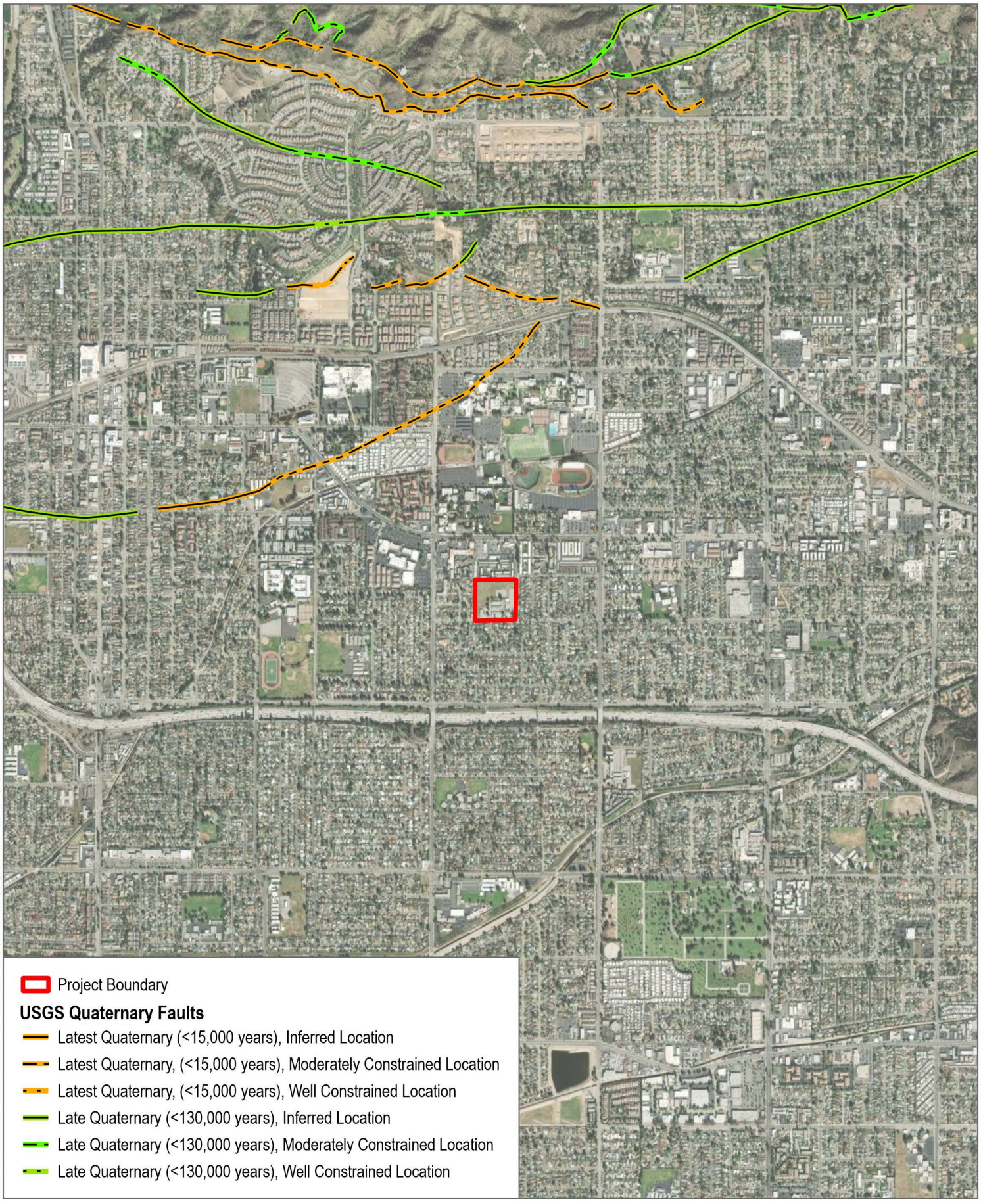
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SOURCE: City of Azusa 2025; Los Angeles County Department of Regional Planning 2025; World Imagery

DUDEK

0 1,000 2,000 Feet

FIGURE 4.6-1

Regional Faults

Delaney Square Residential Project

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4.7 Greenhouse Gas Emissions

This section describes the existing greenhouse gas (GHG) emissions conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance, and references. Information contained in this section is based on California Emissions Estimator Model (CalEEMod), Version 2022.1.1.44, which was used to estimate the Project's GHG emissions from both construction and operations and existing land use operation. For the relevant data, refer to the following appendices:

- **Appendix C-1** Air Quality and Greenhouse Gas Emissions CalEEMod Outputs, prepared by Dudek, dated June 2026
- **Appendix K** Transportation Impact Study for the Mauna Loa Residential Project, prepared by LLG Engineers, dated May 2026

Other sources consulted are listed in Section 4.7.8, References.

4.7.1 Existing Conditions

4.7.1.1 The Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2025a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect, and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (IPCC 2013; EPA 2025a). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use

changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further under "Potential Effects of Human Activity on Climate Change."

4.7.1.2 Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code section 38505(g), for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (see also CEQA Guidelines § 15364.5).[1] Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.[2]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane. CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (such as in rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., CFCs, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial,

[1] Climate forcing substances include GHGs and other substances such as black carbon and aerosols. The Draft EIR's analysis focuses on the seven GHGs identified in California Health and Safety Code section 38505, because impacts associated with other climate forcing substances (i.e., black carbon and aerosols) are not evaluated herein.

[2] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change's Second Assessment Report and Fourth Assessment Report (IPCC 1995, 2007), CARB's Glossary of Terms Used in GHG Inventories (CARB 2025a), and EPA's Glossary of Climate Change Terms (EPA 2024b).

commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.

- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** NF_3 is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons. CFCs are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. CFCs are chemically unreactive in the lower atmosphere (troposphere) and the production of CFCs was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons. HCFCs are a large group of compounds, whose structure is very close to that of CFCs—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of CFCs for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. DPM emissions are a major source of black carbon and are TACs that have been regulated and controlled in California for several decades to protect public health. In relation to declining DPM from CARB regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric ozone (O_3), which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

4.7.1.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or energy reflection) (EPA 2025b). The IPCC developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

CalEEMod (Version 2022.1.1.44) (CAPCOA 2022) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2008). The GWP values identified in CalEEMod were applied to the Project.

Contributions to Greenhouse Gas Emissions

Contributions to Greenhouse Gas Emissions

Per the EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total United States GHG emissions were approximately 6,343 million metric tons (MMT) CO_2e in 2022 (EPA 2024a). Total U.S. emissions have decreased by 3.1% from 1990 to 2022, down from a high of 15.2% above 1990 levels in 2007. Emissions increased from 2021 to 2022 by 0.2% (14.4 MMT CO_2e). Net emissions (i.e., including sinks) were 5,489.3 MMT CO_2e in 2022. Overall, net emissions increased 1.3% from 2021 to 2022 and decreased 16.7% from 2005 levels. From 2021 to 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due, in part, to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. The CO_2 emissions from fossil fuel combustion increased by 1.0% from 2021 to 2022 and were 1.1% below emissions in 1990. CO_2 emissions from natural gas use increased by 5.2% (84.80 MMT CO_2e) from 2021 to 2022, and CO_2 emissions from coal consumption decreased by 6.1% (58.6 MMT CO_2e) from 2021 to 2022 (EPA 2024a).

According to California's 2000–2022 GHG emissions inventory (2024 edition), California emitted approximately 371.1 MMT CO_2e in 2022 (CARB 2024). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high-GWP substances, and recycling and waste. Table 4.7-1 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2022.

Table 4.7-1. GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)[a]	Percent of Total[1]
Transportation	141.0	38%
Industrial	74.2	20%
Electricity[2]	59.4	16%
Residential and commercial uses	40.8	11%
Agriculture and Forestry	29.7	8%
High GWP substances	22.3	6%
Recycling and waste	7.4	2%
Totals	**371.1**	**100%**

Source: CARB 2024.
Notes: GHG = greenhouse gas; GWP = global warming potential; MMT CO_2e = million metric tons of carbon dioxide equivalent. Emissions reflect 2022 California GHG inventory.
1 Totals may not sum due to rounding.
2 Includes emissions associated with imported electricity.

Potential Effects of Human Activity on Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 Intergovernmental Panel on Climate Change Synthesis Report indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia.3 Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, rising sea levels, and ocean acidification.[4]

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature. Reflecting the long-term warming trend since pre-industrial times, observed global mean surface temperature for the decade 2006–2015 was 0.87°C (likely between 0.75°C and 0.99°C) higher than the average over the 1850–1900 period.[5] Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Human activities are estimated to have caused approximately 1.0°C (1.8°F) of global warming above pre-industrial levels, with a likely range of 0.8°C to 1.2°C (1.4°F to 2.2°F).[6] Global warming is likely to increase 1.5°C (2.7°F) between 2030 and 2052 if the trend continues at the current rate.[7]

3 IPCC, Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change, 2014.
4 IPCC, Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change, 2014.
5 IPCC, Summary for Policymakers, in Global Warming of 1.5°C – An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty, 2018.
6 IPCC, Summary for Policymakers, in Global Warming of 1.5°C – An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty, 2018.
7 IPCC, Summary for Policymakers, in Global Warming of 1.5°C – An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty, 2018.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The Office of Environmental Health Hazard Assessment (OEHHA) identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernable evidence that climate change is occurring in California and is having significant, measurable impacts in the state. Changes in the state's climate have been observed, including an increase in annual average air temperature with record warmth from 2012 to 2016, more frequent extreme heat events, more extreme drought, a decline in winter chill, an increase in cooling degree days and a decrease in heating degree days, and an increase in variability of statewide precipitation.[8]

Warming temperatures and changing precipitation patterns have altered California's physical systems—the ocean, lakes, rivers, and snowpack—upon which the state depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the state's annual water supply. Impacts of climate on physical systems have been observed, such as high variability of snow-water content (i.e., amount of water stored in snowpack), decrease in snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters.[9]

Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed including climate change impacts on terrestrial, marine, and freshwater ecosystems. As with global observations, species responses include those consistent with warming: elevational or latitudinal shifts in range, changes in the timing of key plant and animal life cycle events, and changes in the abundance of species and in community composition. Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses a threat to public health as warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California, as well as the variability of heat-related deaths and illnesses. In addition, since 1950, the areas burned by wildfires each year has been increasing.

The California Natural Resources Agency (CNRA) has released four California Climate Change Assessments (2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, and ocean acidification, hypoxia, and warming. To address local and regional governments' need for information to support action in their communities, the fourth Assessment in 2018 includes reports for nine regions of the state, including the Los Angeles Region where the Project is located. Key projected climate changes for the Los Angeles Region include the following:[10]

- Continued future warming over the Los Angeles Region. Across the Region, average maximum temperatures are projected to increase around 4°F to 5°F by the mid-century, and 5°F to 8°F by the late-century.
- Extreme temperatures are also expected to increase. The hottest day of the year may be up to 10°F warmer for many locations across the Los Angeles Region by the late-century under certain model scenarios. The number of extremely hot days is also expected to increase across the Region.

8 Office of Environmental Health Hazard Assessment (OEHHA), Indicators of Climate Change in California, May 9, 2018.
9 OEHHA, Indicators of Climate Change in California, May 9, 2018.
10 CNRA, California's Fourth Climate Change Assessment – Los Angeles Regional Report, 2018.

- Despite small changes in average precipitation, dry and wet extremes are both expected to increase. By the late twenty-first century, the wettest day of the year is expected to increase across most of the Los Angeles Region, with some locations experiencing 25-percent to 30-percent increases under certain model scenarios. Increased frequency and severity of atmospheric river events are also projected to occur for this region.
- Sea levels are projected to continue to rise in the future, but there is a large range based on emissions scenario and uncertainty in feedbacks in the climate system. Roughly 1 foot to 2 feet of sea level rise is projected by the mid-century, and the most extreme projections lead to 8 feet to 10 feet of sea level rise by the end of the century.
- Projections indicate that wildfire may increase over southern California, but there remains uncertainty in quantifying future changes of burned area over the Los Angeles Region.

4.7.2 Regulatory Requirements

4.7.2.1 Federal

Massachusetts vs. EPA

On April 2, 2007, in Massachusetts v. U.S. Environmental Protection Agency, the U.S. Supreme Court ruled that CO_2 was a pollutant and directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA administrator is required to follow the language of section 202(a) of the Clean Air Act. On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under section 202(a) of the Clean Air Act:

- The elevated concentrations of GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- The combined emissions of GHGs—CO_2, CH_4, N_2O, and hydrofluorocarbons—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Federal Vehicle Standards

In 2007, in response to the *Massachusetts v. EPA* U.S. Supreme Court ruling, the Bush Administration issued Executive Order (EO) 13432 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 through 2016 (75 Fed. Reg. 25324–25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction,

clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021 (77 Fed. Reg. 62624–63200). On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6% to 23% over the 2010 baselines (76 Fed. Reg. 57106–57513).

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

On April 2, 2018, the EPA, under administrator Scott Pruitt, reconsidered the final determination for light-duty vehicles and withdrew its previous 2017 determination, stating that the current standards may be too stringent and therefore should be revised as appropriate (EPA 2018).

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards then in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2% to 3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1°C by 2100 (EPA and NHTSA 2018). California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives.

In 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (SAFE-1) (84 Fed. Reg. 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued, which set CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026, with less stringent standards than previously required. In March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and were thereafter entirely rescinded.

EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. On September 24, 2009, CARB adopted

amendments to the Pavley regulations that reduced GHG emissions in new passenger vehicles from 2009 through 2016. The Pavley regulations were originally adopted in 2002 by the state legislature, AB 1493 ("Pavley" regulations) and required that the CARB develop and adopt, no later than January 1, 2005, regulations to achieve the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHG emissions from 2012 through 2016. CARB's September 2009 amendments allowed for California's enforcement of the Pavley rule while providing vehicle manufacturers with new compliance flexibility. The amendments also prepared California to harmonize its rules with the federal rules for passenger vehicles. It was expected that the Pavley regulations would reduce GHG emissions from California passenger vehicles by about 22% in 2012 and about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs.

However, in 2025 the President of the United States signed an EO, *Unleashing American Energy*, which directed EPA to eliminate the social cost of carbon calculation from any federal permitting or regulatory decision and submit recommendations on the legality and continued applicability of the 2009 endangerment finding, among other directives (The White House 2025). On July 29, 2025, the EPA released its proposal to rescind the 2009 endangerment finding and repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines pursuant to CAA Section 202(a). The proposed rule would remove GHG-related provisions from Title 40 of the Code of Federal Regulations (40 CFR), Part 600 (90 FR 36288 – 36365).

In May 2025, the U.S. Senate approved several bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). While the U.S. Senate Parliamentarian and the Government Accountability Office concluded that that the bills were illegal (GAO 2025), these actions impact CARB's Advanced Clean Trucks, Advanced Clean Cars II, and Heavy-Duty Omnibus authority with the current result eliminating California's enforcement of these fuel standard regulations. Consequently, California filed a lawsuit challenging the revocations (see State of California et al. v. U.S.A et al. (2025) N.D. Cal Case No. 25-CV-04966, challenging disapproval of California's CAA waivers that allowed California to set its own vehicular fuel economy standards), which is currently pending.

On February 12, 2026, the U.S. EPA Administrator rescinded the 2009 GHG Endangerment Finding and eliminated all subsequent federal GHG emission standards for motor vehicles and engines. The final rule rescinds EPA GHG emission standards and related regulatory provisions for light-, medium-, and heavy-duty vehicles and engines promulgated pursuant to the 2009 Endangerment Finding, including the following rulemakings (EPA 2026):

Light-Duty Vehicle Greenhouse Gas Standards:

- Model Year (MY) 2012–2016 Light-Duty Vehicle GHG Standards
  - Joint EPA–NHTSA standards establishing federal GHG emission limits for passenger cars and light trucks.
- MY 2017 and Later Light-Duty Vehicle GHG Standards
  - EPA standards tightening GHG emission requirements beyond MY 2016.
- MY 2023–2026 Light-Duty Vehicle GHG Standards
  - Revisions to national GHG standards for passenger cars and light trucks beyond MY2022.

- MY 2027 and Later Light-Duty Multi-Pollutant Standards (GHG Provisions)
  - Tightening GHG emission requirements beyond MY 2027.

Medium- and Heavy-Duty Vehicle and Engine GHG Standards:

- Phase 1 Medium- and Heavy-Duty Vehicle GHG Standards
  - Initial federal GHG standards for heavy-duty engines and vehicles.
- Phase 2 Medium- and Heavy-Duty Vehicle and Engine GHG Standards (Through MY 2027)
  - Expanded GHG standards covering tractors, vocational vehicles, heavy-duty pickups and vans, and trailers.
- Phase 3 Medium- and Heavy-Duty Vehicle GHG Standards (MY 2027 and Beyond)
  - GHG standards applicable to later model years, including early phases extending into the 2030s.

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law. Among other key measures, the Act included the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

The Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The bill includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the U.S. by 40% as compared to 2005 levels by 2030. The bill allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles, and includes measures that will make homes more energy efficient.

4.7.2.2 State

Reduction Targets

Executive Order S-3-05

EO S-3-05 (June 2005) established California's GHG emissions reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels
- By 2020, reduce GHG emissions to 1990 levels

- By 2050, reduce GHG emissions to 80% below 1990 levels

EO S-3-05 also directed the California EPA to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The California Climate Action Team was also formed, which subsequently issued reports from 2006 to 2010 (CAT 2016).

Assembly Bill 32

In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state's long-range climate objectives.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and Assembly Bill (AB) 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. To facilitate achieving this goal, EO B3015 called for CARB to update the Scoping Plan to express the 2030 target in terms of MMT CO_2e. The EO also called for state agencies to continue to develop and implement GHG emissions reduction programs in support of the reduction targets.

Senate Bill 32 and Assembly Bill 197

Senate Bill (SB) 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

Senate Bill 605 and Senate Bill 1383

SB 605 (2014) requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCPs) in the state; and SB 1383 (2016) requires CARB to approve and implement that strategy by January 1, 2018. SB 1383 also establishes specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for methane and HFCs, and 50% below 2013 levels by 2030 for anthropogenic black carbon) and provides direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its SLCP Reduction Strategy in March 2017. The SLCP Reduction Strategy establishes a framework for the statewide reduction of emissions of black carbon, methane, and fluorinated gases (CARB 2017b).

Executive Order B-55-18

EO B-55-18 (September 2018) establishes a statewide policy for the state to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. The goal is an addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 1279

The Legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels.

Assembly Bill 1757

AB 1757 (September 2022) requires the CNRA to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions that reduce GHG emissions for future years 2030, 2038, and 2045. These targets are to be determined by no later than January 1, 2024, and are established to support the state's goals to achieve carbon neutrality and foster climate adaptation and resilience.

Senate Bill 1020

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources:

- 90% by December 31, 2035
- 95% by December 31, 2040
- 100% by December 31, 2045

California Air Resources Board Regulations

2007 Statewide Limit

In 2007, in accordance with California Health and Safety Code section 38550, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2e).

California Air Resources Board's Climate Change Scoping Plan

One specific requirement of AB 32 is for CARB to prepare a scoping plan to help achieve the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (California Health and Safety Code § 38561(a)), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: The Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan) (CARB 2008). The Scoping Plan included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission-reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives.

In 2014, CARB approved the first update to the Scoping Plan. The First Update to the Climate Change Scoping Plan: Building on the Framework (2014 Scoping Plan Update) defined the state's GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EO S-3-05 and EO B-16-2012 (CARB 2014). The 2014 Scoping Plan Update concluded that California was on track to meet the 2020 target, but recommended that a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The 2014 Scoping Plan Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

In December 2017, CARB released the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan Update) for public review and comment (CARB 2017a). The 2017 Scoping Plan Update builds on the successful framework established in the initial Scoping Plan and 2014 Scoping Plan Update, while identifying new technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The strategies' known commitments include implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant (SLCP) Plan, and increased stringency of SB 375 targets (CARB 2017b). To fill the gap in additional reductions needed to achieve the 2030 target, the 2017 Scoping Plan Update recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

CARB adopted the 2022 Scoping Plan Update in December 2022 (2022 Scoping Plan Update). The 2022 Scoping Plan Update outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward achieving GHG reduction goals by 2030. Per the Legislative Analyst's Office, the 2022 Scoping Plan Update identifies a more aggressive 2030 GHG goal. As it relates to the 2030 goal, perhaps the most significant change in the 2022 Scoping Plan Update (as compared to previous Scoping Plans) is that it identifies a new GHG target of 48% below the 1990 level, compared to the current statutory goal of 40% below. Current law requires the state to reduce GHG emissions by at least 40% below the 1990 level by 2030 but does not specify an alternative goal. According to CARB, a focus on the lower target is needed to put the state on a path to meeting the newly established 2045 goal, consistent with the overall path to 2045 carbon neutrality. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to 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 (CARB 2022a).

The 2022 Scoping Plan Update also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon. Strategies for carbon removal and sequestration include carbon capture and storage from anthropogenic point sources, where CO_2 is captured as it leaves a facility's smokestack and is injected into geologic formations or used in industrial materials (e.g., concrete); and CO_2 removal from ambient air, through mechanical (e.g., direct air capture with sequestration) or nature-based (e.g., management of natural and working lands) applications.

The 2022 Scoping Plan Update details "Local Actions" in Appendix D. The Appendix D Local Actions include recommendations to build momentum for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in the 2022 Scoping Plan Update's Appendix D are non-binding (i.e., not regulatory) and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals.

2022 Scoping Plan Update Appendix D recognizes consistency with a CEQA-qualified GHG reduction plan such as a climate action plan (CAP) as a first option for evaluating potential GHG emission impacts under CEQA. Absent a qualified GHG reduction plan, for residential and mixed-use projects, 2022 CARB Scoping Plan Appendix D provides a second option for evaluating project consistency with recommendations for key attributes that projects should achieve that would align with the state's climate goals. These key attributes include EV charging infrastructure, infill location, no loss or conversion of natural and working lands, transit-supportive densities or proximity to transit stops, reducing parking requirements, provision of affordable housing (at least 20% of units), no net loss of existing affordable units, and all-electric appliances with no natural gas connection (CARB 2022a). Projects that achieve all key attributes are considered "clearly consistent" with the state's climate and housing goals, since these attributes address the largest sources of operational emissions for residential and mixed-use projects. According to the 2022 Scoping Plan Update, in general, residential and mixed-use projects that incorporate all these attributes are aligned with the state's priority GHG reduction strategies for local climate action as shown on Table 1 of the 2022 Scoping Plan Update, and with the state's climate and housing goals. Such projects are considered consistent with the 2022 Scoping Plan Update; and therefore, the GHG emissions associated with such projects generally result in a less-than-significant GHG impact under CEQA (CARB 2022a). Additionally, the 2022 CARB Scoping Plan Update states that lead agencies under CEQA "may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the state's climate goals" (CARB 2022a).

The above is CARB's recommended approach for evaluating significance of GHG impacts for residential and mixed-use development projects (CARB 2022a). However, alternative approaches to evaluating project-level alignment with state climate goals are also provided in the 2022 CARB Scoping Plan Appendix D. Lead agencies under CEQA can make a significance determination based on whether the project would result in net-zero GHG emissions and whether the project is consistent with a significance determination/threshold recommended by the applicable air district or other lead agencies (CARB 2022a). The 2022 Scoping Plan Update's Appendix D acknowledges, however, that net zero may not be feasible or appropriate for every project (CARB 2022a).

California Building Energy Standards

CCR Title 24, Part 6

Title 24 of the California Code of Regulations (CCR) was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (PRC § 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (PRC § 25402). These regulations are carefully scrutinized and analyzed for technological

and economic feasibility and cost effectiveness (PRC § 25402 (b)(2), (b)(3), and (d)). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2022 Title 24 standards improved upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. CEC adopted the 2022 Title 24 Energy Code in August 2021 and the California Building Standards Commission approved incorporating the updated code into the California Building Standards Code in December 2021.

The CEC formally adopted the 2025 Title 24 Energy Code on September 11, 2024 and it went into effect January 1, 2026. The 2025 Energy Code's updates for residential and nonresidential buildings introduce several key changes aimed at improving energy efficiency and supporting the state's climate goals. These include enhanced mechanical system standards, such as updated requirements for heating, ventilation, and air conditioning and heat pump water heaters, and stronger building envelope performance to reduce energy loss. Electrical systems now require more advanced lighting controls and expanded testing protocols. The 2025 Energy Code also adds readiness provisions for solar and battery storage installations and includes laboratories under its scope for energy-intensive processes. Compliance tools and manuals have been revised to reflect new modeling rules.

The 2025 amendments include measures that will further reduce energy use in single-family, multifamily, and nonresidential buildings through the following strategies (CEC 2024a):

- For homes, use heat pumps for both space heating and water heating, expanding on the single heat pump baselines in the 2022 update.
- For nonresidential building types, expanding on the single zone heat pump baselines in the 2022 update.
- For low-rise multifamily buildings with individual water heaters in dwelling units, use heat pump water heater baselines, expanding on the space heating heat pump baselines in the 2022 update.
- Encouraging electric-ready buildings to set up owners to use cleaner electric water heating and cooking when they are ready to invest in those technologies.
- Updating photovoltaic and battery energy storage system standards for high-rise multifamily and nonresidential buildings to achieve cost-effective installations in consideration of revised net billing and virtual net billing rules.
- Updating space conditioning system control standards for nonresidential buildings.
- Updating ventilation requirements in multifamily buildings to improve indoor air quality.

CCR Title 24, Part 11

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The 2025 CALGreen standards are the current applicable standards to the Project. For residential projects, the 2025 Title 24 changes are focused on multifamily EV charging requirements and bicycle parking requirements (24 CCR, Part 11).

CCR Title 20

Title 20 of the CCR requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. The CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems.

Renewable Energy and Energy Procurement

SB 1078, EO S-14-08, SB X1-2, SB 350, SB 100, SB 1020

SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. EO S-14-08 (November 2008) required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. SB X1-2 expanded the RPS by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. SB 350 (October 2015) further expanded the RPS by establishing a goal of 50% of the total electricity sold to retail customers in California per year be renewable by December 31, 2030. SB 100 (2018) increased the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the State that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources: 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045.

Mobile Sources

State Vehicle Standards (AB 1493 and EO B-16-12)

AB 1493 (July 2002) was enacted in response to the transportation sector accounting for more than half of California's CO_2 emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the State board to be vehicles that are primarily used for noncommercial personal transportation in the State. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, California Public Utilities Commission (CPUC), and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 identified a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special

performance requirements necessary for the protection of the public safety and welfare. EPA and NHTSA approved the SAFE Vehicles Rule Part One and Two, which revoked California's authority to set its own GHG emissions standards and set Zero Emission Vehicle (ZEV) mandates in California.

As explained previously, in March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Heavy Duty Diesel

CARB adopted the final Heavy Duty Truck and Bus Regulation, California Code of Regulations, Title 13, Division 3, Chapter 1, Section 2025, on December 31, 2014, to reduce particulate matter and oxides of nitrogen emissions from heavy-duty diesel vehicles. The rule requires particulate matter filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule required nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxic Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (13 CCR § 2485).

Executive Order S-1-07

EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 § CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered. In September 2018, CARB approved amendments for the LCFS that require a 20% reduction in carbon intensity by year 2030.

Senate Bill 375

SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If a metropolitan planning organization is unable to devise an SCS to achieve the GHG reduction target, the metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code section 65080(b)(2)(K), an SCS does not (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process. In April 2024, SCAG approved its most recent

RTP/SCS, Connect SoCal, which included updated targets of an 8% per capita reduction below 2005 levels by 2020 and a 19% per capita reduction by 2035 (SCAG 2024).

Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars (ACC) I program (January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle (LEV) regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for ZEV that contributes to both types of emission reductions (CARB 2025b). The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. At the time, it was estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold in 2015. The ZEV program was designed to act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The ACC II program, which was adopted in August 2022, established the next set of LEV and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards (CARB 2025c). The main objectives of ACC II are:

- Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.

Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

However, as discussed above, CARB's ability to enforce ACC II was eliminated by the May 2025 U.S. Senate approved bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). The implications of this federal resolution on the state's capability to enforce its independent fuel economy standards are uncertain at this time, as the California Attorney General filed a lawsuit against the federal government on June 12, 2025, to challenge House Joint Resolution 88. Whether this action will be successful is unknown, as is the possibility that a federal judge will issue a stay to halt the implementation of the ACC II regulation during the legal process. Notably, the mobile source emissions calculations and estimates disclosed in this analysis do not account for this regulatory update as emissions factors have not been updated by the CARB and implemented in CalEEMod at this time.

Advanced Clean Trucks Regulation

The Advanced Clean Trucks Regulation was also approved by CARB in 2020. The purpose of the regulation is to accelerate the market for ZEVs in the medium- and heavy-duty truck sector and to reduce air pollutant emissions generated from on-road mobile sources (CARB 2022b). The regulation has two components including (1) a manufacturer sales requirement and (2) a reporting requirement:

- **Zero-emission truck sales:** Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines will be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales.
- **Company and fleet reporting:** Large employers including retailers, manufacturers, brokers and others will be required to report information about shipments and shuttle services. Fleet owners, with 50 or more

trucks, will be required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

However, in May 2025, the U.S. Senate approved several bills under the Congressional Review Act that purported to rescind California's CAA waiver, which allows California to regulate fuel economy (H.J.Res. 87, H.J.Res. 88, and H.J.Res. 89). The U.S. Senate Parliamentarian and the Government Accountability Office concluded that the bills were illegal (GAO 2025). Nonetheless, these actions impact CARB's Advanced Clean Trucks, Advanced Clean Cars II, and Heavy-Duty Omnibus authority, with the current result eliminating California's enforcement of these fuel standard regulations. By signing the resolutions, the administration nullified the CARB waivers and prohibited EPA from issuing similar waivers in the future.

Consequently, California filed a lawsuit challenging the revocations (see State of California et al. v. U.S.A et al. (2025) N.D. Cal Case No. 25-CV-04966, challenging disapproval of California's CAA waivers that allowed California to set its own vehicular fuel economy standards), which is currently pending. Despite the pending litigation, state regulations including CARB's Advanced Clean Trucks, Advanced Clean Cars II, and Heavy-Duty Omnibus are no longer in effect.

Assembly Bill 1236

AB 1236 (October 2015) (Chiu) requires all California cities and counties to approve applications for the installation of electric vehicle charging stations, as defined, through the issuance of specified permits unless the city or county makes specified written findings based upon substantial evidence in the record that the proposed installation would have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact. The bill provided for an appeal of that decision to the planning commission, as specified. The bill provided that the implementation of consistent statewide standards to achieve the timely and cost-effective installation of electric vehicle charging stations is a matter of statewide concern. The bill required electric vehicle charging stations to meet specified standards. The bill required a city, county, or city and county with a population of 200,000 or more residents to adopt an ordinance, by September 30, 2016, that created an expedited and streamlined permitting process for electric vehicle charging stations, as specified. The bill also required a city, county, or city and county with a population of less than 200,000 residents to adopt this ordinance by September 30, 2017.

Water

Executive Order B-29-15

In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Solid Waste

Assembly Bill 939 and Assembly Bill 341

In 1989, AB 939, known as the Integrated Waste Management Act (PRC § 40000 et seq.), was passed to address the increase in the state's waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (Chapter 476, Statutes of 2011 [Chesbro]) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops and in August 2015 published a discussion document titled AB 341 Report to the Legislature, which identifies five priority strategies that CalRecycle believes would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 Chesbro (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Other State Actions

Senate Bill 97

SB 97 (Dutton) (August 2007) directed the Governor's Land Use and Climate Innovation (LCI) (formerly the Office of Planning and Research) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted amendments to the CEQA Guidelines in response to SB 97 in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (CEQA Guidelines § 15064.4(a)). The CEQA Guidelines require a lead agency to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (CEQA Guidelines § 15064.4(b)). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG

emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a mandatory GHG emission threshold, but rather allow CEQA lead agencies to develop, adopt, and apply their own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009a).

With respect to GHG emissions, the CEQA Guidelines state in section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (CEQA Guidelines § 15064.4(a)). CEQA Guidelines section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (CEQA Guidelines § 15064.4(b)).

Executive Order S-13-08

EO S-13-08 (November 2008) was issued to hasten California's response to the impacts of global climate change, particularly sea-level rise. Specifically, the EO S-13-08 directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009b), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: Agriculture, Biodiversity and Habitat, Emergency Management, Energy, Forestry, Ocean and Coastal Ecosystems and Resources, Public Health, Transportation, and Water. Issuance of the Safeguarding California: Implementation Action Plans followed in March 2016 (CNRA 2016). In January 2018, the CNRA released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

4.7.2.3 Regional and Local

South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). As discussed in Section 4.7.3, Thresholds of Significance, the SCAQMD has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not formally adopted by SCAQMD's Governing Board.

Southern California Association of Governments

As noted above, SB 375 was passed to require metropolitan planning organizations to prepare an SCS in their RTP. In April 2024, SCAG's Regional Council adopted the Connect SoCal 2024 (2024-2050 RTP/SCS). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2024).

City of Azusa 2004 General Plan

The City's General Plan, Chapter 5, Natural Environment, includes various policies related to improving air quality as follows. The Air Quality component of the Natural Environment Element works together with the Land Use and Mobility Elements, and includes planning and design goals to reduce vehicular and source emissions, and promotes the use of efficient operational practices to reduce emissions from quarries, on- and off-road vehicles, and industrial uses. Sources of pollution (including particulate matter) within the City include automobiles, heavy diesel trucks, and rock mining and quarrying. It should be noted that improving air quality has a co-benefit of reducing GHGs and supporting the goals and policies listed in Section 4.2, Air Quality of this Draft EIR; therefore, reductions in air quality pollutants also have some co-benefits for GHG reductions. The Project's potential to conflict with these policies is discussed in Section 4.10, Land Use and Planning.

Goal 1. Improve air quality in Azusa and reduce exposure to air pollutants.

Policy 1.1. Integrate air quality concerns into land use planning decisions.

Policy 1.2. Integrate air quality concerns into site design review.

Policy 1.3 Reduce pollutant emissions from quarry operations, off -road vehicle use areas, industrial uses, and vehicular traffic

Policy 1.4. Participate in regional air quality planning strategies.

Policy 1.5. Consider encouraging the use of "green roof" construction technologies.

4.7.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to GHG/climate change are based on Appendix G of the CEQA Guidelines which states that a significant impact related to GHG emissions would occur if the Project would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.3.1 Greenhouse Gas Emissions Significance Thresholds

Global climate change has a cumulative impact; a project can play a role in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of an individual project would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts, GHG emissions impacts must also be evaluated at a project level under CEQA.

The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009a). The state has not adopted emission-based thresholds for GHG emissions under CEQA. OPR's (now LCI)Technical Advisory titled "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review" states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008). Furthermore, OPR's Technical Advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice." CEQA Guidelines section 15064.7(c) specifies that "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (SCAQMD 2008). This guidance document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the SCAQMD's Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1 Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2 Consider whether or not the Project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3 Consider whether the Project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_{2e} per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the Project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4 Consider whether the Project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per service population for project level analyses and 6.6 MT CO_2e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Because the Project involves residential land uses, this analysis applies the SCAQMD screening threshold of 3,000 MT CO_2e per year for mixed-use projects for Tier 3. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the Project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, adds amortized construction emissions to the estimated annual operational emissions and then compares operational emissions to the proposed SCAQMD threshold of 3,000 MT CO_2e per year for the Tier 3 analysis.[11]

Regarding the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions (see Threshold 4.7b), the analysis includes a comparison of the Project's potential to conflict with SCAG's 2024 RTP/SCS (Connect SoCal), CARB's 2022 Scoping Plan, AB 1279, and EO B-55-18.

[11] The City understands that the 3,000 MT CO_2e per year threshold was proposed in 2010 and was never adopted. However, the 3,000 MT CO_2e per year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (SCAQMD 2008) document and subsequent Working Group meetings (latest in 2010). This threshold uses the Executive Order S-3-05 goal as the basis, so it is not tied to only the 2020 target year and is thus not outdated. This threshold is also based on the 90% capture rate methodology, which means that 90% of total emissions from all new or modified projects would be subject to some type of CEQA analysis, which was the approach taken by SCAQMD to establish the stationary/industrial source threshold, as well as by the California Air Resources Board (for interim threshold for stationary source projects) and one of the options suggested by the California Air Pollution Control Officers Association (quantitative threshold based on market capture). Further, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction.

4.7.3.2 Approach and Methodology

Construction Emissions

CalEEMod Version 2022.1.1.44 (CAPCOA 2022) was used to estimate potential Project-generated GHG emissions during construction. Construction of the Project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants are discussed in Section 4.2.3, Thresholds of Significance (Section 4.2.3.2, Approach and Methodology, in Section 4.2, Air Quality) are also applicable for the estimation of construction-related GHG emissions. Please see Section 4.2.3 of Section 4.2, Air Quality, for a discussion of construction emissions calculation methodology and assumptions used in the GHG emissions analysis.

Operational Emissions

Emissions from the operational phase of the Project were estimated using CalEEMod Version 2022.1.1.44. Operational year 2029 was assumed, following completion of construction. In addition to the Project, a historical baseline condition was modeled for the existing school land uses on the Project site to conduct an operational emissions netting analysis.

Area Sources. CalEEMod was used to estimate GHG emissions from the Project's area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. See Section 4.2.3 in Section 4.2, Air Quality, for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in volatile organic compound emissions, which are analyzed in air quality analysis only, as they add little to no GHG emissions.

Energy Sources. The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the Project's land uses. As a conservative means of estimating emissions, energy sources from the Project's proposed garage spaces (within single family homes and townhomes) were modeled within CalEEMod. The energy use (electricity per square foot per year) from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Study. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity) for CO_2 and other GHGs. Annual electricity emissions were estimated in CalEEMod using the emissions factors for Azusa Light & Power, which would be the electrical energy provider for the Project. The Project would include all electric development—no natural gas lines would be used on-site.

Mobile Sources. All details for criteria air pollutants discussed in Section 4.2.2 of Section 4.2, Air Quality, of this Draft EIR, are also applicable for the estimation of operational mobile source GHG emissions. Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the NHTSA and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the Project's motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the CalEEMod emission factors for motor vehicles in 2029.

Solid Waste. The Project would generate solid waste, and therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for the Project.

Water and Wastewater Treatment. Supply, conveyance, treatment, and distribution of water for the Project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the Project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use, and associated electricity consumption from water use and wastewater generation were estimated using default values in CalEEMod.

4.7.4 Impacts Analysis

Threshold 4.7a: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Construction of the Project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold recommends that "construction emissions be amortized over a 30-year Project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies" (SCAQMD 2008). Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 MT CO_2e per year. The quantification of emissions, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.7.2, Thresholds of Significance. Construction of the Project is anticipated to commence in November 2026 and reach completion in November 2029, lasting a total of approximately 36 months. On-site sources of GHG emissions include off-road equipment and off-site sources including haul trucks, vendor trucks, on-site trucks, and worker vehicles. Table 4.7-2 presents construction emissions for the Project from on-site and off-site emission sources.

Table 4.7-2. Estimated Annual Construction Greenhouse Gas Emissions

	CO_2	CH_4	N_2O	R	CO_2e
Construction Year	Metric Tons per Year				
2026	54.66	<0.005	<0.005	0.02	55.81
2027	263.28	0.01	0.01	0.06	266.53
2028	271.61	0.01	0.01	0.09	273.93
2029	342.9	0.01	0.01	0.11	346.12
				Total Construction GHG Emissions	942.49
				Amortized Emissions (30-year Project Life)	31.42

Notes: CO_2 = carbon dioxide; CH_4 = methane; GHG = greenhouse gas; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; R: refrigerant.
Source: See Appendix C-1 for complete results.

As shown in Table 4.7-2, the estimated total GHG emissions during would be approximately 943 MT CO_2e over the construction period. When amortized over 30 years, the construction emissions would be approximately 31 MT CO_2e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the following operational emissions analysis.

Operational Emissions

Long-term operations of the Project would result in GHG emissions through mobile sources and area sources (landscape maintenance equipment); energy use (generation of electricity consumed by the Project); water supply, treatment, and distribution and wastewater treatment, refrigerants; and solid waste disposal. Annual GHG emissions from these sources were estimated using CalEEMod.

The estimated operational GHG emissions from Project area sources, energy consumption, mobile sources, solid waste, emergency generator, refrigerants, and water consumption and wastewater treatment associated with the Project in 2029, existing land use emissions and net emissions are shown in Table 4.7-3. Details of the emission calculations are provided in Appendix C-1.

Table 4.7-3. Estimated Operational Greenhouse Gas Emissions

	CO_2	CH_4	N_2O	R	CO_2e
Sources	**Metric Tons per Year**				
Project					
Mobile	931.97	0.04	0.04	1.04	945.56
Area	3.38	<0.005	<0.005	-	3.40
Energy	189.62	0.01	<0.005	-	190.46
Water	24.50	0.45	0.01	-	38.89
Waste	8.69	0.87	0	-	30.41
Refrigerants	-	-	-	0.24	0.24
	Construction (amortized over 30 years) (Table 4.7-2)				*31.42*
				Total Project Emissions	**1,240.38**
Existing Emissions[1]					
Mobile	660.26	0.04	0.03	1.32	671.33
Area	0.61	<0.005	<0.005	-	0.61
Energy	74.60	0.01	<0.005	-	74.9
Water	8.25	0.03	<0.005	-	9.32
Waste	3.48	0.35	0	-	12.2
Refrigerants	-	-	-	0.02	0.02
				Total Existing Emissions	*768.35*
				Net Change in Emissions (Proposed Emissions – Existing Emissions)	**472.03**
				SCAQMD GHG Threshold	**3,000**
				Exceeds thresholds?	**No**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrogen dioxide; R = refrigerant; CO_2e = carbon dioxide equivalent; — = data not available
See Appendix C-1 for complete results.
<0.005 = value less than reported 0.005 metric tons per year.
The values shown for the project reflect the combined emissions from the proposed land uses, including emissions from a separate CalEEMod run for the inclusion of garages within the proposed dwelling units.

[1] Existing uses quantified include the baseline existing school buildings and surface parking lot. As detailed in Chapter 2, this analysis uses historic operations to establish an augmented baseline for existing conditions.
Source: Appendix C-1.

Table 4.7-3 indicates that the net GHG emissions associated with development of the Project equal to approximately 472 MT CO_2e per year which would be below the SCAQMD GHG threshold of 3,000 MT CO_2e per year. Even without netting out historical emissions associated with the longstanding elementary school, the Project's estimated emissions would be below the SCAQMD GHG threshold of 3,000 MT CO_2e per year. Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this would represent a less-than-significant impact.

Threshold 4.7b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potential to Conflict with the Connect SoCal (2024–2050 RTP/SCS)

SCAG's Connect SoCal is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would not conflict with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. As discussed in Section 4.12, Population and Housing, and Threshold 4.2(a) of Section 4.2, Air Quality, the Project would accommodate an expected 397 residents which would be counted within the overall population growth projections for the City included in the Connect SoCal.

As stated in the Connect SoCal 2024–2050 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project's potential to conflict with the RTP/SCS (SCAG 2024). Because there is no reliable population, housing, or employment data after 2010, as the U.S. Census is conducted every ten years, all data for years prior to the 2020 Census should be viewed as projections or estimates. As demonstrated in Section 4.10, Land Use and Planning, the Project would implement the guiding principles, goals and policies of SCAG's 2024–2050 RTP/SCS as they relate to livability, economic prosperity, and sustainability through the development of walkable community along major transportation corridors. Metro currently operates the Metro A Line in the vicinity of the Project site. The Metro A Line is a light rail line running between the cities within the San Gabriel Valley and Long Beach. The A Line runs northeast/southwest with the closest station to the Project site (APU/Citrus Station) located at North Citrus Avenue and West Foothill Boulevard approximately 0.71 miles north of the Project site.

There are also four Foothill Transit bus lines that run within 0.25 miles of the Project site. Foothill Transit Line 188 provides service between Azusa and the City of Montclair and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025a). Foothill Transit Line 281 provides service between Glendora, Azusa, West Covina, and Puente Hills and runs along North Citrus Avenue, approximately 645 feet west of the Project site (Foothill Transit 2025b). Foothill Transit Line 284 provides service between Glendora, San Dimas, Covina, and West Covina and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025c). Foothill Transit Line 488 provides service between Azusa, Glendora, West Covina, and El Monte Station and passes by the Project site along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025d). There are multiple bus stops near the Project site, including near the intersections of North Citrus Avenue and East Alosta Avenue, North Calera Avenue and East Alosta Avenue, and near North Citrus Avenue and East Mauna Loa Avenue. These stops provide access to Foothill Transit Bus Line 188, Foothill Transit Bus Line 281, Foothill Transit Bus Line 284, and Foothill Transit Bus Line 488. It should be noted that Foothill

Transit is committed to operating a 100% zero-emission bus fleet and currently operate a battery-electric fleet to 19 buses and 37 Xcelsior CHARGE H2™ hydrogen fuel cell electric buses (FCEB).

Connect SoCal 2024 underlines four core categories, including mobility, communities, environment, and economy, and each category has its own set of goals. The major goals under the environmental category of the Connect SoCal are outlined in Table 4.7-4, along with an overview of the Project's consistency with the RTP/SCS goals.

Table 4.7-4. Project Potential to Conflict with Connect SoCal (SCAG 2024–2050 RTP/SCS)

RTP/SCS Goal	Potential to Conflict
Environmental Goal 1: Sustainable Development	**No Conflict.** The 2024–2050 RTP/SCS identifies sustainable development, including water and energy-efficient building practices and green infrastructure, as a strategy to reduce GHG emissions. The on-site residences would be constructed to include features compliant with California energy code through the use of programmable thermostats, light-emitting diode (LED) lighting, electric heat pump water heaters, high-efficiency electric heat pump HVAC systems, low-e vinyl windows, high R-value insulation, Energy Star rated appliances, and spray foam insulation in the attics. Based on the requirements of 2025 Title 24, Part 11, solar will be appropriately sized based on the residences' energy loads to provide electricity production for the homes. No battery energy storage systems are required for the Project as a residential development. Dwelling units would include plumbing fixtures that are WaterSense-certified and compliant with California energy code. The landscaping design was selected based on water-efficient plantings, and the irrigation will comply with code requirements for water usage. These irrigation timers will be smart technology which adjusts to the weather conditions.
Environmental Goal 2: Air Quality	**No Conflict.** The 2024–2050 RTP/SCS identifies air quality and meeting federal and state ambient air quality standards as a co-benefit of reducing GHG emissions. As demonstrated in Section 4.2.4 Impact Analysis, of Section 4.2, Air Quality, the Project would not exceed the SCAQMD's threshold of significance for any criteria air pollutant and would not result in any significant impacts related to air quality.
Environmental Goal 3: Clean Transportation	**No Conflict.** The 2024–2050 RTP/SCS identifies EV charging infrastructure, adoption of zero-emission vehicles, and clean transit as ways to reduce GHG emissions from mobile sources. The Project would comply with CALGreen standards for EV charging. In addition, the Metro A Line is a light rail line running between the cities within the San Gabriel Valley and Long Beach. The A Line runs northeast/southwest with the closest station to the Project site (APU/Citrus Station) located at North Citrus Avenue and West Foothill Boulevard approximately 0.71 miles north of the Project site, providing access to public transportation. Additionally, as noted previously, Foothill Transit is committed to operating a 100% zero-emission bus fleet and currently operate a battery-electric fleet to 19 buses and 37 Xcelsior CHARGE H2™ hydrogen FCEB. As the Project site is within 0.25 miles of the Foothill Transit bus lines and near multiple bus stops, this would support the environmental goal for clean transportation.

Table 4.7-4. Project Potential to Conflict with Connect SoCal (SCAG 2024–2050 RTP/SCS)

RTP/SCS Goal	Potential to Conflict
Environmental Goal 4: Natural and Agricultural Lands Preservation	**No Conflict.** The 2024-2050 RTP/SCS promotes the conservation and restoration of natural and agricultural lands through several policies, such as quantifying the carbon sequestration potential of natural and agricultural lands and prioritization of sensitive habitat and wildlife corridors for permanent protection. The Project is located on developed property and would not result in the removal of natural or agricultural lands.
Environmental Goal 5: Climate Resilience	**No Conflict.** The 2024-2050 RTP/SCS promotes regional coordination and solutions for effective emergency response for climate-related hazards. Additionally, in the category of climate resilience, SCAG has established the following policies: prioritize the most vulnerable populations and communities subject to climate hazards; support local and regional climate and hazard planning; support nature-based solutions to increase regional resilience; promote sustainable housing needs in a drier environment. While the Project does not directly address these climate resilience efforts, the Project would not interfere with this goal.

Source: SCAG 2024.

As shown in Table 4.7-4, the Project would not conflict with any of the environmental goals within SCAG's Connect SoCal. Therefore, the Project would not conflict with the goal to improve air quality and GHG emissions in the region.

Potential to Conflict with CARB's 2022 Scoping Plan, AB 1279, and EO B-55-18

As discussed in Section 4.7.2.2, the California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the Project, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require that GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. EO B-55-18 establishes a new statewide policy to achieve carbon neutrality (i.e., the point at which removal of carbon pollution from the atmosphere meets or exceeds emissions) no later than 2045, and to achieve and maintain net negative greenhouse gas emissions thereafter.

> As defined in AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and was updated in 2014, 2017, and most recently in 2022. While the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used as the sole basis for project-level evaluations,[12] it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets.

[12] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

> Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Climate Change Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017a), and the most recent CARB 2022 Scoping Plan for Achieving Carbon Neutrality update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022b). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2022 Scoping Plan updates the strategy to achieve those targets that are the most applicable to the Project.

Many of the measures and programs included in the 2022 Scoping Plan would result in the reduction of Project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (LCFS), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy).

CARB's 2022 Scoping Plan includes a key strategy specific to transportation electrification. While the Project would not provide EV charging infrastructure that meets the most ambitious voluntary standards in the CALGreen code at the time of Project approval, the Project would meet CALGreen code requirements at the time of building permit issuance, which would, at a minimum, include EV-capable infrastructure within each dwelling unit's garage. As such, the Project would partially conflict with this key strategy.

CARB's Scoping Plan details 6 key strategies to reduce VMT for projects, which include being situated on infill sites, not resulting in the loss or conversion of natural and working lands, proximity to transit stops, reduced parking requirements, affordable housing, and no net loss of existing affordable units. The Project is a single-family and townhome residential development located on an infill site that is surrounded by urban uses and is presently served by existing utilities and essential public services, including transit, streets, water, and sewer, and as such, would not conflict with this key strategy. The Project site is currently built-out with existing underutilized uses, and thus would not result in the conversion of the state's natural or working (i.e., agricultural) lands, and as such, would not conflict with this key strategy.

There are four Foothill Transit bus lines that run within 0.25 miles of the Project site. Foothill Transit Line 188 provides service between the City of Azusa and the City of Montclair and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025b). Foothill Transit Line 284 provides service between Glendora, San Dimas, Covina, and West Covina and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025c). Foothill Transit Line 488 provides service between Azusa, Glendora, West Covina, and El Monte Station and passes by the Project site along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025d). There are multiple bus stops near the Project site, including near the intersections of North Citrus Avenue and East Alosta Avenue, North Calera Avenue and East Alosta Avenue, and near North Citrus Avenue and East Mauna Loa Avenue. These stops provide access to Foothill Transit Bus Line 188, Foothill Transit Bus Line 281, Foothill Transit Bus Line 284, and Foothill Transit Bus Line 488. In addition, Metro currently operates the Metro A Line in the vicinity of the Project site. The Metro A Line is a light rail line running between the cities within the San Gabriel Valley and Long Beach. The A Line runs northeast/southwest with the closest station to the Project site (APU/Citrus Station) located at North Citrus Avenue and West Foothill Boulevard approximately 0.71 miles north of the Project site. Therefore, the Project would not conflict with the VMT reduction strategy of being located proximately to transit stops.

Project parking would include garage spaces and surface parking spaces; however, the Project would support the use of existing and proposed pedestrian, bicycle, and mass-transit infrastructure and connectivity. The City does not currently have a parking maximum ratio, and the Project would not impede the City from implementing a parking maximum in the future. Parking has been provided onsite to meet the City's minimum allowed parking ratios consistent with City zoning requirements and Green Building codes. As such, the Project does not conflict with this key strategy to reduce parking requirements.

Regarding affordable housing, as discussed in Section 4.12 Population and Housing, the Regional Housing Needs Assessment (RHNA) is part of the State's housing element law that determines the projected and existing housing needs for each jurisdiction in the State. State Housing Element law requires that a local jurisdiction accommodate their share of the region's projected housing needs for the planning period. State law mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community (City of Azusa 2023). SCAG is responsible for allocating the RHNA to individual jurisdictions within the region. The RHNA is distributed by income category for the 2021-2029 Housing Element. The RHNA planning period is between October 15, 2021 through October 31, 2029 (i.e., 2021–2029 RHNA). While the Project does not provide low-income housing, the Project would provide 128 market-rate units, designed to count towards the City's RHNA allocation and would not result in a loss of affordable units. As the Project would provide townhomes, which would likely be more affordable than single-family housing prevalent in the City, the Project's proposed townhome units would support this measure. Additionally, the City had an overall vacancy rate of 3.7 percent in 2025, and lower vacancy rates increase competition for housing and may result in higher housing costs that can potentially reduce housing opportunities for lower income households (DOF 2025). As such, adding much-needed housing to the City may result in lower housing costs which would support the aims of providing affordable housing in the City. The Project site is an infill site, and would redevelop previously underutilized land with housing, thereby supporting this measure and the goals of the City. Therefore, the Project would partially conflict with this key strategy but meets the overall intent of the key strategy.

CARB's Scoping Plan includes one key strategy for building decarbonization, which states that projects should use all-electric appliances without any natural gas connections. Supporting decarbonization, the Project would provide all-electric housing units without any natural gas connections and does not propose the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. As such, the Project does not conflict with this key strategy.

Overall, the Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As demonstrated above, the Project would not conflict with the majority of CARB's 2022 Scoping Plan updates and with the state's ability to achieve the GHG reduction and carbon neutrality goals. According to the 2022 CARB Scoping Plan Update, Appendix D, these attributes are a guide to determine residential/mixed-use projects that are *clearly consistent* with the state's climate strategy for CEQA purposes and are not necessarily required. However, lead agencies, such as the City, may determine with adequate supporting evidence that projects that incorporate some, but not all, of the key project attributes are consistent with the state's climate goals. It is also important to note that the 2022 CARB Scoping Plan Update emphasizes the need for housing to address the state's severe housing shortage and notes that CEQA GHG impact analyses and mitigation measures can be sources of litigation and delay for projects (CARB 2022b). The 2022 CARB Scoping Plan Update, Appendix D, also states that the "the housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals" (CARB 2022b). Because the Project provides residential units in an area with existing and forecasted employment and services, and because it incorporates a majority of the key attributes CARB identifies for new residential/mixed-

use development, the Project has been determined to meet most, but not all of the state goals by providing housing in a way that does not conflict with the state's ability to meet future climate goals. As such, overall, the Project would not conflict with CARB's Scoping Plans. Further, the Project's consistency with most applicable measures and programs would assist in meeting the City's contribution to GHG emission reduction targets in California. Based on the considerations previously outlined, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be less than significant.

4.7.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from Project implementation including other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130. For purposes of GHG emissions, the geographical area of cumulative impacts is global, further detailed below.

Threshold 4.7a - Cumulative **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

As previously discussed in Section 4.7.1, Existing Conditions, global climate change including the generation of GHG emissions is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. As shown in Table 4.7-3, the Project would not result in GHG emissions in exceedance of the interim SCAQMD significance threshold. Therefore, the Project would not contribute to a cumulatively considerable impact with regard to generation of GHG emissions and the cumulative impact would be less than significant.

Threshold 4.7b - Cumulative **Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

As previously discussed in Section 4.7.4, Impact Analysis under Threshold 4.7b, the Project would be consistent with all applicable GHG reduction plans, including the 2024-2050 RTP/SCS Connect SoCal, CARB's 2022 Scoping Plan, AB 1279, and EO B-55-18. Therefore, cumulative impacts associated with the conflict of any applicable plan, policy or regulation adopted to reduce GHG emission would be less than significant.

4.7.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to greenhouse gas emissions and no mitigation measures are required.

4.7.7 Significance Conclusion

Threshold 4.7a. The Project would result in a **less-than-significant impact** regarding the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Threshold 4.7b. The Project would result in a **less-than-significant impact** associated with the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

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4.8 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, significance conclusions, and references. Information sources used to prepare this section include review of a list of hazardous waste and substances sites (Cortese List) in accordance with California Government Code section 65962.5, as well as information from the following appendices:

- **Appendix F-1** Preliminary Geotechnical Evaluation and Recommendations (Geotechnical Report), Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles, California, prepared by LGC Technical Inc., dated January 23, 2025
- **Appendix G:** Phase I Environmental Site Assessment for Proposed Residential Development Former Powell Elementary School, 1035 East Mauna Loa Avenue, Azusa, Los Angeles County, CA 91702, prepared by EnviroApplications, Inc., dated January 9, 2025
- **Appendix H,** Hydrology and LID Report (LID Report), Delaney Square, 1035 E. Mauna Loa Avenue, Azusa, CA 91702, prepared by Kimley Horn, dated June 16, 2025

Other sources consulted are listed in Section 4.8.8, References.

4.8.1 Existing Conditions

4.8.1.1 Environmental Setting

According to the Phase I Environmental Site Assessment (ESA) conducted for the Project, the Project site lies approximately 627 feet above mean sea level and gently slopes to the south (Appendix G).

Groundwater

The Project site is located in the Main San Gabriel Valley Groundwater Basin. According to the Phase I ESA, various sites listed on the GeoTracker database and located within the vicinity of the Project site estimated the depth of groundwater to be approximately 200 feet below ground surface (bgs), and groundwater in the area is anticipated to flow towards the southwest (Appendix G). Groundwater was not encountered to the maximum depth of approximately 51.5 feet below existing ground surface during the subsurface evaluation conducted for the Geotechnical Evaluation (Appendix F-1). Historic high groundwater is approximately 175 feet below current grade. Groundwater is not expected to impact the proposed development. Seasonal fluctuations of groundwater elevations should be expected over time. In general, groundwater levels fluctuate with the seasons and local zones of perched groundwater may be present due to local seepage caused by irrigation and/or recent precipitation. Local perched groundwater conditions or surface seepage may develop once site development is completed (Appendix H).

Methane, Oil, and Gas

According to the Los Angeles County Department of Public Works, the Project site is not located within 300 feet of an oil or gas well or 1,000 feet of a methane producing site (LADPW 2025). There are no oil wells or oil/mineral extraction activities on or near the Project site (CalGEM 2025). Additionally, there are no pipelines located within 1 mile of the Project site that are used to convey hazardous materials (USDOT PHMSA 2025).

4.8.1.2 Hazardous Materials

Historical Use and Associated Hazards

According to the Phase I ESA, the Project site was first developed and used as agricultural land from at least the 1920s through the 1960s, and by 1964, the Project site was redeveloped with the existing Powell Elementary School. The use of land for farming typically results in the upper one to two feet of soil being impacted by pesticides. Soil sampling and laboratory analysis was performed as part of the Phase I ESA, in which eight soil samples were collected throughout the Project site at 6-inches bgs. Soil samples were analyzed by EPA Method 6010B (T22 Metals/CAM17) and 8081A (Organochlorine Pesticides) and determined the detected concentrations were within typical regional background levels and below. Additionally, a Vapor Encroachment Screen (VES) was also performed to evaluate whether sites that store or dispose of potential chemicals of concern or have documented volatile contaminant releases may result in vapors migration onto the Project site. However, presence of potential vapor encroachment conditions on the Project site were ruled out (Appendix G). The Phase I ESA determined that no evidence of a recognized environmental condition (REC), an American Society for Testing and Materials (ASTM) REC, a Controlled REC, or a Historical REC is associated with the Project site.[1]

Asbestos, Lead-Based Paint, and Universal Waste

The Phase I ESA did not include an asbestos-containing material (ACM) survey for asbestos, lead-based paints, polychlorinated biphenyls (PCBs), or universal wastes such as fluorescent lighting fixtures. However, seven buildings on the Project site were constructed in the 1960s when asbestos and use of lead-based paints was common. Additionally, PCB-containing building materials were particularly common in schools built or renovated between 1950 and 1979 (EPA 2015). According to regulatory records, approximately 0.5 tons of ACMs were removed from the existing Powell School; it is unknown if all ACMs were removed during this abatement (Appendix G). As such, it is possible ACMs are still present on site.

Asbestos has been specifically designated as a hazardous substance pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 102, but abatement costs are generally not recoverable under CERCLA. Many building materials commonly contained asbestos until the late 1970s, and a smaller list of building materials contained asbestos in the 1980s, such as drywall, joint compounds, vinyl flooring, roofing, asbestos-cement products, and stucco. Under the Toxic Substances Control Act, the U.S. Environmental Protection Agency (U.S. EPA) banned the use of asbestos in many products, with partial bans occurring in 1989 and 1993. However, a full ban of asbestos products did not occur until 2019. Therefore, if a building was constructed

[1] The term recognized environmental condition (REC) is defined by ASTM Standard E 1527-21 as: "… (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.
Historical RECs (HRECs) – a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A historical recognized environmental condition is not a recognized environmental condition.
Controlled RECs (CRECs) – a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations) (Appendix G)

prior to 1989, it is likely it contains asbestos. If it was constructed between 1989 and 2019, it is less likely asbestos is present, but there is still a chance that asbestos was used.

Paint manufacturers frequently used lead as a primary paint ingredient through the 1940s and gradually decreased its use in the 1950s and 1960s. The federal department of Housing and Urban Development (HUD) estimates 30% of homes built in the United States before 1978 contain some lead-based paint. The Consumer Product Safety Commission prohibited the use of lead-based paints in residential buildings in 1978; however, the use of lead-based paints in commercial and industrial buildings is not prohibited.

Based on the age of the structures on the Project site (1960s), there is a likelihood that asbestos and/or lead-based paints are present in the buildings.

Universal wastes in schools include common hazardous items like batteries, fluorescent lighting fixtures, electronic devices (e-waste), and mercury-containing equipment. Because these items are common in schools, it is likely that universal wastes are present in onsite buildings.

Hazardous Material Contaminated Sites

California Government Code section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile a list of hazardous waste and substances sites (Cortese List). While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) Envirostor database (Health and Safety Code §§ 25220, 25242, 25356, and 116395);
2. List of Leaking Underground Storage Tank (LUST) Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (Health and Safety Code § 25295);
3. List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code § 13273(e) and 14 CCR § 18051);
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code §§ 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to section 25187.5 of the Health and Safety Code, identified by the DTSC.

A review of the Cortese List databases listed above confirmed that the Project site is not listed in any of these databases (CalEPA).

In addition to Cortese List databases, other online databases provide environmental information on release and cleanup cases in the state. While these databases are not included in the Cortese List, they may provide additional information regarding potential environmental contamination on the project site. The Phase I ESA included a database search in accordance with ASTM Standard E 1527-21. A summary of the results of the database search is included in the Phase I ESA (Appendix G).

4.8.1.3 Schools

Powell Elementary School, a now-vacant public school, is located on the Project site. As described in Chapter 3, Project Description, the on-site structures would be demolished to accommodate the Project. There are no schools within 0.25 miles of the Project site. However, Azusa High School, a public school, located at 240 North Cerritos Avenue, and Azusa Pacific University and Citrus College, located at 901 East Alosta Avenue and 1000 West Foothill Boulevard, respectively, are within 0.75 miles of the Project site.

4.8.1.4 Airports

The nearest commercial airport is San Gabriel Valley Airport, located approximately 8.65 miles southwest of the Project site. The Project site is not located within any of the designated safety zones for the airport, as defined in the airport layout plans (AECOM 2016). The Federal Aviation Administration (FAA) Notice Criteria Tool determined that the Project site is not within the San Gabriel Airport notification zone or any other notification zone under 40 CFR 77.9 (b)(1), which indicates that notification of the Project to the FAA is not necessary (FAA 2025). More information regarding this regulation is provided in Section 4.8.2.1, Federal Regulatory Requirements.

4.8.1.5 Fire Hazards and Emergency Response

The Project site is located in a developed urbanized area of the City and is not within a State Responsibility Area or designated as a Very High Fire Hazard Severity Zone (CAL FIRE 2025). The City is located within a Local Responsibility Area and fire protection, environmental safety, and emergency response are provided by the Los Angeles County Fire Department (LACoFD).

The City has adopted a Local Hazard Mitigation Plan (LHMP), the purpose of which is to better protect the people and property of the City from the effects of natural disasters and hazard events. The City's LHMP provides operational concepts related to various emergency situations; identifies mitigation strategies; and overall describes plan adoption, implementation, and maintenance. The General Plan includes a Natural Environment Element which designates goals and policies to ensure the safe use and handling of any hazardous materials, along with fire prevention procedures and emergency response (City of Azusa 2004b).

Los Angeles County Department of Public Works (LADPW) has published disaster routes for each city within its jurisdiction (LADPW 2008). Disaster routes are freeway, highway, or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. The City is located within LADPW Disaster Management Area D. The Project site is located approximately 650 feet south of East Alosta Avenue and approximately 0.28 miles north of Interstate (I-) 210, both of which are designated as disaster routes in the City (LADPW 2008).

4.8.2 Regulatory Requirements

4.8.2.1 Federal

U.S. Environmental Protection Agency

Title 40 Code of Federal Regulations, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 Code of Federal Regulations, Chapter 1, Subchapter I, Part 273 – Universal Waste

Universal waste comes primarily from consumer products containing mercury, lead, cadmium, and other substances that are hazardous to human health and the environment. Universal wastes; however, can be managed and transported under more relaxed rules compared to hazardous wastes because they pose lower immediate risk to people and the environment when managed properly. Nonetheless, as universal wastes still contain hazardous materials, they must be taken to a designated handler or recycler. Part 273 – Universal Waste – of the United States Code governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 Code of Federal Regulations, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing materials (ACM) as one of these materials. ACM use, removal, and disposal are regulated by the EPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 15 United States Code, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 empowers the EPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead based paint waste. As discussed above, the EPA has also established NESHAP, which governs the use, removal, and disposal of ACM as a hazardous air pollutant and mandates the removal of friable ACM before a building is demolished and requires notification before demolition. In addition to asbestos, ACM, and lead based paint requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Regional Screening Levels

The EPA provides regional screening levels (RSLs) for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the DTSC's Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the USEPA RSLs. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 Code of Federal Regulations, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, lead based paint, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey be prepared prior to demolition.

Title 29 Code of Federal Regulations, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan and prepare a fire prevention plan.

Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 (FEMA 2003), is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat

to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

4.8.2.2 State

California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404 – 25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the CalEPA, the DTSC and Enforcement and Emergency Response Program administer the implementation of Certified Unified Program Agencies (CUPAs), which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level. CUPAs implement the hazardous waste and materials standards. This program was established under the amendments to the California Health and Safety Code (HSC) made by Senate Bill 1082 in 1994. The programs that make up the Unified Program are as follows:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans)
- Hazardous Material Management Plan and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the Project site is the Los Angeles County Fire Department, Health Hazardous Materials Division.

Hazardous Waste Management

Title 22 California Code of Regulations, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

Title 22 California Health and Safety Code, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 –Department of Toxic Substance Control-Modified Screening Levels

Human Health Risk Assessment Note Number 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

California Department of Transportation/California Highway Patrol

Title 13 California Code of Regulations, Division 2, Chapter 6

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

Title 8 California Code of Regulations – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (Cal/OSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the California Code of Regulations (CCR). CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations (8 CCR § 1529). Only a CalOSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, §§ 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Asbestos and Air Quality

Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board is responsible for overseeing compliance with the federal Asbestos NESHAPs in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by Health and Safety Code section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) The California Air Resources Board reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and EPA to facilitate communication and enforcement continuity and assists EPA in training district staff to enforce the asbestos NESHAP.

Lead-Based Paint

According to the Phase I ESA, it is considered possible that LBP is present at the existing Project site. The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are as follows:

California Health and Safety Code Sections 124125 to 124165

Declared childhood lead exposure as the most significant childhood environmental health problem in the state. Established the Childhood Lead Poisoning Prevention Program and instructed it to continue to take steps necessary to reduce the incidence of childhood lead exposure in California.

California Health and Safety Code Sections 105275 to 105310

Reaffirmed California's commitment to lead poisoning prevention activities; provided the California Department of Public Health with broad mandates on blood lead screening protocols, laboratory quality assurance, identification, and management of lead exposed children, and reducing lead exposures.

California Health and Safety Code Section 105250

Establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities.

California Civil Code Section 1941.1; California Health and Safety Code Sections 17961, 17980, 124130, 17920.10, 105251 to 105257

Deems a building to be in violation of the State Housing Law if it contains lead hazards and requires local enforcement agencies to enforce provisions related to lead hazards. Makes it a crime for a person to engage in specified acts related to lead hazard evaluation, abatement, and lead-related constructions courses, unless certified or accredited by the Department. Permits local enforcement agencies to order the abatement of lead hazards or issue a cease-and-desist order in response to lead hazards.

California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known lead-based paint hazards upon sale of a property.

California Labor Code Sections 6716 to 6717

Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

California Health and Safety Code Sections 116875 to 116880

Requires the use of lead-free pipes and fixtures in any installation or repair of a public water system or in a facility where water is provided for human consumption.

California Building Standards Commission

Title 24 of the California Code of Regulations – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials. The Chief Building Official at the local government level (i.e., the City) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

California Fire Code

The California Fire Code (CFC) is provided in California Code of Regulations Title 24, Chapter 9. It was created by the California Building Standards Commission and is based on the IFC. The CFC is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separation from project site lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every three years.

Chapter 4, Emergency Planning and Preparedness, addresses human contribution to life safety in buildings where a fire or other emergency may occur, and requires preparation of an approved fire safety and evacuation plan in compliance with CFC Section 404 (CFC §403.2 Group A Occupancies). Additionally, the CFC requires an approved fire emergency guide be distributed to the residents of the Project (CFC § 403.9.2.2 Group R-2 Residences). Chapter 5, Fire Service Features, provides requirements that apply to all buildings and occupancies such as access roads, access to building openings and roofs, key boxes, fire department access to equipment, and emergency responder radio coverage in buildings. CFC section 501.3, Construction Documents, of Chapter 5 requires construction documents be submitted to the fire department for review and approval prior to construction to ensure compliance with applicable fire service feature provisions, such as adequate roadway and building access for emergency responders.

California Emergency Services Act

Under the Emergency Services Act (California Government Code § 8550 et seq.), the state has developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

California Dig Alert

California Government Code 4216

In accordance with California Government Code section 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between 2 and 14 calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a "high priority subsurface installation," which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an onsite meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the onsite meeting is complete.

4.8.2.3 Regional and Local

South Coast Air Quality Management District

Rule 1403: Work Practice Requirements for Asbestos

SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings.

Rule 403: Fugitive Dust

SCAQMD Rule 403 applies to any activity or man-made condition capable of generating fugitive dust, and does not allow fugitive dusts from an active operation, open storage pile, or disturbed surface such that dust remains visible in the atmosphere beyond the property line, or dust emissions exceed 20 percent opacity.

Rule 1166: Volatile Organic Compound Emissions from Decontamination of Soil

SCAQMD Rule 1166 requires control of VOC emissions from excavation, grading, handling, and treating VOC-contaminated soils. VOC-contaminated soils are defined as those with a VOC reading of 50 parts per million (ppm) or greater when measured with an organic vapor analyzer no more than 3 inches from the surface of the soil.

Los Angeles County Fire Department, Health Hazardous Materials Division

The CUPA, which has the responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management as part of the Unified Program (discussed above), is the Health Hazardous Materials Division of the LACoFD.

The CUPA maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, the City has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

Countywide Household Hazardous Waste Program

The LADPW's Hazardous Waste Management Division organizes regular household hazardous waste "round-ups" for residents to discard refuse items such as paints, oils, or pesticides that require special handling. Household hazardous waste roundups are held nearly every week, typically on Saturdays, at various locations throughout the County. The County also provides information on the locations of motor oil recycling centers.

Emergency Response and Evacuation Planning

Los Angeles County Operational Area Emergency Response Plan

The City is within the Los Angeles County Operational Area (OA), which includes the County and all political subdivisions (e.g., cities). The California Office of Emergency Services (formerly California Emergency Management Agency) designated the County as OA coordinator. As such, the County is responsible for coordination and

facilitation of emergency operations within the OA (County of Los Angeles 2023). The County of Los Angeles Operational Area Emergency Operations Plan (OAEOP) addresses the OA's coordinated response to emergency situations associated with natural, man-made, and technological incidents. The OAEOP includes prevention, protection, response, recovery, and mitigation within the OA, and describes the OA's emergency organization, authorities, and responsibilities, as well as the mutual aid process during emergencies, to ensure effective coordination of needed resources (County of Los Angeles 2023). The OAEOP incorporates and complies with the principles and requirements found in federal and state laws, regulations, and guidelines, and is compliant with the National Incident Management System; the National Response Framework (NRF); and the Standardized Emergency Management System (County of Los Angeles 2023).

The County, as the OA coordinator, may declare a local emergency due to a specific situation, such as flood, earthquake, or other conditions. Pursuant to section 8630 of the California Government Code, when the County proclaims a local emergency, it is not necessary for cities to also proclaim the existence of a local emergency (County of Los Angeles 2023). Further, cities within the County are bound by County rules and regulations adopted by the County pursuant to section 8634 of the California Government Code during a County proclaimed local emergency, even if the cities do not independently proclaim the existence of a local emergency (County of Los Angeles 2023).

County Office of Emergency Management, All-Hazards Mitigation Plan

To meet the requirements of the federal law known as the Disaster Mitigation Act 2000, the Los Angeles County Office of Emergency Management (OEM) prepared an All- Hazards Mitigation Plan (AHMP) to assess risks posed by natural hazards and to develop a mitigation action plan for reducing the risks in unincorporated Los Angeles County. The AHMP describes local hazards and includes risk assessment for the unincorporated County, vulnerable populations, and critical facilities. The AHMP includes a mitigation strategy for how the County will reduce its risks and identifies critical facilities for addressing the risks. The OEM ensures that the hazard profiles for the unincorporated areas are included in the Los Angeles County Threat and Hazard Identification Risk Assessment and the Los Angeles County Operational Area Emergency Response Plans and Annexes.

Master Mutual Aid System

The mutual aid system facilitates the rendering of aid to agencies/jurisdictions stricken by an emergency whenever its respective resources are overwhelmed or inadequate. Statewide mutual aid is voluntary aid provided between and among local jurisdictions and the state under the terms of the California Disaster and Civil Defense Master Mutual Aid Agreement (MMAA) (County of Los Angeles 2023). The MMAA creates a formal structure wherein each jurisdiction retains control of its own facilities, personnel, and resources, but may also receive or render assistance without the expectation of reimbursement, to other jurisdictions within the state. Mutual Aid Regions were established under the Emergency Services Act (County of Los Angeles 2023). The OA is in Mutual Aid Region I, which is in the California Office of Emergency Services Southern Administrative Region (County of Los Angeles 2023).

As part of the mutual aid system, the County Emergency Operations Center (CEOC)/Operational Area Emergency Operations Center (OAEOC) provides a facility for centralized emergency coordination and support to agencies/jurisdictions in the OA during an emergency or disaster. If the CEOC/OAEOC is not able to facilitate the requested support, it will request assistance from the state. Requests for federal assistance during an emergency are coordinated through the state (County of Los Angeles 2023).

City of Azusa Local Hazard Mitigation Plan

Azusa has adopted an LHMP to guide hazard mitigation planning and better protect the people and property of the City from the effects of hazard events. The City's LHMP demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decision makers direct mitigation activities and resources. The goals include:

Goal 1: Minimize risk and vulnerability of Azusa to natural hazards and protect lives and prevent losses to property, public health, economy, and the environment.

Goal 2: Increase community education, awareness, and preparedness to hazards of concern and promote participation and action to reduce hazard-related losses.

Goal 3: Improve the community's capabilities to prevent/mitigate hazard-related losses and to be prepared for, respond to, and recover from a disaster event

City of Azusa 2004 General Plan

The following goals, policies, and implementation programs outlined in the General Plan Economy and Community Element are relevant to the Project (City of Azusa 2004b):

Goal 2: Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

Azusa Municipal Code

The AMC includes regulations pertaining to proper handling, storage, and/or use of hazardous materials. The purpose of Chapter 60, Stormwater and Urban Runoff Pollution Prevention, is to protect the health and safety of the residents of the city and county by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the city from pollutants carried by stormwater and non-stormwater discharges. The following regulation is relevant to the Project:

> Section 60-8(b) states that no person shall cause the disposal of hazardous materials or waste into trash containers used for municipal trash disposal.

4.8.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines which state that a significant impact related to hazards and hazardous material would occur if the Project would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as result, would it create a significant hazard to the public or the environment.

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

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

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

4.8.4 Impacts Analysis

Threshold 4.8a **Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less-Than-Significant Impact with Mitigation. The following discussion evaluates whether Project construction and operation would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction

Construction would require the use of heavy equipment and machinery. Hazardous materials that may be used during construction and demolition activities include, but are not limited to, gasoline, diesel fuel, lubricants, grease, adhesives, welding gases, solvents, paints, and vehicle and equipment-maintenance-related materials. These materials would be stored in designated construction staging areas within the boundaries of the Project site and the construction contractor must ensure the transport, handling, use, storage, and disposal of any hazardous materials would be in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations. Therefore, the use and of these hazardous materials for their intended purpose would not pose a significant risk to the public or environment. Any hazardous construction materials would be transported by a licensed hazardous waste hauler and disposed of at an appropriately permitted offsite facility, in accordance with California Code of Regulations, Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste.

As discussed in Section 4.8.1, Existing Conditions, a Vapor Encroachment Screen (VES) was performed for the Project site (Appendix G) and concluded the presence of a vapor encroachment condition at the Project site from an offsite source is unlikely. Given the age of the buildings, there is a possibility that asbestos-containing materials (ACMs) and lead based paint are present at the Project site (Appendix G). According to regulatory records, approximately 0.5 tons of ACMs were removed; however, it is unknown if all ACMs were removed during this abatement, so it is possible that ACMs are still present on site. Though no PCB-containing equipment was identified in the Phase I ESA (Appendix G), it is possible that small amounts of PCBs in such items as light fixtures, caulk, and paint are present in the existing school buildings (EPA 2015), as well as mercury and other universal wastes. Demolition of structures that contain asbestos or other hazardous materials/wastes could result in a significant hazard if not properly identified and managed. With implementation of MM-HAZ-1, potential asbestos, lead-based paint, PCBs, and universal wastes would be identified in a hazardous building materials survey of the site prior to demolition activities and would require proof of abatement and proper disposal is provided to the City's Public

Services Department. Therefore, impacts associated with the handling, transport, and disposal of asbestos, lead paint, PCB, and/or universal wastes during demolition activities would be less-than-significant with mitigation incorporated.

Operation

During the operational phase of the Project, hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are typically used in residential and commercial uses, and when used in accordance with manufacturers' recommendations and applicable regulations, do not result in a risk to human health or the environment. Should reportable quantities be maintained onsite, they would be subject to applicable federal, state, and local health and safety laws and regulations, which include spill response and prevention measures. In addition, the County of Los Angeles offers household hazardous waste disposal events in the remote chance that hazardous wastes, such as used paints or solvents used in maintenance activities, are generated, further reducing the likelihood of mishandling and improper disposal. The routine transport, use, and/or disposal of hazardous materials during the operational phase of the Project would be subject to compliance with applicable federal, state, and local health and safety laws and regulations by the user, as summarized in Section 4.8.2, which would minimize health risk to the public and the environment and impacts would be less than significant.

Threshold 4.8b **Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less-Than-Significant Impact with Mitigation. The following discussion evaluates whether Project construction and operation would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Construction

During construction of the Project, any hazardous materials would be stored in designated construction staging areas within the boundaries of the Project site and the construction contractor is required to ensure hazardous materials are managed in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations. Demolition activities associated with the Project could potentially expose the public and the environment to significant hazards associated with the release of hazardous materials, including asbestos, lead-based paint, PCB-containing items, and universal wastes potentially present in the buildings scheduled for demolition. However, as discussed further in the Phase I ESA, the Project site was historically used for farming, which typically results in the upper one to two feet of soil being impacted by pesticides. Soil sampling and laboratory analysis was performed as part of the Phase I ESA, in which eight soil samples were collected throughout the Project site at 6-inches bgs. Soil samples were analyzed by EPA Method 6010B (T22 Metals/CAM17) and 8081A (Organochlorine Pesticides) and determined the detected concentrations were within typical regional background levels and below. As a result, the Phase I ESA determined no evidence of a REC.

Implementation of MM-HAZ-1, would identify potential asbestos, lead-based paint, PCBs, and universal wastes in a hazardous building materials survey prior to demolition activities and would require that proof of abatement and proper disposal is provided to the City's Public Works Department. Therefore, impacts related to the potential to 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 during demolition activities would be less-than-significant with mitigation incorporated.

Operation

As outlined in Section 4.8.1, Existing Conditions, a Vapor Encroachment Screen (VES) was performed for the Project site (Appendix G) and concluded that the presence of a vapor encroachment condition at the Project site from an offsite source is unlikely. In addition, hazardous materials used during operation of the Project would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances typically used in residential and commercial uses. When used in accordance with manufacturer's recommendations and applicable regulations, these substances do not result in significant hazards to the public or environment. Should reportable quantities be maintained onsite, they would be subject to applicable federal, state, and local health and safety laws and regulations, which include spill response and prevention measures. These preventative measures would minimize health risk to the public and the environment and impacts would be less than significant.

Threshold 4.8c **Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No Impact. Powell Elementary School is located on the Project site; it is currently vacant and scheduled for demolition as part of the proposed Project. As such, no impacts to students would occur. As discussed above in Section 4.8.1.3, Schools, there are no schools located within 0.25 miles of the Project site. The closest schools -- Azusa High School, Azusa Pacific University, and Citrus College -- are within 0.75 miles of the Project site. In addition, the Project would be required to comply with all existing regulations regarding the emission or handling of acutely hazardous materials. Therefore, no impact would occur related to emissions of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Threshold 4.8d **Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as a result, would it create a significant hazard to the public or the environment?**

No Impact. As detailed in Section 4.8.1, Existing Conditions, the Project site is not listed on or adjacent to a Cortese List site, nor is it likely that the Project site has been impacted by a Cortese List site (Appendix G). Therefore, the Project would not create a significant hazard to the public or the environment as it is not located on or adjacent to a hazardous materials site included on the list compiled under Government Code section 65762.5, and no impact would occur.

Threshold 4.8e **For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?**

No Impact. The Project site is not located within 2 miles of a public use airport, nor is it located within an airport land use plan. The nearest commercial airport is San Gabriel Valley Airport, located approximately 8.65 miles southwest of the Project site. Therefore, the Project would not result in a safety hazard or excessive noise due to proximity to an airport for people residing or working in the Project area, and no impact would occur.

Threshold 4.8f **Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less-Than-Significant Impact. As discussed above in Section 4.8.1.5, Fire Hazards and Emergency Response, the Project site is located north of I-210 and south of East Alosta Avenue, both of which are designated as disaster routes in the City (LADPW 2008). The City's adopted emergency response and evacuation plans are the LHMP and the OAEOP. Impairment of emergency response plans or emergency evacuation plans would occur if the Project would introduce an undue or extraordinary burden on emergency responders during an emergency or otherwise inhibit response and/or evacuation protocols in the event of an emergency. Common examples of such a situation include Project placement and design that could impede access by emergency responders or the orderly evacuation of a site in the event of a natural or man-made disaster, such as dam breach or fire. Additionally, indirect emergency access impacts could occur if emergency access easements and internal roadways that connect off-site and to adjacent developments are obstructed.

Construction

As detailed in Section 4.15, Transportation, of this Draft EIR, Project construction is anticipated to begin in November 2026 and end in November 2029. The Project would require temporary lane closures along North Calera Avenue and East Mauna Loa Avenue in the vicinity of the Project during some of the construction activities. If not managed appropriately, these temporary closures could interfere with evacuation or emergency plans. However, a temporary traffic control and access plan is required to permit activity within the City public right of way when temporary disruption of traffic is implemented. To ensure adequate safeguards for pedestrian, bicycle and vehicular circulation and emergency vehicle access during short-term construction activities, a Construction Traffic Control Plan (TCP) would be prepared in accordance with AMC section 62-50 and approved by the City engineer. The TCP would address construction-related vehicular traffic and pedestrian and bicycle circulation disruption in the public right-of-way, describe safe detours, and include protocols for implementing temporary traffic controls. Preparation of the TCP would ensure that any potential on and off-site impacts of the Project's short-term construction activities related to physical interference with an emergency response plan or emergency evacuation plan would be less than significant.

Operation

As detailed in Section 4.13, Public Services, the Project site is located in a highly urbanized area and the City contracts with LACoFD for fire protection and emergency response services within the City, including fire, rescue, and hazardous materials (City of Azusa 2004a). The Project would increase residential density and activity levels at the Project site, which would increase the service population for emergency responders. The Project would comply with all applicable provisions of the AMC and CFC (as amended) pertaining to emergency access and preparedness, including CFC section 403.1 requiring preparation of an approved fire safety and evacuation plan, and CFC section 501.3, requiring review and approval of Project plans to ensure adequate roadway and building access is provided for emergency responders. Compliance with CFC requirements would ensure appropriate access and other conditions (i.e., emergency responder radio coverage) for first responders during Project operation.

As shown in Figure 3-1, Conceptual Site Plan, in Chapter 3, Project Description of this Draft EIR, the Project site would be accessible from East Mauna Loa Avenue and North Calera Avenue. Internal circulation would be provided by internal streets, which would be accessible to emergency vehicles and would be constructed in accordance with City standards and requirements for access.

Additionally, the Project would be required to adhere to General Plan Economy and Community Element (Public Services) Goal 2, which require adequate fire protection, including adequate emergency response access, from fire and medical emergencies for Azusa residents. As discussed in Section 4.8.2, the City is also party to a broader mutual aid system, which would help ensure proper implementation of LHMP and OAEOP procedures in the event of a natural disaster or other City-wide emergency. The Project's required compliance with the CFC and other City policies and standards adopted to ensure proper emergency response and evacuation would ensure that the potential for operational Project impacts related to implementation of the LHMP and OAEOP would be less than significant.

Threshold 4.8g **Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

No Impact. As discussed above in Section 4.8.1.5, Fire Hazards and Emergency Response, the Project site is located in a highly urbanized area and is not located within an area of high wildfire hazard, such as a wildland urban interface area, State Responsibility Area, or within a Very High Fire Hazard Severity Zone (CAL FIRE 2024). Therefore, people and structures would not be subject to significant risks related to wildland fires, and no impact would occur.

4.8.5 Cumulative Impact Analysis

For the cumulative impact analysis, the hazardous materials geographic scope is generally restricted to the area immediately surrounding the Project site as the potential for risk is limited to the area immediately surrounding an affected hazardous material site or risk generator. However, other topics associated with human health and safety such as transport and disposal of hazardous materials, wildfire hazard, airport safety, and emergency response can expand through the surrounding region.

Cumulative projects occurring in the area immediately surrounding the Project site would also be subject to federal, state, and local regulations related to hazardous materials and other public health and safety issues. In a manner similar to the proposed Project, adherence to these regulatory requirements would reduce incremental impacts associated with public exposure to health and safety hazards in the surrounding area. Additionally, most hazardous material and safety-related risks are localized, generally affecting a specific site and immediate surrounding area, thus minimizing the potential for an impact to combine with another project to create a cumulative scenario. According to Table 2-3, List of Cumulative Projects, and Figure 2-4, Cumulative Projects Location Map, in Chapter 2, Environmental Setting of this EIR, the closest cumulative project to the Project site is identified as LA9 (see Figure 2-4), located at 6233 Galanto Avenue approximately 160 feet east of the Project site. For the purposes of this cumulative impact analysis for Thresholds 4b through 4d, an assessment of the Project in combination with potential impacts associated with the construction and operation of Cumulative Project LA9 is detailed further below. For Thresholds 4.8a and 4.8f, the geographic scope for the cumulative analysis is the County, therefore, all cumulative projects listed in Table 2-3 (of Chapter 2 of this Draft EIR) are considered.

Threshold 4.8a-Cumulative **Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

As stated above, there are regulations governing the use of hazardous materials with which the Project and cumulative projects would be required to comply. As a result, development of the Project and cumulative projects would occur in accordance with adopted plans and regulations. However, even with compliance with applicable regulations, the Project would have the potential to create a significant hazard to the public with the demolition of

on-site buildings and their likelihood of having asbestos-containing materials, lead based paint, or other universal wastes; and excavation and grading activities within contaminated soil and soil vapor. Without mitigation, these potential hazards from Project demolition, plus similar impacts from cumulative projects, could result in cumulative impacts without appropriate mitigation. As described in Section 4.8.4, MM-HAZ-1 would require proper abatement of asbestos and lead-based paint and identification and abatement of other hazardous materials and universal wastes prior to demolition and construction activities. As such, with implementation of MM-HAZ-1, impacts associated with the transport and disposal of asbestos, universal wastes, and hazardous materials during construction would be less than significant with mitigation incorporated. Similar mitigation for other nearby projects would also result in less-than significant impacts, and impacts, if any, are expected to be site-specific and would not be cumulative. Through the required CEQA review process, if it is determined that existing regulations are insufficient to reduce other cumulative project impacts to less than significant levels, then the City would require implementation of similar mitigation measures on a project-by-project basis. Therefore, through compliance with applicable regulations and required CEQA review, which would ensure implementation of any required mitigation, impacts related to the Project in combination with cumulative projects would not be cumulatively considerable.

Similar to the operational phase of the Project, it is anticipated that the use of hazardous materials on cumulative project sites would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are typically used in residential and commercial uses, and when used in accordance with manufacturers' recommendations and applicable regulations, do not result in a risk to human health or the environment. Should reportable quantities be maintained within cumulative project sites, they would be subject to applicable federal, state, and local health and safety laws and regulations, which include spill response and prevention measures. In addition, the County of Los Angeles offers household hazardous waste disposal events in the remote chance that hazardous wastes, such as used paints or solvents used in maintenance activities, are generated, further reducing the likelihood of mishandling and improper disposal. The routine transport, use, and/or disposal of hazardous materials during the operational phase of the Project and cumulative projects would be subject to compliance with applicable federal, state, and local health and safety laws and regulations by the user, as summarized in Section 4.8.2, which would minimize health risk to the public and the environment. Therefore, in combination with the proposed Project, cumulative operational impacts would not be cumulatively considerable.

Threshold 4.8b-Cumulative **Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

As described in Section 4.8.4, any hazardous materials would be stored in designated construction staging areas within the boundaries of the Project site and the construction contractor is required to ensure hazardous materials are managed in accordance with the manufacturer's specifications and all applicable federal, state, and local laws and regulations. However, demolition activities associated with the Project could potentially expose the public and the environment to significant hazards associated with the release of hazardous materials, including asbestos, lead-based paint, PCB-containing items, and universal wastes potentially present in the buildings scheduled for demolition. As a result, the Project incorporates MM-HAZ-1, which requires a hazardous building materials survey to identify hazardous materials prior to demolition activities and requires proof of abatement and proper disposal to be provided to the City's Public Works Department. These impacts are primarily limited to the Project site, and would not result in a cumulatively considerable impact when considered with cumulative projects. Similar to the Project, cumulative project LA9 (see Table 2-3, List of Cumulative Projects, in Chapter 2 of this Draft EIR) would comply with applicable hazardous material management, abatement, and disposal regulations. Due to the localized

nature of the impact and required compliance with applicable regulations, impacts related to the Project in combination with cumulative projects would not be cumulatively considerable.

Threshold 4.8c-Cumulative **Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

As described in Section 4.8.4, there are no schools within 0.25 miles of the Project site. The schools nearest to the Project site are Azusa High School, a public school located at 240 North Cerritos Avenue, and Azusa Pacific University and Citrus College, located at 901 East Alosta Avenue and 1000 West Foothill Boulevard, respectively, all within 0.75 miles of the Project site. In addition, the Project would be required to comply with all existing regulations regarding the emissions or handling of acutely hazardous materials. Therefore, the Project has no potential to contribute to a cumulatively considerable impact related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of an existing or proposed school.

Threshold 4.8d-Cumulative **Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65762.5 and, as a result, would it create a significant hazard to the public or the environment?**

The Project would have no impact related to listing on a Cortese List site and therefore has no potential to contribute to cumulative impacts.

Threshold 4.8e-Cumulative **For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?**

The Project site is not located within 2 miles of a public use airport, nor is it located within an airport land use plan, and therefore has no potential to contribute to cumulative impacts.

Threshold 4.8f-Cumulative **Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The cumulative projects are in the vicinity of Grand Avenue, Alosta Avenue, SR-39, and I-210, which are designated disaster evacuation routes. However, similar to the Project, the cumulative projects in the City and neighboring City of Glendora would be subject to CEQA review. Through CEQA, any potential construction related impacts with the potential to impair or interfere with an adopted emergency response plan or emergency evacuation plan would be identified and mitigated at the project level, as appropriate. Thus, all cumulative projects would be subject to CFC provisions pertaining to emergency access and preparedness, which would help support emergency responders and emergency response activities in the event of a natural disaster or other largescale event requiring implementation of an emergency response or evacuation plan, such as the OAEOP or LHMP. For cumulative projects in the City, the General Plan Economy and Community Element (Public Services) Goal 2 contains policies which require adequate fire protection, including adequate emergency response access, from fire and medical emergencies for Azusa residents. As with the Project, cumulative projects located within the City would be required to comply with the same policies. Thus, with compliance with applicable CFC standards, and General Plan policies, the Project's impacts, in combination with cumulative projects, would not be cumulatively considerable.

Threshold 4.8g-Cumulative **Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

As discussed above in Section 4.8.1.5, Fire Hazards and Emergency Response, the Project site is located in a highly urbanized area and is not located within an area of high wildfire hazard, such as a wildland urban interface area, State Responsibility Area, or within a Very High Fire Hazard Severity Zone (CAL FIRE 2025). Therefore, the Project would have no impact related to wildland fires and has no potential to contribute to cumulative impacts.

4.8.6 Mitigation Measures

MM-HAZ-1 Hazardous Building Materials Survey. Prior to the issuance of a demolition permit for any existing on-site structures, a qualified environmental specialist shall conduct a survey for asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury, and other hazardous building materials, such as universal wastes and refrigerants, to document the presence of any potentially hazardous materials within the structures. Certification/registration is required in the State of California for asbestos and lead-based paint inspectors and contractors; proof of licensure will be provided for all survey proposals and bids. Once complete, if survey results are positive, all potentially hazardous materials identified as part of this survey shall be handled and disposed in accordance with federal and state hazardous waste and universal waste regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the findings of the hazardous building materials survey and federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, California Occupational Safety and Health Administration (Cal/OSHA) Title 8 section 1529 (which regulates employee exposure during construction), the South Coast Air Quality Management District (SCAQMD) Rule 1403 (which requires an electronic notification to be submitted to SCAQMD ten days prior to any demolition or removal of more than 100 square feet of asbestos-containing material (ACM) with greater than one percent of asbestos), and the Metallic Discards Act of 1991 (Public Resources Code, §42160 et seq.), particularly Public Resources Code section 42175, Materials Requiring Special Handling, for the removal of mercury switches, PCB-containing ballasts, and refrigerants. The hazardous building materials survey required by this measure together with the related plans and specifications specifying required abatement measures shall be provided to the City's Economic & Community Development Department for review and sign off prior to issuance of demolition permits. The Project's contractor shall ensure implementation of the abatement requirements specified in the plans through the contract specifications for all confirmed and suspected hazardous materials which require abatement. Upon completion of construction activities, proof of abatement and proper disposal shall be provided to the City's Economic & Community Development.

4.8.7 Significance Conclusion

Threshold 4.8a. The Project would have a **less-than-significant impact with mitigation** incorporated associated with the routine transport of asbestos, universal wastes, and hazardous materials for offsite disposal during construction.

Threshold 4.8b. The Project would have a **less-than-significant impact with mitigation** incorporated related to the potential upset and accident conditions involving the release of hazardous materials to the environment during construction.

Threshold 4.8c. The Project would have **no impact** related to the release or handling of hazardous emissions or materials near existing or proposed schools.

Threshold 4.8d. The Project would have **no impact** related to creating a significant hazard to the public or the environment due to its location of a hazardous materials site included on the Cortese list.

Threshold 4.8e. The Project would have **no impact** associated with hazards from airports for people residing or working in the Project area.

Threshold 4.8f. The Project would not impair implementation or physically interfere with an emergency evacuation or response plan and the impact is **less-than-significant impact**.

Threshold 4.8g. The Project would have **no impact** related to exposing people or structures to significant risks related to wildland fires.

4.8.8 References

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4.9 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on the following appendices:

- **Appendix H,** Hydrology and LID Report (LID Report), Delaney Square, 1035 E. Mauna Loa Avenue, Azusa, CA 91702, prepared by Kimley Horn, dated June 16, 2025
- **Appendix F-1** Preliminary Geotechnical Evaluation and Recommendations (Geotechnical Report), Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles, California, prepared by LGC Technical Inc., dated January 23, 2025

Other sources consulted are listed in Section 4.9.8, References.

Comments received in response to the NOP are summarized in Table 1-1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, Introduction, of this EIR. A copy of the NOP is included in Appendix A-1 and the comment letters received in response to the NOP are included in Appendix A-2 of this Draft EIR.

4.9.1 Existing Conditions

4.9.1.1 Surface Water

San Gabriel River Watershed

The Project site is located within the Upper San Gabriel River Watershed, a hydraulic subarea of the larger 689-square mile San Gabriel River Watershed (Los Angeles County 2025; LARWQCB 2014). The San Gabriel River Watershed is one of the largest in the region and is also very diverse in terms of land use patterns. The Watershed consists of extensive areas of undisturbed riparian and woodland habitats in its upper reaches near the headwaters which originate in the San Gabriel Mountains. Much of the watershed of the West Fork and East Fork of the San Gabriel River is set aside as a wilderness area; other areas in the upper watershed are subject to heavy recreational use. The rest of the watershed is urbanized and much of the lower part of the river itself is highly modified, having been lined with concrete along most of its length by the U.S. Army Corps of Engineers (LARWQCB 2014).

Upper San Gabriel River Subwatershed

The Upper San Gabriel River subwatershed drains into the San Gabriel River and then out to the Pacific Ocean near the Port of Long Beach. In addition, other tributaries in this watershed include Big Dalton Wash, San Dimas Wash, Live Oak Wash, and San Jose Creek (Los Angeles County 2025). Municipalities that fall within the boundaries of the Upper San Gabriel River subwatershed include the City of Azusa (City) and the cities of Pomona, West Covina, Diamond Bar, Baldwin Park, Monrovia, and unincorporated areas of Los Angeles County (County) (Los Angeles County 2025). Figure 4.9-1, Upper San Gabriel River Watershed Subarea, depicts the boundaries of the watershed in relation to the Project site as well as the greater San Gabriel River Watershed.

Surface Water Quality

From the Project site, the Big Dalton Wash is located approximately 0.66 miles southeast, the Little Dalton Wash is located approximately 0.34 miles to the north, the San Dimas Wash is located approximately 1.43 miles southeast, the Live Oak Wash is located approximately 5.75 miles southeast, and the San Jose Creek is located approximately 9.87 miles southwest. Existing, potential, or intermittent beneficial uses for the Big Dalton Wash, the Little Dalton Wash, the San Dimas Wash, the Live Oak Wash, and San Jose Creek for the underlying groundwater basin in the City (Main San Gabriel Groundwater Basin) include: domestic water supply; industrial activities; industrial process dependent upon water quality; agricultural supply; groundwater recharge; water recreation; warm water ecosystems; cold water ecosystems; terrestrial ecosystems; rare, threatened or endangered species; and wetland ecosystems (LARWQCB 2014). Under the Clean Water Act section 303(d), the State of California is required to develop total maximum daily loads (TMDLs), which define how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. TMDLs have been established for impaired water bodies throughout California. The Rio Hondo/San Gabriel River Water Quality Group (RH/SGRWQG) identified one impaired water body (Santa Fe Dam Park Lake) as well as three impaired receiving waters (San Gabriel River Reach 5, Big Dalton Wash, and Walnut Creek) within the Upper San Gabriel River subwatershed (RH/SGRWQG 2016). Stormwaters from the Project site discharge into the Little Dalton Wash, and then flow into the San Gabriel River, and eventually into the Pacific Ocean (Appendix H).

Storm Drainage

Storm drainage in the City is provided by curbs and gutters along streets which drain all stormwater flows into applicable receiving waters such as the Little Dalton Wash or the Big Dalton Wash (City of Azusa 2004). According to the RH/SGRWQG Enhanced Watershed Management Program (EWMP) Management Plan, there are approximately 28 structural and/or institutional best management practices (BMPs) currently being implemented in the City. These include BMPs related to green infrastructure (e.g., infiltration trenches, cultic storm filters, infiltration facilities, and infiltration drywells), and source control (e.g., gross pollutant separators and catch basin inserts, screens, and filters), as well as institutional BMPs (e.g., covered trash bins, enhanced street sweeping, dog parks, and signage and stenciling) (RH/SGRWQG 2016).

Flood Zones

The Federal Emergency Management Agency (FEMA) provides flood hazard and risk data to help guide mitigation actions. Flood mapping is an important part of the National Flood Insurance Program, as it is the basis of National Flood Insurance Program regulations and flood insurance requirements. The Project site is not located within a FEMA-designated Special Flood Hazard Area and is designated as Zone X (an area of minimal flooding potential) (FEMA 2025).

Project Site Conditions

There are no surface water features on the Project site. The elevation of the Project site ranges from approximately 633 to 618 feet above mean sea level (amsl). The site currently slopes northeast to southwest and the property is relatively flat, with an estimated 15 feet of elevation differential across the site. The developed school area and the open space area on the Project site are separated by a slope. As shown on Figure 4.9-2, Existing Drainage Conditions, the Project site contains two drainage sub areas: DA-1, an 8.15-acre area that drains to East Mauna Loa Avenue at the southwest corner of the Project site, and DA-2, a 1.02-acre area that drains to the southeast

corner of the Project site. Based on the topographic survey there is no existing storm drain infrastructure at the southwest corner of the property (Appendix H).

4.9.1.2 Groundwater

The Project site is located above the Main San Gabriel Groundwater Basin (Main Basin), an adjudicated basin which occupies most of the San Gabriel Valley. It encompasses approximately 107,000 acres and stores approximately 8.6 million acre-feet of water (Watermaster 2024). The Main Basin serves as a natural storage reservoir, transmission system, and filtering medium for wells. It also provides approximately 85% of the overall water supply needs of nearly 1.4 million residents overlying the basin (Watermaster 2024).

The Main Basin requires supplemental recharge in order to replenish and maintain ground water levels. The Main San Gabriel Basin Watermaster (Watermaster) was established as the governing body in 1973 and oversees management of the Main Basin. The major sources of natural recharge are from infiltration of rainfall on the valley floor and runoff from the nearby mountains; however, a two-decade-long dry period has resulted in low rainfall, minimal runoff, and limited recharge. In 1983, the operational groundwater elevation was 294 feet above mean sea level (amsl), which is the highest level recorded since the basin was adjudicated. In 2018, the groundwater elevation was 169 feet amsl, which represents a historic low (Watermaster 2024). As a result, Main Basin recovery depends largely on Watermaster management actions, including purchasing and importing supplemental water from the State Water Project (SWP).

Approximately 85% of Main Basin demand is satisfied from local groundwater, 10% from treated imported water and 5% from other local supplies (e.g., recycled water and local surface water diversions) (Watermaster 2024). In addition, an average of about 40,000 acre-feet per year of untreated imported water historically has been delivered for Main Basin replenishment (Watermaster 2024). The Watermaster established an Operating Safe Yield (OSY) for 2022/23 of 150,000 acre-feet; however, annual pumping production in 2022/23 was approximately 168,400 acre-feet (Watermaster 2024). Consequently, the replacement water obligation, was approximately 16,900 acre-feet (Watermaster 2024). The City can also purchase water from the Metropolitan Water District (MWD) or the San Gabriel Valley Municipal Water District (SGVMWD) for the purposes of groundwater replenishment (City of Azusa 2004).

Ground Water Quality

Four areas of the Main Basin are included on the Environmental Protection Agency's (EPA's) National Priorities List, also known as Superfund Sites. Contaminants such as trichloroethylene, perchloroethylene, carbon tetrachloride, perchlorate, N-nitrosodimethylamine, and 1,4-dioxane impact Whittier Narrows, Puente Basin, Baldwin Park, and El Monte areas (referred to as "Operable Units") (Watermaster 2024). There is currently an ongoing effort to clean up the Baldwin Park Operable Unit, whereby responsible parties have agreed to fund research, cost recovery, and treatment plant construction (Watermaster 2024). Those facilities have operated for over 17 years and continue to operate (Watermaster 2024).These areas are located downstream from the City, and thus, are not expected to impact the Project site.

Project Site Conditions

There are no groundwater wells on the Project site, and the site is not used as a municipal site for groundwater spreading (e.g. spreading basins) or infiltration. The nearest spreading basin is approximately 1.1 miles south of the Project site near South Citrus Avenue and Arrow Highway. Further, there are no mapped active groundwater

wells for municipal or water supply within 1 mile of the Project site (SWRCB 2025). Groundwater was not encountered to the maximum depth of approximately 51.5 feet below existing ground surface during the subsurface evaluation, and historic high groundwater is approximately 175 feet below current grade according to the Geotechnical Report (Appendix F-1).

4.9.2 Regulatory Requirements

4.9.2.1 Federal

Clean Water Act

The Clean Water Act (CWA) (33 U.S. Code § 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Key sections of the CWA are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives and establish TMDLs for each pollutant/stressor.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. As there are no federal jurisdictional waters within the Project site, no water quality certification under CWA section 401 would be required.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, municipal stormwater discharges, and various kinds of non-stormwater discharges. State and regional water quality related permits and approvals, including NPDES permits, are discussed below.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency. As there are no federal jurisdictional waters within the Project site, the Project would not require a permit under CWA section 404.

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers. At the state level, with the exception of tribal lands, the California Environmental Protection Agency and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

Federal Antidegradation Policy

The Federal Antidegradation Policy (40 Code of Federal Regulations 131.12) requires states to develop statewide antidegradation policies and identify methods for implementation. Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods shall, at a minimum, protect and maintain the following: (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate

economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

4.9.2.2 State

Porter-Cologne Water Quality Act (California Water Code)

The Porter–Cologne Water Quality Control Act (Porter-Cologne Act) (codified in the California Water Code § 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state, which includes isolated wetlands and groundwater in addition to federal waters. The Porter–Cologne Act is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the state could cause pollution or nuisance, including impacts to public health and the environment.

The Porter–Cologne Act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), waste discharge requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same BMPs and pollution control technologies as required by NPDES-derived permits.

California Toxics Rule

The U.S. Environmental Protection Agency has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharge to that water body shall not unreasonably affect present or anticipated beneficial use of such water resources.

NPDES and WDR Permits

The NPDES and WDR programs regulate construction, municipal, and industrial stormwater and non-stormwater discharges under the requirements of the CWA and the Porter–Cologne Act. The Construction Stormwater Program is administered by the SWRCB, while the Municipal Stormwater Program and other WDRs are administered by the

Los Angeles RWQCB. Table 4.9-1 lists the water-quality-related permits that would apply directly or indirectly (through implementing City ordinances) to the Project, each of which is further described below.

Table 4.9-1. State and Regional Water Quality-Related Permits and Approvals

Program / Activity	Order Number/ NPDES Number	Permit Name	Affected Area
Construction Stormwater Program	SWRCB Order 2022-0057-DWQ and Order 2009-0009-DWQ, as amended / CAS000002	National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit)	Statewide
Municipal Stormwater Program	Los Angeles RWQCB Order No. R4-2021-0105 / CAS004004	Waste Discharge Requirements for National Pollutant Discharge Elimination System (NPDES) for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties	Coastal Watersheds of Los Angeles and Ventura Counties

Source: LARWQCB 2018, 2021; SWRCB 2022.

Construction General Permit (SWRCB Order 2022-0057-DWQ and Order 2009-0009-DWQ, as amended)

Pursuant to CWA section 402(p), requiring regulations for permitting of certain storm water discharges, the SWRCB has issued a statewide General Permit for Stormwater Discharges Associated with Construction Activity and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the SWRCB on September 8, 2022, became fully effective September 1, 2023. The statewide programmatic permitting option per Section III.B.4 of Order 2022-0057-DWQ became effective on December 17, 2022.

Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing permit registration documents, which include a Notice of Intent and Stormwater Pollution Prevention Plan (SWPPP), prior to the commencement of construction activity. SWPPPs incorporate erosion control, sediment removal, and construction waste management control measures during construction, site stabilization measures in the short-term post-construction period, and may identify BMPs for post-construction land use.

Dischargers must file a Notice of Termination when construction is complete and final stabilization has been reached or ownership has been transferred. The discharger must certify that all state and local requirements have been met in accordance with this Construction General Permit. For construction to be found complete, the discharger must install post-construction storm water management measures and establish a long-term maintenance plan.

California Building Standards Code

Title 24, Part 2 of the California Code of Regulations is known as the California Building Standards Code (California Building Code or CBC), which is a compilation of building standards that have been adopted by state agencies or authorized by the California legislature. The CBC includes standards that are based on national model codes as well as standards that have been created and adopted to address particular California concerns, such as standards set forth in CBC Part 11 (i.e., the California Green Building Standards Code, discussed in further detail below).

All occupied buildings in California are subject to national model codes adopted into the CBC and are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies. The City has adopted the 2022 California Building Code with state amendments applicable to local jurisdictions, as well as Appendices C, F, H, I, J, and O based on the 2021 International Building Codes. The City's changes and amendments to the CBC (as adopted) are set forth in Article II, Division 2, section 14-51, Building Code of the City of AMC.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen Code), Part 11 of the CBC (discussed above), is designed to improve public health, safety, and general welfare by using design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices. The CALGreen Code provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development. The City has adopted the CALGreen Code as Article VIII, section 14-584, CALGreen Building Code, of the AMC.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014. SGMA requires governments and water agencies of high- and medium-priority groundwater basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California. SGMA identifies the Main Basin as an adjudicated basin, which is exempt from the requirements of developing Groundwater Sustainability Plans and subsequently designated as very-low priority basins pursuant to SGMA (ALW 2026). In compliance with SGMA, the Watermaster submits annual reports to the California Department of Water Resources (ALW 2026; Watermaster 2024).

4.9.2.3 Regional and Local

Water Quality Control Plan, Los Angeles Region

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs

throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura County, including the Project site.

The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura counties (Los Angeles RWQCB Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code §§ 13240–13247) (LARWQCB 2014). The Los Angeles RWQCB Basin Plan is the Water Quality Control Plan (WQCP) applicable to the City and region (i.e., RWQCB Region 4, Los Angeles) and must conform to the policies set forth in the Porter-Cologne Act as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their Basin Plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Los Angeles RWQCB Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the RWQCB region, and changes to beneficial use designations and associated water quality objectives.

Municipal Stormwater Permit (Los Angeles RWQCB Order No. R4-2021-0105), NPDES Permit No. CAS004004

The WDRs for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles and Ventura Counties (MS4 Permit) covers 85 incorporated cities within the coastal watersheds of the County, unincorporated areas of the County, the Los Angeles County Flood Control District (LACFCD), Ventura County Watershed Protection District, County of Ventura, and 10 incorporated cities within Ventura County (LARWQCB 2021). Under the MS4 Permit, the LACFCD is designated as the Principal Permittee. The Permittees are the 88 cities in the County (including the City) and the County. Collectively, these are the “Co-Permittees” of the MS4 Permit. The Principal Permittee helps to facilitate activities necessary to comply with the requirements outlined in the MS4 Permit but is not responsible for ensuring compliance of any of the other Permittees.

The Los Angeles RWQCB initially adopted WDRs for MS4 discharges within the Coastal Watersheds of Los Angeles County on June 18, 1990 (Order No. 90-079; NPDES Permit No. CA0061654). The current MS4 Permit (Order No. R4-2021-0105; NPDES Permit No. CAS004004) was adopted on July 23, 2021, and became effective on September 11, 2021 (LARWQCB 2021).

The MS4 Permit contains effluent limitations, receiving water limitations, minimum control measures, and TMDL provisions, and outlines the process for developing watershed management programs, including the EWMP. The MS4 Permit incorporates the TMDL waste load allocations applicable to dry- and wet-weather as water quality-based effluent limitations and/or receiving water limitations. The MS4 Permit adopts low-impact development (LID) principles and requires development and redevelopment projects to incorporate stormwater management strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, cisterns, and rain barrels to store, evaporate, detain, and/or treat runoff may be used.

Enhanced Watershed Management Program

The County and cities in the San Gabriel River and Los Angeles River Watersheds are responsible for the implementation of watershed improvement plans or EWMP to improve water quality and assist in meeting the TMDL milestones. In response to the Phase I Los Angeles County MS4 Permit, Order No. R4-2012-0175, the Rio Hondo/San Gabriel River Water Quality Group (RH/SGRWQG) was formed and subsequently developed an EWMP (RH/SGRWQG 2016). The RH/SGRWQG is comprised of the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and the LACFCD. The EWMP addresses water quality priorities in portions of the Rio Hondo and San Gabriel River, and their respective tributaries. A comprehensive stormwater management plan that optimizes stormwater and financial resources was produced and implemented through the EWMP process. The EWMP integrates existing planning efforts and identifies additional opportunities for water quality enhancement through both programmatic and structural controls. In addition, the EWMP incorporates multi-benefit projects that improve water quality, as well as providing aesthetic, recreational, water supply, and/or community enhancements (RH/SGRWQG 2016).

Low-Impact Development Standards Manual

The County prepared the 2014 LID Standards Manual (LADPW 2014) to comply with the requirements of the MS4 Permit (No. R4-2021-0105, CAS004004). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The LID Standards Manual is an update and compilation of the following documents:

- Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (September 2002)
- Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (2004 Design Manual, February 2004)
- Stormwater Best Management Practice Design and Maintenance Manual (2010 Design Manual, August 2010)
- Low Impact Development Standards Manual (February 2014)

The LID Standards Manual addresses the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies. It is intended to minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies. The LID Standards Manual is intended to minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies. The LID Standards Manual is applicable to this Project.

City of Azusa 2004 General Plan

The General Plan Built Environment Element includes the following goals and policies designed to protect water quality and groundwater resources (City of Azusa 2004):

Goal 2: Provide a water supply system that is able to meet the projected water demands; upgrade and expand water treatment, supply, and distribution facilities; and pursue funding sources to reduce the cost of water provision for the City

Policy 2.4: Require that new development and retrofit existing developments to contain safeguards and measures preventing water supply degradation.

Policy 2.6: Minimize water consumption through site design, use of efficient systems, and other techniques.

Policy 2.7: Continue the City's water conservation efforts; review programs periodically and modify and/or expand them as appropriate and feasible.

Policy 2.8: Continue to require the incorporation of water conservation features in the design of all new construction and site development.

Policy 2.10: Require the use of reclaimed water for landscaped irrigation, grading, and other non-contact uses in new developments, where available or expected to be available.

Policy 2.11: Ensure the costs of improvements to the existing water supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Goal 4: Provide a flood control system that is able to support the permitted land uses while preserving the public safety; upgrade existing deficient systems; and pursue funding sources to reduce costs of flood control provision in the city.

Policy 4.1: Maintain existing public storm drains and flood control facilities, upgrade and expand storm drain and flood control facilities.

Policy 4.4: Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system.

Policy 4.7: Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Policy 4.9: Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas.

Policy 4.10: Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retrofit of existing development.

City of Azusa Municipal Code

Chapter 60, Stormwater and Urban Runoff Pollution Prevention

As stated in Section 60-2 of the AMC, the purpose of Chapter 60 is to protect the health and safety of the residents of the city and county by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the city from pollutants carried by stormwater and non-stormwater discharges. The intent of this chapter is to enhance and protect the water quality of the receiving waters of the city and the United States, consistent with the Clean Water Act.

Section 60-5 – Illicit Discharges Prohibited. This section states that no person shall discharge or cause any discharge to enter the storm drain system unless such discharge: (1) consists entirely of stormwater; (2) consists of non-stormwater that is authorized by a NPDES permit, waiver or waste discharge order issued by the U.S. EPA, the state board, or the regional board provided that the person is in compliance with all requirements of the permit, waiver or order and other applicable laws and regulations; (3) is associated with emergency firefighting activities; or (4) is otherwise in compliance with the requirements of this chapter.

Section 60-9 – Stormwater and Runoff Pollution Mitigation for Construction Activity. Section 60-9 requires that construction activity for which a permit is required does not commence without implementing all stormwater and runoff pollution mitigation measures required by such a permit.

Section 60-13 – Regulated Development or Redevelopment Projects. This section requires that, prior to the construction of a regulated development or redevelopment project, such project must be reviewed by the City for its potential to discharge pollutants to the municipal storm drain system. Such review must be conducted in accordance with development planning requirements established by the regional board or its executive officer, pursuant to the municipal NPDES permit. In addition, once such project has been reviewed for its potential to discharge pollutants to the municipal storm drain system, the City requires appropriate BMPs to be implemented during construction and following project completion. The prescription of BMPs shall be in keeping with the Standard Urban Storm Water Mitigation Plan requirements established by the regional board or its executive director, pursuant to the municipal NPDES permit.

4.9.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to hydrology and water quality are based on Appendix G of the CEQA) Guidelines which state that a significant impact related to hydrology and water quality would occur if the Project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

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

b) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
   i. result in substantial erosion or siltation on or off site;
   ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or 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; or

iv. impede or redirect flood flows.

c) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

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

4.9.4 Impacts Analysis

Threshold 4.9a **Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Short-Term Construction Impacts

Less Than Significant Impact. Implementation of the Project would require the demolition of existing school structures, the existing parking area, and related infrastructure. Final and comprehensive grading plans would be approved by the City before a grading permit is issued, in compliance with all applicable AMC requirements. Grading and construction would potentially result in short-term erosion and associated siltation that could discharge into the adjacent storm drain infrastructure. Erosion-induced sedimentation affects water quality and interferes with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages which could contribute to the degradation of water quality. Other pollutants that could affect surface-water quality during the construction phase include petroleum products (gasoline, diesel, oil, and grease), hydrocarbons from asphalt paving, construction equipment leaks, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, and rodenticides).

In accordance with the Construction General Permit, as established by the Porter-Cologne Water Quality Control Act, the development of an acre or more of land must file a notice of intent with the SWRCB, followed by development of a site-specific SWPPP for construction activities (AMC section 60-9, Stormwater and Runoff Pollution Mitigation for Construction Activity). The property owner/developer must comply with the Construction General Permit applicable at the time a grading permit is issued. As detailed under Section 4.9.2, the SWPPP must include erosion- and sediment-control BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit, as well as BMPs that control the other potential construction-related pollutants. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. The SWPPP is also required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality during Project construction. Typical BMPs that could be incorporated into the SWPPP to protect water quality include, but are not limited to, the following:

- Diverting off-site runoff away from the construction site
- Placing perimeter straw wattles to prevent off-site transport of sediment
- Using drop inlet protection (filters and sandbags or straw wattles), with sandbag check dams within paved areas
- Regular watering of exposed soils to control dust during demolition and construction
- Implementing specifications for demolition/construction waste handling and disposal
- Using contained equipment wash-out and vehicle maintenance areas
- Maintaining erosion and sedimentation control measures throughout the construction period

- Stabilizing construction entrances to avoid trucks from imprinting soil and debris onto adjoining roadways
- Training, including for subcontractors, on general site housekeeping
- Vegetating landscaped/vegetated swale areas as soon as feasible following grading activities

Incorporation of required BMPs for temporary materials and waste storage and handling during construction, and equipment and vehicle maintenance and fueling would reduce the potential discharge of polluted runoff from construction sites, consistent with the state's Construction General Permit and the AMC requirements for construction activities.

As set forth in Chapter 60, Stormwater and Urban Runoff Pollution Prevention, of the AMC, the Project must ensure the health and safety of City and County residents by protecting the beneficial uses, marine and river habitats, and ecosystems of receiving waters within the City from pollutants carried by stormwater and non-stormwater discharges. AMC section 60-6 prohibits installation, maintenance, or use of any connection to the storm drain system and prohibits non-stormwater discharge or conveyance through a connection to the system unless permitted by the City. AMC section 60-13 requires that all proposed regulated development and/or redevelopment activities protect water quality by implementing permit-required BMPs in accordance with the Standard Urban Storm Water Mitigation Plan requirements during construction and following project completion. The Project would adhere to all applicable stormwater management and discharge control regulations, and, as such, is not anticipated to violate any water quality standard or WDRs during construction.

As discussed in Section 4.6, Geology and Soils, of this Draft EIR, the historical high groundwater levels in the Project vicinity have been identified at 175 feet below the ground surface, and as such, excavation activities are not expected to encounter groundwater. However, groundwater conditions are dependent on seasonal precipitation and land use, among other factors, and may vary as a result (Appendix F-1). Groundwater is not anticipated to be encountered during excavation for the Project (Appendix F-1).

Compliance with existing regulations, including the requirements of the Construction General Permit and the AMC requirements, would prevent any violation of water quality standards and minimize the potential for contributing sources of polluted runoff during short-term construction activities. The Project would not violate any water quality standards or WDRs or otherwise substantially degrade surface or groundwater quality from demolition and construction activities. Impacts would be less than significant.

Long-Term Operational Impacts

Less Than Significant Impact. The primary source of surface water pollution from long-term operations on the Project site are expected to include oil, grease, petroleum products, and automobile-related pollutants, pathogens/bacteria from pets, pesticides/herbicides/insecticides and nitrogen and phosphorous from fertilizers for landscaping, and trash or debris that can accumulate on impervious surfaces, such as parking areas, trash storage/waste areas, driveways, and sidewalks. Other potential pollutants that may be generated by the Project include household-type cleaning products, maintenance products (e.g., paints, solvents, cleaning products), and refrigerants associated with mechanical heating, ventilation, and air conditioning (HVAC) systems. During storm events, pollutants from paved areas lacking proper stormwater controls and BMPs could enter the municipal storm drain system. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants. Such discharges would potentially violate state/federal antidegradation policies, the California Toxics Rule, and water quality objectives as established in the Los Angeles RWQCB Basin Plan.

However, Project design, construction, and operation must be completed consistent with the RH/SGRWQG EWMP, and in accordance with the City's Stormwater and Urban Runoff Pollution Prevention Ordinance (Chapter 60 of the AMC), MS4 Permit, WDRs, and the County of Los Angeles LID Standards Manual (LID Manual), with the goal of reducing the amount of pollutants in stormwater and urban runoff. The LID Manual requires that post-construction stormwater runoff from new development be infiltrated, evapo-transpired, captured and reused, and/or treated through a high efficiency BMP onsite for the 85th percentile storm event, or 0.75 inches of precipitation, whichever is greater (LADPW 2014).

The LID Manual requires that BMPs be designed and implemented to manage and capture stormwater runoff. Infiltration systems are the first priority type of BMP improvements as such systems provide percolation and infiltration of stormwater into the ground, which not only reduces the volume of stormwater runoff entering the MS4, but also contributes to groundwater recharge in some areas. The second priority BMP is capturing and reusing stormwater onsite for either landscape irrigation or toilet flushing. Proposed drainage for the Project would include stormwater treatment and infiltration features, in accordance with the City and County LID requirements.

As discussed in the LID Report, the Project would increase the amount of impervious surface area on the Project site by approximately 3.49 acres (from 4.58 acres to 8.07 acres of impervious area), which would result in an increase in runoff due to a decrease in stormwater infiltration on the property. Based on the Project's Geotechnical Report and LID Report, it was determined that a system, including on-site catch basins, gutters running along proposed drive aisles, and infiltration chambers, is feasible for stormwater treatment and would satisfy the City and County LID requirements. The existing infiltration rate for the Project site is 2.5 inches/hour with a design infiltration of 0.6 inches/hour. The Project's proposed infiltration chamber and pretreatment device would be constructed just south of the center of the Project site, as shown on Figure 4.9-3, Proposed LID Plan. The pretreatment device would pretreat stormwater before it flows to the system's infiltration chambers. The required mitigated volume for the proposed system is 26,542 cubic feet (CF), and the proposed infiltration system is designed to accommodate 27,804 CF; therefore, the required mitigated volume would be exceeded (Appendix H).

Therefore, after construction of the Project, the site's runoff would not drain onto adjacent properties and land as it currently does under existing conditions. Any overflow from a storm event greater than the 85th percentile event would be discharged to an existing 36-inch storm drain line running along Mauna Loa Avenue and then to the 60-inch storm drain line within Baseline Road. The proposed drainage would be within the allowable flow rate set by Los Angeles County for the existing 36-inch storm drain and the 60-inch storm drain; therefore, it was determined that the existing storm drain system has adequate capacity to accommodate the proposed Project (Appendix H).

The implementation of LID features would, to the maximum extent practicable, reduce the discharge of pollutants into receiving waters (e.g., Little Dalton Wash and the San Gabriel River), including inadvertent release of pollutants (e.g., hydraulic fluids and petroleum); improper management of household hazardous materials; and trash and debris during Project operations. In accordance with all applicable state and local regulations, Project source controls to improve water quality would be provided for impervious surfaces, such as parking areas, trash storage/waste areas, driveways, and sidewalks. As a result of compliance with existing regulations and implementation of the Project's drainage system design, the Project would not violate any water quality standards or WDRs or otherwise substantially degrade surface or groundwater quality during the long-term Project operations. Impacts would be less than significant.

Threshold 4.9b **Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

Less Than Significant Impact. The existing Project site consists of impervious surfaces in the form of buildings, walkways, and a paved parking lot, pervious surfaces including the open field and grassy areas, and minimum landscaping features within the parking lot and around the existing buildings and site boundaries. The Project proposes construction of 128 residential units and associated residential amenities, with a total of approximately 52,016 square feet (sf) of open space consisting of 15,100 sf of common open space (i.e., central paseo, tot lot, barbeque area, etc.) and 36,916 sf of private open space (i.e., private yards). The amount of impervious area on the Project site would increase with implementation of the Project. However, as discussed under Threshold 4.9a, the Project site is suitable for infiltration of stormwater, and the Project would incorporate an underground infiltration system to facilitate on-site infiltration in compliance with applicable LID requirements. The Project site is not currently used for groundwater infiltration, either by spreading or by groundwater injection.

As described under Threshold 4.9a, the Project is not anticipated to encounter groundwater during construction, as the depth to groundwater is approximately 175 feet below current grade. However, the presence of groundwater conditions cannot be ruled out due to local zones of perched groundwater from local seepage caused by precipitation. In the unlikely event that perched groundwater is encountered during earthwork and trenching for utilities, resulting in the need for dewatering, the Project applicant/developer would be required to obtain a dewatering permit from the Los Angeles RWQCB for pumping and disposal of groundwater. Groundwater dewatering is controlled in compliance with the Waste Discharge Requirements for the Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). Temporary dewatering, if required, would be short-term and would not substantially interfere with groundwater supplies.

Additionally, the Project site is located above the Main Basin (Groundwater Basin 4-013), which has been designated as Very Low Priority with respect to establishment of a GSA and completion of a Groundwater Sustainability Plan (SGMA 2025).

Historical prolonged droughts have caused groundwater levels to decrease resulting in the Raymond Basin Management Board to temporarily reduce the amount of groundwater which may be produced. The decreased production is designed to promote recovery of groundwater levels. At such time the groundwater levels have recovered, the program may be suspended and can be reinstated as needed in the event groundwater levels decrease in the future. Azusa Light and Water (ALW) has production facilities in the Main Basin and has the ability to shift production, if needed. In addition, ALW has a treated water connection and has access to MWD water as an additional source of supply (ALW 2026). If needed, ALW can utilize its Water Shortage Contingency Plan to manage water supplies to minimize the adverse impacts of any potential water shortages. The proposed Project would not include any wells that would directly deplete groundwater supplies, and the ALW 2025 Urban Water Management Plan anticipates adequate supply through 2050. In addition, ALW water conservation efforts will continue into the future to reduce water demands thereby making local supplies more reliable (ALW 2026).

Given the above, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of a groundwater basin. Impacts would be less than significant.

Threshold 4.9c **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- **i result in substantial erosion or siltation on or off site?**
- **ii substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;**
- **iii create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- **iv impede or redirect flood flows?**

Less Than Significant Impact. The Project site is currently developed and is located in an urbanized portion of the City, surrounded by other development. The Project would infiltrate stormwater in accordance with all applicable LID regulations, as described under Threshold 4.9a, and would continue to discharge into the existing stormwater system. No naturalized drainages or creeks would be affected because there are no natural drainages or creeks present on the site. As discussed under Threshold 4.9a, there would not be a substantial increase in erosion or siltation during construction activities, and although the total amount of impervious surface on the Project site would increase and the site's runoff rate would increase, the Project includes development of on-site catch basins, gutters running along proposed drive aisles, and infiltration chambers, which would satisfy the City and County LID requirements and Project site runoff would no longer flow off site. The required mitigated volume for the proposed system is 26,542 cubic feet (CF), and the proposed infiltration system is designed to accommodate 27,804 CF during operation of the Project; therefore, the required mitigated volume for operations would be exceeded (Appendix H). As such, the Project would not substantially alter the existing drainage pattern of the site in a manner that would result in erosion or siltation, result in flooding on or off-site, exceed the capacity of storm drain system, or impede or redirect flood flows. Impacts would be less than significant.

Threshold 4.9d **In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to Project inundation?**

Less Than Significant Impact. According to FEMA, the Project site is not located within a FEMA-designated Special Flood Hazard Area and is designated as Zone X (an area of minimal flooding potential) (FEMA 2025). However, the City lies downstream from several dams and debris basins, including the Cogswell Reservoir, San Gabriel Dam, and Morris Dam. Should dam failure occur, a majority of the City, not including the southern and easternmost portions of the City, or the Project site, would be located within the potential dam inundation area (DWR 2025a). The lowest areas of the City and those immediately along the San Gabriel River channel in the western portion of the City would be the most susceptible to damages from a potential flood event (City of Azusa 2003). These dams are regulated by the California Department of Water Resources Division of Safety of Dams and must comply with state dam and safety regulations to reduce the potential magnitude of downstream flooding (DWR 2025b). According to the General Plan Draft EIR, flood hazards in the City are addressed and mitigated by existing General Plan implementation programs (City of Azusa 2003).

The Project site is not located near a body of water or close to the ocean and as a result, is not susceptible to a tsunami or seiche (DOC 2025). In the unlikely event that the site experiences flooding as a result of dam failure, the risk of release of pollutants due to inundation of the Project site is low, as the Project's primary uses (i.e.,

residential) would not include storage of large quantities of acutely hazardous materials or hazardous waste.[1] Existing state, regional and local regulations related to emergency preparedness would be sufficient to address potential hazards associated with floods, tsunamis, or seiches, which have not been identified as hazards for the Project site. Therefore, Project impacts would be less than significant.

Threshold 4.9e Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Los Angeles RWQCB Basin Plan is the Water Quality Control Plan for the Los Angeles Region (i.e., RWQCB Region 4), which includes the City (LARWQCB 2014). As previously discussed, stormwater from the City is discharged into the Little Dalton Wash or the Big Dalton Wash, which are identified in the Los Angeles RWQCB Basin Plan as providing a number of intermittent and potential beneficial uses, including groundwater recharge, recreation, municipal and domestic supply, and warm freshwater habitat (LARWQCB 2014). These types of beneficial uses are contingent upon maintaining relevant water quality standards. Without proper precautions in place, development and other operational activities associated with the Project, such as those discussed under Threshold 4.9a, above, have the potential to contribute pollutants and other stressors to the drainage basin/watershed via stormwater runoff, which could potentially result in adverse water quality impacts, such as exceedance of applicable TMDLs, in conflict with the applicable Water Quality Control Plan. As discussed in further detail below, a Groundwater Sustainability Plan is not required and has not been adopted for the Main Basin.

With compliance with applicable regulations, the Project does not include any facilities or land uses that could generate pollutants resulting in substantial water quality impacts. As discussed under Threshold 4.9a, compliance with the City's stormwater management requirements would protect the water quality of watercourses in a manner pursuant to and consistent with the Federal Clean Water Act, and pursuant to the NPDES Construction General Permit No. 2022-0057-DWQ. Restrictions in the City's Stormwater and Urban Runoff Pollution Prevention Ordinance are applicable to both Project construction activities and operations. Additionally, compliance with the Construction General Permit issued by the SWRCB would require implementation of BMPs during construction to address the potential for pollutants from entering downstream waters. As discussed in further detail above under Thresholds 4.9a and 4.9b, the Project's potential to violate any water quality standards or WDRs or otherwise substantially degrade surface water or groundwater quality would be less than significant.

As previously discussed, the Project would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, stormwater BMPs, and LID design, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts within the Upper San Gabriel River Watershed subarea and the overall San Gabriel River Watershed. In addition, compliance with these regulatory requirements would ensure the Project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key surface water drainages throughout the jurisdiction of the Los Angeles RWQCB Basin Plan would not be adversely impacted. As a result, the Project would not conflict with or obstruct the Los Angeles RWQCB Basin Plan.

[1] As discussed further in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR, hazardous materials used and stored on site would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Such chemicals are typically used in residential uses, and when used in accordance with manufacturer's recommendations and applicable regulations, do not result in a risk to human health or the environment. The storage and disposal of these substances would be subject to applicable federal, state, and local health and safety laws and regulations.

With respect to groundwater management, SGMA empowers local agencies to form GSAs to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California. A GSA has not been established for the Main San Gabriel Basin, as it is an adjudicated basin and is not considered a high priority basin. Therefore, a Groundwater Sustainability Plan is not required and has not been adopted for the Main Basin. Further, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, the Project would not conflict with or obstruct a sustainable groundwater management plan. Impacts would be less than significant.

4.9.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from the construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 . The geographic context for the cumulative analysis as it relates to hydrology and water quality is the San Gabriel River Watershed and the Upper San Gabriel River subwatershed. The geographic context for groundwater is the Main Basin. The past, present, and reasonably foreseeable projects (i.e., cumulative projects) used for this analysis are presented in Chapter 2, Section 2.4, Cumulative Impacts, and on Figure 2-4, Cumulative Projects Location Map, of this Draft EIR. The potential for cumulatively considerable impacts related to the topic of hydrology and water quality (i.e., Thresholds 4.9a through 4.9e) is discussed in further detail below.

Threshold 4.9a- Cumulative **Would the project, in combination with other past, present, and reasonably foreseeable future projects contribute to a violation of water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

The Project in combination with other cumulative projects has the potential to increase the amount of pollutants released into the San Gabriel River Watershed and the Upper San Gabriel River subwatershed during both construction and operational phases. Typical pollutants of concern would be associated with the construction phase (e.g., sediment, fuels, litter, etc.), private vehicle use (e.g., any leakage of grease/oils), landscaping/grounds work (e.g., improper/excessive use of pesticides, herbicides, and/or fertilizers), and/or trash (e.g., due to improper waste disposal). The release of such pollutants; however, would be minimized through compliance with terms and conditions of the applicable NPDES permits, CALGreen Code, California Building Code, AMC, and the municipal codes and ordinances of other authorities in the region, including the requirement to implement a SWPPP for development and redevelopment projects disturbing an area of one or more acre(s) for coverage under the Construction General Permit. In summary, all cumulative development would be subject to existing regulatory requirements to protect water quality and minimize increases in stormwater runoff. For example, the MS4 Permit requires each Permittee, including the City, to effectively prohibit non-stormwater discharges from within its boundaries and to prohibit and eliminate illicit discharges and illicit connections to the municipal stormwater system. Permittees are required to comply with the requirements of the MS4 Permit applicable to its discharges and must also prepare and provide compliance reports to the Los Angeles RWQCB, including but not limited to non-compliance reporting, annual reports, monitoring reports, and the report of waste discharge.

Every two years, the Los Angeles RWQCB must reevaluate water quality within its geographic region and identify those water bodies not meeting water quality standards. For those impaired water bodies, a TMDL must be prepared and implemented to reduce pollutant loads to levels that would not contribute to a violation of water quality standards. All development within the San Gabriel River Watershed would be subject to the water quality standards outlined in the Los Angeles RWQCB Basin Plan and would comply with any established TMDLs. The continuing

review process would ensure that cumulative development within the watershed would not substantially degrade water quality. Therefore, the existing cumulative impact is less than significant. Because there is a less-than-significant cumulative impact that the Project could contribute to, cumulative impacts to water quality would be less than significant.

Threshold 4.9b- Cumulative **Would the project, in combination with other past, present, and reasonably foreseeable future projects contribute to a decrease in groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

The Project site is located in the Upper San Gabriel River subwatershed, which is an area that has largely been urbanized with impervious surfaces. While other cumulative projects located in the Upper San Gabriel River subwatershed, including those listed in Chapter 2 of this Draft EIR, may slightly increase the amount of impervious surface in the area, this increase would be modest. As such, due to the existing developed nature of the Project site, its surrounding area, and the Upper San Gabriel River subwatershed, cumulative impacts related to groundwater supplies would be less than significant. Because there a less-than-significant cumulative impact that the Project could contribute to, cumulative impacts to groundwater would be less than significant.

Threshold 4.9c- Cumulative **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

i. result in substantial erosion or siltation on or off site?

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

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

iv. impede or redirect flood flows?

Impacts related to alteration of existing drainage patterns are generally site-specific and do not combine to result in a cumulative impact. All of the drainages and washes in the City, including the Little Dalton Wash and the Big Dalton Wash, are concrete-lined, meaning no alteration in the course of these channels would occur from future development. Additionally, as discussed in Threshold 4.9b, the Project and its surroundings are located in a built-up, urbanized area that is mainly covered with impervious surfaces. As such, cumulative projects would not result in a large increase in the amount of impervious surface area. Therefore, a substantial increase in the amount of surface water that would result in flooding or exceed the capacity of existing stormwater infrastructure would not occur. Cumulative impacts related to the alteration of existing drainage patterns would be less than significant. Because there is a less-than-significant cumulative impact that the Project could contribute to, cumulative impacts to altering the existing drainage pattern of the site (which is site specific) would be less than significant.

Threshold 4.9d- Cumulative **In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to Project inundation?**

Impacts related to flood hazards, tsunami or seiche are generally site-specific and do not combine to result in a cumulative impact. There are several dams at the foothills of the San Gabriel Mountains that pose inundation hazards to the relevant geographic area in the event of dam failure (e.g., Cogswell Reservoir, and the San Gabriel and Morris dams) (DWR 2025a). Failure of a dam could impact existing and future development located in the dam inundation areas. However, the construction of dams in accordance with state and federal dam safety regulations, as well as the preparation of emergency action plans, reduce the potential for dam failure to result in hazards associated with the release of pollutants. Therefore, with compliance with applicable safety and water quality standards the cumulative impact is less than significant.

However, in the event of a catastrophic dam failure, flood waters could impact large areas of the City. In accordance with the City's Provisions for Flood Hazard Reduction regulations (Division 5 of the AMC), all new construction and major improvements to structures are required to be adequately anchored to prevent flotation, collapse, or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads; to be constructed with materials and utility equipment resistant to flood damage for areas below the base flood elevation; to use methods and practices that minimize flood damage; and to have electrical, heating, ventilation, plumbing, and air conditioning equipment and other utility systems that prevent water from entering or accumulating within structures during floods. Compliance with these regulations would ensure the cumulative impact is less than significant.

Reservoirs in the area are also designed with setbacks from adjacent developments to decrease the likelihood of impacts associated with seiche. The Project site is not located in a coastal area that is subject to tsunami hazards. Therefore, there would be no cumulative impact.

Threshold 4.9e- Cumulative **Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan that could impede sustainable management of a drainage basin or groundwater basin?**

Conflicts with a water quality control plan or sustainable groundwater management plan are generally project-specific and do not combine to result in a cumulative impact. As discussed under Threshold 4.9e in Section 4.9.4, Impacts Analysis, the Project in combination with other cumulative projects in the area would be subject to the Los Angeles RWQCB Basin Plan, which is the RWQCB Region (i.e., Region 4). With future development, there is an increased likelihood for conflict with this water quality control plan to arise. However, these future projects would be required to comply with all applicable federal, state, and local policies regarding water quality. This would include requirements related to the Construction General Permit and MS4 Permit (e.g., implementation of a SWPPP, stormwater BMPs, and LID design). With the compliance of applicable regulations, the Project, as well as future cumulative projects, would reduce the potential for impairment of surface and groundwater resources. Further, pursuant to the SGMA, the Main San Gabriel Basin is identified as very low priority basin and is exempt from the requirements of developing a Groundwater Sustainability Plan. The Project is not anticipated to encounter and groundwater or perched groundwater during construction; however, in the event that discharge or dewatering is required, the Project as well as the other cumulative projects would also be subject the WDRs for Discharge of Groundwater from Construction and Project Dewatering to Surface Waters in the Coastal Watersheds of Los Angeles and Ventura counties (Los Angeles RWQCB Order No. R4-2018-0125) which would help ensure that any potential impacts to local groundwater basins would not be significant. As such, cumulative impacts associated with the conflict or obstruction of a water quality control plan or sustainable groundwater management plan that could impede

sustainable management of a drainage basin or groundwater basin would be less than significant; thus, the Project would not contribute to an existing cumulative impact.

4.9.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to hydrology and water quality, and no mitigation measures are required.

4.9.7 Significance Conclusion

Threshold 4.9a. The Project would result in **a less-than-significant impact** related to a violation of water quality standards or waste discharge requirements, or the potential to degrade surface or groundwater quality.

Threshold 4.9b. The Project would result in **a less-than-significant impact** related to the potential to impede sustainable groundwater management of the basin.

Threshold 4.9c(i). The Project would not alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation, and impacts would be **less than significant**.

Threshold 4.9c(ii). The Project would not alter the existing drainage pattern of the site or area in a manner that would substantially increase the rate or amount of surface runoff, resulting in flooding on or off site, and impacts would be **less than significant**.

Threshold 4.9c(iii). The Project would not alter the existing drainage pattern of the site or area in a manner that would 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, and impacts would be **less than significant**.

Threshold 4.9c(iv). The Project would not alter the existing drainage pattern of the site or area in a manner that would impede or redirect flood flows, and impacts would be **less than significant**.

Threshold 4.9d. The Project would result in a **less-than-significant impact** related risk of release of pollutants due to Project inundation in flood hazard, tsunami, or seiche zones.

Threshold 4.9e. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be **less than significant**.

4.9.8 References

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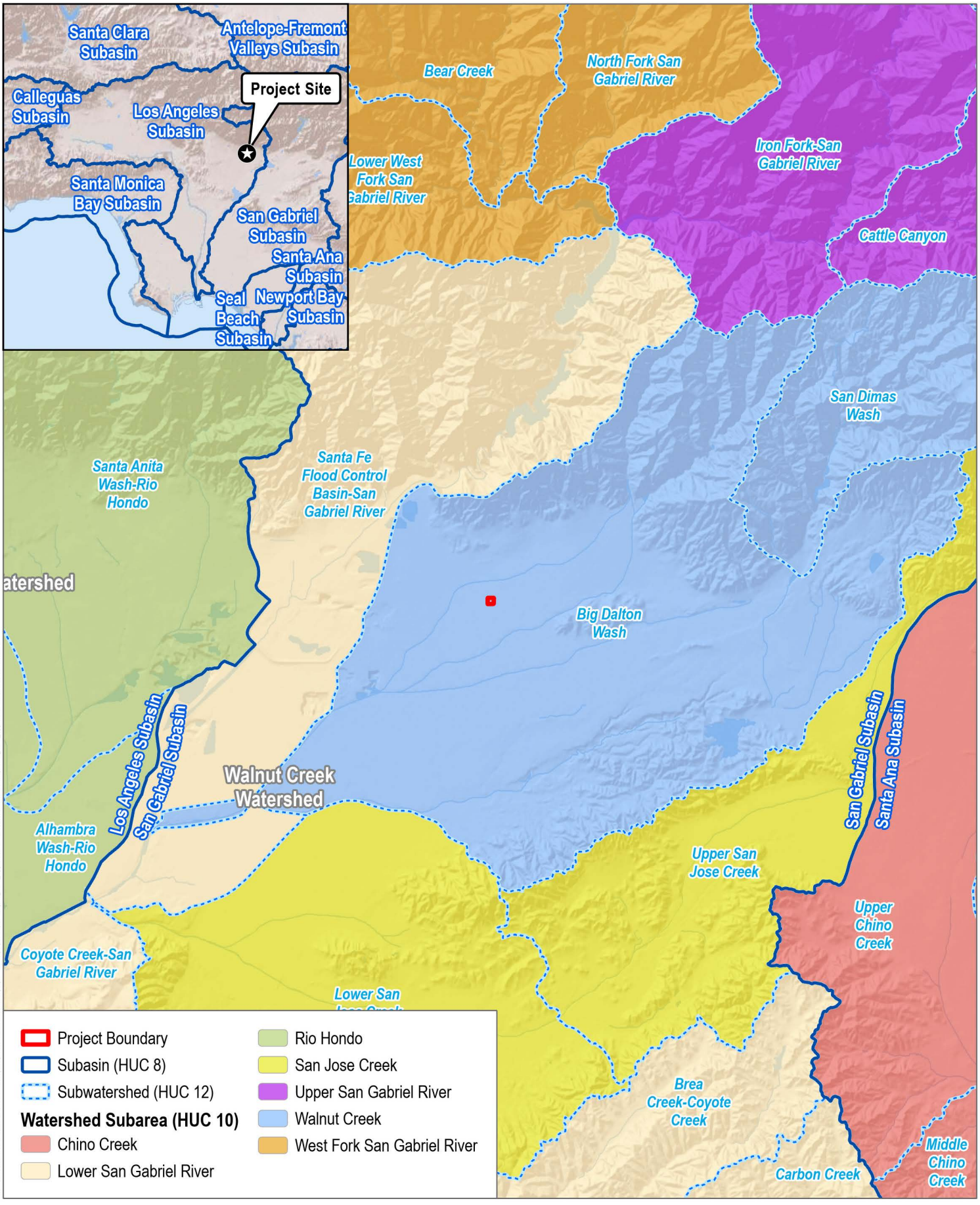
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SOURCE: City of Azusa 2025; Los Angeles County Department of Regional Planning 2025; World Imagery

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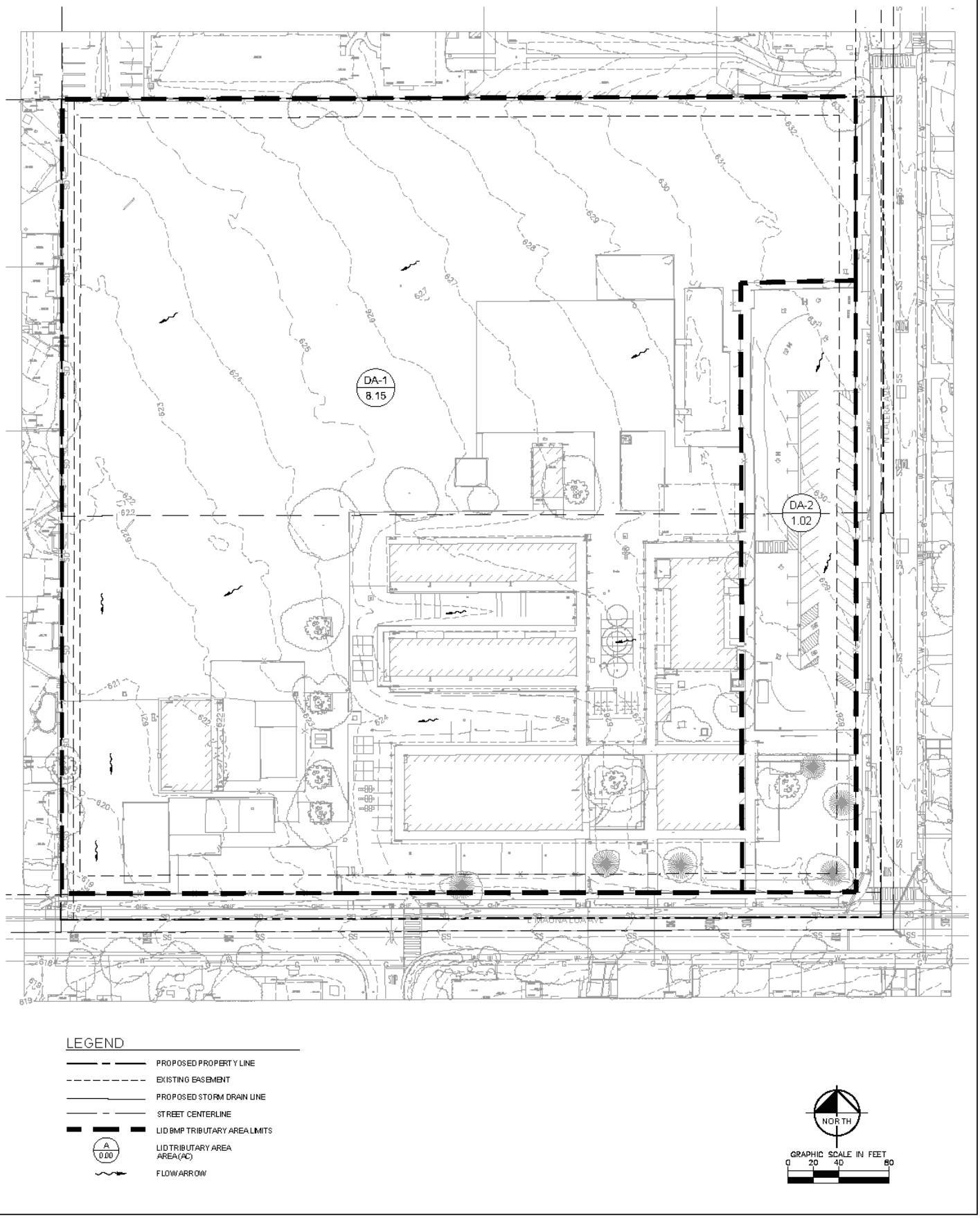
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FIGURE 4.9-1

Upper San Gabriel River Watershed

Delaney Square Residential Project

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SOURCE: Kimley Horn 2025

FIGURE 4.9-2

Existing Drainage Conditions

Delaney Sqayre Residential Project

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SOURCE: Kimley Horn 2025

FIGURE 4.9-3

Proposed LID Plan

Delaney Sqayre Residential Project

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4.10 Land Use and Planning

This section describes the existing land use and planning conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, and references. Information contained in this section is based on review of local, regional, and statewide policies and regulations encompassing the Project site, including the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Plan (RTP/SCS; also known as Connect SoCal), the General Plan, and the AMC and Development Code. Other sources consulted are listed in Section 4.10.8, References.

4.10.1 Existing Conditions

4.10.1.1 Regional and Local Land Use Conditions

Citywide Conditions

The City of Azusa (City) is generally characterized as an urbanized and built-out community within the San Gabriel Valley of Los Angeles County (County). The City contains distinct and identifiable areas: residential communities, the Downtown/Civic district, the West End industrial district, and development associated with Azusa Pacific University, Citrus College, and the University district. A majority of the City consists of open space and trails within the foothills of the San Gabriel Mountains, single-family residential neighborhoods, mixed uses, industrial uses centralized within the West End industrial district, and the City's Downtown/Civic district which includes a mixture of commercial, mixed-use development, residential uses.

Existing Project Site Conditions

The Project site, located at 1035 East Mauna Loa Avenue on the eastern edge of the City, encompasses one parcel (Assessor Parcel Number [APN] 8628-004-900) and is approximately 9.77 acres in size. The Project site is bound by existing commercial and moderate-density residential uses to the north; existing low-density residential uses to the south, east, and west; and is bound by East Mauna Loa Avenue to the south, and North Calera Avenue to the east. The Project site currently includes approximately seven school buildings associated with Powell Elementary School, an associated surface parking lot, limited ornamental landscaping and trees, and an open field. Figure 2-1, Regional Location and Vicinity, included in Chapter 2, Environmental Setting of this Draft EIR, provides the Project boundaries in the context of the surrounding community and adjacent jurisdictions.

City of Azusa General Plan and Zoning

As shown in Chapter 2, Environmental Setting of this Draft EIR, Figure 2-2, Existing General Plan Land Use Designation, and Figure 2-3, Existing Zoning, show the Project site's existing General Plan designations and zoning, respectively. As shown in Figure 2-2, the General Plan designates the Project site as Institutional/School. According to the General Plan, the Institutional/Public designation allows for religious, community meeting, school, and governmental office uses where the floor area ratio (FAR) must be between 0.35 and 1.2, and where buildings must be constructed at a scale and intensity that respect the surrounding uses (City of Azusa 2004). As shown in Figure 2-3, the zoning for the Project site is Institutional/School (INS). Per Development Code section 88.28.020(A), the INS zoning is applied to sites within the City that are occupied by or reserved for public facilities and utilities, meeting facilities, public and private schools, libraries, government offices, etc. (City of Azusa 2025).

Surrounding Land Uses

The City contains a diverse mix of land uses, including single- and multi-family residential neighborhoods, commercial, industrial, office land uses, and parks and open space. As shown in Chapter 2 of this Draft EIR, Figures 2-2 and 2-3 show the Project site and surrounding area's General Plan land use designations and zoning, respectively. The Project site is situated in a densely developed, urbanized area of the City and is surrounded predominantly by residential and commercial uses, as follows:

- **Land Uses to the North:** Azusa Park Apartments and other moderate-density residential uses, as well as commercial uses, are located directly north of the Project site. Azusa Pacific University and other uses designated as Institutional/School are located slightly farther north, across East Alosta Avenue. Current zoning north of the Project site includes University District – Mixed Use, University District – Residential Medium, and University District – Residential Moderate, as well as the Azusa Pacific Specific Plan zone.
- **Land Uses to the East:** Land uses east of the Project site include low-density residential uses and Stanton Elementary School located approximately 0.38 miles east of the Project site. The Project site is adjacent to the City's eastern boundary with the unincorporated County; although, the neighboring City of Glendora boundary is approximately 0.40 miles east of the Project site. Current County zoning east of the Project site, across North Calera Avenue, includes Single-Family Residential (R-1-6000 [minimum lot size 6,000 square feet] within the City's SOI and within the unincorporated County.
- **Land Uses to the South:** Immediately south of the Project site is East Mauna Loa Avenue and the City's southern boundary with the unincorporated County. Residences are located south of the Project site, within the City's SOI and within the unincorporated County. Dalton Park is located approximately 0.41 miles southeast of the Project site and Magnolia Elementary School is located approximately 0.5 miles south of the site. Current zoning south of the Project site includes R-1-6000 [minimum lot size 6,000 square feet]) within the City's SOI and within the unincorporated County.
- **Land Uses to the West:** Immediately west of the Project site are residential uses followed by mixed uses within the University District along North Citrus Avenue and East Alosta Avenue. Azusa Pacific High School and various other recreational and educational facilities are located approximately 0.5 miles to the west of the Project site. The current zoning west of the Project site includes Low Density Residential, University District – Commercial, University District – Commercial/Residential Mixed Use, and Institutional/School.

4.10.2 Regulatory Requirements

4.10.2.1 Federal

There are no federal plans, policies, or ordinances applicable to the land use considerations of the Project.

4.10.2.2 State

Senate Bill 375

The adoption of California's Sustainable Communities and Climate Protection Act SB 375 (Steinberg, Chapter 728, Statutes of 2008) on September 30, 2008, aligns with the goals of regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations, such as SCAG, to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy within their regional transportation plan to demonstrate achievement of GHG reduction targets. In

compliance with SB 375, SCAG adopted an SCS (i.e., Connect SoCal) that covers the City of Azusa and the County of Los Angeles, as well as other cities and counties.

4.10.2.3 Regional and Local

Connect SoCal

SCAG is the designated Metropolitan Planning Organization for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City is one of the many jurisdictions that fall under SCAG.

Adopted in April 2024, Connect SoCal (the current Sustainable Communities Strategy (SCS)/Regional Transportation Plan (RTP) for the SCAG region) presents the land use and transportation vision for the region through the year 2050, providing a long-term investment framework for addressing the region's challenges. The following are the Connect SoCal goals: Mobility: Build and maintain an integrated multimodal transportation network; Communities: Develop, connect and sustain communities that are livable and thriving, Environment: Create a healthy region for the people of today and tomorrow, and; Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents (SCAG 2024a).

Regional Housing Needs Allocation

In accordance with Government Code section 65584, projected housing needs for each city and county in the Southern California region are prepared by SCAG under a process known as the Regional Housing Needs Assessment or Allocation (RHNA). RHNA allocates regional housing needs by income level among member jurisdictions.

The City updated its Housing Element to accommodate the 6th cycle of the RHNA, which covers the planning period of October 2021 through October 2029. SCAG's allocation for the City is 2,651 units (City of Azusa 2023). The 2,651 housing units allocated to the City are out of the anticipated total regional construction need of 1,341,827 units (89,616 of which are in the San Gabriel Valley in the SCAG region). Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the City has been allocated 2,651 new housing units, which includes 760 very low-income units, 368 low income units, 382 moderate income units, and 1,141 above moderate units (City of Azusa 2023). See Section 4.12, Population and Housing, of this Draft EIR for more discussion.

City of Azusa 2004 General Plan

A General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code section 65302 requiring local preparation and adoption of General Plans. The General Plan should be viewed as a dynamic guideline to be refined as the physical environment of the City's changes. The City's General Plan was adopted in 2004 and includes the following mandated and optional elements, applicable to the Project: The Built Environment Element, Economy and Community Element, Natural Environment Element, and the Housing Element. According to the Built Environment Element, buildout projections for the General Plan analyzed existing trends until 2024. The City is currently undergoing a comprehensive update to the General Plan, although the City has not yet released a public draft of the comprehensive update. For the

purposes of this Draft EIR, the analysis contained in this section is based on the applicable goals and policies from the General Plan, as identified below in Table 4.10-1.

The Built Environment Element

A land use element is a required element of the General Plan, specified in Government Code section 65302(a). The City's Built Environment Element serves as the required land use element and has the broadest scope of all the General Plan elements. It is intended to portray the future direction of the City (the City Design section of this Element). The Built Environment Element aims to repair the City's damaged urban form and is a guide for future land uses in the City. Under state law, the City's other ordinances and plans, for example the Development Code, must be consistent with the General Plan, and therefore with The Built Environment Element.

Economy & Community Element

The Economy and Community Element is concerned with the economic health of the City and the public services that serve the City's communities. It focuses on the expansion and maintenance of the City's economic base and on the enhancement of the City's business climate. Economy and Community goals and policies direct City activities toward maximizing the City's economic development potential and to preserve and enhance the City's public services. The Economy and Community Element is an optional element in General Plan. Government Code section 65303 enables cities to adopt optional general plan elements. The City elected to include an Economy and Community Element because it focuses on issues significant to the City's future that are not addressed elsewhere.

Natural Environment Element

A General Plan is required to have a Conservation Element to guide the "conservation, development, and utilization of natural resources" of the City (Government Code § 65302(d)). The City's General Plan discusses these issues within its Natural Environment Element, including the effects of land use and development on natural resources, and specifically addresses parks and recreation, open space and biological resources, geologic hazards, mineral resources, air quality, and noise (City of Azusa 2004). The Natural Environment Element includes programs and policies to promote community-wide conservation and requires new development to incorporate sound conservation principles and mitigate any negative environmental impacts consequent to development within or bearing upon the City.

Housing Element

The Housing Element is one of the seven required General Plan elements mandated by state law. State law requires that each jurisdiction's Housing Element consist of "identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement and development of housing." The Housing Element sets forth the City's housing goals and policies to address identified housing needs (City of Azusa 2023).

As discussed above, the City updated its Housing Element to accommodate the 6th cycle of RHNA, which covers the planning period of October 2021 through October 2029. On July 27, 2023, the Department of Housing and Community Development determined that the City's adopted Housing Element was in substantial compliance with State Housing Element Law (HCD 2026). See Section 4.12, Population and Housing, of this Draft EIR for more discussion.

City of Azusa Municipal Code

Chapter 88, Development Code

The City's Development Code (codified in Chapter 88, Article 1 of the AMC) is intended to regulate the use and development of land within the City and carry out the policies of the General Plan. It is also the intent of the Development Code to protect and promote public health, safety, comfort, convenience, prosperity, and general welfare of residents, and business within the City.

Section 88.22.040 - Central East Neighborhoods

Section 88.22.070 Neighborhood Site Planning and Building Design

This section of the Development Code applies to the central east neighborhoods of Azusa located north of I-210, south of Alosta Avenue and Azusa Pacific University, west of Barranca Avenue and east of Cerritos Avenue. The intent of these standards is to outline the general plan goals and development guidelines within the central-east neighborhoods of Azusa and to be a guideline to assist present and future residents, developers, and City staff in evaluating the evolving character and potential of these neighborhoods and to preserve and enhance the existing quality and fabric of these residential neighborhoods. This section includes development standards that would regulate aesthetic quality, such as limitations regarding streets, landscapes, and building fabric.

Section 88.42.140 - Multi-Family and Small Lot Single-Family Projects

This section of the Development Code applies to new or remodeled multi-family projects, and subdivisions of detached single-family homes on parcels smaller than 6,000 square feet, and thus this Project must comply with the standards of this section. This section includes development standards that would regulate aesthetic quality, including standards related to site and building design (e.g., unit access, facades, windows, stairways, and roofs), parking, open space, lighting, storage, and television antennas.

Section 88.51.032 - Design Review

This section of the Development Code applies to new single-family dwellings and multi-family projects, among others. Design review is intended to ensure that the design of proposed development and new land uses assists in maintaining and enhancing the attractive appearance of the City. Design review ensures the interdependence of land values and aesthetics and encourage the orderly and harmonious appearance of development within the community, encourages that new uses and structures enhance their sites and are compatible with the highest standards of improvement in the surrounding neighborhoods, retains and strengthens the visual quality and attractive character of the community, assists project developers in understanding the City's concerns for the aesthetics of development, and ensures that development complies with all applicable City standards and guidelines, and does not adversely affect community health, safety, aesthetics, or natural resources.

Section 88.51.060 – Zoning Amendments

This section of the Development Code provides procedures for the amendment of the Zoning Map or Development Code. An amendment may be initiated by the City Council, Planning Commission, City Staff, or by application submitted by one or more property owners for which the amendment is sought. An amendment to the Zoning Map or Development Code may be recommended by a majority of Planning Commission members and approved by City Council.

Section 88.51.080 – General Plan Amendments

This section of the Development Code provides procedures for the amendment of the Development Code, the General Plan, or the Zoning Map. An amendment may be initiated by the filing of an amendment application with the Planning Commission by the owner(s) or authorized agent of property for which the amendment is sought. An amendment to the Development Code, the General Plan, or the Zoning Map may be recommended by a majority of Planning Commission members and approved by City Council.

88.51.050. - Variance and Minor Variance

This section of the Development Code provides a process for the City to consider requests to waive or modify certain standards of this Development Code when, because of special circumstances applicable to the property, including location, shape, size, surroundings, topography, or other physical features, the strict application of the development standards otherwise applicable to the property denies the property owner privileges enjoyed by other property owners in the vicinity and in the same zoning district.

4.10.3 Thresholds of Significance

The significance criteria used to evaluate the Project's impacts to land use and planning are based on Appendix G of the CEQA Guidelines which state that a significant impact related to land use and planning would occur if the Project would:

a. Physically divide an established community.
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.10.4 Impacts Analysis

Threshold 4.10a. Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area.

The Project site is currently developed with the Powell Elementary School and associated surface parking. The Project involves construction of single-family residences and townhomes, totaling 128 dwelling units, and associated on-site open space and recreational amenities. Project implementation would result in the demolition and removal the existing on-site buildings and surface parking. The Project site is not considered an established community (which typically includes occupied residences) and the Project would not result in the construction of a new roadway used as a connection or thoroughfare between established communities. Instead, the Project proposes an internal roadway system to facilitate circulation on site and as a result would create a new driveway on East Mauna Loa Avenue. Project-related improvements would connect to the existing roadways (North Calera Avenue and East Mauna Loa Avenue) surrounding the Project site. In addition, the proposed General Plan Amendment to Medium Density Residential would contribute to the existing established residential community surrounding the Project site. The Project's proposed land use would provide a density transition between adjacent residential uses, including the Moderate Density Residential designation on the parcels to the north of the Project

site (up to 27 dwelling units per acre) and the Low Density Residential parcels to the west of the Project site (up to 8 dwelling units per acre), as illustrated in Figure 2-2, Existing General Plan Land Use Designations. Similarly, the proposed zone change to Neighborhood General 3 – Medium (NG3-MED) would conform with the existing NG3-MED zoning to the east, south, and west of the Project site, as illustrated in Figure 2-3, Existing Zoning. As such, the Project would not physically divide an established community; therefore, there would be no impact.

Threshold 4.10b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. To evaluate the Project's impacts related to land use and planning, the following analysis examines the Project's potential to conflict with applicable regional and local plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect that regulate land uses within the Project site's vicinity, as listed below:

- SCAG's Connect SoCal (2024–2050 RTP/SCS)
- City of Azusa General Plan
- City of Azusa Municipal Code

Connect SoCal

SCAG's Connect SoCal is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. Connect SoCal incorporates local land use projections and circulation networks from city and county general plans. Typically, a project would be consistent with the RTP/SCS if the project does not exceed the underlying growth assumptions within Connect SoCal. As discussed in Section 4.12, Population and Housing, the Project would accommodate up to approximately 397 residents. SCAG's 2024 Demographics and Growth Forecast Technical Report estimates that the City will have a total population approximately 53,010 in 2050 (SCAG 2024b). Therefore, the Project's future residents would not exceed the underlying growth assumptions within Connect SoCal. Additionally, it is likely that the proposed residential units would accommodate a combination of new City residents and residents that currently reside within the City.

The Project would replace Powell Elementary school with new residential uses. As discussed in Section 4.12, Population and Housing of this Draft EIR, the Project would result in a net loss of approximately 23 employees as a result of demolition of the existing school use, under the historical baseline condition which assumes a fully occupied/ operational school (see Chapter 2, Environmental Setting, for more discussion). As the Project would result in a slight reduction in overall employment, the Project would not exceed SCAG employment projections or induce substantial unplanned population (see Section 4.12, Population and Housing of this Draft EIR for additional details related to population growth). As such, the Project would not outpace regional infrastructure, since Connect SoCal is used for local and regional planning purposes.

Table 4.7-4, Project Potential to Conflict with Connect SoCal (SCAG 2024-2050 RTP/SCS), of Section 4.7, Greenhouse Gas Emissions, details an analysis of the Project's potential to conflict with Connect SoCal. As detailed in Table 4.7-4, the Project would not conflict with any of the goals within Connect SoCal. The Project would redevelop the Project site with residential uses, resulting in approximately 397 new residents and a net loss of 23 employees as compared to existing baseline conditions. The Project site vicinity is served by existing public transit such as various local and regional bus transit lines and light rail. As demonstrated in Table 4.7-4, the Project would help

implement the guiding principles, goals, and policies of Connect SoCal as they relate to livability, mobility, and sustainability through infill development of new residential with access to existing multi-modal infrastructure and transit opportunities. For these reasons, the Project would not conflict with the applicable goals in Connect SoCal adopted for the purpose of avoiding or mitigating an environmental effect, and Project impacts would be less than significant.

City of Azusa General Plan

Currently, the Project site is designated Institutional/School by the General Plan. Project implementation would require a General Plan Amendment to change the General Plan land use designation from Institutional/School to Medium Density Residential. The Medium Density Residential designation allows for residential uses up to 15 dwelling units per acre. In addition, the Project would require a Zone Change from Institutional/School (INS) to Neighborhood General 3 – Medium (NG3-MED) to facilitate internal consistency between the General Plan land use map and base zoning provisions. The proposed amendments would not reduce or eliminate any environmentally protective regulations in the City's zoning ordinance or General Plan.

Table 4.10-1 further outlines the applicable goals and policies identified in each element of the General Plan (Built Environment Element, Economy and Community Element, and Natural Environment Element) and the Project's potential to conflict with each applicable policy. The City is currently undergoing a comprehensive update to the General Plan. For the purposes of this Draft EIR, the analysis contained in this section is based on the applicable goals and policies from the General Plan. As shown below, the Project would not conflict with applicable goals and policies of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
Built Environment Element	
City Design	
Goal LU-1. Provide for a complete and integrated mix of residential, commercial, industrial, recreational, public and open space meeting the needs of existing and future residents and businesses.	**No Conflict.** The Project proposes a residential development that would promote the City's goal of providing a balance of land uses. The Project proposes the development of 128 new dwelling units on an existing school site, which is surrounding by a mix of other residential uses. The Project would provide open space amenities that would support the needs of future residents. Thus, the Project's proposed redevelopment would enhance an existing balance of residential land uses.
Policy LU-2.1. Establish Azusa as a "community of neighborhoods". Using a scale of five-minute walk, each interconnected neighborhood will develop its own unique character, but all neighborhoods will share common elements: • a "neighborhood center" that provides a place for neighbors to gather. The center can be located in the middle of the neighborhood or at its edge. The center might include a school, a park, a	**No Conflict.** The Project would redevelop the existing Powell Elementary School to residential uses consisting of single-family detached cluster homes and townhomes. As such, upon approval of the proposed General Plan Amendment and Zone Change, the Project would support the City's policy of establishing a community of neighborhoods, with a focus on single family homes as well as a mix of housing types that are compatible in scale and character to the surrounding neighborhood.

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
neighborhood store, or perhaps, all three; • high-quality new and renovated homes available to a broad range of buyers; • single family homes will be the predominate type of housing within the neighborhood, but a mix of other housing types will be permitted if they currently exist or if they are compatible in scale and character as the surrounding neighborhood.	
Policy LU-2.4. Preserve and protect established, stable residential neighborhoods.	**No Conflict.** The Project would redevelop the existing Powell Elementary School to residential uses consisting of single-family detached cluster homes and townhomes, both with a maximum height of two stories. The Project's proposed General Plan Amendment and Zone Change would provide a residential density transition between the adjacent residential land uses and surrounding vicinity, which would allow for neighborhood cohesion within a residential neighborhood. As such, the Project would maintain and complement surrounding residential uses.
Policy LU-2.5. Enhance neighborhoods by adding traditional elements such as pedestrian oriented, street lighting, street trees, landscaped parkways, traffic calming measures, and neighborhood centers.	**No Conflict.** The Project would redevelop the existing Powell Elementary School site to residential uses with circulation improvements that would enhance the surrounding neighborhood. As shown in Figure 3-1, Conceptual Site Plan, the Project site would be accessible to pedestrians from existing sidewalks along East Mauna Loa Avenue and North Calera Avenue. These sidewalks would connect to an internal sidewalk network on site. In addition, the Project would include a central paseo with a pathway for pedestrian connectivity, landscaping, shaded gathering space, and a butterfly garden.
Policy LU-2.7. Accommodate the development of single-family housing in all neighborhoods in accordance with Table CD-2.	**No Conflict.** The Project would result in residential development consisting of single-family detached cluster homes and townhomes, which would be allowed upon the approval of the proposed General Plan Amendment to Medium Density Residential. As stated in Table CD-2 of the City's Built Environment Element, the Medium Density Residential land use designation allows for a maximum density of 8.1-15 units per net acre. The proposed Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units on the 9.77-acre site. Given this, the proposed residential density would be approximately 13.1 dwellings units per acre.
Policy LU-2.9. Require both single family residential and multifamily units and sites be designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This	**No Conflict.** The Project would result in residential development that would complement and be cohesive with surrounding uses. The General Plan Amendment to Medium Density Residential that allows for up to 15 dwelling units per acre would provide for a density transition between adjacent residential uses; specifically, the Moderate Density Residential designation on

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
includes, but not limited to: Single Family and Multifamily • using "living space forward" design concepts; • modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; • using extensive site landscape to complement the architectural design of the structure; and • minimizing the amount and width of paving in front and side yards for driveway and garage access. Multifamily • conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures; • including separate, well-defined entries for each residential unit; • locate the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.	the parcels to the north of the Project site (up to 27 dwelling units per acre), and the Low Density Residential to the west of the Project site (up to 8 dwelling units per acre), which would complement the surrounding neighborhood character. The Project would include frontage improvements to enhance the pedestrian experience, such as new/replacement street trees. All buildings would incorporate window, balcony, and roof treatments that provide variation along each elevation, as well as contrasting garage doors. Architectural styles would alternate between Spanish Colonial, Traditional, Craftsman, and Western Ranch (see Figures 4.1-1a and 4.1-1b), and building materials and color palettes would complement each other, thus maintaining the City's standard of architectural and aesthetic quality. Landscaping throughout the residential site would include a variety of trees, shrubs, and grasses that would complement the architectural design. Duplex and triplex buildings would be oriented around landscaped lawns with most garages at the rear or side of the buildings to reduce garage frontage domination. Lastly, as discussed in Section 4.1, Aesthetics, the City's required Design Review provides a process for the appropriate review of development projects. The Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code Section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the city (Development Code Section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-2.10. Require new residential development in existing traditional residential neighborhoods to be compatible with existing structures, including the: • maintenance of the predominant existing front yard setback; and • use of complementary building materials, colors, and forms, while allowing for flexibility for distinguished design solutions.	**No Conflict.** Upon approval of the proposed General Plan Amendment and Zone Change, the Project site would be designated Medium Density Residential and zoned Neighborhood General 3 – Medium (NG3-MED). The General Plan Amendment and Zone Change required for implementation of the Project would provide a residential density transition between the adjacent residential properties and surrounding residential community, which would increase neighborhood cohesion within a residential neighborhood. Within this context, the Project would be appropriately scaled and massed. Single-family detached homes would be located adjacent to the existing single-family neighborhood on the west, south, and east property edge; and two-story triplexes and duplexes would be located adjacent to the existing multi-family community on the north property edge, thus blending the Project form and scale with the surrounding buildings. Furthermore, the proposed architectural styles would be appropriate with the buildings

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	surrounding the Project site. As such, the Project's overall design and architectural treatment are compatible with the intended urban form and character of the NG3-MED zone. Moreover, the Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code Section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the City (Development Code Section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-2.11. Require the design of new residential developments to include the following: • greenbelts, sidewalks, landscaped parkways, parks, recreation amenities, and other community amenities; • minimizing the width of streets to encourage pedestrian activity and to slow traffic, as appropriate; • potentially, include well designed and lighted alleys to minimize the dominance of garages along street frontage; • siting of development to avoid disturbances of sensitive areas and maintain important environmental resources, including topographical formations and habitat; and accommodate the development of recreational, community meeting, educational, and day care facilities in all residential areas, provided that they are compatible with the intended residential function and character of the neighborhood, and subject to City review and approval.	**No Conflict.** The Project site would incorporate pedestrian pathways, sidewalks, and landscaped common areas, including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. Shared outdoor spaces would occur between residences, with most garages located in drive aisles at the rear or sides of the residences; therefore, garage doors would not dominate any pedestrian-focused street frontages. Furthermore, the Project would be required to comply with AMC section 88.31.030, Outdoor Lighting, which sets the City's exterior lighting standards. In compliance with the AMC, the Project would balance safety and security needs for lighting and avoid light trespass (spillover light) onto surrounding properties with the requirement of all lights to be shielded and directed downward and away from adjoining properties and public rights-of-way. Internal roadways would contain sidewalks and landscaping for pedestrians, which would connect throughout the Project site and along East Mauna Loa Avenue and North Calera Avenue. Additionally, the Project includes approximately 73,030 square feet of landscaping and would plant approximately 204 trees (the AMC requires a minimum of 75 trees) in compliance with development standards, which would enhance the aesthetic quality and pedestrian experience. All proposed landscaping would also be required to comply with the City's Water Efficient Landscaping Ordinance. Lastly, the Project site is in a fully developed portion of the City and does not contain sensitive vegetation communities, and no riparian habitat areas were found on or adjacent to the Project site (see Section 4.3, Biological Resources). No conflict would occur.
Policy LU-3.2. Multifamily and mixed-use units and sites are designed to convey a high level of quality and character, and reflect and complement surrounding neighborhood character. This includes, but is not limited to:	**No Conflict.** The Project site would incorporate pedestrian pathways, sidewalks, and landscaped common areas, including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. Shared outdoor spaces would occur between residences, with most garages located in drive aisles at the rear or sides of the residences; therefore, garage doors would not dominate any pedestrian-focused street

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
• using "living space forward" design concepts; • modulation and building elevation articulation and masses (avoiding undifferentiated "boxlike structures"); • incorporating well-defined roof lines; • using extensive site landscape to complement the architectural design of the structure; • conveying the visual character of individual units rather than a singular building mass and volume for multifamily structures; • including separate, well-defined entries for each residential unit; • locating the first occupiable floor at or near the predominate grade elevation, ensure subterranean parking facilities are not visible from the street frontage; and • siting and design of parking areas and facilities to be integrated with and not dominate the architectural character of the structure.	frontages. Internal roadways would contain sidewalks and landscaping for pedestrians, which would connect throughout the Project site and along East Mauna Loa Avenue and North Calera Avenue. Additionally, the Project includes approximately 73,030 square feet of landscaping and would plant approximately 204 trees in compliance with development standards, which would enhance the aesthetic quality and pedestrian experience. Moreover, the Project's application for a Design Review must be reviewed by the City to ensure that the application is in compliance with applicable development standards and compatible in terms of scale and aesthetic design with surrounding properties and developments (Development Code section 88.51.032). Project plans would be subject to the City's Design Review to ensure that proposed development and new land uses assist in maintaining and enhancing the attractive appearance of the city (Development Code section 88.51.032). As such, the Project would be required to meet the City's architectural and aesthetic quality standards.
Policy LU-3.3. Require new developments to provide for on-street landscaping, landscaped parkways, and other streetscape as specified in the Urban Form Element and Development Code.	**No Conflict.** See response to General Plan Policy LU-2.11, above. The Project would provide for on-street landscaping and street trees. All proposed landscaping would be required to comply with the City's Water Efficient Landscaping Ordinance. Further, through the City's Design Review process, the Project would adhere to the City's design standards.
Policy LU-9.2. Require that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure.	**No Conflict.** The Project would result in the redevelopment of a school site that already is served by existing utilities and other supporting infrastructure with 128 residential units. As discussed in Section 4.17, Utilities and Service Systems, of this Draft EIR, the proposed water infrastructure, which includes a new water main and lateral pipeline on site, and existing infrastructure would provide adequate potable water. The Project also proposes sewer pipeline connections which would accommodate existing plus Project flows. Existing electrical lines and natural gas would provide adequate supply of electricity and gas. In the event that unanticipated upgrades were to be required, such improvements would be limited to lateral connections and coordinated with appropriate service providers with either trenchless technology or open trenching and would be required to comply with all regulatory requirements outlined within this Draft EIR. As discussed in Section 4.9, Hydrology and Water Quality, of this Draft EIR, the drainage patterns of the

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	Project site would not substantially change relative to current conditions. The Project would incorporate low impact development (LID) features, including a proposed drainage system with gutters for off-site stormwater, and would not contribute a substantial amount stormwater. As such, this Project would have adequate supporting infrastructure.
Policy LU-11.1. Require all structures to be constructed in accordance with City building and other pertinent codes and regulations, including all new, adaptively re-used, and renovated buildings; allowing appropriate exceptions for historically-significant buildings.	**No Conflict.** The Project would be constructed in accordance with the California Building Code, the AMC, and Development Code. Project plans would be reviewed and approved by the City prior to building permit issuance in accordance with the City's Design Review and plan check process. The Project would be built with the latest standards required for the public's health, safety, and welfare.
Policy LU-11.7. Require new development and existing development be maintained in a safe manner.	**No Conflict.** See response to General Plan Policy LU-11.1 above. Moreover, as described in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR, construction impacts associated with the demolition of the existing school would be less than significant with mitigation incorporated. With the implementation of MM-HAZ-1, a Hazardous Building Materials Survey would be required prior to the issuance of a demolition permit for any existing on-site structures, a qualified environmental specialist shall conduct a survey for asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury, and other hazardous building materials, such as universal wastes and refrigerants, to document the presence of any potentially hazardous materials within the structures and if any such materials are identified to develop and include abatement measures in the project plans and specifications. As further detailed in Section 4.8, all other impacts related to hazards and hazardous materials would be less than significant or would result in no impact.
Goal UF-2. Promoted enhanced mobility and reduced congestion throughout the City.	**No Conflict.** The Project would redevelop an existing school with new residential uses proximate to existing transit facilities and bicycle routes. The Project, which is located in a dense, developed, and jobs-rich portion of the City would site residential uses in close proximity to commercial uses, which would reduce a need for significant transit for the Project's residents. Further, the Project is forecasted to generate less than 110 net new daily vehicle trips when compared to an operational school. In addition, a VMT analysis was prepared (included in Appendix K). Using the San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool, the Project is forecast to generate 21.01 VMT per capita, which exceeds the threshold of 20.67 Home-Based VMT per capita. However, with the incorporation of MM-TRA-1 (implementation of Community Based Travel Planning), a 2.28 percent reduction in Project VMT would occur, and impacts would be reduced to less than

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	significant. See Section 4.15, Transportation, of this Draft EIR for further discussion.
Goal UF-3. Enhance the livability of multifamily residential buildings, their compatibility with single-family neighborhoods, and their orientation towards the street.	**No Conflict.** The Project proposes single-family and multi-family (i.e., townhomes) residential development that would be integrated in the Project site's design. As shown in Figure 3-1, Conceptual Site Plan, the Project would enhance the livability of multifamily residential buildings by incorporating the townhomes within the center and northern edge of the site, surrounded by the proposed single-family homes. Furthermore, the proposed townhomes to the north would be proposed adjacent to the existing off-site apartments to the north of the site. The proposed General Plan Amendment to Medium Density Residential would allow for up to 15 dwelling units per acre and provide for a density transition between adjacent residential uses; specifically, the Moderate Density Residential designation on the parcels to the north of the Project site (up to 27 dwelling units per acre), and the Low Density Residential to the west of the Project site (up to 8 dwelling units per acre), which would increase neighborhood cohesion within a residential neighborhood.
Policy UF-3.1. Require all new multi-family housing developments to have a separate ground floor entrance for each unit, except for mixed-use projects combining commercial and residential uses.	**No Conflict.** As shown in Figure 3-1, internal sidewalks and pedestrian walkways would be present throughout the Project site along internal roadways, featuring landscaping with drought-tolerant plantings, and up to proposed dwellings fronting East Mauna Loa Avenue and North Calera Avenue. In addition, pedestrians would have access to the northern townhomes along the northern boundary of the site via a sidewalk that would connect to the publicly-accessible sidewalk along North Calera Avenue.
Goal UF-4. Improve the visual appeal of the city.	**No Conflict.** The Project would result in residential development that would complement surrounding uses. The General Plan Amendment and Zone Change required for implementation of the Project would provide a residential density transition between the adjacent residential properties and surrounding residential community, which would increase neighborhood cohesion by eliminating an institutional use within a residential neighborhood. Project plans would be subject to the City's Design Review to ensure that all approved site and structural development respects the physical and environmental characteristics of the site, exemplifies the best professional high quality design practices, maintains a distinct neighborhood and/or community identity, and minimizes or eliminates negative or undesirable visual impacts in accordance with Development Code section 88.51.032. As such, the Project would be required to meet the City's architectural and aesthetic quality standards. Table 4.1-1, Aesthetics Conflict Analysis, in Section 4.1, Aesthetics, of this Draft EIR, indicates that the Project would comply with all design and development guidelines outlined by the City, including applicable policies in the General Plan. As detailed in the conflict analysis provided for

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	General Plan Policy LU-2.9, the Project would employ several architectural strategies to achieve visual integration with its surroundings. These include façade articulation and changes in materials and colors. As such, the Project would enhance the visual character, quality, and uniqueness of the City's neighborhoods and districts and would not conflict with this policy.
Policy UF-4.3. Continue the underground overhead utilities.	**No Conflict.** Electrical utility lines would be converted to below-ground along East Mauna Loa Avenue and North Calera Avenue. Other improvements would be required to connect to existing utilities within existing roadways, which include sewer and water. See Section 4.17 Utilities and Service Systems, for further discussion.
Policy UF-5.1. Encourage new residential projects to be built in a form and scale compatible with and appropriate to their surroundings.	**No Conflict.** Upon approval of the proposed Zone Change, the Project site would be designated Medium Density Residential and zoned NG3-MED. The General Plan Amendment and Zone Change required for implementation of the Project would provide a residential density transition between the adjacent residential properties and surrounding residential community, which would increase neighborhood cohesion within a residential neighborhood. Within this context, the Project would be appropriately scaled and massed. Single-family detached homes would be located adjacent to the existing single-family neighborhood on the west, south, and east property edge; and two-story triplexes and duplexes would be located adjacent to the existing multi-family community on the north property edge, thus blending the Project form and scale with the surrounding buildings. Furthermore, the proposed architectural styles would be appropriate with the buildings surrounding the Project site. As such, the Project's overall design and architectural treatment are compatible with the intended urban form and character of the NG3-MED zone.
Policy UF-6.1. Encourage front doors and public living spaces of buildings to be located toward the street and garages to be located toward the rear of lots.	**No Conflict.** Shared outdoor spaces would occur between the proposed residences, with most garages located in drive aisles at the rear or sides of the residences; therefore, garage doors would not dominate any pedestrian-focused street frontages.
Goal UF-8. Encourage a variety of housing types and sizes to accommodate the diverse needs of the population.	**No Conflict.** The Project would include 128 new for sale units, including 65 single-family and 63 townhomes. These new residential units would assist the City in meeting its mandated RHNA allocation.
Policy UF-8.1. Support the development of multiple housing types in corridors and the districts, require high quality design, construction methods, materials, and maintenance.	**No Conflict.** See response to General Plan Policy LU-2.9.
Mobility	
Policy 2.5. Improve the operational efficiency of the roadway system, with implementation of traffic management	**No Conflict.** The Project would not alter the existing roadway network or alter the efficiency of the network. As discussed in Section 4.15, Transportation, of this Draft EIR, a VMT analysis

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
measures, to minimize delay and congestion but without adversely impacting transit vehicles, bicyclists, and pedestrians.	was prepared (included in Appendix K) for the proposed Project. Using the SGVCOG VMT Evaluation Tool, the Project is forecast to generate 21.01 VMT per capita, which exceeds the threshold of 20.67 Home-Based VMT per capita. However, with the incorporation of mitigation measure MM-TRA-1 (implementation of Community Based Travel Planning), a 2.28 percent reduction in the Project's VMT would occur, and impacts would be reduced to a less than significant level. MM-TRA-1 would require outreach that will provide households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles. Moreover, construction of the Project would include new sidewalks, relocation of existing curb cuts, utility connections, and new or replacement street trees per City standards. The Project would not increase hazards because of a geometric design feature or incompatible uses. Additionally, bicycle access to and from the Project site would be provided via North Calera Avenue and East Mauna Loa Avenue and would be accommodated by the Project's internal roadway network. The Project would not preclude the City or County from constructing bicycle facilities or from pursuing bicycle network improvements along local roadways near the Project. As such, impacts adversely impacting transit vehicles, bicyclists, and pedestrians would be less than significant.
Goal 3. Provide a connected, balanced, and integrated transportation system that enables Azusans to walk, bike, and take transit rather than using their car.	**No Conflict.** The Project would provide sidewalks, curb, and gutter along all of its internal private roadways in order to accommodate pedestrian access to the proposed residential dwelling units and central paseo. The internal sidewalks would connect to the public sidewalks provided along the Project site's frontages on Calera Avenue and Mauna Loa Avenue. Thus, the access between the Project site and sidewalks would be suitable for pedestrians. Bicycle access to and from the Project site would be available via North Calera Avenue and East Mauna Loa Avenue and by the Project's internal roadway network. Public transit service is available along Citrus Avenue to the west of the Project site and along Historic Route 66 to the north of the Project site. The Project would not impact access at the existing bus stops. As such, the Project would not conflict with the City's goal to provide connected, balanced, and integrated transportation system that enables Azusans to walk, bike, and take transit rather than using their car.
Policy 3.1. Develop and maintain a citywide pedestrian network of both on-street and off-street walkways. Network shall link new neighborhoods with existing neighborhoods, connect neighborhood centers, schools, parks, commercial centers, and citywide destinations such as Downtown, the San Gabriel River, and Civic Center.	**No Conflict.** See response to General Plan Mobility Goal 3, above, and Section 4.15, Transportation, of this Draft EIR for further discussion.

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
Policy 3.3. Provide pedestrian amenities (such as benches, seats, water fountains, shady street trees, etc.) and conditions that enhance the pedestrian experience along the pedestrian network.	**No Conflict.** The Project site would incorporate pedestrian pathways, sidewalks, and landscaped common areas, including a central paseo. Internal roadways would contain sidewalks and landscaping for pedestrians, which would connect throughout the Project site and along East Mauna Loa Avenue and North Calera Avenue. Additionally, the Project includes approximately 73,030 square feet of landscaping and would plant approximately 204 landscaping trees throughout to enhance the aesthetic quality and pedestrian experience. See Section 4.1, Aesthetics, of this Draft EIR for further discussion.
Policy 3.4. Develop and maintain a citywide bicycle network of both on-street bike lanes and off-street bike paths in accordance with the Bicycle Routes. The network provides for off-street paths along the San Gabriel River, railroad rights-of-way, alongside flood control channels, and within existing and new neighborhoods, where feasible. The network improves connections between residential neighborhoods, schools, and commercial centers, as well as providing connections to citywide destinations such as Downtown, the University District, the San Gabriel River, and Civic Center.	**No Conflict.** Bicycle access to and from the Project site would be available via Noth Calera Avenue and East Mauna Loa Avenue and would be accommodated by the Project's internal roadway network. The Project would not preclude the City or County from constructing bicycle facilities or from pursuing bicycle network improvements along local roadways near the Project. See Section 4.15, Transportation, of this Draft EIR for further discussion.
Policy 3.5. Provide bicycle amenities (bicycle parking spaces, bike lockers, etc.) on/near the bicycle network.	**No Conflict.** See response to General Plan Mobility Policy 3.4, above, and Section 4.15, Transportation, of this Draft EIR for further discussion.
Goal 4. Design/redesign streets to encourage pedestrians and bicycles and to accommodate vehicles. Make city streets more pedestrian-friendly and bicycle-friendly.	**No Conflict.** See response to General Plan Mobility Goal 3, above, and Section 4.15, Transportation, of this Draft EIR for further discussion. In addition, the Project would not preclude the City from installing any of the infrastructure improvements recommended for the portions of Citrus Avenue and Historic Route 66 within the vicinity of the Project site in the Azusa Walks Pedestrian Plan. Development of the Project would not preclude the City from implementing any other systemic pedestrian improvements or pursuing effective roadway safety countermeasures.
Policy 4.4. Provide bicycle lanes where possible on city streets.	**No Conflict.** See response to General Plan Mobility Policy 3.4, above, and Section 4.15, Transportation, of this Draft EIR for further discussion.
Policy 5.2. Calm traffic (i.e. slow speed, limit through traffic, etc.) in residential neighborhoods including the use of various traffic calming devices or procedure.	**No Conflict.** Construction of Project access would include new sidewalks and relocation of existing curb cuts, which would not substantially alter traffic patterns. The Project would not increase hazards because of a geometric design feature or incompatible uses and impacts would be less than significant. Further, a Traffic Control Plan (TCP) would be prepared in accordance with the AMC to ensure that warning devices as necessary are implemented to warn vehicular traffic and pedestrians of the construction work. The implementation of

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	TCP and standard measures would ensure traffic calming procedures are in place.
Goal 7. Focus truck traffic onto appropriate arterial corridors within the City, and keep truck traffic out of residential neighborhoods.	**No Conflict.** Construction would involve truck trips, which would cease once the Project is operational. A TCP would also be prepared in accordance with the AMC to ensure truck traffic during construction would not substantially impact traffic within the City. See Section 4.15, Transportation, of this Draft EIR for further discussion.
Goal 8. Encourage walking, biking, and the use of transit through a variety of land use development and urban design measures.	**No Conflict.** See response to General Plan Mobility Goal 3, above, and Section 4.15, Transportation, for further discussion.
Policy 8.1. Plan for an adequate amount, not an oversupply, of parking for autos, carpool vans, and bicycles for each land use.	**No Conflict.** The Project would include on-site parking for residents and guests. The Project would provide a total of 326 parking spaces as required by the City's Development Code section 88.36.050, which would exceed the development standards for the Project site. As shown in Figure 3-1, Conceptual Sie Plan, the provided parking would include 256 covered parking and 70 uncovered parking. This would be inclusive of resident parking and guest parking to adequately serve the Project site's residents and visitors, and thus, would not represent an oversupply of provided parking on site.
Policy 8.4: Plan land uses and design buildings to encourage transit, rideshare or carpool, bicycling, and walking. This includes but is not limited to: • permitting higher densities along transit corridors and around transit stations; • allowing a mix of uses to include residential and commercial uses in the same area in order to reduce the number of vehicular trips made; • locating and designing new developments to encourage access by non-auto modes; • requiring new development to provide direct and convenient pedestrian access to transit and adjacent land uses within walking distances; • requiring the provision of transit facilities/amenities in larger scale developments; • along corridors, requiring off street parking to be located behind buildings so barriers to pedestrians and transit users are not created	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project site is currently supported by existing sidewalks along North Calera Avenue and East Mauna Loa Avenue. The Project would also contribute to walkability and pedestrian connectivity via onsite pedestrian improvements including walkways throughout the Project site that connect to existing sidewalks along East Mauna Loa Avenue and North Calera Avenue. The Project would also include shared open spaces with amenities, such as the central paseo, to contribute to pedestrian-oriented activities and that are accessible to pedestrians. Bicycle access to and from the Project site will also be provided via North Calera Avenue and East Mauna Loa Avenue and will be accommodated by the Project's internal roadway network. See Section 4.15, Transportation, for further discussion.

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
between the building and the street; and • locating buildings close to the street to be inviting to pedestrians and transit users, as appropriate.	
Housing	
Goal H-2. Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter and owner households.	**No Conflict.** See response to General Plan Policy UF-8. The Project would require a General Plan Amendment and Zone Change, which would allow for residential development on a site that is otherwise zoned for institutional uses. The Project would provide 128 new residential units, including single-family and townhome for-sale dwellings. These new residential units would assist the City in meeting its mandated RHNA allocation for above moderate-income housing.
Goal H-3. Encourage a variety of housing types to meet the existing and future needs of Azusa residents.	**No Conflict.** See response to General Plan Urban Form Policy UF-8 and Housing Goal H-2, above.
Policy H-3.1. Accommodate a range of residential development types in Azusa, including low-density single-family homes, moderate-density townhomes, higher-density multi-family units, and residential/commercial mixed use in order to address the City's share of regional housing needs.	**No Conflict.** See response to General Plan Housing Goal H-2 and General Plan Housing Goal H-3, above.
Policy H-3.4. Encourage development and long-range planning that uses compact urban forms that foster connectivity, walkability, and use of alternative transportation modes, in particular within the Azusa TOD planning area.	**No Conflict.** The Project would require a General Plan Amendment and Zone Change, which would allow for residential development on a site that is otherwise zoned for institutional uses. The Project would provide 128 new residential units, including single-family and townhome for-sale dwellings within 0.70 mile of the Metro A Line APU / Citrus College Station. Project improvements would include sidewalks that connect residences to pathways accessible to the public.
Policy H-3.7. Encourage infill development and recycling of land to provide adequate residential sites and support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development	**No Conflict.** The Project would create a new residential use on a site that is currently occupied by a school. As detailed in Chapter 2, Environmental Setting, the school is currently vacant. Implementation of the Project would result in infill residential development within a developed area of the City.
Historic/Cultural Resources	
Policy 1.1: Determine early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.	**No Conflict.** The Archaeological Resources Inventory Report indicated that there is a low potential for the inadvertent discovery of intact subsurface archaeological deposits during Project implementation (Appendix E-1). As discussed in Section 4.4, Cultural Resources, of this Draft EIR, the SCCIC records did not identify any cultural resources within the Project Area of Potential Impacts (API). A NAHC SLF search was also requested for the Project, and results were positive for Native American cultural resources within one mile of the Project area, though the NAHC did not provide details on what the resource(s) are or

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

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	where they are located. As detailed further in Section 4.16, Tribal Cultural Resources, no previously recorded cultural resources of Native American origin or TCRs listed on the California Register of Historical Resources or local register were identified within the Project site as a result of the CHRIS records search at the SCCIC, archival information review, or archaeological resources pedestrian survey. Implementation of MM-CUL-1 would ensure that potential impacts related to inadvertent discovery of archaeological resources would be less than significant. See Section 4.4, Cultural Resources, of this Draft EIR for more discussion.
Infrastructure	
Policy 1.1. Monitor the demands on the electrical system, manage development to mitigate impacts and/or facilitate improvements to the energy supply and distribution system, and maintain and expand energy supply and distribution facilities.	**No Conflict.** Electrical power is provided by Azusa Light and Water (ALW) and is currently provided to the Project site. No additional improvements are anticipated with implementation of the Project. If unanticipated upgrades were to be required for the Project's electrical power needs, they would be limited to the lateral connections to the Project site and not any centralized facilities. Additionally, the Project would be required to comply with all regulatory requirements outlined within this Draft EIR for the purpose of mitigating impacts associated with construction activities and energy consumption. Further, the Project's electrical consumption would be a negligible percentage (less than 0.001%) of the County's current annual use. As such, the Project would be adequately served and impacts to the electrical system would be less than significant. See Section 4.5, Energy, and Section 4.17, Utilities and Service Systems, of this Draft EIR for further discussion.
Policy 1.4. Minimize electrical consumption through site design, use of efficient systems, and other techniques.	**No Conflict.** The Project would be built in accordance with the current California Building Standards Code (Title 24) in effect at the time of construction, which include robust requirements for energy efficiency. Also, the provisions of the CALGreen building code apply to the planning, design, operation, construction, use and occupancy of every newly constructed building or structure in the state. Therefore, due to the inherent increase in efficiency of building code regulations, the Project would not result in a wasteful, inefficient, or unnecessary use of energy. See Section 4.5, Energy, of this Draft EIR for further discussion.
Policy 1.6. Continue to require the incorporation of electrical conservation features in the design of all new construction and site development. Encourage the retrofit to existing buildings and development to include electrical conservation features, including, but not limited to, wireless technology and solar energy.	**No Conflict.** See discussion under General Plan Infrastructure Policy 1.4, above.
Policy 1.7. Continue to underground all overhead electrical lines.	**No Conflict.** The existing overhead power transmission lines adjacent to the Project site (including the high voltage overhead power lines along North Calera Avenue and East Mauna Loa

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	Avenue) and transformer units would be undergrounded as part of this Project.
Policy 1.8. Ensure the costs of improvements to the existing electrical supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project would comply with all applicable fees necessary for Project implementation.
Policy 2.1. Monitor the demands on the water system, manage development to mitigate impacts and/or facilitate improvements to the water supply and distribution system, and maintain and expand water supply and distribution facilities.	**No Conflict.** The Project's proposed water infrastructure would include a new water main within the Project site roads and new lateral pipeline household connections from the proposed water main. In addition, the Project includes two new lateral connections to the existing water main pipelines within East Mauna Loa Avenue and North Calera Avenue to provide domestic water, fire water, and irrigation water to the Project site. As discussed in Appendix M-3, ALW determined that sufficient water volumes are available to serve the Project. As determined within Appendix M-1, the capacity of the existing pipelines can accommodate existing plus Project flows. See Section 4.17, Utilities and Service Systems, for further discussion.
Policy 2.4. Require that new development and retrofit existing developments to contain safeguards and measures preventing water supply degradation.	**No Conflict.** The Project would adhere to all applicable stormwater management and discharge control regulations, and, as such, is not anticipated to violate any water quality standard or Water Discharge Requirements (WDRs) during construction. Additionally, in accordance with all applicable state and local regulations, Project source controls to improve water quality would be provided for impervious surfaces, such as parking areas, trash storage/waste areas, driveways, and sidewalks. As such, the Project would not violate any water quality standards or WDRs or otherwise substantially degrade surface or groundwater quality during Project construction or operation. See Section 4.9, Hydrology, of this Draft EIR for further discussion.
Policy 2.5. Require all new development to connect to the sewer system.	**No Conflict.** As included in Appendix M-1, a sewer study was conducted for the Project. The Project proposes sewer pipeline connections which would accommodate existing plus Project flows. See Section 4.17, Utilities and Service Systems, for further discussion.
Policy 2.6. Minimize water consumption through site design, use of efficient systems, and other techniques.	**No Conflict.** The Project would adhere to the water conservation methods established in Title 20 of the California Code of Regulations and Title 24 of the California Building Code. The Project would also adhere to the Los Angeles RWQCB Basin Plan and City's Urban Water Management Plan and Water Efficient Landscaping Ordinance, per section 88.34.080 of the AMC. See Section 4.9, Hydrology and Water Quality, and Section 4.17,

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	Utilities and Service Systems, of this Draft EIR for further discussion.
Policy 2.8. Continue to require the incorporation of water conservation features in the design of all new construction and site development.	**No Conflict.** The Project would adhere to the water conservation methods established in Title 20 of the California Code of Regulations and Title 24 of the California Building Code. The Project would also adhere to the Los Angeles RWQCB Basin Plan and City's Urban Water Management Plan and Water Efficient Landscaping Ordinance, per section 88.34.080 of the AMC. See Section 4.9, Hydrology and Water Quality, and Section 4.17, Utilities and Service Systems, of this Draft EIR for further discussion.
Policy 2.10. Require the use of reclaimed water for landscaped irrigation, grading, and other non-contact uses in new developments, where available or expected to be available.	**No Conflict.** The Project would be required to include all drought-tolerant landscaping requirements included in state and local regulations. AMC Chapter 78, Article VI, Division 7, Landscape and Irrigation Standards, requires City approval of a landscape plan prepared by a licensed landscape architect for the Project, including an irrigation and grading plan that incorporate water efficient landscaping practices.
Policy 2.11. Ensure the costs of improvements to the existing water supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**No Conflict.** The Project would comply with all applicable fees necessary for Project implementation. See Section 4.9, Hydrology and Water Quality, for more discussion.
Policy 3.5. Ensure the costs of improvements to the existing sewer collection and treatment facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**No Conflict.** The Project would comply with all applicable fees necessary for Project implementation. See Section 4.17, Utilities and Service Systems, for more discussion.
Goal 4. Provide a flood control system that is able to support the permitted land uses while preserving the public safety; upgrade existing deficient systems; and pursue funding sources to reduce costs of flood control provision in the city.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project would not substantially modify the existing on-site drainage patterns, would incorporate low impact development features, and would be required to comply with applicable regulatory requirements, and the Project would not contribute a substantial amount of new stormwater runoff relative to existing conditions. Project design, construction, and operation would be completed consistent with the Rio Hondo/San Gabriel River Water Quality Group Enhanced Watershed Management Program, and in accordance with Chapter 60, Stormwater and Urban Runoff Pollution Prevention, of the AMC, and the County's Low Impact Development Best Management Practices Handbook, with the goal of capturing stormwater runoff for infiltration and reducing the amount of

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	pollutants in stormwater and urban runoff. The Project would incorporate low impact development features, including a proposed drainage system with gutters along the proposed drive aisles that would direct water flow to proposed on-site catch basins which would contribute to an overall reduction in off-site stormwater runoff from the Project site (Appendix H). Further, the Project site is not located within a FEMA-designated Special Flood Hazard Area and is designated as Zone X (an area of minimal flooding potential). See Section 4.9, Hydrology and Water Quality, and Section 4.17, Utilities and Service Systems, for further discussion.
Policy 4.1. Maintain existing public storm drains and flood control facilities, upgrade and expand storm drain and flood control facilities.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. See response to General Plan Infrastructure Goal 4, above, and Sections 4.9, Hydrology and Water Quality, and Section 4.17, Utilities and Service Systems, for further discussion.
Policy 4.4. Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. See response to General Plan Infrastructure Goal 4, above, and Sections 4.9, Hydrology and Water Quality, and Section 4.17, Utilities and Service Systems, for further discussion
Policy 4.7. Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.	**No Conflict.** The Project would comply with all applicable fees necessary for Project implementation. See Section 4.9, Hydrology and Water Quality, for more discussion.
Policy 4.8. Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas.	**No Conflict.** Project design, construction, and operation would be completed consistent with the Rio Hondo/San Gabriel River Water Quality Group Enhanced Watershed Management Program, and in accordance with Chapter 60, Stormwater and Urban Runoff Pollution Prevention, of the AMC, and the County's Low Impact Development Best Management Practices Handbook, with the goal of capturing stormwater runoff for infiltration and reducing the amount of pollutants in stormwater and urban runoff. The Project would incorporate low impact development features, including a proposed drainage system with gutters along the proposed drive aisles that would direct water flow to proposed on-site catch basins which would contribute to an overall reduction in off-site stormwater runoff from the Project site (Appendix H). As the Project would not substantially modify the existing on-site drainage patterns, would incorporate low impact development features, and would be required to comply with applicable regulatory requirements, the Project would not contribute a substantial amount of new stormwater runoff relative to existing conditions. As a result of compliance with existing regulations and implementation of the Project's drainage system design, the Project would minimize the damage to environmentally sensitive areas and control

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	drainage. See Section 4.9, Hydrology and Water Quality, and Section 4.17, Utilities and Service Systems, for further discussion.
Policy 4.10. Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retrofit of existing development.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. As discussed in the LID Report, the Project would increase the amount of impervious surface area on the Project site by approximately 3.49 acres (from 4.58 acres to 8.07 acres of impervious area). However, the Project would incorporate low impact development features, including a proposed drainage system with gutters along the proposed drive aisles that would direct water flow to proposed on-site catch basins which would contribute to an overall reduction in off-site stormwater runoff from the Project site (Appendix H). See Policy 4.9, above, and Section 4.9, Hydrology and Water Quality, for further discussion.
Goal 5. Maintain solid waste collection and disposal services in accordance with the California Integrated Waste Management Act of 1989, pursue funding sources to reduce the cost of the collection and disposal services in the City.	**No Conflict.** The Project would be required to comply with all applicable local and state regulations related to solid waste, including the California Integrated Waste Management Act of 1989. Solid waste generated by the Project would be collected and transported to a local or regional solid waste disposal facility by Athens Services, confirmed by the will serve letter provided in Appendix M-3. Further, the local solid waste disposal facilities listed in Table 4.17-2 of Section 4.17, Utilities and Service Systems, all hold current solid waste facility permits issued by CalRecycle, the agency that regulates solid waste handling, processing, and disposal activities in the state. Compliance with applicable federal, state, and local laws is required for issuance of a solid waste facility permit, which is subject to review every five years. Additionally, the City is required to comply with the solid waste reduction and diversion requirements set forth by the state and listed above in Section 4.17.2, Regulatory Requirements, including AB 939, AB 341, AB 1327, and AB 1826. The private waste haulers contracted by the City, Athens Services, are required to adhere to AB 341 as well as AMC waste management reporting requirements to help track compliance with applicable solid waste diversion targets (AMC Article XVIII). See Section 4.17, Utilities and Service Systems, for further discussion.
Policy 5.1. Maintain adequate solid waste collection for commercial, industrial, and residential developments in accordance with state laws.	**No Conflict.** The Project would be required to comply with all applicable local and state regulations related to solid waste collection. Due to (1) required compliance with CALGreen and the AMC regulations applicable to garbage, refuse and recycling (i.e., Article XVIII and Chapter 58) and (2) the available capacity of local inert landfills and debris facilities, Project construction and demolition would not generate waste in excess of standards or in excess of the capacity of local infrastructure and would not otherwise impair the attainment of solid waste reduction goals. Once operational, the Project's solid waste generation would account for approximately 0.000014% of the total remaining available daily disposal capacity, which is not a substantial share of the existing remaining daily capacity and would not be

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	in excess of capacity of local infrastructure capacity. As such, Project impacts would be less than significant in regards to solid wase collection and disposal. See Section 4.17, Utilities and Service Systems, for further discussion.
Economy and Community Element	
Economic Development	
Policy 3.2. Offer a broad mix of housing choices to support a diverse resident workforce.	**No Conflict.** The proposed Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units. As further detailed in Section 4.12, Population and Housing, the current jobs/housing balance in the City is approximately 1.56, which indicates a slightly above balanced, or a jobs-rich community. With the loss of jobs on site, the City's jobs/housing balance would change nominally to 24,477 jobs compared to the City's current housing stock of 15,711 units, or a jobs/housing balance of 1.56. As a result, the City would continue to be a slightly jobs-rich community under existing conditions. The Project's contribution to total jobs lost in the City would be considered nominal and would not substantially change the City's overall jobs/housing balance.
Policy 8.1. Work to ensure a range of housing opportunities for Azusa residents of all ages, incomes, and family structures.	**No Conflict.** The proposed Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units. As further detailed in Section 4.12, Population and Housing, the proposed Project's 128 units would accommodate up to 397 individuals, assuming 3.1 persons per household, which could include all ages, incomes, and family structures. Additionally, it is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City.
Policy 9.2. Promote in a housing stock that will appreciate in value over time.	**No Conflict.** The Project would provide 128 new residential units, including single-family and townhome for-sale dwellings, which would appreciate in value over time.
Public Services	
Policy 1.1. Maintain personnel and facilities in the City's Police Department necessary to provide the best response time feasible.	**No Conflict.** As discussed in Section 4.13, Public Services, of this Draft EIR, new police protection facilities and/or physically altered facilities would not be required to continue to provide acceptable service to the City under Project conditions. Further, because Azusa Police Department (AZPD) operates primarily through mobile patrol units, response times are maintained without the need for additional police protection facilities. The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities and potential impacts to police services would be less than significant.
Policy 1.3. Require development projects contribute fees based on their proportional	**No Conflict.** The Project would comply with all applicable fees necessary for Project implementation, including fees to parks in

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
impact and demand for new resources, in accordance with State Nexus legislation.	compliance with the Quimby Act, fees to schools pursuant to California Education Code section 17620 et seq. and Government Code sections 65995(h) and 65996(b), and standard development fees. See Section 4.13, Public Services, for more discussion.
Policy 1.8. Ensure that project development site designs provide "defensible space."	**No Conflict.** According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone Viewer, the Project site is not within a Fire Hazard Severity Zone or a State Responsibility Area (see Section 5.5.3, Wildfire, of Chapter 5, Other CEQA Considerations, of this Draft EIR). The proposed Project would be designed and constructed in accordance with all applicable provisions of the applicable fire code. The City would review site plans prior to issuance of building permits to ensure compliance with applicable provisions of the fire code.
Goal 2. Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.	**No Conflict.** The Project site is within the existing service area of the Los Angeles County Fire Department. The Project's required compliance with the CFC and other City policies and standards adopted to ensure proper emergency response and evacuation would ensure that operational Project impacts related to implementation of the Local Hazard Mitigation Plan and Operational Area Emergency Operations Plan would be less than significant. In addition, the TCP prepared in accordance with the AMC would reduce the impacts of temporary closures that could interfere with evacuation or emergency plans. See Sections 4.8, Hazards and Hazardous Materials, and 4.13, Public Services, of this Draft EIR for more discussion.
Policy 2.5. Require new development be assessed a pro-rated fee to pay for fire facilities and personnel.	**No Conflict.** As stated in Section 4.13, Public Services, the City contracts with Los Angeles County Fire Department (LACoFD) for fire prevention services. The Project would comply with applicable development fees established by LACoFD to pay for fire facilities and personnel services.
Policy 2.6. Require all new development to design site plans and structures with fire and emergency access and safety in mind.	**No Conflict.** As detailed in Section 4.15, Transportation, of this Draft EIR, all areas of the Project site would be accessible to emergency responders for the long-term operation of the Project. Local access to the Project site would be provided via East Maona Lua Avenue and North Calera Avenue. Project access driveways would be constructed per City's applicable design standards to ensure adequate access to the Project site, including access for emergency vehicles and adequate turning radii would be provided. The internal drive aisles and loading and parking areas would be designed to comply with City and LACoFD's width, clearance, and turning radius requirements, which were established to ensure safe and efficient vehicular circulation. The proposed Project would also be designed and constructed in accordance with all applicable provisions of the applicable fire code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii,

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	automatic sprinkler systems, fire alarms, and floor-to-sky height limits along emergency access routes.
Policy 2.7. Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.	**No Conflict.** See response to General Plan Public Services Policy 2.6, above.
Policy 4.1. Construct new library facilities and expand the new facilities as required to meet the needs of the library uses.	**No Conflict.** The ACL is currently undergoing renovations and is anticipated to meet the needs of the existing and growing population, including the new residents associated with the proposed Project. See Section 4.13, Public Services, of this Draft EIR for further discussion.
Goal 5. Promote a strong public school system that advocates high-quality education promote the maintenance and enhancement of the existing educational systems facilities, and opportunities for students and residents of the city to enhance the quality of life for existing and future residents.	**No Conflict.** The Project's 128 dwelling units would generate approximately 834 new students using Azusa Unified School District student generation rates. This breaks down to approximately 278 elementary age students, 278 middle school age students, and 278 high school age students. The three schools that would primarily serve the Project are Charles H Lee Elementary School, Gladstone Middle School, and Azusa High School. Charles H Lee School has a current (2024-2025) enrollment of 378students and a capacity of 705 students; Gladstone Middle School has an enrollment of 1,326 students with a capacity of 1,908 students; and Azusa High School has an enrollment of 1,609 students with a capacity of 3,492 students (Appendix J-3). As such, the proposed Project would not exceed the current capacity of any of the three schools serving the Project, and impacts would be less than significant.
Policy 5.1. Continue the dialogue between the City of Azusa and local schools regarding: • measures to accommodate student population growth; and • "shared responsibility agreements" for property/facilities maintenance and operation where public recreation activities occur at local school sites and where local schools use public facilities.	**No Conflict.** See discussion for General Plan Public Services Goal 5, above.
Natural Environment Element	
Recreation	
Goal 1. Provide constructive and creative leisure opportunities for all Azusans.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project would result in an increase in population that would decrease the City's ratio of persons per parkland. This increase in population, however, would not be substantial, and would not result in significant impacts to existing parks and recreational facilities. Further, the Project applicant would pay its fair share of the City's park and recreation redevelopment fees pursuant to Chapter 66, Article I, section 66-5 of the AMC, currently set as follows: One bedroom at $150; Two bedrooms at $300; Three

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	bedrooms at $450; Four bedrooms or more at $600; and Mobile home unit at $150. The Project would include a number of on-site open space and recreational amenities including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. In total, the Project would provide approximately 15,100 square feet of common open space (i.e. recreational community amenities and pathways) and 36,916 square feet of private open space (i.e. yards). Potential impacts to parks and recreational facilities are discussed in Section 4.13, Public Services, and Section 4.14, Recreation, of this Draft EIR.
Policy 1.5. Provide the highest quality of services to park and recreation facilities users through adequate staffing and technically trained staff.	**No Conflict.** The City has a goal to maintain a minimum of 1.14 acres of parkland per 1,000 residents. Based on the City's 2024 population, the current parkland per person ratio is 2.22 acres per 1,000 residents, With the addition of 397 residents generated from the Project, the parkland per person ratio (of City-operated parks) would decrease to 2.21 acres per 1,000 residents. Therefore, the Project would not cause the park per capita ratio to decrease below the City's standard of 1.14 acres per 1,000 persons. The increase to the City's population with the Project would not be substantial, and would not require the construction or expansion of existing City recreational facilities. See Section 4.13, Public Services, and Section 4.14, Recreation, of this Draft EIR for further discussion.
Policy 2.1. Maintain the current park per capita ratio of 1.14 acre per 1,000 persons.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project would include a number of on-site open space and recreational amenities. In total, the Project would provide approximately 15,100 square feet of common open space (i.e. recreational community amenities and pathways) and 36,916 square feet of private open space (i.e. yards). See Section 4.14, Recreation, of this Draft EIR for more discussion. The Project would not exceed the park per capita ratio.
Open Space and Biological Resources	
Goal 1. Preserve, restore, and enhance the diversity of biological resources in the City's undeveloped hillsides, canyons, floodplains, and urban areas.	**No Conflict.** The Project site is located within an urbanized portion of the City and currently developed with school buildings. A limited amount of landscaped area is located within the Project site and along the public rights-of-way, consisting of small areas of ornamental trees and shrubs, which do not form a cohesive plant community that would provide quality, suitable habitat for candidate, sensitive or special status wildlife species, or support wildlife movement (see Section 4.3, Biological Resources for more discussion). No native habitat, riparian habitat, or wetland is known to occur on the Project site. However, there is landscaping on and adjacent to the Project site that would have the potential to provide nesting sites for birds and raptors that are protected under the Migratory Bird Treaty Act (16 USC §§ 703–712) and California Fish and Game Code sections 3503, 3503.5, and 3513. The proposed Project construction has the potential to adversely affect nesting birds

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
	or raptors. However, with implementation of MM-BIO-1 (Nesting Bird Avoidance), impacts would be less than significant. See Section 4.3, Biological Resources, of this Draft EIR for further discussion.
Policy 1.3. Strive for the long-term maintenance of all native wildlife species living in the City and the Sphere of Influence including common and sensitive species.	**No Conflict.** See discussion for General Plan Open Space and Biological Resources Goal 1, above.
Air Quality	
Goal 1. Improve air quality in Azusa and reduce exposure to air pollutants.	**No Conflict.** The Project would result in the redevelopment of an existing site currently supporting a school. The Project would result in the demolition of existing buildings and surface parking and construct new residential buildings. Any demolition or renovation activity is required to have an asbestos study performed prior to demolition, per SCAQMD. Implementation of MM-HAZ-1, Hazardous Building Materials Survey, would comply with this regulation (see Section 4.8, Hazards and Hazardous Materials). See more discussion on the Project's potential impacts to air quality in Section 4.2, Air Quality, of this Draft EIR. According to this section, the Project would result in a less-than-significant impact regarding the potential to conflict with or obstruct implementation of an applicable air quality management plan in the SCAQMD.
Policy 1.1. Integrate air quality concerns into land use planning decisions.	**No Conflict.** See response to General Plan Air Quality Goal 1 above and Section 4.2, Air Quality, of this Draft EIR for more discussion. According to Section 4.2, the Project would result in a less-than-significant impact regarding the potential to conflict with or obstruct implementation of an applicable air quality management plan in the SCAQMD.
Policy 1.2. Integrate air quality concerns into site design review.	**No Conflict.** This policy is a responsibility of, and is directed to, the City. However, the Project would result in less-than-significant impacts related to air quality concerns (see Section 4.2, Air Quality, of this Draft EIR). Site designs would also be subject to City Design Review, per the AMC.
Policy 1.3. Reduce pollutant emissions from quarry operations, off -road vehicle use areas, industrial uses, and vehicular traffic.	**No Conflict.** The Project would result in the redevelopment of an existing site currently supporting a school. The Project would result in the demolition of existing buildings and surface parking and construct new residential buildings. Construction activities would include vehicular traffic. See more discussion on the Project's potential impacts to air quality in Section 4.2, Air Quality, of this Draft EIR. According to this section, the Project would result in less-than-significant impacts related to criteria pollutants, including those from traffic.
Policy 1.4. Participate in regional air quality planning strategies.	**No Conflict.** See response to General Plan Air Quality Goal 1 and General Plan Air Quality Policy 1.1, above.
Noise	

Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies

Goal/Policy	Analysis
Goal 1. Maintain community noise levels that meet health guidelines and allow for a high quality of life.	**No Conflict.** The Project would contribute to temporary increases in ambient noise levels due to construction, including on-site construction and off-site traffic noise. With implementation of MM-NOI-1, which requires the installation of temporary noise barriers and offers the Project applicant (or its construction contractors) flexible and practical options to implement it successfully and yield compliant noise exposure levels, construction noise would be less than significant with mitigation. Additionally, the Project would result in permanent increases in ambient noise levels in the vicinity of the Project include off-site traffic and ground-level HVAC. Due to compliance with applicable building code requirements and designs, stationary operational noise from the baseline condition would result in a less-than-significant impact related to operational noise. See Section 4.11, Noise, for further discussion.
Policy 1.1. Integrate noise considerations in the City's land use planning and project approval process.	**No Conflict.** The Project's noise impacts have been analyzed in Section 4.11, Noise, of this Draft EIR. See response for General Plan Noise Goal 1 for more discussion.
Policy 1.2. Protect those areas of the City where the existing noise environments are considered unacceptable or "noise sensitive".	**No Conflict.** The Project would comply with existing noise regulations and restrictions designated for the Project site. However, the Project site is surrounded by noise sensitive land uses. As detailed in Section 4.11, Noise, of this Draft EIR, the Project would result in less-than-significant noise-related impacts during operation and less than significant with mitigation during construction. See response to General Plan Noise Goal 1 above and Section 4.11, Noise, of this Draft EIR for further discussion.

Source: City of Azusa 2004, 2022.

Based on Table 4.10-1 and the analysis described above, the Project would be consistent with the General Plan for the purposes of avoiding or mitigating environmental effect.

City of Azusa Municipal Code

The AMC includes standards that regulate development within its Zoning Code which are codified in the Development Code, which in conformance with the General Plan, regulates land use development in the city. In each zone, the zoning regulations specify the permitted and prohibited uses, and the development standards, including setbacks, height, parking, and design standards, among others.

The current INS zone does not allow for residential uses. Thus, a Zone Change would be required to rezone the Project site to NG3-MED zone. As discussed above, the Project requires the proposed Zone Change to facilitate internal consistency between the General Plan land use map and base zoning provisions. The proposed change would not reduce or eliminate any environmentally protective regulations in the City's zoning ordinance or General Plan. In addition, the Project's proposed zoning would be consistent with the NG3-MED zone to the east, south, and west of the Project site, as illustrated in Figure 2-3, Existing Zoning. Under the proposed NG3-MED zoning, the Project site would have an allowable base density of 15 dwelling units per acre, of which the Project proposes 13.10 dwelling units per acre, for a total of 128 residential units on the 9.77-acre Project site. Given this, the Project as

proposed would be consistent with the density allowed under NG3-MED. Regarding development standards, the NG3-MED zone has a maximum allowable building height of two and one-half stories or 35 feet, whichever is less. The Project proposes 2-story residences with a maximum height of 29 feet 10 inches. Thus, the Project would not exceed the maximum allowable building height for the proposed zoning on site.

In addition to the proposed General Plan Amendment and Zone Change, the Project requires variances for building separation and rear yard setback. According to Development Code section 88.51.050, Variance and Minor Variance, a variance and minor variance provide a process for City consideration of requests to waive or modify certain standards of the Development Code when, because of special circumstances applicable to the property, including location, shape, size, surroundings, topography, or other physical features, the strict application of the development standards otherwise applicable to the property denies the property owner privileges enjoyed by other property owners in the vicinity and in the same zoning district. A variance may be granted to waive or modify any requirement of this Development Code except: allowed land uses; residential density; specific prohibitions (for example, prohibited signs), or procedural requirements. As described in Chapter 3, Project Description of this Draft EIR, the Project proposes single-family residences to be separated by 3.6 feet instead of the 5-foot minimum for building separation. In addition, the Project would provide a 20-21-foot setback instead of the 25-foot minimum for the Project site's rear setback. As such, a variance is required to deviate from the design standards required for the proposed NG3-MED zone (see Development Code section 88.22.070(D)(3)). Implementation of the proposed deviations would represent nominal differences in length, and impacts related to a conflict with any regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. Upon approval of the proposed variance, the Project's deviation in development standards would be in compliance with the City's Development Code.

Similarly, as further discussed in Section 4.3, Biological Resources, of this EIR, the Project proposes to remove all on-site trees. The removal of these trees would be subject to City's Tree Preservation Ordinance, which outlines replacement tree requirements. As detailed in Chapter 3, the Project would exceed the minimum replacement requirement with an anticipated 204 tree plantings. See Section 4.3, Biological Resources, for more discussion.

As described in Chapter 3, Project Description, the Project's design would consist of four architectural styles (Spanish Colonial, Traditional, Craftsman, and Western Ranch). Furthermore, the Project would include landscaping, walls, and fences, in addition to common and private open space. According to Table 4-3 of the City's Development Code (section 88.42.140 Multi-Family and Small Lot Single-Family Projects), projects are required to provide a minimum of 2,000 square feet of common open space, for projects with 31 or more units, and 150 square feet of private open space per dwelling unit. The Project would provide 15,100 square feet of common area open space (inclusive of a central paseo, tot lot, barbeque area, shaded gathering space, and a butterfly garden) and 36,916 square feet of private residential open space in the form of yards for a total of 52,016 square feet of residential open spaces. Therefore, the Project would exceed the open space requirements for the site. In summary, the Project plans would be subject to the City's Design Review by the City's Review Authority, including the Director, Zoning Administrator, and Planning Commission to ensure that all approved site and structural development exemplifies the best professional high quality design practices, maintains a distinct neighborhood and/or community identity, and minimizes or eliminates negative or undesirable visual impacts (Development Code section 88.51.032). Through the plan check process, the City would thoroughly review all plans for the Project to ensure compliance with the AMC, Development Code, and other relevant plans, policies, and regulations. Upon approval of the General Plan Amendment and Zone Change, variance, and other discretionary approvals, impacts would be less than significant related to land use regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Conclusion

Based on the analysis provided above, the Project would not conflict with the applicable goals and policies of the SCAG's Connect SoCal, General Plan, or the AMC. The Project proposes to create a new residential development within an existing developed site. The Project would comply with applicable development standards for the Project site as proposed. Thus, the Project would be consistent and would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project site adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

4.10.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from Project implementation including other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 . As described in Chapter 2, Environmental Setting, the geographic context for the cumulative analysis as it relates to land use and planning is the regional and local area surrounding the Project site including the SCAG region and the City. The scope of the cumulative impact analysis for land use and planning includes projections based on applicable local and regional plans (i.e., General Plan and the Connect SoCal).

Threshold 4.10a-Cumulative Would the project physically divide an established community?

Regarding cumulative impacts from physically dividing an established community, cumulative land use impacts could occur if other related projects in the vicinity of the Project site would result in land use incompatibility impacts in conjunction with the impacts of the Project. The Project would have no impact related to the division of an established community. Therefore, there would be no potential to contribute to a cumulatively significant impact.

Threshold 4.10b-Cumulative Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Cumulative land use impacts regarding conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigated an environmental impact could occur if other cumulative projects would result in land use incompatibility impacts in conjunction with the impacts of the Project. As detailed above, with implementation of mitigation measures, the Project would result in less than significant impacts regarding a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. All future projects would be subject to the General Plan and applicable zoning.

Generally, land use conflicts would be related to noise, traffic, air quality, and hazards/human health and safety issues, which are discussed in the relevant sections of this Draft EIR. Land use conflicts are also typically site-specific and not cumulative in nature; in other words, despite the number of cumulative projects in a given area, they would not necessarily compound to create cumulative land use conflicts. As such, the cumulative environmental effects associated with implementation of the Project have been addressed in the technical sections of this Draft EIR. Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact related to land use conflicts with land use plans, policies, or regulations for the purposes of avoiding or mitigating an environmental effect, and the cumulative impact would be less than significant.

4.10.6 Mitigation Measures

No mitigation measures are required.

4.10.7 Significance Conclusion

Threshold 4.10a. The Project would have **no impact** related to the physical division of an established community.

Threshold 4.10b. The Project would have a **less-than-significant impact** related to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.10.8 References

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4.11 Noise

This section describes the existing conditions of the Project site and vicinity related to noise, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information contained in this section is based on publicly available data as well as the following:

Appendix I-1 Photographs of Measurement Locations and Field Notes, prepared by Dudek, October 2025

Appendix I-2 Construction Noise Model Worksheets, prepared by Dudek, June 2026

Appendix I-3 Traffic Noise Modeling Calculations, prepared by Dudek, June 2026

Other sources consulted are listed in Section 4.11.8, References.

4.11.1 Existing Conditions

4.11.1.1 Noise Terminology and Characteristics

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receptor determine the sound level and characteristics of the noise perceived by the receptor. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (µPa). One µPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 µPa. Because of this huge range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of decibels (dB). The threshold of hearing for young people is about 0 dB, which corresponds to 20 µPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a receptor equidistant to each sound source would be 3 dB higher than one source under the same conditions. For example, if one automobile produces an SPL of 70 dB when it passes an observer, two cars passing simultaneously would not produce 140 dB—rather, they would combine to produce 73 dB. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dB louder than one source.

A-Weighted Decibels

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the SPL in that range. In general, people are most sensitive to the frequency range of 1,000–8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an "A-weighted" sound level (expressed in units of dBA) can be computed based on this information.

The A-weighting network approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Other weighting networks have been devised to address high noise levels or other special problems (e.g., B-, C-, D-, and G-scales), but these scales are rarely used in conjunction with highway traffic noise. Noise levels for traffic noise reports are typically reported in terms of A-weighted decibels (dBA). Table 4.11-1, Typical A-Weighted Noise Levels, arranges typical outdoor and indoor noise sources against a decreasing linear scale of A-weighted sound levels.

Table 4.11-1. Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	— 110 —	Rock band
Jet fly-over at 1000 feet		
	— 100 —	
Gas lawn mower at 3 feet		
	— 90 —	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	— 80 —	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	— 70 —	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	— 60 —	
		Large business office
Quiet urban daytime	— 50 —	Dishwasher next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime		
	— 30 —	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	— 20 —	
		Broadcast/recording studio
	— 10 —	
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Source: Caltrans 2013.

Human Response to Changes in Noise Levels

As discussed above, doubling sound energy results in a 3 dB increase in sound. However, given a sound level change measured with precise instrumentation, the subjective human perception of a doubling of loudness will usually be different than what is measured.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1 dB changes in sound levels, when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz–8,000 Hz) range (Caltrans 2013). In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5 dB increase is generally perceived as a distinctly noticeable increase, and a 10 dB increase is generally perceived as a doubling of loudness. Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3 dB increase in sound would generally be perceived as barely detectable.

Noise Descriptors

Noise in our daily environment fluctuates over time at varying rates. Various noise descriptors have been developed to describe time-varying noise levels. The following are the noise descriptors utilized in this analysis.

- **Equivalent Sound Level (L_{eq}):** L_{eq} represents an energy average of the sound level occurring over a specified period. The 1-hour A-weighted equivalent sound level ($L_{eq}[h]$) is the energy average of A-weighted sound levels occurring during a one-hour period and is the basis for noise abatement criteria used by the California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA). Note that L_{eq} is not an arithmetic average of varying dB levels over a period of time; it accounts for greater sound energy represented by higher decibel contributions.
- **Percentile-Exceeded Sound Level (L_{xx}):** L_{xx} represents the sound level exceeded for a given percentage of a specified period (e.g., L_{10} is the sound level exceeded 10% of the time, and L_{90} is the sound level exceeded 90% of the time).
- **Maximum Sound Level (L_{max}):** L_{max} is the highest instantaneous sound level measured during a specified period.
- **Day-Night Level (L_{dn}):** L_{dn} is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied to A-weighted sound levels occurring during nighttime hours between 10 PM and 7 AM
- **Community Noise Equivalent Level (CNEL):** Similar to L_{dn}, CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied to A-weighted sound levels occurring during the nighttime hours between 10 PM and 7 AM, and a 5 dB penalty applied to the A-weighted sound levels occurring during evening hours between 7 PM and 10 PM

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on the following factors:

- **Geometric Spreading** – Sound from a localized source (i.e., an ideal point source) propagates uniformly outward in a spherical pattern (or hemispherical when near a surface). The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Roadways consist of several localized noise sources on a defined path, and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.
- **Ground Absorption** – The propagation path of noise from a sound emission source to a receptor is usually horizontal and proximate to the ground. Under these conditions, noise attenuation from ground absorption and reflective-wave canceling can add to the attenuation associated with geometric spreading. For acoustically "hard" paths over which sound may traverse (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or "soft" sites (i.e., those sites with an absorptive ground surface between the source and the receptor, such as fresh-fallen snow, soft dirt, or dense vegetative ground cover), an additional ground-attenuation value of +1.5 dB per doubling of distance is normally assumed. When added to cylindrical spreading for line source sound propagation, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance.

- **Atmospheric Absorption** – In addition to aforementioned geometric spreading, the fluid medium (i.e., the air) through which sound travels yields frequency-dependent attenuation that increases in magnitude with increasing frequency. The effect is influenced by temperature and relative humidity, and typically negligible over short source-to-receptor distances (e.g., less than 500 feet); but, it helps explain why lower-frequency sound such as a thunderclap appears to "travel farther" over great distances.
- **Meteorological Effects** – Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound pressure levels can also be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects when distances between a source and receptor are large.
- **Shielding by Natural or Human-Made Features** – A large object or barrier in the direct path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and ridgelines) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor specifically to reduce noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. Taller barriers provide increased noise reduction. While a line of trees may visually occlude the direct line between a source and a receptor, its actual noise-reducing effect is usually negligible because it does not create an acoustically solid barrier. Deep expanses of dense wooded areas, on the other hand, can offer noise reduction under the right conditions.

Vibration Characteristics

Vibration is oscillatory movement of mass (typically a solid) over time. It is described in terms of frequency and amplitude and, unlike sound, can be expressed as displacement, velocity, or acceleration. For environmental studies, vibration is often studied as a velocity that, akin to the discussion of sound pressure levels, can also be expressed in dB as a way to cast a large range of quantities into a more convenient scale. Vibration impacts to buildings are generally discussed in terms of inches per second (ips) peak particle velocity (PPV), which will be used herein to discuss vibration levels for ease of reading and comparison with relevant standards. Vibration can also be annoying and thereby impact occupants of structures, and vibration of sufficient amplitude can disrupt sensitive equipment and processes (Caltrans 2020), such as those involving the use of electron microscopes and lithography equipment. Common sources of vibration within communities include construction activities and railroads. Ground-borne vibration generated by construction Projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities where sudden releases of subterranean energy or powerful impacts of tools on hard materials occur. Depending on their distances to a sensitive receptor, operation of large bulldozers, graders, loaded dump trucks, or other heavy construction equipment and vehicles on a construction site also have the potential to cause high vibration amplitudes. The maximum vibration level standard used by Caltrans for the prevention of structural damage to typical residential buildings is 0.3 ips PPV (Caltrans 2020). For human annoyance, Caltrans guidance indicates that a more stringent threshold of 0.2 ips PPV due to continuous vibration (e.g., nearby roadway traffic) would be "annoying." Vibration velocity limits for transient or single events tend to be less stringent than those for continuous or "steady-state" vibration sources.

Sensitive Receptors

Noise- and vibration-sensitive land uses are typically considered locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, and hospitals are

usual examples, with others depending on what the local jurisdiction may have defined or established. Based on context from the Noise Ordinance and General Plan Noise Element as summarized in Section 4.11.2, Regulatory Requirements, sensitive receptors include residences, schools, hospitals, hotels and motels, places of worship, and open space/recreation uses. Residential land uses are the nearest noise-sensitive land uses in the vicinity of the Project site. The nearest noise-sensitive receptors are the residential land uses to the west and north of the Project site, both located within City limits. There are additional receptors further afield, such as residential land uses on the opposite side of Mauna Loa Avenue and Calera Avenue; both located within County limits. These existing sensitive receptors represent the nearest land uses with the potential to be impacted by construction and operation of the Project, including noise levels associated with the addition of Project-related traffic on the local roadway network.

Existing Aircraft Operations

The nearest major public airport to the Project site is the Brackett Field Airport, over 5.9 miles to the southeast. At this distance, the Project site is well beyond the 65 dBA CNEL noise contour associated with existing aviation noise from operations at this nearest airport (County of Los Angeles 2015).

4.11.1.2 Ambient Noise Measurements

The existing noise environment of the Project area and its vicinity includes a variety of acoustical contributors that include proximate roadway traffic noise on Mauna Loa Avenue and Calera Avenue, more distant roadway traffic noise from other nearby arterial roadways, and an assortment of stationary noise sources that include operating heating, ventilating, and air-conditioning systems (HVAC) from residential land uses.

SPL measurements were conducted near the proposed project site on October 15 and 16, 2025 to quantify and characterize the existing outdoor ambient sound levels in the project area. The existing elementary school was observed to be closed during the measurement survey. Therefore, these measured noise levels are likely lower than the measured noise levels would be when the elementary school is operational.

Short-term measurements were conducted using a Rion NL-52 model sound level meter (SLM) equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The NL-52 SLM meets the current American National Standards Institute standard for a Type 1 (Precision) SLM. A long-term measurement (24 consecutive hours) was conducted using a SoftdB Piccolo II model SLM equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The Piccolo II SLM meets the current American National Standards Institute standard for a Type 2 (General Use) SLM. The accuracy of all SLMs was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four (4) short-term (ST) noise level measurement locations were conducted in the Project area, intended to be representative of the outdoor ambient sound environment. These locations are depicted as receivers ST1 through ST4 on Figure 4.11-1. The measured L_{eq}, L_{max}, and L_{min} noise levels at these surveyed locations are provided in Table 4.11-2. As shown in Table 4.11-2, the measured SPL ranged from approximately 51 dBA L_{eq} at ST4 to 60 dBA L_{eq} at ST1 and ST3. Beyond the summarized information presented in Table 4.11-2, detailed noise measurement data is included in Appendix I-1.

Table 4.11-2. Measured Baseline Outdoor Ambient Noise Levels

Site	Location/Address (and noted noise sources)	Time (hh:mm)	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
ST1	Adjacent to the front yard of 18652 E. Mauna Loa Avenue (traffic)	12:58 p.m. to 1:13 p.m.	60	73	45
ST2	On the Project side, directly across the street from the front yard of 6238 N. Calera Avenue (traffic, distant landscaping)	12:41 p.m. to 12:56 p.m.	57	75	45
ST3	Adjacent to the front yard of 942 E. Hollyvale Street (traffic, distant aircraft, distant dog barking, distant conversations/yelling, rustling leaves)	1:17 p.m. to 1:31 p.m.	60	73	43
ST4	Southeast corner of the multi-family building at 363 N. Calera Avenue (distant landscaping, distant dog barking, distant traffic)	12:23 p.m. to 12:38 p.m.	51	67	44

Source: Appendix I-1.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval; L_{min} = minimum sound level during the measurement interval; dBA = A-weighted decibels; ST = short-term noise measurement locations.

Generally, the measured samples of daytime L_{eq} agree with expectations: all of the measured locations are in an urban area, with roadway traffic making up the majority of the noise contribution at each site.

Long-term (LT) noise monitoring was conducted at one location with the SLM configured to operate in a continuous manner, cataloging all noise metrics pertinent to identification and evaluation of noise levels (i.e., L_{eq}, L_{max}, L_x, etc.) in the Project vicinity. Ambient noise levels recorded at the long-term noise monitoring location are presented in Table 4.11-3 and the monitor position is shown in Figure 4.11-1. Exhibit I displays an hourly chart of the long-term measurement data for LT1. More detailed information for the long-term noise measurement can be found in Appendix I-1.

Table 4.11-3. Summary of the Long-Term Ambient Noise Measurement

Site	Location	L_{dn}	Average Noise Levels (dBA)							
			Daytime				Nighttime			
			L_{eq}	L_{10}	L_{50}	L_{90}	L_{eq}	L_{10}	L_{50}	L_{90}
LT1	Co-located with ST1	70	67	68	64	59	63	63	58	54

Source: Dudek 2025, Appendix I-1.
Notes: dBA = A-weighted decibels; L_{dn} = Day Night noise level; L_{eq} = average equivalent noise level; L_{max} = maximum noise level; L_{50} = sound level exceeded 50% of the period; L_{90} = sound level exceeded 90% of the period; LT = long-term noise measurement locations.

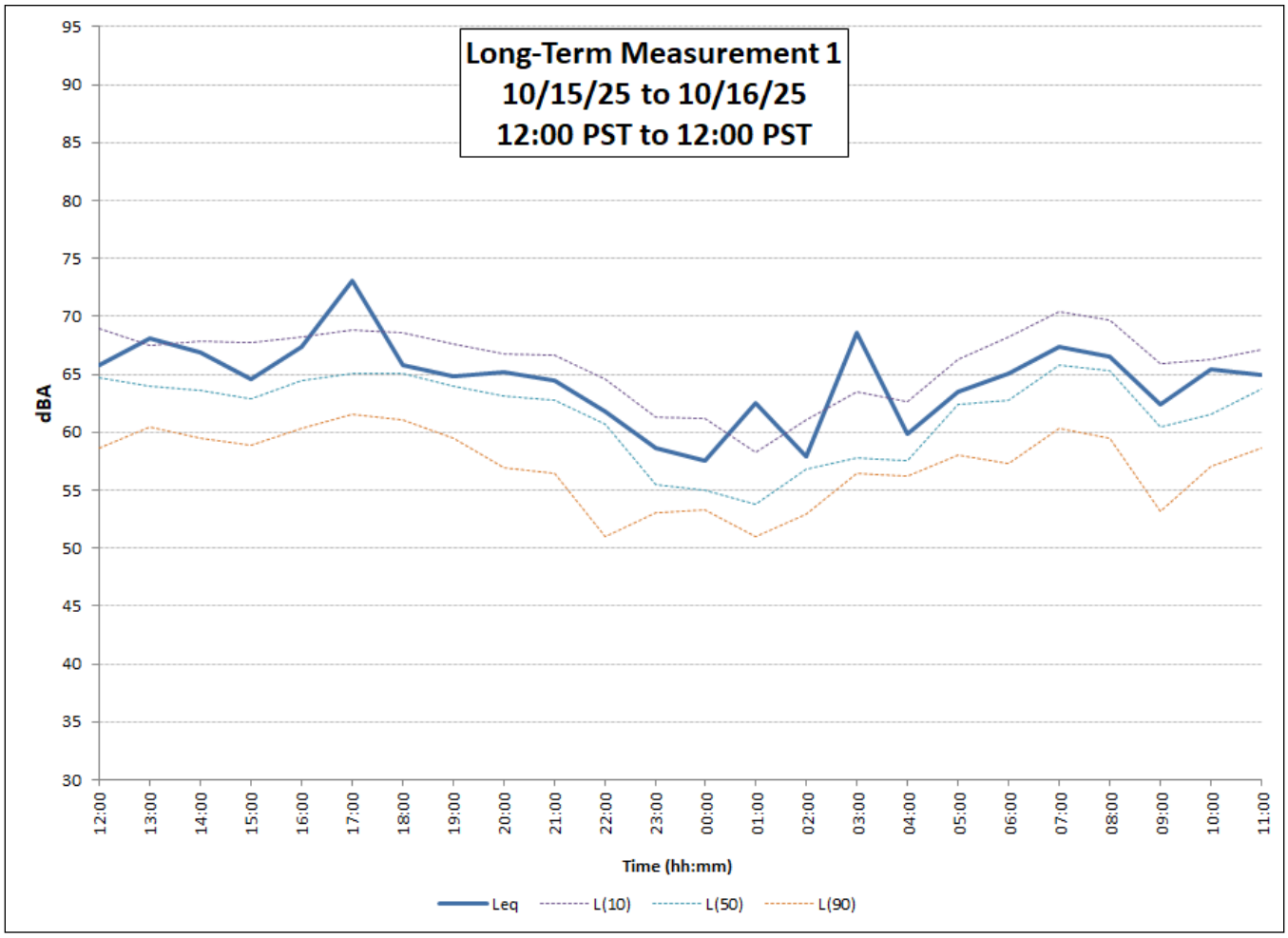


Exhibit I: Long-Term Measurement 1 (10/15/25 to 10/16/25) Hourly Data Chart

The primary noise source affecting the long-term noise monitoring locations was apparent vehicular traffic on the local roadway network. During the long-term noise monitoring, the average (L_{eq}) noise level ranged from approximately 58 dBA L_{eq} to 73 dBA L_{eq}.

4.11.2 Regulatory Requirements

4.11.2.1 Federal

There are no federal noise standards that would directly regulate environmental noise during construction and operation of the Project. The following is provided because guidance summarized herein is used or pertains to the analysis.

Federal Transit Administration (FTA)

In its Transit Noise and Vibration Impact Assessment guidance manual, the FTA recommends that the daytime construction noise level should not exceed 80 dBA L_{eq} over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project.

Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels.

With respect to vibration, Table 4.11-4 presents FTA guidance thresholds for assessing building damage risk and human annoyance. Akin to the aforementioned guidance for airborne noise from construction activities, the values in Table 4.11-4 represent recommended assessment guidance when local regulations lack such standards.

Table 4.11-4. Federal Transit Administration Vibration Threshold Guidance

Vibration Receptor	Vibration Assessment Metric	
	Peak Particle Velocity (PPV, in/sec)	Approximate Root Mean Square VdB*
Potential Damage to Structures by Building/Structural Category		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
Residential Building Occupant Human Response		
Frequent events *(more than 70 events per day)*		72
Occasional events *(30-70 events per day)*		75
Infrequent events *(fewer than 30 events per day)*		80
Institutional Land Use (Primarily Daytime Use) Occupant Human Response		
Frequent events *(more than 70 events per day)*		75
Occasional events *(30-70 events per day)*		78
Infrequent events *(fewer than 30 events per day)*		83

Source: FTA 2018
Notes: *root mean square (rms) vibration level in decibels (VdB) is calculated from the PPV using a crest factor of 4 and is with respect to one (1) micro-inch per second.

Federal Interagency Committee on Noise

Some guidance regarding the determination of a substantial permanent increase in ambient noise levels in the Project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON 1992), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of L_{dn}. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources and permanent non-transportation noise sources. The changes in noise exposure that are shown below are expected to result in equal changes in annoyance at sensitive land uses:

- If outdoor ambient sound level without the project is less than 60 dBA L_{dn}, then a project-attributed increase of 5 dBA or more would be considered significant; and
- If outdoor ambient sound level without the project is between 60 and 65 dBA L_{dn}, then a project-attributed increase of 3 dBA or more would be considered significant; and
- If outdoor ambient sound level without the project is greater than 65 dBA L_{dn}, then a project-attributed increase of 1.5 dBA or more would be considered significant.

4.11.2.2 State

California Noise Control Act of 1973

Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act of 1973, declare that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also identifies a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Department of Transportation

The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2020) offers guidance comparable to aforementioned FTA guidance presented in Table 4.11-4, but includes recommended thresholds (expressed as PPV) for building damage risk and occupant annoyance that distinguish between “transient” sources (e.g., detonation of explosive charges or a dropped ball during building demolition) and “continuous” or “frequently intermittent” vibration sources. The latter of these Caltrans vibration occurrence categories would be comparable to the “frequent” and “occasional” FTA event frequency categories appearing in Table 4.11-4.

Government Code Section 65302(g)

California Government Code section 65302(g) requires the preparation of a Noise Element in a General Plan, which shall identify and appraise the noise problems in the community. The Noise Element shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research (now known as the Governor's Office of Land Use and Climate Innovation (LCI)), provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Table 4.11-5, Land Use Compatibility for Community Noise Environments, summarizes these guidelines for determining acceptable and unacceptable community noise exposure limits for the various indicated land use categories.

Table 4.11-5. Land Use Compatibility for Community Noise Environments

Land Use Type	Community Noise Exposure (CNEL, dBA)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential-low density, single-family, duplex, mobile homes	50–60	55–70	70–75	75–85
Residential – multiple-family	50–65	60–70	70–75	70–85
Transient lodging – motel, hotels	50–65	60–70	70–80	80–85
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	80–85
Auditoriums, concert halls, amphitheaters	NA	50–70	NA	65–85
Sports arenas, outdoor spectators' sports	NA	50–75	NA	70–85
Playgrounds, neighborhood parks	50–70	NA	67.5–77.5	72.5–85
Golf courses, riding stables, water recreation, cemeteries	50–70	NA	70–80	80–85
Office buildings, business commercial and professional	50–70	67.5–77.5	75–85	NA
Industrial, manufacturing, utilities, agriculture	50–75	70–80	75–85	NA

Source: Appendix D, Figure 2 from Office of Planning and Research (OPR) 2017.
Notes: CNEL = Community Noise Equivalent Level; NA = not applicable

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

2 Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the required noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

3 Normally Unacceptable: New construction or development should be discouraged. If new construction of development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.

4 Clearly Unacceptable: New construction or development should generally not be undertaken.

The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. The Office of Planning and Research guidelines are

advisory in nature. Local jurisdictions, including the City, have the responsibility to set specific noise standards based on local conditions.

4.11.2.3 Local and Regional

County of Los Angeles Noise Regulations

Although the Project site itself is located within City limits, the County of Los Angeles exterior noise limits would apply to Project-generated noise received by noise sensitive receptors south of Mauna Loa Avenue and east of Calera Avenue located within unincorporated Los Angeles County. Section 12.08.440 of the County of Los Angeles (County) Code of Ordinances addresses construction noise restrictions. Construction activity is prohibited between the hours of 7:00 p.m. and 7:00 a.m. Monday through Saturday and all day on Sundays, where the noise would create a disturbance across a residential property line. For single-family residences, that disturbance noise level overnight is defined as greater than 50 dBA (for construction with a duration greater than 10 days). For construction lasting less than 10 days, or when "mobile" construction equipment is in use, the daytime (i.e., between 7:00 a.m. and 7:00 p.m.) limit for noise exposure at a single-family residential property affected by the construction noise is 75 dBA. For construction lasting longer than 10 days, or when "stationary" construction equipment is in use, the daytime limit for noise exposure at a single-family residential property affected by the construction noise is 60 dBA (County of Los Angeles 1978).

Section 12.08.390 of the County Code of Ordinances establishes the maximum exterior noise level that may be generated within each of four designated noise zones. The noise zone descriptions and allowable exterior noise limits from the County Code 12.08.390 are translated into the County Noise Element as Table 11.2 (reproduced here as Table 4.11-6) (County of Los Angeles 2025).

The County General Plan was adopted by the Board of Supervisors on October 6, 2015. The Noise Element establishes noise generation limits for each land use type and provides noise management policies to protect residents from excessive noise exposure. The County adapted the State of California's Office of Planning and Research (OPR) Land Use Compatibility for Community Noise Environments Matrix to develop the County's exterior noise standards, as shown in Table 4.11-6. By controlling the noise generation from individual properties within a given land use designation (or zone district), all uses should be afforded protection against excessive noise exposure.

With respect to durable sources of groundborne vibration, such as the operation of installed electro-mechanical equipment on a site, the County Code (Section 12.08.560) also specifies that operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way, is prohibited. The perception threshold shall be a vibration velocity of 0.01 in/sec over the range of 1 to 100 Hz.

Table 4.11-6. Los Angeles County Community Noise Criteria (in dBA)

Noise Zone	Land Use of Receptor Property	Time	Std 1 L50 (30 min/hr)	Std 2 L25 (15 min/hr)	Std 3 L8.3 (5 min/hr)	Std 4 L1.7 (1 min/hr)	Std 5 L0 (at no time)
I	Noise Sensitive[a]	Anytime	45	50	55	60	65
II	Residential[b]	10:00 p.m. to 7:00 a.m.	45	50	55	60	65
		7:00 a.m. to 10:00 p.m.	50	55	60	65	70
III	Commercial	10:00 p.m. to 7:00 a.m.	55	60	65	70	75
		7:00 a.m. to 10:00 p.m.	60	65	70	75	80
IV	Industrial	Anytime	70	75	80	85	90

Source: County of Los Angeles 1978.

Notes: dBA = A-weighted decibel; Std = Standard; min = minutes; hr = hour. [a] Noise sensitive zones are designated by the County Health Officer and are required to be clearly identified with posted signs, such as hospital facilities. [b] Residential includes single family and multiple family dwellings, but excludes transient lodging

City of Azusa 2004 General Plan

The General Plan Natural Environment Element provides the following goals, policies, and implementation programs pertaining to noise and vibration concerns which are applicable to the Project (City of Azusa 2004):

Goal 1. Maintain community noise levels that meet health guidelines and allow for a high quality of life.

Policy 1.2. Protect those areas of the City where the existing noise environments are considered unacceptable or “noise sensitive”.

An analysis of the Project’s potential to conflict with the applicable noise and vibration goals and policies is provided in Section 4.10, Land Use and Planning, of this Draft EIR.

The City’s Noise Element serves as an aid in defining acceptable land uses and as a guideline for compliance with California Noise Insulation Standards. As stated in Government Code section 65302(f), the ultimate purpose of noise control policies and programs is to "minimize the exposure of community residents to excessive noise.” Land use planning decisions in the City are guided by the Noise/Land Use Compatibility Criteria set forth in Figure N-4 of the Noise Element, which resemble those of the State Planning Guidelines and are shown below in Table 4.11-7.

Table 4.11-7. City of Azusa Land Use Compatibility for Community Noise Environments

Land Use Category	Exterior Noise Exposure (dBA, CNEL)						
	50-55	55-60	60-65	65-70	70-75	75-80	80+
Residential (Low Density Single-Family, Duplex, Mobile Homes)							

Table 4.11-7. City of Azusa Land Use Compatibility for Community Noise Environments

Land Use Category	Exterior Noise Exposure (dBA, CNEL)						
	50-55	55-60	60-65	65-70	70-75	75-80	80+
Residential (Multi-Family)							
Transient Lodging (Motels, Hotels)							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable[1] | Conditionally Acceptable[2] | Normally Unacceptable[3] | Clearly Unacceptable[4]

Source: City 2004a; California Office of Noise Control, Department of Health Services

Notes: (1) Normally Acceptable: Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. (2) Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy. (3) Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and the noise insulation features needed included in the design. (4) Clearly Unacceptable: New construction or development should generally not be undertaken.

City of Azusa Municipal Code

The City's Noise Ordinance (Section 88.31.020 of the AMC) is designed to provide standards for noise mitigation that are intended to protect the community health, safety, and general welfare by limiting exposure to the unhealthful effects of noise. Section 88.31.020 of the Azusa Development Code presents the City's overall standards for various uses, presented below in Table 4.11-8 City of Azusa Overall Noise Standards. These standards are applied to new developments.

Table 4.11-8. City of Azusa Overall Noise Standards

Land Use	Outdoor Activity Areas[1,2] L_{dn}	Interior Spaces	
		L_{dn}	L_{eq}
Residential	65 dBA	45 dBA	N/A
Transient Lodging	65 dBA	45 dBA	N/A
Hospitals, Extended Care	65 dBA	45 dBA	N/A
Theater, Auditorium	(3)	45 dBA	35 dBA
Meeting Facility, Public or Private	65 dBA	45 dBA	40 dBA
Offices	65 dBA	45 dBA	45 dBA
Schools, Libraries, Museums	65 dBA	45 dBA	45 dBA
Playgrounds, Parks	70 dBA	N/A	N/A

Source: AMC Section 88.31.020.
Notes: dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level; (1) Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use, (2) Where it is not possible to reduce noise in outdoor activity areas to 65 dB L_{dn}/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 70 dB L_{dn}/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table. (3) Subject to an acoustical analysis in compliance with subsection C.2 of section 88.31.020 of the AMC.

Sections 46-405 through 46-408 of the AMC (Division 2, Noise Standards) also establish exterior and interior noise level limits that apply according to the land use zone and time for stationary noise sources for residential, office and public institutions, commercial, and industrial activities during the daytime and nighttime. The City's AMC standards are presented in Table 4.11-9 for exterior AMC standards and 4.11-10 for interior AMC standards. The following AMC noise standards, unless specifically indicated, shall apply to all real property within a designated noise zone.

Table 4.11-9. City of Azusa Exterior Noise Ordinance Standards

Noise Zone	Exterior Noise Standards	
	Noise Level	Time Period
1 (all residential properties)	55 dBA 50 dBA	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.
2 (all professional office and public institutional properties)	55 dBA	Anytime
3 (all commercial properties)	60 dBA	Anytime
4 (all industrial properties)	70 dBA	Anytime

Source: AMC section 46-405.
Note: dBA = A-weighted decibels.

Section 46-406 prohibits noise levels in Table 4.11-9 to exceed the applicable noise standards:

1) for a cumulative period of more than 30 minutes in any hour;

2) plus five dBA for a cumulative period of more than 15 minutes in any hour;

3) plus 10 dBA for a cumulative period of more than five minutes in any hour;

4) plus 15 dBA for a cumulative period of more than one minute in any hour; or

5) plus 20 dBA for any period of time.

In the event the ambient noise level exceeds any of the first four noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

Table 4.11-10. City of Azusa Interior Noise Ordinance Standards

Noise Zone	Interior Noise Standards	
	Noise Level	Time Period
1 (all residential properties)	55 dBA 45 dBA	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.
2, 3, 4 (all professional office and public institutional properties, all commercial properties, all industrial properties)	55 dBA	Anytime

Source: AMC section 46-407.
Note: dBA = A-weighted decibels.

Section 46-408 prohibits noise levels in Table 4.11-10 to exceed the applicable noise standards:

1) for a cumulative period of more than five minutes in any hour;

2) plus five dBA for a cumulative period of more than one minute in any hour;

3) plus 10 dB for any period of time.

In the event the ambient noise level exceeds either of the first two noise limit categories above, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. In the event the ambient noise level exceeds the third noise level, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level. Each of the noise limits specified above shall be reduced by five dBA for impact or predominant tone noises, or for noises consisting of speech or music. In the event that the noise source and the affected property are within different noise zones, the noise standards of the affected property shall apply.

Section 88.31.020 and Section 46-409 of the AMC prohibits construction activities during the nighttime hours of 6:00 p.m. to 7:00 a.m. Monday through Saturday and 5:00 p.m. to 9:00 a.m. on Sundays and National Holidays if approved by review authority through conditions of approval. Extended construction hours may only be allowed by the review authority through conditions of approval between 6 p.m. and 10 p.m. Monday through Saturday.

Section 88.31.040E limits ground vibration generated by project operations as follows: no ground vibration shall be generated that is perceptible without instruments by a reasonable person at the property lines of the site, except for vibrations from temporary construction or demolition activities, and motor vehicle operations.

4.11.3 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the applicable thresholds of significance with regard to noise are listed below. A project may have a significant impact if it would result in:

Threshold 4.11a 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.

Threshold 4.11b Generation of excessive ground-borne vibration or ground-borne noise levels.

Threshold 4.11c 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, a project may have a significant impact if it would expose people residing or working in the project area to excessive noise levels.

Based upon relevant regulations and other agency standards described in Section 4.11.2, quantitative thresholds have been established for the purposes of this noise and vibration impact assessment and are listed below.

- **Construction Noise –** Through adherence to the limitation of allowable construction times provided in the AMC, construction-related noise would be considered compliant with the AMC for residential land uses within the City limits. However, to be consistent with CEQA expectations regarding "applicable standards of other agencies" this Project has adopted quantified construction noise thresholds per Federal Transit Administration (FTA) guidance, which recommends a not to exceed threshold of 80 dBA 8-hour L_{eq} at the exterior of a residence during daytime hours (FTA 2018).

  For residential land uses within unincorporated County limits, assuming construction activities take place between the hours of 7:00 a.m. and 7:00 p.m., construction noise levels must adhere to a 75 dBA limit for mobile equipment and 60 dBA for stationary equipment, as established in Section 12.08.440 of the County of Los Angeles Code of Ordinances.
- **Off-site Traffic Noise –** Following FICON guidance, noise impacts due to Project-generated traffic would be considered significant at residential land uses within City limits and within unincorporated County limits:
  - If outdoor ambient sound level without the project is less than 60 dBA L_{dn}, then a project-attributed increase of 5 dBA or more would be considered significant; and
  - If outdoor ambient sound level without the project is between 60 and 65 dBA L_{dn}, then a project-attributed increase of 3 dBA or more would be considered significant; and
  - If outdoor ambient sound level without the project is greater than 65 dBA L_{dn}, then a project-attributed increase of 1.5 dBA or more would be considered significant.
- **On-site Operations Noise –** For residential land uses within City limits, noise emissions from Project-related HVAC systems would need to comply with section 88.31.020 and sections 46-405 through 46-408 of the AMC (Division 2, Noise Standards, as summarized in Section 4.11.2.3.

For residential land uses within the unincorporated County limits, Project-attributed stationary source noise must adhere to the maximum exterior noise levels for residential land uses of 50 dBA from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m., per section 12.08.390 of the County Code of Ordinances.

- **Construction Vibration** – As discussed in Section 4.11.2.1, for building damage risk to these existing offsite residential buildings, the threshold would be 0.3 inches per second PPV per Caltrans guidance with respect to continuous or intermittent sources (e.g., construction activities). The building occupant annoyance threshold within such a structure would be 0.2 inches per second PPV or 94 VdB.
- **Exposure of Project Workers or Visitors to Excessive Aviation Noise** – Typically, project areas where outdoor workers or visitors may be present that intersects the 65 dBA CNEL aviation noise contour of a public or private airport would be considered a potentially significant noise impact.

4.11.4 Impact Analysis

Threshold 4.11a **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Temporary Increase in Ambient Noise Levels

Less-Than-Significant Impact with Mitigation. The Project's proposed temporary increases in ambient noise levels in the vicinity of the Project are detailed below and include on-site construction noise.

Construction Noise Analysis Methodology

Construction noise is considered a short-term and temporary impact and would be considered significant if construction activities for receptors within the City limits exceed the City's allowable hours of operation or exceeds the FTA guidelines, or County guidelines for receptors residing within unincorporated County limits.

Equipment that would be in use during construction would include, in part, backhoes, excavators, concrete saws, dozers, pavers, rollers, and front-end loaders. The typical maximum and equivalent noise levels at a distance of 50 feet from various pieces of construction equipment and activities anticipated for use on the proposed project site are presented in Table 4.11-11. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 4.11-11. Sound Levels of Typical Construction Equipment

Equipment	Maximum Sound Level (dBA L_{max}) – 50 feet from Source	Equivalent Sound Level (dBA L_{eq}) – 50 feet from Source
Air Compressor	67	66
Aerial Lift (Man Lift)	73	72
Backhoe	84	76
Compactor (Plate)	75	N/A
Compactor (Roller)	83	N/A

Table 4.11-11. Sound Levels of Typical Construction Equipment

Equipment	Maximum Sound Level (dBA L_{max}) – 50 feet from Source	Equivalent Sound Level (dBA L_{eq}) – 50 feet from Source
Concrete Mixer	82	81
Concrete Saw	88	85
Crane, Mobile	76	74
Dozer	86	80
Forklift	88	N/A
Generator	68	67
Grader	79	N/A
Horizontal Bore Drill	88	87
Loader	81	72
Paving - Asphalt	83	N/A
Paving - Concrete	88	85
Pump	74	73
Scraper	92	N/A
Flatbed Truck	74	N/A
Welding Machine	72	71

Notes: dBA = A-weighted decibel; L_{max} = maximum instantaneous noise level. N/A = Equipment without average (L_{eq}) noise levels are non-stationary and best represented only by maximum instantaneous noise level (L_{max}).
Source: NASEM 2018

Off-Site Construction Noise Assessment

Noise-sensitive land uses in the vicinity of the Project include single and multi-family residential land uses within City limits west and north of the Project site and single-family residential land uses within unincorporated County limits east and south of the Project site. Although additional residences and other noise-sensitive receivers are further afield, the construction noise assessment focused on Project-attributed noise exposure levels at these nearest noise-sensitive receptors. Construction noise levels at more distant receptors would be substantially lower, consistent with established acoustical principles of attenuation with geometric divergence and other factors such as intervening structures.

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) version 2.0 (FHWA 2018) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Although the RCNM was funded and promulgated by the FHWA, it is often used for non-roadway projects, because the same types of construction equipment used for roadway projects are often used for other types of construction. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., a front end loader, a backhoe, a paver, and an excavator) the measured level across four locations for the determination of the L_{eq} (for stationary sources) or L_{max} (for non-stationary sources) at 50 feet from the source, and the distance from the noise-sensitive receptor. The predictive model also considers how many hours that equipment may be on-site and operating (or idling) within an established work shift. Table 4.2-6, Construction Scenario Assumptions, of Section 4.2, Air Quality, presents the equipment list used for the construction noise analysis. Conservatively, no topographical or structural shielding was assumed in the modeling. All parameters used in the RCNM analysis are detailed in Appendix I-2.

Using the provided construction information, and following general FTA construction noise assessment methodologies, prediction results are summarized using the shortest activity-to-receptor distance for the loudest two pieces of equipment operating during each construction phase for residential land uses within the City limits. For residences within unincorporated County limits, all equipment was assumed to be operating during each construction phase using the shortest-activity-to-receptor distance. These methods are considered to be conservative approaches to assess what might be characterized as a peak exposure level, applicable to not more than approximately 10% to 15% of the total construction period and when the studied construction activity is taking place with all equipment along the property boundary nearest to these nearest off-site receivers. This "nearest" method assumes that the listed equipment (either the two loudest pieces for residential land uses within City limits or all of the equipment within unincorporated County limits in a given phase) would be at these nearest distances. Therefore, the equipment unrealistically "stacks" near the boundary line and would not be working in other areas of the construction site using this methodology.

For the purposes of interpreting the County standards presented in Section 4.11.2.3, "stationary equipment" would be equipment that is set at a given location and would remain at that location over the course of the construction phase. Primary examples include sources of onsite power, such as electrical generators and air compressors, as well as cement mixers or rock-crushers that process materials brought to their locations. "Mobile equipment" refers to concrete saws, dozers, scrapers, front-end loaders, and similar self-propelled equipment that moves within multiple on-site locations to perform work, and to trucks used to transport equipment and materials to and from the project site. Hence, mobile-equipment-use and off-site construction traffic noise must not exceed 75 dBA L_{eq} at single-family residences, 80 dBA L_{eq} at multi-family residences, or 85 dBA L_{eq} at commercial properties between 7:00 a.m. to 8:00 p.m., Monday through Saturday.

Appendix I-2 includes the construction noise model worksheets and their input parameters for on-site and off-site construction activities. Table 4.11-12, Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors, summarizes the distance to each of the studied receptors from the construction phase boundary for residential land uses within City limits and within unincorporated County limits. Table 4.11-13, Predicted Construction Noise Model Results Summary; City of Azusa – Unmitigated, presents the predicted results and comparison to the City thresholds, as detailed in Appendix I-2. Table 4.11-14 Predicted Construction Noise Model results Summary; County of Los Angeles – Unmitigated, presents the predicted results and comparison to the County thresholds, as detailed in Appendix I-2.

Table 4.11-12. Estimated Distances between Construction Activities and the Nearest Noise-Sensitive Receptors

Construction Phase	Nearest Distance from Construction Phase Boundary to Nearest Noise-Sensitive Receptor within City Limits (Feet)		Nearest Distance from Construction Phase Boundary to Nearest Noise-Sensitive Receptor within Unincorporated County Limits (Feet)	
	West	North	East	South
Demolition	60	205	80	60
Site Prep & Grading	10	10	75	60
Onsite Utilities	20	20	75	65
Paving	30	80	80	80
Building Construction	20/175	35/45/135	90/90/255	80/225
Architectural Coating	20	20	90	80

Note: Distances displayed in RCNM workbook includes distance from construction phase boundary to receptor and distance from receptor to potential barrier location. Building construction was modeled at multiple locations to account for potential concurrent construction (perimeter single family/core townhome or perimeter single family/perimeter townhome/core townhome); analyzed distances are listed under each of the modeled directions from the Project site. See Appendix I-2 for details.

Table 4.11-13. Predicted Construction Noise Model Results Summary; City of Azusa - Unmitigated

Construction Phase	Impact Threshold[b] ($L_{eq(8h)}$, dBA)	Predicted Construction Noise Level at Nearest Residential Noise-Sensitive Receptor (NSR)			
		Phase 8-hour L_{eq} (dBA) - West	Impact?	Phase 8-hour L_{eq} (dBA) - North	Impact?
Demolition	80	83.5	Yes	69.4	No
Site Prep & Grading	80	96.2	Yes	96.2	Yes
Onsite Utilities	80	86.7	Yes	86.7	Yes
Paving	80	89.4	Yes	79.6	No
Building Construction[a]	80	96.6/64.3	Yes/No	91.7/79.6/62.9	Yes/No/No
Architectural Coating	80	72.3	No	72.3	No

Notes: See Appendix I-2 for complete results.

a Building construction was modeled at multiple locations to account for potential concurrent construction (perimeter single family/core townhome or perimeter single family/perimeter townhome/core townhome); individual predicted levels are listed under each of the modeled directions from the Project site. See Appendix I-2 for details.

b The City of Azusa does not have a quantitative threshold for construction noise assessment and only restricts construction activity based upon day of the week and time of day. Therefore, this analysis uses FTA guidance, which indicates that a level exceeding 80 dBA L_{eq} over 8 hours would be considered impactful.

Table 4.11-14. Predicted Construction Noise Model Results Summary; Los Angeles County - Unmitigated

Construction Phase	Mobile Equipment Impact Threshold[b] (L_{eq} or L_{max}, dBA)	Stationary Equipment Impact Threshold[c] (L_{eq} or L_{max}, dBA)	Predicted Construction Noise Level at Nearest Residential Noise-Sensitive Receptor (NSR)											
			Mobile Equipment						Stationary Equipment					
			East			South			East			South		
			Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)[d]	Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)[d]	Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)[d]	Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)[d]	Impact?
Demolition	75	60	80.3	84.4	Yes	84.1	86.9	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Site Prep & Grading	75	60	84.3	83.8	Yes	86.7	85.8	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Onsite Utilities	75	60	76.2	83.8	Yes	78.1	85.1	Yes	60.5	70.4	Yes	62.5	71.7	Yes
Paving	75	60	80	80	Yes	80	80	Yes	59.7	69.9	Yes	59.7	69.9	Yes
Building Construction[a]	75	60	81.9/ 81.9/ 70.7	84.1/ 84.1/ 75.0	Yes / Yes / No	83.4/ 71.9	85.1/ 76.1	Yes / Yes	63.5/ 63.5/ 52.5	6.96/ 69.6/ 60.5	Yes / Yes / Yes	64.9/ 53.8	70.6/ 61.6	Yes / Yes
Architectural Coating	75	60	N/A	N/A	N/A	N/A	N/A	N/A	58.5	62.9	Yes	58.5	62.9	Yes

Notes: See Appendix I-2 for complete results.

a Building construction was modeled at multiple locations to account for potential concurrent construction (perimeter single family/core townhome or perimeter single family/perimeter townhome/core townhome); individual predicted levels are listed under each of the modeled directions from the Project site. See Appendix I-2 for details.

b Per section 12.08.440 of Los Angeles County's Code of Ordinances, the construction noise limit for mobile equipment is 75 dBA L_{eq}. Levels exceeding the County limits would be considered impactful.

c Per section 12.08.440 of Los Angeles County's Code of Ordinances, the construction noise limit is 60 dBA L_{eq} for stationary equipment. Levels exceeding the County limits would be considered impactful.

Table 4.11-13 illustrates that construction noise would reach up to 97 dBA L_{eq} at the nearest sensitive receptors within City limits, which exceeds the 80 dBA L_{eq} over 8-hour FTA threshold, thus triggering a potential significant impact during short-term construction activities. Table 4.11-14 illustrates that mobile construction noise levels would reach up to 84 dBA L_{eq} over one hour with a single equipment piece maximum noise level of 87 dBA and that stationary construction noise would also reach up to 63 dBA L_{eq} over one hour with a single equipment piece maximum level of 72 dBA at the nearest receptors within unincorporated County limits. Therefore, mitigation measure MM-NOI-1 is included to reduce construction noise exposure levels when construction activities are allowed to occur. The City prohibits construction activities during the nighttime hours of 6:00 p.m. to 7:00 a.m. Monday through Saturday and 5:00 p.m. to 9:00 a.m. on Sundays. The County prohibits construction during nighttime hours from 7:00 p.m. and 7:00 a.m. Monday through Saturday and all day Sundays. Therefore, in order to reduce predicted construction noise levels to not surpass both exceedance thresholds, construction is restricted to between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, from 5:00 p.m. to 9:00 a.m. on Saturdays, and all day Sunday.

MM-NOI-1 requires limiting the time of usage for forklifts and installation of temporary noise barriers and offers the Project applicant (or its construction contractors) flexible and practical options to implement it successfully and yield compliant noise exposure levels. The barriers can comprise one or more materials of construction and/or assembly, so long as the net sound transmission class (STC) is 25 or better, and thus expected to yield a minimum of 5 dB noise reduction and up to approximately 16 dB noise reduction when blocking direct sound paths between onsite Project construction noise-producing activities or equipment and the offsite receptor of concern (ASTM 2022). This performance is achieved because an STC 25 rating means the barrier material itself blocks at least 25 dB of sound from passing directly through it. Because this material isolation is substantially higher than the targeted reduction, the sound leaking through the barrier becomes acoustically negligible.

A concurrent phase analysis was also conducted and found to be compliant with City and County thresholds with MM-NOI-1 applied, the results of which can be found in Appendix I-2. Table 4.11-15, Predicted Construction Noise Model Results Summary; City of Azusa – Mitigated, displays the predicted mitigated construction noise levels by phase for the nearest noise-sensitive City receptors. Table 4.11-16, Predicted Construction Noise Model Results Summary; Los Angeles County – Mitigated, displays the predicted mitigated construction noise levels by phase and equipment type for the nearest noise-sensitive County receptors. Therefore, with MM-NOI-1 applied to the Project, construction noise would be less than significant with mitigation.

Table 4.11-15. Predicted Construction Noise Model Results Summary; City of Azusa - Mitigated

Construction Phase	Impact Threshold[b] ($L_{eq(8h)}$, dBA)	Predicted Construction Noise Level at Nearest Residential Noise-Sensitive Receptor (NSR)			
		Phase 8-hour L_{eq} (dBA) - West	Impact?	Phase 8-hour L_{eq} (dBA) - North	Impact?
Demolition	80	68.7	No	69.4	No
Site Prep & Grading	80	79.8	No	79.8	No
Onsite Utilities	80	70.9	No	70.9	No
Paving	80	74.0	No	65.1	No
Building Construction[a]	80	79.8/50.5	No/No	76.5/64.6/62.9	No/No/No
Architectural Coating	80	56.5	No	72.3	No

Notes: See Appendix I-2 for complete results.

a Building construction was modeled at multiple locations to account for potential concurrent construction (perimeter single family/core townhome or perimeter single family/perimeter townhome/core townhome); individual predicted levels are listed under each of the modeled directions from the Project site. See Appendix I-2 for details.

b The City of Azusa does not have a quantitative threshold for construction noise assessment and only restricts construction activity based upon day of the week and time of day. Therefore, this analysis uses FTA guidance, which indicates that a level exceeding 80 dBA L_{eq} over 8 hours would be considered impactful.

Table 4.11-16. Predicted Construction Noise Model Results Summary; Los Angeles County - Mitigated

Construction Phase	Mobile Equipment Impact Threshold [b] (L_{eq} or L_{max}, dBA)	Stationary Equipment Impact Threshold [c] (L_{eq} or L_{max}, dBA)	Predicted Construction Noise Level at Nearest Residential Noise-Sensitive Receptor (NSR)												
			Mobile Equipment							Stationary Equipment					
			East			South				East			South		
			Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)	Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)		Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)	Impact?	Phase 1-hour L_{eq} (dBA)	Loudest Equipment L_{max} (dBA)	Impact?
Demolition	75	60	66.2	71.3	No	69.7	73.2	No	N/A	N/A	N/A	N/A	N/A	N/A
Site Prep & Grading	75	60	69.7	69.5	No	73.6	73.2	No	N/A	N/A	N/A	N/A	N/A	N/A
Onsite Utilities	75	60	61.7	69.5	No	65.5	73.8	No	45.8	55.7	No	47.8	56.9	No
Paving	75	60	66.8	66.1	No	66.8	66.1	No	46.1	56.3	No	45.1	55.2	No
Building Construction [a]	75	60	70.8 / 70.8 / 63.9	73.4 / 73.4 / 67.9	No / No / No	71.5 / 64.4	73.8 / 68.3	No / No	51.3 / 51.3 / 45.3	57.4/ 57.4/ 53.2	No / No / No	51.8 / 45.8	57.4/ 53.6	No/ No
Architectural Coating	75	60	N/A	N/A	N/A	N/A	N/A	N/A	47.8	52.2	No	47.8	52.2	No

Notes: See Appendix I-2 for complete results.

a Building construction was modeled at multiple locations to account for potential concurrent construction (perimeter single family/core townhome or perimeter single family/perimeter townhome/core townhome); individual predicted levels are listed under each of the modeled directions from the Project site. See Appendix I-2 for details.

b Per section 12.08.440 of Los Angeles County's Code of Ordinances, the construction noise limit for mobile equipment is 75 dBA L_{eq}. Levels exceeding the County limits would be considered impactful.

c Per section 12.08.440 of Los Angeles County's Code of Ordinances, the construction noise limit is 60 dBA L_{eq} for stationary equipment. Levels exceeding the County limits would be considered impactful.

Construction Noise Levels Compared to Ambient Noise Levels

Table 4.11-17, Highest Predicted Concurrent Construction Noise Levels Compared to Ambient Noise Levels, compares the predicted construction noise levels to measured ambient noise levels for the identified nearest residential receivers.

Table 4.11-17. Highest Predicted Concurrent Construction Noise Levels Compared to Ambient Noise Levels

Receptor	Ambient Noise Level (L_{eq}, dBA)	Highest Predicted Construction Noise Level (L_{eq}, dBA) – No Mitigation	Amount of Largest Increase (L_{eq}, dBA) – No Mitigation	Highest Predicted Construction Noise Level (L_{eq}, dBA) – With Temporary Noise Barrier	Amount of Largest Increase (dBA) - With Temporary Noise Barrier
Single Family Residences – South of Project	60[a]	86.7	27	73.8	14
Single Family Residences – East of Project	57[b]	84.3	27	73.4	16
Single Family Residences – West of the Project	60[c]	96.6	37	79.8	20
Multi-Family Residences – North of Project	51[d]	96.2	45	79.8	29

Source: Appendix I-1 and Appendix I-2.

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels.

[a] Based on ambient noise measured at ST1.
[b] Based on ambient noise measured at ST2.
[c] Based on ambient noise measured at ST3.
[d] Based on ambient noise measured at ST4.

As illustrated in Table 4.11-17, unmitigated construction noise levels would be approximately 27 to 45 dBA over existing ambient noise levels and mitigated construction noise levels would be approximately 14 to 29 dBA over existing ambient noise levels at the nearest noise-sensitive receptors. The measured noise levels displayed in Table 4.11-17 were gathered during a time where the elementary school was not operational. Noise levels measured while the school is operational would likely be higher, meaning that the increases over ambient displayed in Table 4.11-17 would be lower. Additionally, it should be noted that construction noise is short-term both from a daily perspective, regulated by the City and County to specific hours, and construction phase perspective, during only the construction phase. It is further broken down by the various construction phases. The highest predicted construction noise levels at the nearest sensitive receptors, for instance, would only occur when activities take place directly adjacent to noise-sensitive receptors which will only be for a short duration; most construction activities would occur at distances farther afield. Thus, the mitigated increases over existing ambient would : (1) occur only during peak construction activities (all relevant equipment working at the project boundary), which would be applicable to not

more than approximately 10% to 15% of the total construction period; (2) occur only during the daytime permitted construction hours; and (3) be limited to specific phases of the Project. Also, daytime construction noise has been determined to be a common part of the urban environment. The City and County provides that construction is limited to certain daytime hours, unless a special permit is obtained. Thus, given the specific nature of construction noise, including its limited-term and occurrence during daytime hours in an urban environment, increases in ambient noise from construction is not considered a significant impact.

Further, the predicted mitigated construction noise level does not exceed the City and FTA 80 dBA L_{eq} threshold for construction noise at the nearest noise-sensitive receptors within City limits. Additionally, it does not exceed the County's 75 dBA L_{eq} threshold for mobile sources and 60 dBA L_{eq} threshold for stationary sources of construction noise at the nearest noise sensitive receptors within unincorporated County limits. Finally, the predicted mitigated construction noise level does not exceed the County's 75 dBA L_{max} threshold for mobile sources and 60 dBA L_{max} threshold for stationary sources of construction noise at the nearest noise-sensitive receptors within unincorporated County limits.

Off-Site Construction Traffic Noise

The Project would result in local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the Project's air quality analysis, Project-related traffic would include workers commuting to and from the Project site as well as vendor and haul trucks bringing or removing materials. The highest number of average daily construction related trips to and from the Project site for all construction phases would be 68 one-way worker trips occurring during the building construction phase, 14 one-way vendor trips occurring during the building construction phase, and 16 one-way haul truck trips occurring during the demolition phase.

Based upon traffic volumes from the Project Traffic Volume figures developed by LLG, the lowest existing peak hour traffic volume on nearby project roadways is 213 trips on Calera Avenue. Comparing the maximum number of daily construction-related trips (a total of 144 PCE trips [assuming a vendor trip equates to two trucks and a haul truck trip equates to three trucks]) to the existing peak hour volume of 213 trips on Calera Avenue, the additional vehicle trips would amount to a worst-case number of trips due to Project construction of approximately 366 peak hour trips, or an increase of 60%, which equates to a 2.2 dB increase in traffic noise level. The predicted existing traffic noise level (see Table 4.11-16, Predicted Traffic Noise Levels) on Calera Avenue is 55 dBA CNEL. Therefore, the existing plus Project construction traffic would have a worst-case noise level of less than 57 dBA CNEL. FICON guidance indicates that if an outdoor ambient sound level without the Project is less than 60 dBA L_{dn}, then a Project-attributed increase of 5 dBA or more would be considered significant. A 2.2 dBA increase is less than 5 dBA. Therefore, impacts from Project-related construction traffic noise would be less than significant.

On-Site Construction Noise Assessment

During the building construction phase, noise generated by the construction of homes during Project development phases that are subsequent to those in which completed homes are occupied has the potential to impact onsite noise-sensitive receivers occupying those newly inhabited dwelling units located on already completed phases. Appendix I-2 contains the details for the on-site sensitive receptor construction noise analysis. As shown, simultaneous activity of two building construction phases (e.g., townhome and SFD) taking place no closer than 110 feet to an occupied residential structure would not exceed the FTA 80 dBA L_{eq} over 8-hour threshold. However, within this screening distance, combined construction noise from concurrent onsite building construction activity would be anticipated to exceed this FTA criterion. Therefore, mitigation measure MM-NOI-1 is included to reduce

construction noise exposure levels when construction activities are allowed to occur. The City prohibits construction activities during the nighttime hours of 6:00 p.m. to 7:00 a.m. Monday through Saturday and 5:00 p.m. to 9:00 a.m. on Sundays. The County prohibits construction during nighttime hours from 7:00 p.m. to 7:00 a.m. Monday through Saturday and all day Sundays. Therefore, in order to reduce predicted construction noise levels to below both thresholds, construction is restricted to between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, from 5:00 p.m. to 9:00 a.m. on Saturdays, and all day Sunday.

MM-NOI-1 requires the installation of temporary noise barriers and offers the Project applicant (or its construction contractors) flexible and practical options to implement the barriers successfully and yield compliant noise exposure levels. The barriers can comprise one or more materials of construction and/or assembly, so long as the net sound transmission class (STC) is 25 or better, and thus expected to yield a minimum of 5 dB noise reduction and up to approximately 16 dB noise reduction when blocking direct sound paths between onsite Project construction noise-producing activities or equipment and the onsite receptor of concern. A concurrent phase analysis was also conducted and found to be compliant with City and County thresholds with MM-NOI-1 applied, the results of which can be found in Appendix I-2. Table 4.11-14, Therefore, with MM-NOI-1 applied to the Project, construction noise would be **less than significant with mitigation**.

Permanent Increases in Ambient Noise Levels

Less-Than-Significant Impact. The Project's proposed permanent increases in ambient noise levels in the vicinity of the Project are detailed below and include off-site traffic and ground-level HVAC.

Off-site Traffic

Utilizing peak hour traffic volumes from the Project Traffic Volume Figures developed by LLG, as well as additional traffic data provided in Appendix I-3, the FHWA's Highway Traffic Noise Prediction Model RD-77-108 was used to estimate potential noise impacts at noise-sensitive uses adjacent to roadway segments expected to experience added traffic volumes attributed to the proposed Project. Information used in the model included p.m. peak hour volumes, posted traffic speeds, truck mix percentage, and day/evening/night mix percentage. Consistent with Caltrans guidance (Caltrans 2013), 80% of the ADT occurs during daytime hours (7:00 a.m. to 7:00 p.m.), 5% during the evening (7:00 p.m. to 10:00 p.m.), and 15% during the nighttime (10:00 p.m. to 7:00 a.m.).

The future modeled traffic speed was conducted using 25 miles per hour (mph) for Mauna Loa Avenue and Calera Avenue. The truck percentages used in the noise model for the modeled scenarios were 2.0% medium trucks and 1.0% heavy trucks. This truck mix is based on vehicle surveys conducted for a number of similarly sized roads in the City that allow truck traffic.

The change in roadway noise levels was determined for four conditions: existing, existing plus Project, future, and future with Project. Traffic noise levels were calculated for Mauna Loa Avenue and Calera Avenue, with predicted changes attributed to the Project on Existing and Future year conditions presented in Table 4.11-18.

Table 4.11-18. Predicted Traffic Noise Levels

Modeled Roadway	From	To	Existing Noise Level (dBA CNEL)	Existing Plus Project Noise Level (dBA CNEL)	Existing Project-Related Noise Level Gain (dB)	Future Noise Level (dBA CNEL)	Future Plus Project Noise Level (dBA CNEL)	Future Project-Related Noise Level Gain (dB)
Mauna Loa Avenue	Factor Avenue	Fairvale Drive / Project Driveway	56.2	56.4	0.1	56.3	56.7	0.4
Mauna Loa Avenue	Fairvale Drive / Project Driveway	Calera Avenue	56.1	56.2	0.1	56.2	56.3	0.1
Calera Avenue	Mauna Loa Avenue	Project Driveway	55.1	55.1	0.0	55.1	55.2	0.1
Calera Avenue	Project Driveway	Route 66	54.8	55.0	0.1	54.9	55.1	0.3

Source: Appendix I-3.

Notes: Levels are rounded from the hundredth decimal. *Existing, Existing Plus Project, Future, and Future Plus Project noise levels are calculated at 50 feet from the roadway centerline.

Based upon the FICON thresholds presented in Section 4.11.2.1 above, an increase of less than 5 dBA when the ambient sound level is less than 60 dBA L_{dn}/CNEL, less than 3 dBA when the ambient sound level is between 60 and 65 dBA L_{dn}/CNEL, or less than 1.5 dBA when the ambient sound level is greater than 65 dBA L_{dn}/CNEL would not be substantial. As shown in Table 4.11-18, the predicted traffic noise increases due to the Project would not be greater than 5 dBA on the studied roadways, which are predicted to be less than 60 dBA L_{dn}/CNEL for all conditions. Therefore, potential impacts at existing off-site noise-sensitive land uses adjacent to the Project would be less than significant.

Ground-Level HVAC

Based on the available architectural plans and other design information for the proposed Project, the proposed single-family homes and townhomes would be served by heating or air conditioning equipment, one at each residence. For the analysis of noise from HVAC equipment operation, a Bryant Model GH5SAN 60-A HVAC unit was modeled at ground-level in the center of the proposed pad. Table 4.11-19 contains the Bryant Model GH5SAN6000A sound power levels used in the model.

Table 4.11-19. Modeled Sound Power Levels (PWL) for Stationary Ground Level Sources (HVAC)

Sound Source	Overall L_{eq} (dBA)	A-Weighted dB at Octave Band Center Frequency (OBCF, Hz)								
		32.5	63	125	250	500	1000	2000	4000	8000
Bryant GH5SAN6000A	76	65	65	65	67	67	70	63	60	56

Source: Carrier 2012.

The aggregate noise emission from these outdoor-exposed HVAC sound sources has been predicted with the Datakustik CadnaA sound propagation program. CadnaA is a commercially available software program for the calculation, presentation, assessment, and prediction of environmental noise based on algorithms and reference data per International Organization of Standardization (ISO) Standard 9613-2, "Attenuation of Sound During Propagation Outdoors, Part 2: General Method of Calculation" (ISO 1996). The CadnaA computer software allows one to position sources of sound emission in a simulated three-dimensional (3-D) space atop rendered "blocks" of Project building masses having heights and footprints consistent with Project architectural plans and elevations. In addition to the above-mentioned sound source inputs and building-block structures that define the three-dimensional sound propagation model space, the following assumptions and parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 0.5, which intends to represent an average or blending of ground covers that are characterized by hard reflective pavements, building surfaces, and grassy or landscaped areas across the Project site and the surroundings;
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces such as the modeled building masses;
- Project buildings with facades featuring an acoustical absorption coefficient of 0.1;
- Off-site residential structures and the commercial buildings have not been rendered in the model;
- Calm meteorological conditions (i.e., no wind) with 68 degrees Fahrenheit and 50% relative humidity; and
- For purposes of impact assessment as evaluated herein, all of the modeled HVAC equipment are operating concurrently and continuously for a minimum period of 1 hour.

Table 4.11-20, Stationary Operations Noise Modeling Results, presents the predicted aggregate noise level exposures from these operating HVAC systems at four nearby off-site noise-sensitive receptors (i.e., existing outdoor residential land uses). Figure 4.11-2 displays the location of the studied noise-sensitive receptors and noise contours.

Table 4.11-20. Stationary Operations Noise Modeling Results

Studied Noise-Sensitive Receptor	Location	Predicted Project Attributed Stationary Operations Exposure Level	Applicable Sound Level Limit[1]	Limit Exceeded?
R1	Southeast corner of the multi-family residential building at 363 N. Calera Avenue	45 dBA L_{eq} 51 dBA L_{dn}	50 dBA L_{eq} 65 dBA L_{dn}	No
R2	In the front yard of the residence at 6214 N. Calera Avenue	46 dBA L_{eq} 52 dBA L_{dn}	55 dBA L_{eq} 65 dBA L_{dn}	No
R3	On the northern side of the residence at 6156 N. Fairvale Drive	36 dBA L_{eq} 42 dBA L_{dn}	45 dBA L_{eq}	No
R4	On the northeast corner of the residence at 939 E. Mauna Loa Avenue	36 dBA L_{eq} 42 dBA L_{dn}	45 dBA L_{eq}	No

Source: Figure 4.11-2.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels.

Aggregate noise emission from continuously operating outdoor-exposed ground-level HVAC units is expected to be below the City exterior nighttime noise threshold of 50 dBA L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.) or 65 dBA L_{dn} for exterior areas of residential land uses. Aggregate noise emission from the same continuously operating outdoor-exposed ground-level HVAC units is expected to be below the County exterior noise threshold of 45 dBA L_{eq} for 30 minutes out of a given hour for exterior areas of residential land uses. Further, the predicted Project-attributed stationary operations exposure noise level is lower than measured ambient noise levels (as shown in Table 4.11-2). Figure 4.11-2 depicts the prediction results of the sound emission model, with the color-coded bands of sound level displayed as a horizontal plane five feet above grade.

Therefore, stationary operational noise would result in a less than significant impact regarding the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the City and County noise ordinances. Therefore, the Project would result in less than significant impacts regarding a substantial permanent increase in ambient noise levels in the vicinity of the Project.

For informational purposes, as this would apply to newly constructed and occupied residential dwellings of the Project and thus external to CEQA impact significance considerations (that focus on project-to-community noise and vibration assessment, not *vice versa*), Title 24 CCR section 1206.4, Allowable interior noise levels, along with City and County code states that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. Therefore, the proposed Project would be required to comply with applicable building code requirements and the designs would incorporate exterior walls and appropriate windows to meet the 45 dB interior standards.

Baseline Condition Operations

As described in Chapter 2, Environmental Setting of this Draft EIR, the elementary school that currently occupies the Project site may be activated and is thus considered the baseline condition. Stationary operations from an occupied elementary school would include the same type of HVAC noise generated by outdoor-exposed equipment as the proposed Project's single-family homes and townhomes. The existing elementary school occupies approximately a quarter of the site while the proposed Project's homes would occupy the entire site and be designed

to accommodate more people than the school. However, the quantities of overall required minimum outside air and cooling tonnage to provide adequate indoor air quality and comfort for the school indoor spaces would likely be less than those demanded by the aggregate of fully occupied Project residential dwelling units. This means aggregate HVAC equipment noise emission evaluated in the preceding section (for the Project) would very likely be louder than that of noise produced from school HVAC systems. Furthermore, a newly operating school would not be expected to function at night, so its HVAC systems would be de-activated during nighttime hours or operate at minimal capacities much less than those needed to meet daytime demands when school is in session. Hence, stationary-source noise generated by the baseline condition (i.e., functioning school) operation would be expected to result in exposure levels at offsite noise-sensitive receivers that are comparable to or less than those appearing in Table 4.11-20 as predicted for the proposed Project. As a result, stationary operational noise from the baseline condition would result in a less than significant impact.

Threshold 4.11b **Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?**

Construction Vibration

Less-Than-Significant Impact. Construction activity can result in varying degrees of ground vibration and ground-borne noise at local receptors, depending on the equipment and methods used, distance to the affected structures, and soil type. Caltrans has been assembling data for vibration and ground-borne noise levels generated by heavy construction equipment during the building of transportation Projects for many years. The vibration and ground-borne noise levels from use of such equipment are representative for other types of construction efforts, not just transportation Projects, and are therefore widely employed to assess vibration and ground-borne noise levels from heavy equipment use for any effort. According to Caltrans (2020), the most important equipment relative to generation of vibration and ground-borne noise, and the vibration and ground-borne noise levels produced by such equipment, is illustrated in Table 4.11-21. Impact pile driving will not be used as a method of construction.

Table 4.11-21. Vibration Velocities and Ground-borne Noise Levels for Typical Construction Equipment

Equipment	PPV at 25 Feet (Inches Per Second)
Impact Pile Driver	0.644
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003

Source: Caltrans 2020b.
Note: PPV = peak particle velocity.

Ground-borne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. By way of example, for a bulldozer operating on-site and as close as the southern Project boundary (i.e., ~10 feet from the nearest occupied property), the estimated vibration velocity would be 0.244 ips per the equation as follows (FTA 2018) using 1.1 as the propagation exponent value consistent with Caltrans guidance (Caltrans 2020):

$PPV_{rcvr} = PPV_{ref} * (25/D)^{1.1} = 0.244 = 0.089 * (25/10)^{1.1}$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receptor position, PPV_{ref} is the reference value at 25 feet from the vibration source (the bulldozer), and D is the actual horizontal distance to the receptor. Other off-site receptors are further afield and are therefore expected to experience less vibration than that of the nearest occupied property (i.e., the nearby residences).

Because this predicted 0.244 ips PPV ground-borne vibration exposure level at the façade of the nearest receiving building façade is less than the 0.3 ips PPV threshold for building damage risk per Caltrans guidance for older residential structures, the impact would be less than significant.

Operational Vibration

Once operational, the proposed Project would not be expected to feature major producers of ground-borne vibration. Anticipated mechanical systems like HVAC units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. Also, the Project does not propose to introduce an industrial use or other use that would rely heavily on heavy-duty trucks or include other potential sources of vibration. On this basis, potential vibration impacts due to proposed Project operation would be less than significant.

Threshold 4.11c **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The nearest major public airport to the Project site is the Brackett Field Airport, over 5.9 miles to the southeast. At this distance, the Project site is well beyond the 65 dBA CNEL noise contour associated with existing aviation noise from operations at this nearest airport (County of Los Angeles 2015). Therefore, there would be no impact to Project on-site employees or future residents with respect to exposure to aviation noise.

4.11.5 Cumulative Impact Analysis

Future development within the City, including the Project, would affect the future (cumulative) ambient noise environment. While it is difficult to project exactly how the ambient noise conditions within the area would change, it is expected that traffic noise levels would increase due to the additional traffic generated by the Project and other development in the City and nearby unincorporated County. In the cumulative scenario, ongoing development in the City and unincorporated County would be expected to increase the ambient noise environment in the area as a result of increased traffic volumes, increased residential population and commercial activities.

The primary factor for the cumulative noise impact analysis is the consideration of future traffic volumes. Non-transportation noise sources (e.g., Project operation) and construction noise impacts are typically Project-specific and highly localized. Construction activities associated with anticipated development within the area would contribute temporarily to the noise levels in the cumulative ambient noise environment, but in a highly localized and transient manner. As other development occurs in the area, noise from different types of uses (e.g., traffic, aircraft, fixed noise sources) would continue to combine, albeit on a localized basis, to cause increases in overall background noise conditions within the area. As a result, such sources do not significantly contribute to cumulative noise impacts at distant locations and are not evaluated on a cumulative level.

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 . The past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, and on Figure 2-4, Cumulative Projects Location Map, of Chapter 2, Environmental Setting, of this Draft EIR. For purposes of noise, the geographical area of cumulative impacts varies by threshold, further detailed below.

Threshold 4.11a – Cumulative **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Noise in Excess of Standards

Implementation of the Project as well as cumulative development projects within its vicinity would all be subject to applicable noise standards (descriptions of the standards applicable within the City and unincorporated County are described throughout this section). On this basis, and because noise impacts of the Project with respect to relevant standards would be less than significant, the Project would not contribute to cumulative exceedances of noise standards, and its incremental effect would be a less-than-significant impact.

Temporary/Periodic Increases in Ambient Noise Levels

The Project would result in temporary noise increases during on- and off-site construction activities, as discussed under Threshold 4.11a above. The construction period of the Project has the potential to overlap with the construction of other development projects in the City and County. Due to the decrease in noise levels with distance and the presence of physical barriers (i.e., intervening buildings and topography), noise due to construction of other projects would not meaningfully combine with future development under the Project to produce a cumulative noise effect during construction. By way of illustration, if there are two concurrent construction projects of comparable sound emission intensity, and the activity nearest to the studied noise-sensitive receptor is compliant with the City and/or unincorporated County applicable noise thresholds, the other activity could be no closer than three times the distance of the receptor to the nearest activity and not make a cumulatively measurable contribution to the total and still result in a City-and/or County compliant noise exposure level. If two concurrent projects were close to a receptor, the cumulative noise would be one of the following:

- the louder (in dBA) of the two concurrent activities; or,
- a logarithmic sum of the two activity noise levels that, per acoustic principles, cannot be more than 3 dBA greater than the louder of the two individual noise-producing activities.

In sum, cumulative construction noise is likely to be dominated by the nearest or loudest activity to the receptor, and the combination will be no more than a barely perceptible difference (i.e., up to a 3 dBA change). Based on the cumulative project list for the Project, no nearby projects are located sufficiently close to common receptors to contribute meaningful construction noise levels. As such, due to attenuation over distance, there are no construction projects that would potentially contribute to construction noise that would, in combination with the Project, result in cumulative impacts . Thus, cumulative impacts associated with temporary increases in ambient noise levels would be considered less than significant.

Permanent Increase in Ambient Noise Levels

Off-Site Traffic

Future development from implementation of the Project along with the cumulative projects would generate off-site traffic noise. When calculating future traffic impacts, the traffic study included traffic attributed to both the Project and cumulative projects. Thus, future traffic noise prediction results with and without the Project already account for the cumulative impacts from cumulative projects contributing to traffic increases. Since the noise impacts are generated directly from the traffic analysis results, the Existing traffic with and without Project and Future traffic with and without Project predicted increases in traffic noise levels described herein already reflect cumulative impacts. As described herein, the noise level increases associated with both of these scenarios would not exceed applicable exterior noise standards. As such, anticipated increases would be below the FICON significance thresholds; hence, the incremental effect of the Project on off-site traffic noise is not cumulatively considerable. Cumulative off-site traffic noise impacts would be less than significant.

Stationary Sources

Noise from operation of stationary mechanical equipment added to the outdoor ambient sound environment as a result of Project implementation would include permanent on-site noise sources (e.g., ground-level HVAC equipment) as addressed under Section 4.11.4, Impact Analysis, under Threshold 4.11a. A cumulative impact could occur if noise produced from such sources due to implementation of the Project were to combine with noise produced from the operation of other cumulative projects in the vicinity to create a cumulatively significant permanent increase in ambient noise levels. The nearest related project is approximately 2,500 feet to the southeast of the Project site. The noise produced from this related project would be obstructed by residential structures and major roadways. As such, cumulative noise emission from the Project's HVAC equipment and the related project would attenuate with distance and can be occluded by structures and terrain. Additionally, the operation of the Project, along with the operation of other cumulative projects, would be subject to applicable requirements from the City and/or County noise ordinance, which limits the exterior noise levels at residences. Hence, for these reasons, cumulative impacts to outdoor ambient noise levels resulting from Project stationary sources would be less than significant.

Threshold 4.11b – Cumulative **Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?**

Ground-borne vibration attenuates very rapidly with distance. For example, at 25 feet from an operating heavy dozer the reported vibration level is 0.089 ips PPV; at a distance of 50 feet the vibration level would be 0.03 ips PPV; and at 200 feet the vibration level would be 0.004 ips PPV. No portion of the Project construction limits would be closer than approximately 200 feet from any of the cumulative projects. With a Project construction-related vibration contribution of no greater than 0.004 ips PPV to construction vibration levels occurring at one of the cumulative Project sites, there would be a less than significant impact and the Project would not result in a cumulatively considerable contribution regarding generation of excessive ground-borne vibration or ground-borne noise levels.

Threshold 4.11c – Cumulative **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?**

The proposed Project is not located within the vicinity of a private airstrip or within 2 miles of a public airport. Additionally, operations from the public airport do not affect the noise exposure for the Project. Therefore, noise associated with aircraft overflights for any of the cumulative projects would be less than significant, and the Project would not result in a cumulatively considerable impact.

4.11.6 Mitigation Measures

MM-NOI-1 Temporary Construction Noise Reduction for Noise Sensitive Receptors. Prior to the issuance of a demolition permit, the Project applicant/developer shall ensure that the following measures are included in the construction contractor's contract specifications and that the following measures are implemented and monitored for compliance throughout construction. Proof of compliance with these measures (i.e. the Contractor's specifications) shall be logged by the contractor and made available to the City and County for inspection and confirmation of compliance throughout construction activities prior to issuance of a permit.

- During construction, equipment must have supplier-approved sound muffling devices (e.g., engine air intake or exhaust treatment) installed and used in compliance with relevant industry standards and California Occupational Safety and Health (Cal/OSHA) regulations pertaining to construction noise, which shall be properly maintained and used at all times such equipment is in operation.
- During the building construction phase and at the nearest receptor distances (i.e. 20 feet from the construction equipment), operation of forklifts shall be limited to 6 hours per day.
- Stationary construction equipment shall be placed so that emitted noise is directed away from noise-sensitive receptors.
- Equipment staging areas shall be located so as to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest to the project site during the construction period.
- All noise-producing construction activities, including warming-up or servicing equipment and any preparation for construction, shall be limited to between 7:00 a.m. and 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturdays.
- A 12-foot-tall temporary noise barrier shall be erected along the western boundary for the entirety of construction. A 12-foot-tall temporary noise barrier shall be erected along the northern boundary for the Site Preparation & Grading, Paving, and Building Construction Phases. A ten (10) foot tall temporary noise barrier shall be erected along the eastern and southern project boundaries during the entirety of construction.
- Temporary solid noise barriers shall be constructed of 3/4-inch Medium Density Overlay (MDO) plywood sheeting, or other material of equivalent utility and appearance having a surface weight of 2 pounds per square foot or greater. Should a flexible barrier

be used, the flexible acoustical barrier (a.k.a., "blanket", "curtain", or "partial enclosure") shall consist of durable, flexible single or composite material featuring a noise barrier layer optionally bonded to sound-absorptive material on the side intended to face the noise-producing equipment or activity of concern. The acoustical material used shall have a Sound Transmission Class (STC) of STC-25 or greater, based on certified sound transmission loss (TL) data taken according to American Society of Testing and Materials (ASTM) Test Method E90 and exhibited by the material supplier.

- Should building construction phase activities occur less than 110 feet but no closer than 30 feet horizontal distance to an on-site exterior first-floor noise-sensitive receptor (NSR), an eight (8) foot tall temporary noise barrier shall be erected on sufficient extent of the NSR property parcel boundary to block line of sight between the affected occupied home and the noise-producing activity. Should the NSR be located on the 2nd floor, a sixteen (16) foot-tall temporary noise barrier shall be erected.

4.11.7 Significance Conclusion

Threshold 4.11a. The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project or for occupied on-site receptors in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and impacts would be **less than significant with mitigation**.

Threshold 4.11b. The Project would not result in generation of excessive ground-borne vibration or ground-borne noise levels, and impacts would be **less than significant**.

Threshold 4.11c. The Project site is not 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, and there would be **no impact**.

4.11.8 References

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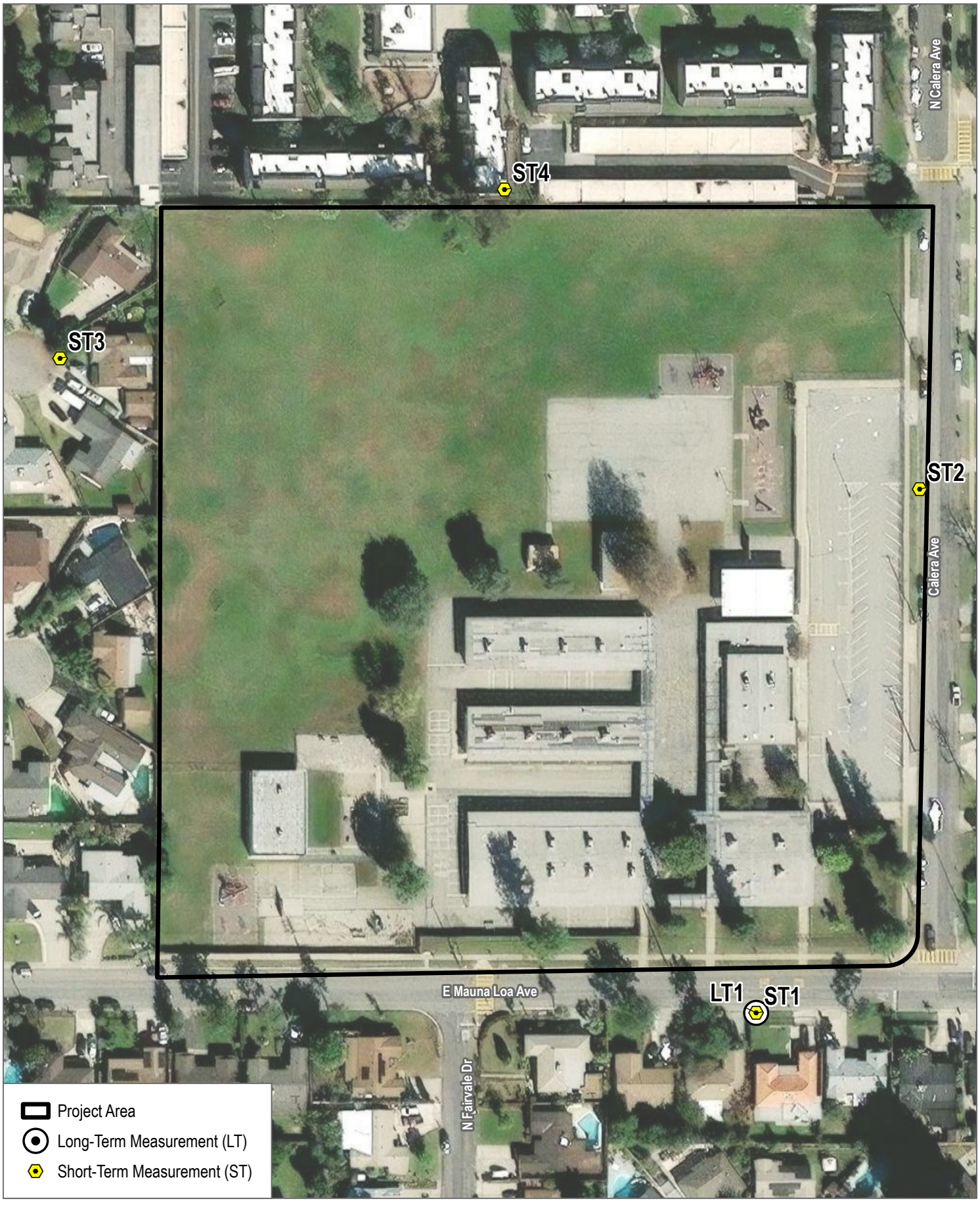
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SOURCE: MAXAR, 2024; CadnaA

DUDEK

0 50 100 Feet

FIGURE 4.11-1

Noise Measurement Locations

Delaney Square Residential Project

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SOURCE: MAXAR, 2024; CadnaA

FIGURE 4.11-2

Predicted Stationary Source Operation Noise from Proposed Project (at 5' above grade)

Delaney Square Residential Project

DUDEK

0 62.5 125 Feet

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4.12 Population and Housing

This section describes the existing population and housing conditions within the Project site and vicinity, identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, level of significance, and references. The information contained in this section is based on local and regional forecasts of the Project area from the Southern California Association of Governments (SCAG) and the General Plan. All population, housing, and employment data is based on the most recent U.S. Census Bureau, California Department of Finance (DOF), and Employment Development Department (EDD) data. Other sources consulted are listed in Section 4.12.8, References.

4.12.1 Existing Conditions

4.12.1.1 Existing Population, Housing, and Employment Data

Southern California Association of Governments Region Overview

SCAG is the nation's largest metropolitan planning organization, representing six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura), 191 cities, and approximately 19 million residents. The Project site is located in the City of Azusa (City) within Los Angeles County (County). The SCAG region is a major hub of global economic activity, representing the 16th largest economy in the world and contains two of the largest ports in the nation. At the time of the issuance of the NOP, the applicable regional growth forecasts were included in Connect SoCal 2024 as adopted in April 2024 (SCAG 2024a).

SCAG completes a comprehensive update of the RTP/SCS every four years to update the regional growth forecast, integrate new projects and programs funded by the six county transportation commissions, confirm alignment with federal and state performance standards and environmental requirements, and to review and refine regional strategies to address gaps in achieving the region's vision for greater mobility, sustainability, and economic prosperity. The plan is a "living" document that can be amended and refined in between the four-year cycles, as necessary, to address regionally significant changes in transportation programs and funding.

The adopted RTP/SCS (also referred to as Connect SoCal 2024) was approved in April 2024. Connect SoCal 2024 is a long-range planning document that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable regional growth pattern. Over 4,000 individual transportation capital projects and programs through 2050, advanced through local and countywide plans, form the foundation of Connect SoCal 2024.

A combination of estimates and forecasts for population, households, and employment within the SCAG region and the County, is included in SCAG's Demographics and Growth Forecast Technical Report (SCAG 2024b) and is presented below in Table 4.12-1.

Table 4.12-1. Regional Population, Households, and Employment Estimates and Forecasts

	2025	2050	Total Change	Percent Change
SCAG Region				
Population	19,068,000	20,909,000	2,079,000	11.04%
Households	6,632,000	7,814,000	1,549,000	24.72%
Employment	9,235,000	10,276,000	1,339,000	14.98%
Los Angeles County				
Population	10,040,000	10,793,000	775,000	7.74%
Households	3,594,000	4,155,000	732,000	21.38%
Employment	5,131,000	5,461,000	519,000	10.50%

Source: SCAG 2024b

County and City Demographic Overview

Population Growth

Table 4.12-2 presents historic data and projections for population growth in the City and the County between 2024 and 2050 based on data from the U.S. Census Bureau and from SCAG's Connect SoCal 2024.

Table 4.12-2. City and County Population Estimates and Forecasts (2024–2050)

Year	City of Azusa Total Residents	Los Angeles County Total Residents
2024	48,383 [a]	9,832,684 [a]
2035	51,150 [b]	10,449,000 [c]
2050	53,010 [b]	10,793,000 [c]
Forecasted Change 2024–2050	**4,627**	**960,316**
Total Percentage Change 2024–2050	**9.56%**	**9.77%**
Average Annual Percentage Change 2024–2050	**0.36%**	**0.38%**

Sources:
[a] U.S. Census Bureau 2025.
[b] SCAG's Connect SoCal does not have estimated population numbers for City for the years 2035 and 2050. As such, the 3.1 persons per household ratio was used to anticipate the City's 2035 population. 3.1 persons per household (DOF 2025a) x 16,500 households for 2035 forecasts (SCAG 2024b) = 51,150 (rounded) persons anticipated for 2035. 3.1 persons per household (DOF 2025a) x 17,100 households for 2050 forecasts (SCAG 2024b) = 53,010 (rounded) persons anticipated for 2050.
[c] SCAG 2024b

As shown in Table 4.12-2, an additional 4,627 people are anticipated to reside in the City between 2024 and 2050. The City's projected total and average annual rate of population growth is on par with (albeit marginally lower than) the County's population growth rate when compared over the same time period. The General Plan Draft EIR anticipated that the City's population would reach 56,336 persons by 2020 (City of Azusa 2003). This represents more persons in comparison to existing conditions as presented in Table 4.12-2, which estimates approximately 48,383 persons living in the City in 2024.

Household Growth

Table 4.12-3 presents historic data and projections in the City and the County's housing units between 2025 and 2050 based on data from the California DOF 2025 estimates and from SCAG's Connect SoCal 2024.

Table 4.12-3. City and County Housing Estimates and Forecasts (2025–2050)

Year	City of Azusa Total Housing Units	Los Angeles County Total Housing Units
2025 [a]	15,711	3,726,527
2035 [b]	16,500	3,933,000
2050 [b]	17,100	4,155,000
Forecasted Change 2025–2050	**1,389**	**428,473**
Total Percentage Change 2025–2050	**8.84%**	**11.50%**
Average Annual Percentage Change 2025–2050	**0.35%**	**0.46%**

Sources:
[a] DOF 2025b.
[b] SCAG 2024b.

As shown in Table 4.12-3, the County's projected total and average annual housing growth is higher than the City's housing growth rate when compared over the same time period. According to Table 4.12-3, a total of 1,389 new households are forecasted in the City between 2025 and 2050. In addition, land use buildout projections according to the General Plan Draft EIR anticipated approximately 15,965 housing units would be built by 2020 (City of Azusa 2003). However, in comparison to 2025 conditions, the City has not met the projected household growth anticipated in the General Plan. When comparing the General Plan's 2020 projections to the DOF's 2025 estimates, there is a difference of254 additional housing units that can be accommodated.[1] Given this, the City's housing stock is within the growth projections anticipated under the General Plan.

Employment Growth

Table 4.12-4 presents historic data and forecasts of employment in the City and the County between 2025 and 2050 based on data from SCAG's Connect SoCal and EDD.

Table 4.12-4. City and County Employment Estimates and Forecasts (2025–2050)

Year	City of Azusa Total Employment	Los Angeles County Total Employment
2025 [a]	24,500	4,743,500
2035 [b]	20,800	5,386,000
2050 [b]	21,000	5,461,000
Forecasted Change 2025–2050	**-3,500**	**717,500**
Total Percentage Change 2025–2050	**-14.29%**	**15.13%**
Average Annual Percentage Change 2025–2050	**-0.57%**	**0.61%**

Sources:
[a] EDD 2025. [b] SCAG 2024b

[1] 15,965 units (anticipated in the General Plan) – 15,711 units (in the City in 2025) = 254 units difference between existing conditions and the General Plan buildout conditions.

As shown in Table 4.12-4, the County's projected total and average annual rate of growth in employment is higher than the City's growth rate in employment when compared over the same time period. Based on existing conditions reported by EDD and SCAG's projections, a total of 3,500 jobs are projected to be lost in the City between 2025 and 2050. However, SCAG's data shows that employment on a regional Countywide scale is growing.

City of Azusa General Plan

General Plan Buildout

The General Plan estimated buildout projections for the City based on the land use designations throughout the City. Table 4.12-5 includes the General Plan EIR's 2020 buildout projections for population and dwelling units in comparison to 2003 conditions.

Table 4.12-5. Azusa General Plan Buildout Projections for 2020

City of Azusa	2003	2020
Population	47,150	56,336
Dwelling Units	14,433	15,965

Sources: City of Azusa 2003.

The City's 2023 Housing Element Update to the General Plan includes buildout projections for the City until 2045. Table 4.12-6 includes the Housing Element's 2045 buildout projections for population (based on SCAG's forecasts).

Table 4.12-6. Azusa Housing Element Update Projections for 2045

City of Azusa	2010	2020	2045	% Change 2010-2020	% Change 2020-2045
Population	46,361	49,658	56,200	6.6%	11.6%

Sources: City of Azusa 2023, Table H-3.1.

As shown in Table 4.12-5, the General Plan anticipated a buildout population of 56,336 persons and 15,965 housing units by 2020. At the time, SCAG projected a population of 50,274 persons by 2020 (City of Azusa 2003). The General Plan EIR assumed that growth would occur at a constant rate, and anticipated 6,062 more persons than SCAG projected for 2020. According to the 2010 U.S. Census Bureau, the City had reached a population of 46,361 in 2010, while the 2020 Census found the City's population to be 50,204 in 2020 (U.S. Census Bureau 2025). Therefore, when compared to the U.S. Census Bureau data for 2020, the General Plan overestimated the 2020 population by approximately 6,132 persons.

Regional Housing Needs Allocation

The Regional Housing Needs Assessment (RHNA) is part of the State's housing element law that determines the projected and existing housing needs for each jurisdiction in the State. State Housing Element law requires that a local jurisdiction accommodate their share of the region's projected housing needs for the planning period. State law mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community (City of Azusa 2023). SCAG is responsible for allocating the RHNA to individual jurisdictions within the region. The RHNA planning period is between October 15, 2021 through October 31, 2029 (i.e., 2021–2029 RHNA).The RHNA is distributed by income category for the 2021-2029 Housing Element: Very Low/Extremely Low Income (up to 50% of Area Median Income (AM)]); Low Income (>50% to 80% of AMI); Moderate

Income (>80% to 120% of AMI); and Above Moderate Income (more than 120% of AMI). The City's 2021-2029 RHNA allocation calls for development of 2,651 total units distributed as follows:

- **Very Low/Extremely Low Income:** 760 units
- **Low Income:** 368 units
- **Moderate Income:** 382 units
- **Above Moderate Income:** 1,141 units

Jobs/Housing Balance

A jobs/housing balance is a ratio that indicates the number of available jobs in the City compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall vehicle miles traveled (VMT) by maintaining a balance between employment and housing in close proximity (e.g., within the City limits). A balanced community would have a match between employment and housing opportunities so that most of the residents could also work in the community. A jobs/housing balance in the range of 0.75 to 1.5 is considered beneficial for reducing VMT (EPA 2014). The current jobs/housing balance in the City is approximately 1.56, which translates to being a slightly jobs-rich community (DOF 2025b; EDD 2025).[2] According to SCAG projections, the City's jobs/housing balance is anticipated to decrease to approximately 1.23 by 2050, which would indicate a balanced community within the range of 0.75 to 1.5 (SCAG 2024b).[3]

Project Site Demographics

The Project is proposed on a 9.77-acre site with approximately seven school buildings associated with the former Powell Elementary School. As discussed in Chapter 2, Environmental Setting, this EIR assumes an occupied and operational Powell Elementary School to establish the baseline conditions for the property. Powell Elementary School is owned by Azusa Unified School District and was operated as an elementary school until 2023. Because the property has been operational as an elementary school in recent years, is still appropriate for use as an elementary school, and could theoretically come back into operation at any point consistent with the land use designation for the property, it is appropriate to assume an operational school as the baseline condition for the proposed Project. It is not appropriate to assume a vacant property as the baseline condition because the site is currently developed, and it is not reasonably foreseeable to assume the property would stay vacant in perpetuity. As such, the baseline conditions and environmental analyses of the Project assume occupancy of Powell Elementary School based on the school's average enrollment of 287 students between the 2018-2023 school years to establish the baseline conditions. Employment on the Project site is estimated to be a total of 23 employees associated with the 2021-2022 school year at Powell Elementary (California Department of Education 2025).

4.12.2 Regulatory Requirements

4.12.2.1 Federal

There are no federal programs, policies, or regulations related to population or housing that are applicable to the Project.

[2] Using the data presented in Tables 4.12-3 and 4.12-4, above, the City's current housing stock of 15,711 units and 24,500 jobs would represent a 1.56 jobs to housing ratio.

[3] Using the data presented in Tables 4.12-3 and 4.12-4, above, the City's future housing stock of 17,100 units and 21,000 jobs would represent a 1.23 jobs to housing ratio.

4.12.2.2 State

Section 65580 of the Government Code (Housing Element Law)

Pursuant to Government Code section 65580, a Housing Element of a General Plan must contain local commitments to the following:

- Provide sites with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction's RHNA for each income level. The RHNA is the only population and/or housing requirement that applies to the General Plan Update.
- Assist in the development of adequate housing to meet the needs of lower and moderate-income households.
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status or disability.
- Preserve assisted housing developments for lower income households.

Department of Housing and Community Development

State law requires that jurisdictions provide their fair share of regional housing needs. The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. HCD, in cooperation with local governments and councils of governments, is charged with making a determination of the existing and projected housing need as a share of the statewide housing need of their city or region. The housing need is determined for four broad household income categories: very low (households making less than 50% of median family income), low (50% to 80% of median family income), moderate (80% to 120% of median family income), and above moderate (more than 120% of median family income). The intent of the future needs allocation by income groups is to relieve the undue concentration of very low and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.

The "fair share" allocation process begins with the California Department of Finance's projection of statewide housing demand for an 8-year period, which is then apportioned by the HCD among each of the state's official regions, which are represented by councils of government. A local jurisdiction's fair share of regional housing need is the number of additional dwelling units that would need to be constructed during a given 8-year planning period. Once a local government has received its final RHNA, it must revise its Housing Element to show how it plans to accommodate its portion of the region's housing need.

4.12.2.3 Regional and Local

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the designated Metropolitan Planning Organization, SCAG is mandated to research and develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG is responsible for planning efforts that result in the RTP and the Federal Transportation Improvement Program; SCAG

also develops the SCS to reduce greenhouse gas emissions as required by the Sustainable Communities and Climate Protection Act (Senate Bill 375).

SCAG is responsible for developing demographic projections; developing land use, housing, employment, transportation programs and strategies for the South Coast Air Quality Management District; ensuring that the RTP and the Federal Transportation Improvement Program conform to the State Implementation Plans for transportation-related criteria air pollutants, per the Clean Air Act; preparing the Regional Housing Needs Assessment, including planning for future population, housing, and employment growth throughout the SCAG region; and preparing the Southern California Hazardous Waste Management Plan. SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts within the SCAG region. SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of the anticipated growth. Growth forecasts contained in the RTP/SCS for the County and the City are used in this section to analyze population, housing, and employment forecasts.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill 375. In April 2024, the SCAG Regional Council adopted the most recent RTP/SCS (also referred to as Connect SoCal). Connect SoCal is a long-term plan for the Southern California region that details investment in our transportation system and development in our communities to meet the needs of the region both today and tomorrow (SCAG 2024a). The horizon year for Connect SoCal is 2050 (SCAG 2024a).

To address the mobility challenge of the region's continuing roadway congestion, Connect SoCal proposes transportation investments in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways; arterials; goods movement; aviation and airport ground access; and operations and maintenance projects. Connect SoCal recommends local jurisdictions accommodate future growth within existing urbanized areas, particularly near existing transit, to reduce VMT, congestion, and greenhouse gas emissions. The Connect SoCal approach to sustainably manage growth and transportation demand would reduce the distance and barriers between new housing, jobs, and services and would reduce vehicle travel and greenhouse gas emissions. As part Connect SoCal, SCAG develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region.

Regional Housing Needs Allocation (RHNA)

The RHNA is mandated by the State Housing Law as part of a periodic process of updating local housing elements in city and county general plans. The RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for eight-year periods. The RHNA provides an allocation of the existing and future housing needs by jurisdiction that represents the jurisdiction's fair share allocation of the projected regional population growth. The future housing needs allocations are broken down by income level so that each jurisdiction is responsible for the development of affordable housing units to meet future housing needs.

The 6th Cycle RHNA Allocation Plan is the RHNA that was in effect at the time that the NOP was issued for the Project and covers a planning period of October 2021 through October 2029; it shows a need for 1,341,827 additional housing units within the SCAG region (SCAG 2021).

SCAG is required to develop a final RHNA methodology to distribute existing and projected housing need for the 6th cycle RHNA for each jurisdiction, which covers the planning period October 2021 through October 2029. Several guiding principles that SCAG staff has developed to use as the basis for developing the distribution mechanism for the RHNA methodology. These principles are based on the input and guidance provided by the RHNA Subcommittee during their discussions on RHNA methodology between February and June 2019.

1. The housing crisis is a result of housing building not keeping up with growth over the last several decades. The RHNA allocation for all jurisdictions is expected to be higher than the 5th RHNA cycle.
2. Each jurisdiction must receive a fair share of their regional housing need. This includes a fair share of planning for enough housing for all income levels, and consideration of factors that indicate areas that have high and low concentration of access to opportunity.
3. It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life.

HCD provided SCAG a final regional determination of 1,341,827 units for the 6th cycle RHNA on October 15, 2019. Based on SCAG's determination of existing need and projected needs, which considers anticipated vacancies and projected household growth, the regional existing need for additional housing units has been determined to be 836,857 units, and the regional projected need is 504,970 units (SCAG 2020a). HCD's regional determination of 1,341,827 exceeds SCAG's 2020–2045 household growth forecast of 1,297,000 by 3.46% (SCAG 2020a).

SCAG's 6th Cycle RHNA allocation to local jurisdictions based on the Regional Council-approved Final RHNA Methodology described above includes the allocations shown in Table 4.12-6. On March 22, 2021, HCD approved SCAG's adopted 2021-2029 RHNA Plan. This is an increase of 1,872 units, from 779 units for the City in the prior 2014-2021 RHNA allocation to 2,651 units for the current 2021-2029 RHNA allocation period.

Table 4.12-7. SCAG's 6th Cycle Final RHNA Allocation

Total	Very-Low Income	Low Income	Moderate Income	Above Moderate Income
SCAG Region				
1,341,827	351,796	206,807	223,957	559,267
Los Angeles County				
812,060	217,273	123,022	131,381	340,384
City of Azusa				
2,651	760	368	382	1,141

Source: SCAG 2021.

City of Azusa 2004 General Plan

The General Plan was adopted in 2004 and the 2021-2029 Housing Element was updated in 2023. A General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code section 65302 requiring local preparation and adoption of General Plans. The General Plan should be viewed as a dynamic guideline to be refined as the physical environment of the City's changes. The General Plan includes the following mandated and optional elements, organized into three "Elements of Place", which include smaller elements within them, applicable to the Project: Build Environment (City Design Element, Mobility Element, Housing Element, Historical and Cultural Resources Element, and Infrastructure

Element), Economy and Community (Economic Development Element and Public Services Element), and Natural Environment (Open Space and Biological Resources Element, Geological Hazards Element, Mineral Resources Element, Air Quality Element, and Noise Element).

The Built Environment Element

The Built Environment Element focuses on five areas that have are or have been constructed by people: City Design (land use and urban form), mobility, housing, historic and cultural resources, and infrastructure. The City Design Element of the Built Environment Element fulfills the requirement of a land use element, specified in Government Code section 65302(a). The City Design Element has the broadest scope of all the General Plan elements. It is intended to portray the future direction of the City. The City Design Element aims to repair the City's damaged urban form and is a guide for future land uses in the City. Under state law, the City's other ordinances and plans, for example the Development Code, must be consistent with the General Plan, and therefore with The City Design Element. The Mobility, Housing, and Infrastructure Elements are required elements, while the Historic and Cultural Resources Element is an optional element.

Economy & Community Element

The Economy and Community Element is concerned with the economic health of the City and the public services that serve the City's communities. It focuses on the expansion and maintenance of the City's economic base and on the enhancement of the City's business climate. Economy and Community goals and policies direct City activities toward maximizing the City's economic development potential and to preserve and enhance the City's public services. The Economy and Community Element is an optional element in the General Plan. Government Code section 65303 enables cities to adopt optional general plan elements. The City elected to include an Economy and Community Element because it focuses on issues significant to the City's future that are not addressed elsewhere.

Natural Environment

The Natural Environment Element focuses on the natural environment, including air, water, flora and fauna, minerals, geology, and noise. The specific elements of the Natural Environment Element include: Recreation, Open Space and Biological Resources, Geologic Hazards, Mineral Resources, Air Quality, and Noise. These elements fulfill the requirements of the Conservation, Open Space, Noise, and Safety Elements, as specified in Government Code sections 65302(d), 65302(e), 65302(f), and 65302(g), respectively. These elements guide the City's planning efforts to enhance public health, safety, environmental conservation, and quality of life by ensuring access to recreation, protecting natural resources, and mitigating hazards and pollution.

Housing Element Update

In 2023, the City amended its Housing Element, which was originally adopted in 2022. The Housing Element is one of the seven required General Plan elements mandated by state law. State law requires that each jurisdiction's Housing Element consist of "identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement and development of housing." The Housing Element must analyze and plan for housing for all segments of the community. This Housing Element covers the planning period from October 2021 to October 2029, consistent with the State-mandated update required for all jurisdictions within the SCAG region.

The following goals and policies from the latest Housing Element are applicable to the Project:

Goal H-2: Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter and owner households.

Goal H-3: Encourage a variety of housing types to meet the existing and future needs of Azusa residents.

Policy H-3.1: Accommodate a range of residential development types in Azusa, including low-density single-family homes, moderate-density townhomes, higher-density multi-family units, and residential/commercial mixed use in order to address the City's share of regional housing needs.

Policy H-3.4: Encourage development and long-range planning that uses compact urban forms that foster connectivity, walkability, and use of alternative transportation modes, in particular within the Azusa TOD planning area.

Policy H-3.7: Encourage infill development and recycling of land to provide adequate residential sites and support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development

4.12.3 Thresholds of Significance

The significance criteria used to evaluate a project's impacts to population and housing are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to population and housing would occur if the Project would:

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.

4.12.4 Impacts Analysis

Threshold 4.12a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. For the reasons discussed below, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Construction

Construction activities at the Project site would lead to the temporary need for construction workers, whom may come from the City, other areas of the County, or elsewhere within the region. The Project involves common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. Additionally, Project construction is anticipated to begin in November 2026 and end in November 2029, spanning approximately 36 months. Different Project construction activities require specific skill sets for a much shorter duration than the overall construction schedule. Because most construction workers would not be working continuously and would only be needed for various components of the Project (e.g., grading contractors,

construction contractors, drywall installers, electricians, plumbers, etc.), it is reasonable to assume that most workers/crews would work at the Project site on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Because the demand for construction workers would be short-term, and because the Project site is located within an urban metropolitan region with a high diversity of skilled labor available, a permanent need for new workers to relocate in order to accommodate the Project's temporary construction workforce is not anticipated. Any changes in the City or regional population, housing, or employment due to short-term construction activities would result in a less-than-significant impact.

Operation

Implementation of the Project would require a Zone Change from the Project site's existing Institutional/School (INS) zoning to NG3-MED. In addition, the Project would also require a General Plan Amendment to change the General Plan land use designation from Institutional/School to Medium Density Residential (which allows up to 15 dwelling units per acre). Therefore, the Project would directly result in the building of new residential land uses on site. Given this, the Project would result in unplanned population growth not considered under the General Plan or SCAG's Connect SoCal 2024.

The Project would demolish the seven existing buildings on the Project site. After demolition, the Project would redevelop the site with detached single-family cluster homes and townhomes for a total of 128 dwelling units and associated amenities and site improvements. The following discussion demonstrates that the proposed Project's population, housing, and employment growth is not considered substantial unplanned growth.

Population Projections

Using estimates from the DOF, the City maintains, on average, 3.1 persons per household (DOF 2025a). Assuming 3.1 persons per household, the proposed Project's 128 residential units would accommodate up to 397 individuals[4]. Additionally, it is likely that the proposed residential units would accommodate a combination of existing residents and new residents that either currently work within the City and/or new residents that would be hired as a result of projected employment generation within the City.

The U.S. Census Bureau estimates that the City had a total of 48,383 residents in 2024 and SCAG estimates the City would grow to approximately 53,010 residents by 2050 (see Table 4.12-2). Additionally, the City's population is projected to be approximately 51,150 residents by 2035. Based on the growth projections presented in Table 4.12-2, between 2024 and 2050, the City's population is anticipated to increase by approximately 4,627 residents. The Project would represent approximately 8.6% of the population growth assumed by SCAG between 2024 and 2050[5] and 14.3% of the population growth assumed by 2035 in the near term.[6] Therefore, the Project's 397 residents would be within the SCAG growth projections assumed for the City.

As discussed above, implementation of the Project would require a General Plan Amendment to change the land use designation from Institutional/School to Medium Density Residential and a Zone Change from INS to NG3-MED. As such, the Project would introduce new residential land uses on an existing institutionally designated and zoned property, which would not have been anticipated in the General Plan growth projections. Although residential

4 This estimated number of new residents conservatively assumes full occupancy of all units. 128 new housing units x 3.1 persons pre household = 397 residents generated by the Project.
5 (397/4,627) x 100 = 8.58 or 8.6%
6 (397/51,150 – 48,383) = (397/ 2,767) x 100 = 14.3%

population growth on the Project site was not accounted for in the General Plan growth projections, the City's actual population growth in recent years has lagged behind General Plan projections. As discussed above in Section 4.12.1.1, Existing Population, Housing, and Employment Data, when compared to more recent U.S. Census Bureau data for 2020, the General Plan overestimated the 2020 population of the City by approximately 6,132 persons, which exceeds the anticipated residential population of the Project (i.e., 397 peoples). Moreover, SCAG estimates a 2045 City population of approximately 56,200 people (see Table 4.12-6); therefore, the Project's residential growth is also within the long-term projections for the City. As a result, the Project would not exceed SCAG projections for population growth.

Because the Project would support the General Plan and SCAG's goals and strategies for growth in the region and the state's goals for increasing the housing stock for all income groups (as described in Section 4.10, Land Use and Planning), and because the Project's anticipated population is within SCAG's growth projections, the Project would not induce substantial unplanned population growth and impacts would be less than significant.

Employment Projections

As described above in Section 4.12.1.1, Existing Population, Housing, and Employment Data, this EIR assumes an occupied and operational Powell Elementary School with an employment of 23 employees associated with the 2021-2022 school year (California Department of Education 2025). The Project would demolish the existing uses on the Project site, resulting in a loss of 23 jobs in the City. As shown in Table 4.12-4, the County's projected total and average annual rate of growth in employment is higher than the City's growth rate. Projections show a loss of jobs within the City; however, an increase in jobs on a regional Countywide scale. The current jobs/housing balance in the City is approximately 1.56, which indicates a slightly above balanced, or a jobs-rich community. With the loss of jobs on site, the City's jobs/housing balance would change nominally to 24,477 jobs[7] compared to the City's current housing stock of 15,711 units (see Table 4.12-3), or a jobs/housing balance of 1.56. As a result, the City would continue to be a slightly jobs-rich community under existing conditions. The Project's contribution to total jobs lost in the City would be considered nominal and would not substantially change the City's overall jobs/housing balance. As such the Project would not induce substantial unplanned population growth associated with employment, and impacts would be less than significant.

Housing Projections

According to SCAG projections set forth in Connect SoCal 2024, the County is anticipated to have an increase of 428,473 units between 2025 and 2050, and the City is anticipated to develop an additional 1,389 dwelling units over the same time period (see Table 4.12-3). The Project's 128 dwelling units would represent 0.03% of SCAG's projected housing growth for the County[8] and 9.22% of the projected housing growth for the City[9] within the 25-year period, and construction of the Project would not exceed these projections.

As discussed above under "Population Projections," the Project would introduce new residential land uses on an institutionally-designated property, under which growth projections for 2050 would have anticipated no housing growth. However, SCAG states that consistency with these growth projections is not binding and that Connect SoCal 2024 does not supersede or otherwise affect a local jurisdiction's authority or decisions on future development, and there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be

7 Using the data presented in Table 4.12-4, above, the City's currently maintains 24,500 jobs. With the loss of 23 jobs, the resulting employment is 24,477 jobs.
8 (128/428,473) x 100 = 0.0299 or 0.03%
9 (128/1389) x 100 = 9.215 or 9.22%

consistent with them (SCAG 2020b). As such, housing growth as a result of the Project would be accommodated on the regional level. Therefore, although the Project site did not account for housing growth under Connect SoCal 2024, it does not represent a substantial increase in housing growth that would exceed SCAG's overall growth projections for the City. Given this, the Project would not result in substantial unplanned housing growth.

California's housing element law requires that each city and county develop local housing programs designed to meet its fair share of existing and future housing needs for all income groups. This effort is coordinated when preparing the state-mandated Housing Element of the General Plan. The fair share allocation seeks to ensure that each jurisdiction accepts responsibility for the housing needs of, not only its resident population, but for all households that might reasonably be expected to reside within the jurisdiction, particularly lower income households. This assumes the availability of a variety and choice of housing accommodations appropriate to their needs, as well as certain mobility among households within the regional market.

Table 4.12-7 provides the 6th Cycle RHNA allocation for the planning period between 2021 to 2029. The City's fair share allocation for the current housing cycle is a total of 2,651 units. This indicates that between the years 2021 to 2029, the City needs to accommodate at least 2,651 housing units, consisting of a variety of housing types to accommodate very low, low, moderate, and above moderate-income households to keep pace with housing demand. The Project would create new housing and would include 128 market-rate units. According to the City's 5th Cycle RHNA data for 2013 to 2021, the City did not meet its mandated allocation for above moderate-income (market-rate) housing, or very low- and low-income housing, indicating the City has historically underperformed (HCD 2025). This Project would address the existing shortfall in housing production for above moderate housing, which is consistent with regional planning goals under RHNA's 6th Cycle allocation.

As such, the Project's 128 new dwelling units would assist the City in meeting the mandated RHNA allocation for above moderate-income units and would be consistent with and supportive of the City's Housing Element projections for new residential units within the City. The Project would not exceed SCAG's projections or induce substantial unplanned population growth. Therefore, the impact is less than significant.

Threshold 4.12b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is developed with seven existing school buildings. No housing is located on the Project site. Thus, Project implementation would not require demolition of existing housing or displace people or housing. The Project would include the construction of a residential development that would add 128 housing units to the City. The Project would not displace any existing residents or housing units requiring construction of replacement housing elsewhere; thus, there would be no impact.

4.12.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130. The geographic context for the cumulative impact analysis as it related to population and housing is the City of Azusa and the past, present, and reasonably foreseeable future projects with residential components. Table 4.12-8 reflects only the cumulative projects that contain a residential component within Table 2-2 in Chapter 2, Environmental Setting.

Table 4.12-8. List of Cumulative Residential Projects in the City

ID No.	Address	Use	Units/Rooms	Square Footage	Population Estimates
City of Azusa					
A1	919 N. Sierra Madre Avenue	Senior Housing - Multi-family Senior Housing – Duplex and triplex General Light Industrial Golf course	230 Senior Housing Units	6 Industrial Warehouses (838,522 SF), 9-hole Golf Course	713
A2	120 N. Aspan Street	Single-family residential	Single family subdivision consisting of 22 lots	—	68
A3	627 E. Sierra Madre Avenue	Multi-family residential	8 DU	—	25
A5	300 W. Foothill Boulevard	Mixed Use	7 DU (Townhomes)	633 SF (Commercial)	22
A6	326 N. Azusa Avenue	Residential	8 DU (Townhomes)	—	25
A7	333 N. Azusa Avenue	Mixed Use	4 DU	1,000 SF (Retail)	12
A8	573-577 E. Arrow Highway	Residential	10 DU (Attached Townhomes)	—	31
A9	619 N. San Gabriel Avenue	Mixed Use	6 DU	888 SF (Retail)	19
A10	800 N. Azusa Avenue	Mixed Use	127 DU	12,000 SF (Retail)	394
A11	807 E. Promenade	Single-family residential	23 DU	—	71
A12	820 N. Soldano	Residential	6 DU (Townhome)	—	19
A16	243 N. Azusa Ave	Residential	4 DU (Condo)	—	12
A18	175 N. Azusa Ave	Residential	4 DU (Condo)	—	12
A19	736-740 N. Angeleno Ave	Residential	4 Affordable housing units	—	12
A23	635 N. San Gabriel Ave	Mixed-Use	Mixed-Use Building with 16 Residential Units and 3 Live-Work Units	—	59
A25	628 N. Pasadena Avenue	Residential	6 DU (Condo)	—	19
A27	630 N. Angeleno	Residential	4 DU	—	12
		Cumulative Total	**492**	—	**1,525**
		Project	**128**	—	**397**
		Cumulative Total + Project	**620**	—	**1,922**

Source: Appendix K
Note: Assuming 3.1 persons per household (DOF 2025a), rounded up to the nearest whole number. Cumulative Project No. A24 was removed due to the project applicant withdrawing the application. See Table 2-2, List of Cumulative Projects, for more information.

Threshold 4.3a- Cumulative **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

As discussed above, assuming 3.1 persons per household (DOF 2025a), the Project's 128 residential units would accommodate up to 397 residents. Additionally, the Project is estimated to result in a reduction of 23 employees as compared to existing conditions. As the Project would result in a reduction of employment, there would be no potential to contribute to a cumulative impact related to substantial unplanned employment growth. As shown in Table 4.12-8, a total of 492 dwelling units are anticipated within the City as a result of the past, present, and reasonably foreseeable future projects within residential components. Including the Project's proposed 128 units, the cumulative total of dwelling units would be 620 new units. Table 4.12-3 reveals the California DOF estimated a total of 15,711 housing units within the City in 2025. SCAG estimates a total of 1,389 new units would be built by 2050 in the City. As such, the addition of 620 units would be within the SCAG's housing growth projections for the City. Furthermore, the proposed housing growth generated by the Project would further the goals and strategies of SCAG and the General Plan by providing for new housing.

Cumulative population growth was assumed using the previously identified 3.1 persons per household. Thus, the cumulative projects could result in approximately 1,525 new residents. In addition to proposed population growth generated by the Project (397 residents), a total of 1,922 additional residents would be generated. Therefore, the expected population growth of the cumulative projects combined with the Project would be captured within SCAG's projected population growth of 4,627 residents between 2024 and 2050 (see Table 4.12-2).

Given the above, it is not anticipated that the Project, in combination with other past, present or future foreseeable projects, would create a cumulatively considerable impact related to substantial unplanned population growth. Therefore, cumulative impacts would be less than significant.

Threshold 4.3b- Cumulative **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

As discussed above in Section 4.12.4, Impact Analysis, under Threshold 4.3b, the Project would not displace existing housing or people and no impact would occur. Therefore, the Project would not contribute to cumulatively considerable impacts related to displacement of people or housing. No impact would occur.

4.12.6 Mitigation Measures

No mitigation measures are required.

4.12.7 Significance Conclusion

Threshold 4.12a. The Project would have a **less-than-significant impact** related to substantial unplanned population growth in an area.

Threshold 4.12b. The Project would have **no impact** related to displacement of substantial numbers of existing people or housing.

4.12.8 References

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4.13 Public Services

This section describes the potential adverse physical impacts associated with the provision or need for new or physically altered governmental services (police and fire protection services, schools, library facilities) or recreational facilities (parks) in order to meet acceptable service ratios, response times, or other performance objectives, due to implementation of the Project. This section also establishes the significance criteria used to evaluate Project impacts based on Appendix G of the CEQA Guidelines, as well as the regulatory framework necessary to analyze and identify environmental impacts, both cumulative and otherwise, that could potentially result from Project design, construction, and/or implementation. Finally, this section reviews any necessary mitigation measures, and assesses relative levels of significance both before and after mitigation.

Information contained in this section is based on a review of the General Plan, the General Plan EIR (State Clearing House Number 2003081144), and written correspondence with the Los Angeles County Fire Department (LACoFD), the Azusa Police Department (AZPD), the Azusa Unified School District (AUSD), the Azusa Recreation Division (ARD), and the Azusa City Library (ACL). For specific correspondence, refer to the following appendices:

- Appendix J-1 Public Services Correspondence Letter, Fire Protection
- Appendix J-2 Public Services Correspondence Letter, Police Protection
- Appendix J-3 Public Services Correspondence Letter, Schools
- Appendix J-4 Public Services Correspondence Letter, Parks
- Appendix J-5 Public Services Correspondence Letter, Libraries

Other sources consulted are listed in Section 4.13.8, References.

Comments received in response to the Notice of Preparation (NOP) are summarized in Table 1-1, Notice of Preparation and Comment Letters Summary, included in Chapter 1, Introduction, of this Draft EIR. A copy of the NOP is included in Appendix A-1 and the comment letters received in response to the NOP are included in Appendix A-2 of this Draft EIR.

4.13.1 Existing Conditions

4.13.1.1 Fire Protection & Emergency Medical Services

The City contracts with LACoFD for fire protection and emergency response services within the City, including fire, rescue, and hazardous materials (City of Azusa 2004a). There are over 5,000 personnel working within LACoFD's emergency and business operations bureaus, including firefighters and paramedics (LACoFD 2025a). The City is located within LACoFD Division II, which is served by LACoFD Fire Battalions 2 and 16 (City of Azusa 2003). The Project site is served by LACoFD Stations #32 and #97. Station #32 is located approximately 1.34 miles west of the site at 605 North Angeleno Avenue. Station #32 serves the central and southeastern portions of the City, as well as many of the unincorporated areas within the City's southern Sphere of Influence (SOI) (City of Azusa 2003). Station #97 is located at 846 Juniper Ridge, approximately 1.36 miles north of the Project site. Station #97 serves northeast Azusa, western Glendora, and also serves some of the unincorporated area within the City's eastern SOI (City of Azusa 2003). Figure 4.13-1, Existing Fire and Police Stations, and City Library, shows the location of the two fire stations within the City.

Emergency Operations Services

LACoFD provides firefighting, dispatch, air and wildland, lifeguard, urban search and rescue, and hazardous materials response services within the City. The Training and Emergency Medical Service (EMS) Bureau falls under Emergency Operations as well and was created to address the growing EMS needs across the County, which make up approximately 85% of LACoFD's responses (LACoFD 2025a). The General Plan has a goal of location fire stations to meet a five-minute or less standard (see Policy 2.1 of the Economy and Community Element).

LACoFD adheres to the National Fire Protection Association (NFPA) Standard 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, which sets minimum standards for firefighter engine and truck company staffing. In addition, the LACoFD is part of the California Master Mutual Aid program in which fire personnel mobilize from unaffected areas to support other areas that are experiencing an emergency, such as earthquake, mudslide, or any number of natural or human-caused disaster, as outlined in the Los Angeles County Operational Area Emergency Response Plan (OAERP) (County of Los Angeles 2023).

Fire Prevention Services

The Fire Prevention Division of LACoFD "focuses on educating the community about the benefits of proper safety practices and identifying and eliminating all types of hazardous conditions, which pose a threat to life, the environment and property." The Fire Prevention Division, under the command of an Assistant Fire Chief designated as LACoFD's Fire Marshal, employs approximately 175 personnel (LACoFD 2025b). LACoFD is also responsible for providing both fire and emergency medical response for the City, including the proposed Project site and vicinity.

Fire Hazard Areas

According to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zone (FHSZ) maps, the Project site is not within a designated FHSZ or within a State Responsibility Area (SRA) (CAL FIRE 2025; City of Azusa 2004a). Portions of the City located approximately 2.15 miles north of the Project site are within a Very High Fire Hazard Severity Zone (VHFHSZ) in SRAs; however, due to the urban setting of the Project site and distance from designated VHFHSZs, the potential for wildland fire hazards in the immediate Project vicinity is considered low (City of Azusa 2003). Interstate 210 (I-210) (running east-west through the City), Historic Route 66 (running east-west through the City), and San Gabriel Canyon Road (running north-south through the City) are designated disaster routes within the City (LADPW 2008). Historic Route 66 is the closest disaster route to the Project site, approximately 600 feet to the north via North Calera Avenue. As identified by CAL FIRE, all of the FHSZs within and adjacent to the City are over 2.5 miles north of I-210, as are the VHFHSZs where residents would need to utilize San Gabriel Canyon Road in the event of a wildfire evacuation (CAL FIRE 2025).

4.13.1.2 Police Protection

As shown in Figure 4.13-1, Existing Fire and Police Stations, and City Library, the AZPD Police Station is located at 725 North Alameda Avenue, approximately 1.18 miles northwest of the Project site. The AZPD employs 55 sworn police officers and 28 civilian professional staff and serves the City 24 hours a day, 365 days a year (AZPD 2025). Officers are assigned to positions such as Patrol, Detective Bureau, or the Traffic Division, and may work collateral duties such as the Gang Unit, Field Training Officer, Terrorism Liaison Officer, School Resource Officer, and Special Weapons and Tactics. Civilian professional staff are assigned to the Records Division, Dispatch Center, Office of Emergency Management, Administration, Patrol, and Training Bureau (AZPD 2025).

4.13.1.3 Schools

The AUSD provides public educational services within the City and the Project site and has a current enrollment of approximately 7,000 students across 12 schools, consisting of eight elementary schools, one middle school, one high school, and one Adult School and Alternative Education School (AUSD 2025a). Public schools serving the Project site include Charles H. Lee Elementary School (grades TK–5), Gladstone Middle School (grades 6–8), and Azusa High School (grades 9-12) (AUSD 2025b). Figure 4.13-2, Existing School Facilities, maps the respective locations of the three AUSD schools serving the Project site, as well as other schools in the district. Table 4.13-1 provides the addresses, total enrollment, and enrollment capacity of each school; as shown therein, each school is operating below its respective enrollment capacity.

Table 4.13-1. Public Schools Serving the Project Site

School	Address	2024-2025 Enrollment	Enrollment Capacity	Remaining Capacity
Charles H. Lee Elementary School	550 N Cerritos Ave, Azusa, CA 91702	378	705	327
Gladstone Middle School	1340 N Enid Ave, Covina, CA 91722	1,326	1,908	582
Azusa High School	240 N Cerritos Ave, Azusa, CA 91702	1,609	3,492	1,883

Sources: Appendix J-3; California Department of Education 2025.

4.13.1.4 Parks

Parks

The City's Recreation Division is responsible for maintaining park land in the City, including 20 parks (City of Azusa 2025a). Table 4.14-1, Park Facilities Serving the Project Site (see Section 4.14, Recreation), shows the City parks and County parks serving the City, including location and acreage, which are also shown in Figure 4.13-3, Existing Park Facilities.

As noted in Appendix J-4, the Project site is served by three parks: Great Park (9.1 acres), which is approximately 0.91 mile northwest of the site, includes rental facilities, picnic shelters, playground equipment, restrooms, walking paths, and outdoor exercise equipment; Slauson Park (8.1 acres), which is approximately 0.74 mile northwest of the site, includes an aquatic park that includes a competition pool, kiddy pool, slides, basketball and volleyball courts, restrooms, dining area, and tiki bar; and Gladstone Park (8.01 acres), which is approximately 0.96 mile southwest of the site, includes a lighted baseball and softball field, picnic facilities, restrooms, playground structure, basketball court and volleyball courts, and a 0.25-mile walking path. As a result, approximately 25.21 acres of parkland are within the Project site's vicinity.

The General Plan has a goal to maintain a 1.14 acre per 1,000 persons ratio (see Policy 2.1 of the Natural Environment Element) and another goal to increase the ratio to 3.0 acres per 1,000 persons (see Policy 2.2 of the Natural Environment Element). Of the 116.72 acres of parkland within the City and a City population of 48,383 in 2024, the current ratio under existing conditions is 2.41 acres of parkland per 1,000 residents. Moreover, the General Plan Natural Environment Element states that the City utilizes the National Recreation and Parks Association (NRPA) recommendations for parkland, which recommend a minimum of 0.6 to 1.0 acres of developed

open space per 1,000 residents (City of Azusa 2004b). As such, under existing conditions, the City is meeting parkland per resident service ratios.

4.13.1.5 Library Services

The ACL provides the City and the Project site with library services. The ACL is located at 729 North Dalton Avenue, approximately 1.14 miles northwest of the Project site. Figure 4.13-1, Existing Fire and Police Stations, and City Library, identifies the location of the ACL.

The ACL includes a collection of 80,000 print materials, a digital Library with downloadable eBooks available 24/7, research publications and databases; a lifelong learning division with instruction in English-as-a-Second language, Citizenship, Adult Literacy, and online high-school diploma courses; social service referrals, including assistance with employment, housing, and government services; passport acceptance; after-school homework help, youth and family programming, and seasonal community-wide events (Appendix J-5). As provided by the ACL, the Library operates with 11 full-time and 12 part-time employees.

At the time of drafting this Draft EIR, the ACL was undergoing renovations, which are expected to be completed by the Project's operational year (Appendix J-5). The ACL has temporarily relocated to Slauson Middle School, located at 340 West Fifth Street, Azusa, CA 91702, while the library is undergoing renovations (City of Azusa 2025b). With the library renovation underway, the ACL can meet the needs of an increasing population (Appendix J-5).

4.13.2 Regulatory Requirements

4.13.2.1 Federal

National Fire Protection Association

The National Fire Protection Association Standard 1710 calls for response time targets of 4 minutes or less for the arrival of the first arriving engine company at a fire suppression incident and 8 minutes or less for the deployment of a full crew. It also establishes EMS response times of 4 minutes or less for a first responder and 8 minutes or less for a full company. The 2020 Edition of this standard also calls for the arrival of a second "properly staffed four-person unit" to arrive within 6 minutes or less (NFPA 2020).

4.13.2.2 State

Quimby Act

California Government Code section 66477, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes. The required dedication and/or fees are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public-school grounds.

California Building Code and California Fire Code

The California Building Code (CBC) is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code (CFC). The CFC is provided in Part 9 of Title 24 of the

California Code of Regulations (CCR). The CFC provides regulations for safeguarding life and property from fire and explosion hazards derived from the storage, handling, and use of hazardous substances, materials, and devices. The provisions of this code apply to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenance connected or attached to such building structures throughout the State.

California Occupational Safety and Health Administration

In accordance with CCR, Title 8, section 1270, Fire Prevention, and section 6773, Fire Protection and Fire Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials; fire hose size requirements; restrictions on the use of compressed air; requirements for access roads; and guidelines for testing, maintaining, and using all firefighting and emergency medical equipment.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50% sales tax to be expended exclusively on local public safety services. California Government Code sections 30051–30056 provide rules to implement Proposition 172. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–1993 fiscal year. An agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection, emergency medical services, and police protection services. Pursuant to this case, "the city has a constitutional obligation to provide adequate fire protection services," and potential effects on public safety services are not in and of themselves an environmental impact that CEQA requires a project applicant to mitigate. The Court stated that "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city." (Cal. Const., Art. XIII, section 35, Subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Thus, the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the City will comply with that provision to ensure that public services are provided.

California Education Code

The facilities and services of the AUSD are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, the State has passed legislation for the funding of local and public schools and provided the majority of funds for education in the State. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. These fees, known as development impact fees, are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the cost of construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines.

Section 65996 of the California Government Code designates section 17620 of the Education Code (the mitigation fees authorized by Senate Bill [SB] 50) and section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

Senate Bill 50 and Proposition 1A

SB 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It placed a $9.2 billion State bond measure (Proposition 1A), which includes grants for modernization of existing school and construction of new schools, on the ballot for the November 3, 1998, election. Proposition 1A was approved by voters, thereby enabling SB 50 to become fully operative. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grant provides funding on a 50/50 State and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts unable to provide some, or all, of the local match requirement may meet financial hardship provisions and are potentially eligible for additional State funding. In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to California Government Code section 65995, the payment of these fees by a developer serves to fully mitigate all potential impacts. At the time of this Draft EIR, the current fees, according to Section 65995 of the California Government Code, are $4.79 per square foot of assessable space for residential construction, and $0.78 per square foot of chargeable covered and enclosed space for commercial construction (AUSD 2025c).

4.13.2.3 Regional and Local

Los Angeles County Operational Area Emergency Response Plan

The OAERP addresses the Operational Area's (i.e., the County's) coordinated response to emergency situations associated with natural, man-made, and technological incidents. The OAERP does not address normal day-to-day emergencies; the operational concepts reflected in the OAERP focus on potential large-scale disasters which can generate unique situations requiring an unusual or extraordinary emergency response. The OAERP establishes the coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation within the County, and describes the County's emergency organization, including authorities and responsibilities, as well as the mutual aid process during emergencies to ensure effective coordination of needed resources. The OAERP is not meant to be a standalone document, rather, it is intended to be used in conjunction with other agencies/jurisdictions emergency response plans, standard operating procedures (SOPs) and other pertinent documents.

City of Azusa Local Hazard Mitigation Plan

Azusa has adopted a Local Hazard Mitigation Plan (LHMP) to guide hazard mitigation planning and better protect the people and property of the City from the effects of hazard events. The City's LHMP demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decision makers direct mitigation activities and resources. The goals include:

Goal 1: Minimize risk and vulnerability of Azusa to natural hazards and protect lives and prevent losses to property, public health, economy, and the environment.

Goal 2: Increase community education, awareness, and preparedness to hazards of concern and promote participation and action to reduce hazard-related losses.

Goal 3: Improve the community's capabilities to prevent/mitigate hazard-related losses and to be prepared for, respond to, and recover from a disaster event.

City of Azusa 2004 General Plan

The following goals, policies, and implementation programs outlined in the Economy and Community Element are relevant to the Project (City of Azusa 2004a):

Goal 1: Protect the community from criminal activity, reduce the incidence of crime, and provide other necessary services within the City.

Policy 1.1: Maintain personnel and facilities in the City's Police Department necessary to provide the best response time feasible.

Policy 1.3: Require development projects contribute fees based on their proportional impact and demand for new resources, in accordance with State Nexus legislation.

Policy 1.8: Ensure that project development site designs provide "defensible space."

Goal 2: Ensure adequate protection from fire and medical emergencies for Azusa residents and property owners.

Policy 2.1: Work with the Los Angeles County Fire Department (LACoFD) to locate fire stations in a manner that will enable emergency fire response times to meet a five-minute or less standard.

Policy 2.2: Work with LACoFD to relocate Fire Station 97 from its current location to a new site within the Monrovia Nursey site.

Policy 2.4: Work with LACoFD to ensure adequate facilities and personnel by evaluating population growth, response times, and fire hazards.

Policy 2.5: Require new development be assessed a pro-rated fee to pay for fire facilities and personnel.

Policy 2.6: Require all new development to design site plans and structures with fire and emergency access and safety in mind.

Policy 2.7: Ensure that buildings and lots are maintained in a manner that is consistent with fire prevention and personal safety.

Goal 4: Ensure that a high level of library services and facilities are provided to the City's residents.

Policy 4.1: Construct new library facilities and expand the new facilities as required to meet the needs of the library uses.

Goal 5: Promote a strong public school system that advocates high-quality education promote the maintenance and enhancement of the existing educational systems facilities, and opportunities for students and residents of the city to enhance the quality of life for existing and future residents.

Policy 5.1: Continue the dialogue between the City of Azusa and local schools regarding:

- measures to accommodate student population growth; and
- "shared responsibility agreements" for property/facilities maintenance and operation where public recreation activities occur at local school sites and where local schools use public facilities.

The goals, policies, and objectives outlined in the Natural Environment Element relevant to the Project are as follows (City of Azusa 2004b):

Goal 1: Provide constructive and creative leisure opportunities for all Azusans.

Policy 1.5: Provide the highest quality of services to park and recreation facilities users through adequate staffing and technically trained staff.

Goal 2: Provide adequately sized and located parklands and recreational facilities to meet local needs, and to preserve the natural resources within and adjacent to Azusa.

Policy 2.1: Maintain the current park per capita ratio of 1.14 acre per 1,000 persons.

Policy 2.2: Strive to achieve the National Parks and Recreation Association's recommended per capita ratio of 3.0 acres per 1,000 persons. When the City has met the 3.0 ratio, strive to achieve the National Parks and Recreation Association's suggested per capita ratio of 5.0 acres per 1,000 persons.

Azusa Municipal Code

Chapter 30, Article II, Fire Code

The City has adopted the 2017 Los Angeles County Fire Code which established minimum requirements consistent with nationally recognized good practice for providing a reasonable level of life safety and property protection from the hazards of fire, explosion, or dangerous conditions in new and existing buildings and to provide a reasonable level of safety to firefighters and emergency responders (City of Azusa 2025c; eLaws.us 2025).

Article 1, Section 66-5, Subdivision Park and Recreation Area Fee

Per the AMC, the subdivider shall design a lot within the subdivision for park and recreation purposes adequate for the general use of the lot owners in the subdivision. The subdivider shall offer for dedication to the City an easement for public park and recreation purposes upon and covering all lots so designed for such purposes. In lieu of such design and dedication, the subdivider may pay or tender to the City, prior to the approval of the final map and subject to such approval, a sum for each lot or dwelling unit contained in the subdivision as follows: $150 per one-bedroom unit; $300 per two-bedroom units; $450 per three-bedroom unit; $600 per unit with four or more bedrooms; and $150 for a mobile home unit. The sum specified in subsection (a) of this section shall be accepted by the City upon such final approval and shall be used or expended only for the purpose of acquiring or improving park or recreational land or facilities designed and located so as to serve the general use of the lot owners in the subdivision.

Section 88.42.140(F), Multi-Family and Small Lot Single-Family Projects, Open Space

AMC Section 88.42.140 establishes open space standards applicable to multi-family and small-lot single-family residential development, requiring both private and common open space for residents. Pursuant to this section,

projects must comply with the minimum per-unit open space requirements set forth in Table 4-3. For projects with 31 and more units, a minimum of 2,000 square feet of common open space is required. In addition, regardless of project size, the minimum private open space required is 150 square feet for each unit.

Library Tax Levy

AMC Chapter 42, Article 1, Section 42-3 states the city council shall levy taxes for the purpose of maintaining and operating the library, including necessary capital outlay therefor. The money in the library fund shall be applied to the cost of maintaining and operating the library.

4.13.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to public services are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to public services would occur if the Project would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
   i. Fire protection.
   ii. Police protection.
   iii. Schools.
   iv. Parks.
   v. Other public facilities.

4.13.4 Impacts Analysis

Threshold 4.13a. **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:**

i. Fire Protection Services?

Less Than Significant Impact. For the reasons discussed below, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Impacts would be less than significant.

Construction

Construction activities associated with the proposed Project may temporarily increase demand for fire protection and emergency medical services. Construction activities would involve the use of construction equipment and machinery, handling and disposal of combustible materials, and the use of flammable or toxic materials.

Project construction would be required to comply with all applicable State and local codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of accidental spills of flammable materials. To comply with California Department of Industrial Relations, Division of Occupational Safety and Health, and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction activities would be maintained on-site. In addition, compliance with State regulatory requirements would reduce the potential for construction activities to expose construction workers to the risk of fire explosion related to hazardous materials.

As further discussed in Section 4.15, Transportation, of this Draft EIR, construction activities could also temporarily result in lane closures along the Project site's frontage on North Calera Avenue to accommodate proposed utility connections and pedestrian improvements. Temporary impacts to the vehicular circulation in the Project site's vicinity could impact access for fire protection services to the site or surrounding area. However, as detailed in Section 4.15, any construction work within public right-of-way would require a Traffic Control Plan (TCP), a traffic control permit pursuant to AMC section 62-50, and approval by the City engineer. Compliance with local regulations would ensure coordination with fire protection services. In addition, in the event that access along North Calera Avenue is not available, fire protection services would be able to access the site along East Mauna Loa Avenue.

Construction activities associated with the proposed Project would not be considered high-risk, and the LACoFD is equipped and prepared to deal with construction-related incidents, should they occur. Due to compliance with applicable codes and fire safety standards, Project construction would not increase demand for fire protection services that would require a new fire station be constructed or expansion of Stations #32 and #97 to accommodate additional firefighters or equipment. Therefore, potential impacts associated with Project construction are considered to be less than significant.

Operation

LACoFD Fire Battalions 2 and 16 serve the Project site and the surrounding area, operating out of Stations #32 and #37. Although the proposed development would introduce a new land use to the Project site, the property is already within the LACoFD service area. The need for new or expanded fire protection facilities is associated with a substantial increase in population, new development, and/or fire activity, such as wildfire hazards. As described in Section 4.12, Population and Housing, the Project would result in a decrease of approximately 23 employees (as compared to baseline conditions) and an increase of 397 new residents. As a result, the Project would not exceed the population projections. Nonetheless, the increase in new residents as a result of the Project would be expected to increase the demand for fire and emergency response calls relative to existing conditions. However, the proposed increase in development intensity at the Project site would not result in substantial adverse physical impacts associated with the need for new or expanded fire protection facilities.

Further, LACoFD confirmed that existing fire protection services are adequate for the proposed development and land use (refer to Appendix J-1). Development of the Project site would result in land uses consistent with established surrounding land uses and a similar demand for fire protection services to existing residential development is anticipated for the Project. LACoFD did not indicate the Project would require the construction of new or expansion of existing fires stations to accommodate the Project. Finally, the Project would be required to pay all applicable fire prevention, plan check, and inspection fees to LACoFD, which would support funding for equipment and facility needs. As noted in the correspondence with LACoFD (included as Appendix J-1 to this Draft EIR), a review of the Project's Phase I ESA was required as part of the plan check process. Subsequent review by the Health Hazardous

Materials Division of LACoFD determined that there were no comments (see further discussion regarding the Phase I ESA within Section 4.8, Hazards and Hazardous Materials, of this Draft EIR).

Furthermore, the proposed Project would be designed and constructed in accordance with all applicable provisions of the State and local fire code, which includes requirements for adequate fire flows, width of emergency access routes, turning radii, automatic sprinkler systems, and fire alarms. Compliance with the fire code standards (including those listed above and in Section 4.13.2, Regulatory Requirements) would be verified through the City's plan check process and review by LACoFD prior to the issuance of building permits for the Project. Additionally, the proposed Project would be designed to include fire protection features, which would help limit fire hazards. Fire safety features and compliance with fire code standards would reduce the potential demand for fire services by decreasing the likelihood and/or severity of a fire emergency at the site.

There are two water mains located on or adjacent to the Project site and available for domestic water and/or fire service connections. As shown in Figure 3-4, Preliminary Utility Plan, and described in Section 4.17, Utilities and Service Systems, the Project's proposed water infrastructure would include new water pipelines within the Project site, beneath the internal roadways, and new lateral pipeline connections to each unit. The new on-site water pipelines would extend off-site beneath the driveways at East Mauna Loa Avenue and at North Calera Avenue to connect to the existing 12-inch water main pipeline in East Mauna Loa Avenue and the existing 8-inch water main pipeline in North Calera Avenue. These water pipelines would provide domestic water, fire water, and irrigation water to the Project site. Water meters would be installed on site to monitor water flow, and a private fire hydrant and fire water line would be installed and connected to the proposed water main. Fire flows must be based on the requirements listed in the CFC in effect at the time of plan submission, as amended by the City. The construction of the proposed watermains and pipeline connections are accommodated within the construction assumptions included in the construction-related impact analyses throughout this Draft EIR, and no new or more significant impacts would occur.

In conclusion, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times. Project impacts related to fire protection services would be less than significant.

ii. Police Protection Services?

Less Than Significant Impact. For the reasons discussed below, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Impacts would be less than significant.

Construction

There is the potential for Project construction activities to create an increase in demand for police protection services, as construction sites can attract nuisances, create hazards, and invite theft and vandalism when not properly secured. This could result in an increase in the demand for police protection services. During construction, the Project Applicant or the construction contractor would implement temporary security features including security fencing, lighting, and a locked entry. These features would reduce the need for police protection services during the Project's construction phase.

In addition, as discussed above, construction activities could also temporarily result in lane closures along the Project site's frontage on North Calera Avenue to accommodate proposed utility connections and pedestrian improvements. Temporary impacts to the vehicular circulation in the Project site's vicinity could impact access for police protection services to the site or surrounding area. However, as detailed in Section 4.15, any construction work within public right-of-way would require a TCP, a traffic control permit pursuant to AMC section 62-50, and approval of the City engineer. Compliance with local regulations would ensure coordination with police protection services. In addition, in the event that access along North Calera Avenue is not available, police protection services would be able to access the site along East Mauna Loa Avenue.

Potential short-term construction impacts to police services would not result in an increase in demand for police services that would necessitate construction of a new building or expansion of the existing facility that could result in substantial adverse physical impacts, and impacts would be less than significant.

Operation

Although the AZPD currently serves the Project site, AZPD the proposed development would introduce a new land use on-site. As detailed above, the Project would result in growth to the City's population; though this would not constitute unplanned growth, the proposed Project would create an incremental increase in demand on existing AZPD resources, and would be expected to incrementally increase the frequency of emergency and non-emergency calls to the AZPD. In the correspondence with AZPD regarding the Project (included as Appendix J-2), AZPD stated that police staffing, deployment, and service levels are managed through a dynamic patrol model that prioritizes calls for service-based on urgency, geographic coverage, and available resources. AZPD does not rely exclusively on fixed officer-to-population ratios, and staffing adjustments are evaluated through the City's annual budget and staffing review processes. As such, the AZPD indicated that new police protection facilities and/or physically altered facilities would not be required, and that existing facilities are adequate to continue to provide acceptable service to the City following Project implementation.

In addition, the proposed Project includes walls and fences around each residence and around the Project site, which would increase safety for future residents, would reduce the potential for crime to occur, and would maintain clear visibility of public spaces and pedestrian corridors. Lighting would also be used to facilitate wayfinding and safe pedestrian movement throughout the site and within the proposed buildings.

Furthermore, in the correspondence regarding the Project, the AZPD indicated that the increase in additional service demand created by the Project, including additional calls for service or workload considerations, does not in itself constitute a significant environmental impact under CEQA and is appropriately addressed through municipal staffing, budgeting, and service planning processes (Appendix J-2). For these reasons, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, and impacts to police protection services would be less than significant.

iii. Schools?

Less Than Significant Impact. According to AUSD, there are no adopted performance standards or objectives related to school capacity (Appendix J-3). As such, this analysis evaluates the Project's contribution relative to the existing capacity of schools in serving the Project site. As described in Chapter 2, Environmental Setting, the Project's operational baseline assumes occupancy of Powell Elementary School based on the average enrollment of 287 students between the 2018-2023 school years. With redevelopment of the Project site, the 287 students

who would have enrolled at Powell Elementary School under baseline conditions would instead be accommodated by other elementary schools within AUSD, such as Charles H. Lee Elementary School, Dalton Elementary School, and Magnolia Elementary School. Table 4.13-3, below, provides a breakdown of enrollment at these schools during the 2024-2025 school year, which reflects the redistribution of students following Powell Elementary School's closure in 2023. As shown, enrollment has not substantively changed at Charles H. Lee Elementary School, Dalton Elementary School, and Magnolia Elementary School subsequent to the closure of Powell Elementary School. With existing AUSD schools already accommodating Powell's former students, the closure would not result in the need for new or expanded school facilities.

Table 4.13-3. Enrollment at Nearby AUSD Elementary Schools

Number of Students	Charles H. Lee Elementary School	Henry Dalton Elementary School	Magnolia Elementary School
2021-2022	369	351	369
2024-2025	378	333	367
Difference	9	-18	-2
Percentage Change	2.4%	-5.1%	-0.5%

Source: California Department of Education 2025.

The proposed Project's approximately 397 new residents would generate school-age students that would attend AUSD schools. AUSD does not utilize a local generation factor for new dwelling units built within the school district boundaries (Appendix J-3). As such, the generation factor recommended for a Unified School District of 0.70 was utilized for this analysis (Office of Public School Construction 2019). Table 4.13-4 provides a breakdown of the number of students for each school that would be generated based on the 128 proposed housing units.

Table 4.13-4. Project Enrollment Generation

Azusa Unified School District	Charles H. Lee Elementary School	Gladstone Middle School	Azusa High School
Project-Related Student Generation	278	278	278
2024-25 Enrollment	378	1,326	1,609
Total Enrollment With Project	**656**	**1,604**	**1,887**
Current Capacity	705	1,908	3,492
Remaining Capacity	49	304	1,605
Capacity Exceeded?	**No**	**No**	**No**

Source: Appendix J-3; Office of Public School Construction 2019.

As illustrated in Table 4.13-4, the number of students generated by the proposed Project would not exceed the current capacity of any of the three schools serving the Project site.

Furthermore, pursuant to SB 50 (Education Code § 17620), school districts are permitted to assess fees on new residential and commercial construction within their respective boundaries. As such, the Project applicant would be required to pay development fees to AUSD prior to issuance of the Project's building permit. The current fees are $3.36 per square foot for single-family detached residential units and $2.98 per square foot for multi-family attached residential units (AUSD 2025c). Pursuant to California Government Code section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels, notwithstanding any contrary provisions in CEQA or other State or local law. Therefore, with the payment of the applicable school fees and existing AUSD schools already accommodating Powell Elementary School's former students, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, or other performance objectives for schools. As such, impacts on schools would be less than significant.

iv. Parks?

Less Than Significant Impact. The Project is estimated to generate approximately 397 new residents. At least a portion of these residents are anticipated to patronize the various existing public parks and recreation facilities located in proximity to the Project site. The Project proposes several landscaped areas as well as open space areas on-site, including 36,916 square feet of private residential open space in the form of yards and 15,100 square feet of common area open space (e.g., recreational community amenities and pathways), for a total of 52,016 square feet of residential open space. The Project also includes a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. As detailed in Chapter 3, Project Description, this would exceed the minimum requirements for provided common and private open space pursuant to Table 4-3 of the City's Development Code (Section 88.42.140 Multi-Family and Small Lot Single-Family Projects).

As discussed above, the City utilizes the NRPA recommendations for parkland, which recommend a minimum of 0.6 to 1.0 acres of developed open space per 1,000 residents (NRPA 2025). As detailed in Table 4.12-2, City and County Population Estimates and Forecasts 2024–2050, of Section 4.12, Population and Housing, the City's estimated population in 2024 was 48,383 residents. Approximately 131.02 acres of parkland are accessible to City residents (25.21 acres of which are within the Project site's local vicinity), including County parks within the City. However, only 116.72 acres of parkland are maintained by the City, as shown in Table 4.14-1 of Section 4.14,

Recreation. Thus, under existing conditions, it is estimated that the City maintains 2.41 acres of parkland per 1,000 residents. Therefore, the City is currently meeting the service ratios.

With an increase in 397 new residents due to the proposed Project, the parkland per resident ratio would decrease to 2.39 acres per 1,000 residents[1]. This decrease would not be significant, as it would not cause the park per capita ratio to decrease below 1.14 acres per 1,000 residents.

In order to address the additional demand on parks within the City, the Project Applicant, pursuant to Chapter 66, Article I, section 66-5 of the AMC, would be required to pay subdivider fees, currently set as follows: $150 per one-bedroom unit; $300 per two-bedroom units; $450 per three-bedroom unit; and $600 per unit with four or more bedrooms. The Project Applicant would provide payment to the City as aforementioned for park needs, which would offset the potential increase in use of parks that the Project may induce. Further, as previously discussed, the proposed Project would include on-site open space for residents. These on-site amenities would provide an alternative to off-site public parks, which would help reduce demand for off-site public parks. Given this, impacts associated with the provision of new or physically altered park facilities or the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, would be less than significant.

v. Other public facilities (libraries)?

Less Than Significant Impact. Other public facilities provided within the City include library services. The need for new or expanded library facilities is associated with a substantial increase in population and/or new development, which would increase the need for other public services within the City. As described in Section 4.12, Population and Housing, the proposed Project would result in a decrease of approximately 23 employees (as compared to baseline conditions) and an increase of 397 new residents. As a result, the proposed Project would not exceed the City's population projections. At the time of preparation of this Draft EIR, the ACL was undergoing renovations, expected to be completed by the Project's operational year. The ACL has temporarily relocated to Slauson Middle School, located at 340 West Fifth Street, while the library is undergoing renovations (City of Azusa 2025b). With the library renovation underway, the ACL confirmed that it can meet the needs of additional residents as a result of the Project (Appendix J-5). In addition, AMC Chapter 42, Article 1, Sec 42-3 authorizes the City Council to levy taxes for the purpose of maintaining and operating the ACL. As such, the ACL is funded by annual property taxes allocated during the City's budget process. The ACL indicated that current staffing levels are sufficient as staff are assigned according to the needs of the community. In addition, the ACL also indicated that the Project would not result in the need to provide any new library facilities and/or physically altered facilities to maintain performance objectives of the APL, with library renovations already underway. Therefore, impacts associated with the provision of new or physically altered libraries or the need for new or physically altered libraries, the construction of which could cause significant environmental impacts, would be less than significant.

4.13.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130. The geographic context for the cumulative analysis as it relates to public services serving the City. The past, present,

[1] (116.72 acres / 48,780 residents) x 1000 = 2.39 acres per 1,000 residents

and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, and on Figure 2-4, Cumulative Projects Location Map, of Chapter 2, this Draft EIR.

Threshold 4.13a(i)-Cumulative **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 fire protection?**

A cumulatively significant impact related to fire protection and emergency services could occur as a result of population growth and development within the City due to the Project combined with the cumulative projects. The Project, along with the other cumulative projects, could result in increased calls and demands for fire protection and emergency services.

The proposed Project would not result in significant impacts related to fire services. Further, the City has not identified any existing significant cumulative impacts related to existing fire services that could be significantly exacerbated by the Project. Both the Project and cumulative projects would be subject to the requirements of the fire code standards (including those listed above and in Section 4.13.2). This would be ensured through the plan check process and LACoFD review prior to the issuance of building permits for the Project and cumulative projects. Furthermore, the Project and cumulative projects would coordinate with the LACoFD to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. Based on the above considerations, the Project's contribution to cumulative impacts to fire protection services would be less than significant.

Threshold 4.13a(ii)-Cumulative **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 police services?**

A cumulatively significant impact related to police protection services could occur as a result of population growth associated with the Project and other cumulative projects within the AZPD service area. The proposed Project would not result in significant impacts related to police services. Additionally, the City has not identified any existing significant cumulative impacts related to existing police services that could be significantly exacerbated by the Project. Further, similar to the proposed Project, the applicants of the cumulative projects would be required to incorporate appropriate safety features into the design and construction of their respective projects to minimize the potential for crime and to maximize safety, ultimately minimizing the need for police protection services. In the correspondence with the AZPD in regard to the Project, the AZPD indicated that increased service demand associated with population growth, including additional calls for service or workload considerations is appropriately addressed through municipal staffing, budgeting, and service planning processes (Appendix J-2). Moreover, while multiple residential developments would incrementally increase demand for routine police services, cumulative growth as a result of the Project and cumulative projects would not require the construction of new police stations, substations, or other physically altered facilities. AZPD would continue to provide police services to future development using existing facilities and operational resources . In addition, the cumulative projects within the City would contribute to funding police protection services or new facilities through development impact fees. Similarly, the cumulative projects within nearby jurisdictions would be required to comply with applicable regulations,

including fees. Based on the above considerations, the Project's contribution to cumulative impacts to police protection services would be less than significant.

Threshold 4.13a(iii)-Cumulative **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 schools?**

The proposed Project would not result in significant impacts related to schools, and following implementation of the Project, all schools serving the site would have remaining student capacity. Further, the AUSD has not identified any existing significant cumulative impacts related to existing schools that could be significantly exacerbated by the Project. The proposed Project itself would not result in significant impacts on services, necessitating the construction of new or physically altered school facilities. As discussed above in Section 4.13.2, Education Code section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. Pursuant to California Government Code section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. Subsections (a) and (b) Government Code section 65996 state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. Therefore, as with the proposed Project, cumulative projects would be required to pay applicable school fees. Given this, the Project's increase in the demand for school facilities and services would not be cumulatively considerable and less than significant impacts would occur.

Threshold 4.13a(iv)-Cumulative **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 parks?**

The proposed Project would not result in significant impacts related to parks, as the addition of Project residents would not cause the City's parkland per capita ratio to decrease below its target. Further, the City has not identified any existing significant cumulative impacts related to existing parks that could be significantly exacerbated by the Project. As previously discussed, while the Project would increase the demand for local and regional parks, this increase would not be substantial, and would not result in a significant impact. In addition, the proposed Project would provide on-site open space amenities, which would offset the demand increase to parks within the Project site's vicinity. The Project applicant would be required to pay its fair share of impact fees to ensure the City would be able to maintain an acceptable level of service (i.e., parkland and population ratios). Additionally, cumulative projects would be required to demonstrate compliance with existing federal, State, and local regulations related to parks and recreational facilities. Cumulative projects within the City would also be required to pay their fair share of park and recreation redevelopment fees on a per-bedroom basis to mitigate their contribution to the demand for local and regional parks. Similarly, the cumulative projects within nearby jurisdictions would be required to comply with applicable regulations, including fees. Therefore, the Project would not result in a cumulatively considerable impact to park facilities, and the impact would be less than significant.

Threshold 4.13a(v)-Cumulative **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 other public facilities?**

The proposed Project would not result in significant impacts related to libraries. Further, the City has not identified any existing significant cumulative impacts related to existing libraries that could be significantly exacerbated by the Project. The Project and future cumulative projects would generate new tax revenues, which act as funding sources for City libraries. These revenues would help offset the increase in demand for library services as a result of the Project and cumulative projects. The proposed Project itself, as determined by the ACL, would not result in the need for new physical facilities (Appendix J-5). Therefore, the Project's contribution to cumulative impacts related to library services would be less than significant.

4.13.6 Mitigation Measures

No mitigation measures are required.

4.13.7 Significance Conclusion

Threshold 4.13a. The Project would result in **less-than-significant impacts** associated with the provision of new or physically altered governmental facilities (i.e., fire and police protection services, schools, parks, and library services), or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental effects, in order to maintain acceptable service ratios, response times, or other performance objectives.

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SOURCE: Los Angeles County; World Imagery

FIGURE 4.13-1

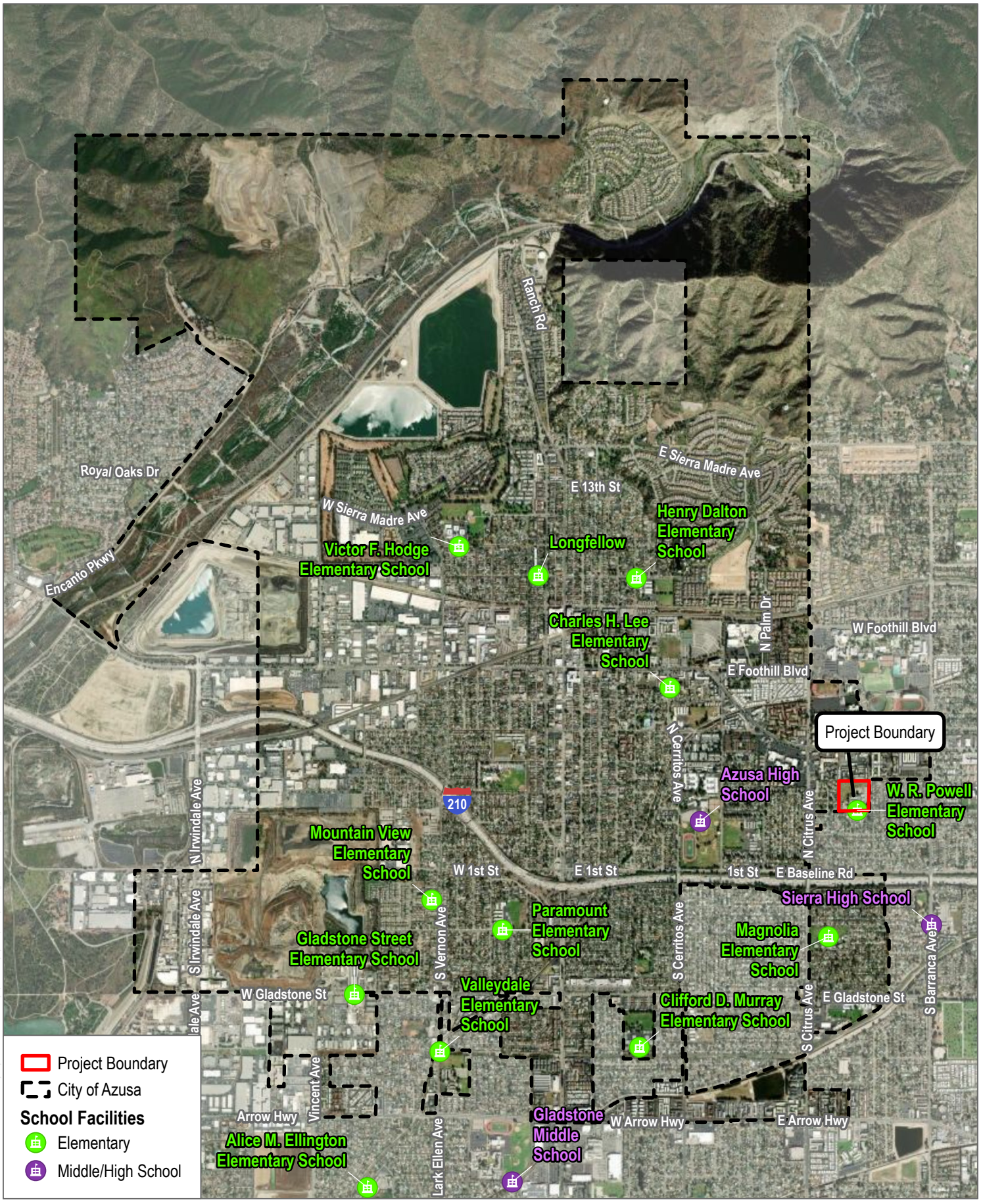
Existing Fire and Police Stations, and City Library

Delaney Square Residential Project

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SOURCE: Los Angeles County; World Imagery

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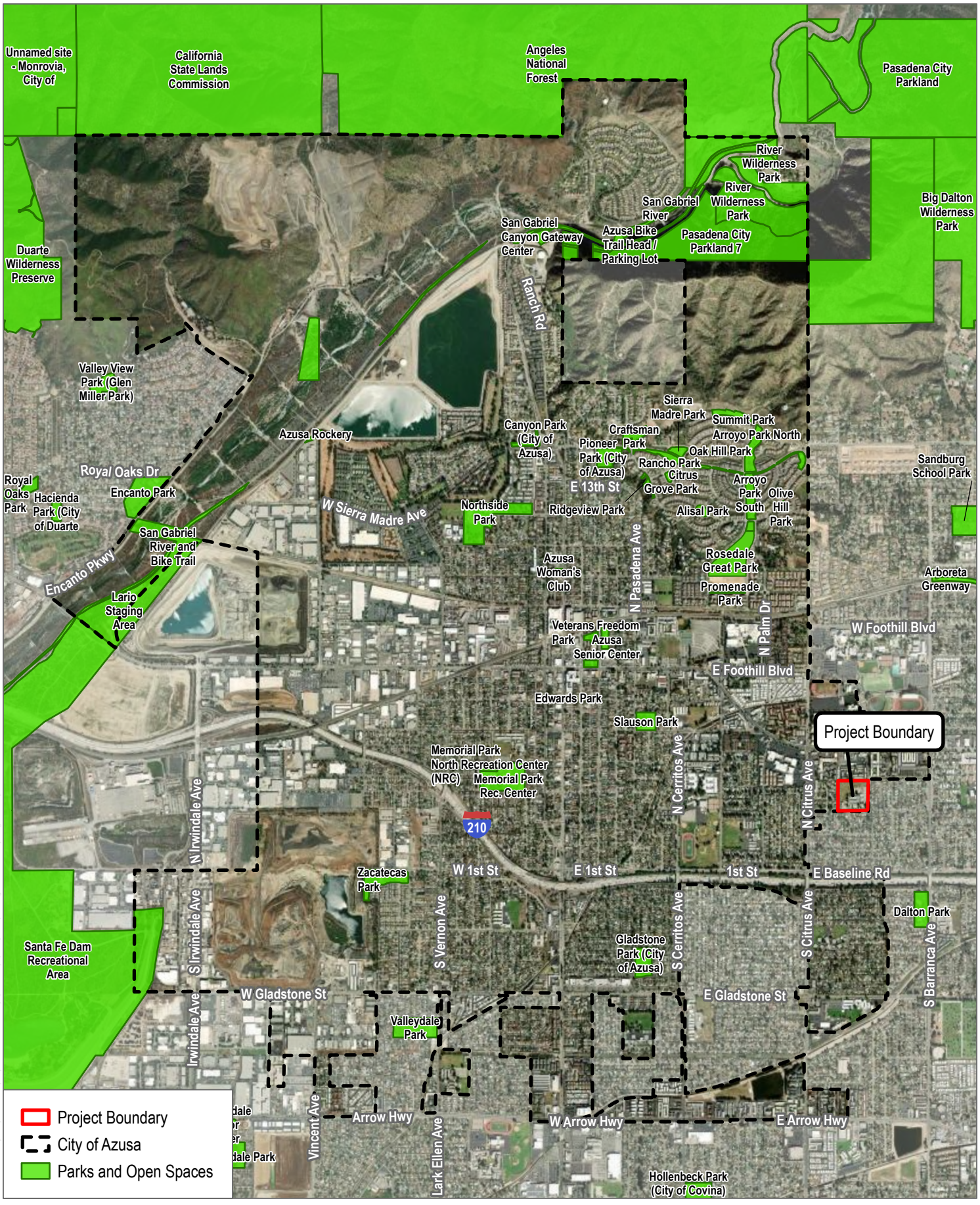
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FIGURE 4.13-2

Existing School Facilities

Delaney Square Residential Project

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SOURCE: Los Angeles County; World Imagery

FIGURE 4.13-3

Existing Park and Recreational Facilities

Delaney Square Residential Project

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4.14 Recreation

This section describes the potential adverse physical impacts associated with increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated from implementation of the Project. This section also establishes the significance criteria used to evaluate Project impacts based on Appendix G of the CEQA Guidelines, as well as the regulatory framework necessary to analyze and identify environmental impacts, both cumulative and otherwise, that could potentially result from Project design, construction, and/or implementation. Finally, this section reviews any necessary mitigation measures, and assesses relative levels of significance both before and after mitigation.

Information contained in this section is based on a review of the General Plan, the General Plan EIR (State Clearing House Number 2003081144), and written correspondence with the Azusa Recreation Division. For specific correspondence, refer to the following appendices:

- Appendix J-4 Public Services Correspondence Letter, Parks

Sources consulted are listed in Section 4.14.8, References.

4.14.1 Existing Conditions

Existing development within the Project site consists of elementary school buildings associated with the former Powell Elementary school and a paved parking lot. The remainder of the site is occupied by an open field associated with the school and enclosed with a fence.

4.14.1.1 Park Facilities

The City's Recreation Division is responsible for maintaining park land in the City, including 20 parks (City of Azusa 2025a). Table 4.14-1, Park Facilities Serving the Project Site, shows the City parks and County parks serving the City, including location and acreage, which are also shown in Figure 4.13-3, Existing Park Facilities (see Section 4.13, Public Services, of this Draft EIR).

Table 4.14-1. Park Facilities Serving the Project Site

Map Key	Park Facility Name	Address	Size (in acres)
Parks			
1	Alisal Park	661 E. Boxwood Ln.	2.1
2	Arroyo North	1512 Azusa Veterans Way	7.5
3	Arroyo South	1204 N. MacNeil Dr.	12.5
4	Canyon Park	1401 N. San Gabriel Canyon Rd.	1.5
5	Citrus Grove Park	600 Gardenia Dr.	0.84
6	Craftsman Park	503 E Sierra Madre Ave.	1
7	Edwards Park	600 N. Azusa Ave.	0.4
8	Gladstone Park	414 S. Pasadena Ave.	8.01

Table 4.14-1. Park Facilities Serving the Project Site

Map Key	Park Facility Name	Address	Size (in acres)
9	Northside Park	600 Blk W. 11th St.	28.14
10	Oak Hill Park	701 E. Heather Circle	0.73
11	Olive Hill Park	1238 MacNeil Dr.	0.73
12	Pioneer Park	1360 N. Dalton Ave.	7.6
13	Rancho Park	1357 MacNeil Dr.	1.13
14	Ridgeview Park	1305 Vosburg Dr.	1.58
15	Rosedale Great Park	991 Rosedale Ave	9.1
16	Sierra Madre Park	579 Orange Blossom Way	1.88
17	Slauson Park	501 E. Fifth Street	8.1
18	Summit Park	708 E. Camelia Way	1.13
19	Veteran's Freedom Park	213 E. Foothill Blvd.	10.17
20	Zacatecas Park	924 W. 1st St.	12.58
		Total Park Facilities Acres	**116.72**
County Park Facilities			
20	Dalton Park	18867 E. Armstead St.	5.24
21	Valleydale Park	5525 N. Lark Ellen Ave.	9.13
		Total County Park Facility Acreage	**14.37**
		Net Total Park Facility Acreage	**131.09**

Source: City of Azusa 2003, City of Azusa 2025a; LA County Parks and Recreation 2016; LA County Parks and Recreation 2025a; Appendix J-4; Muñoz 2022.

As noted in Appendix J-4, the Project site is served by three parks: Great Park (9.1 acres), which is approximately 0.91 mile northwest of the site, includes rental facilities, picnic shelters, playground equipment, restrooms, walking paths, and outdoor exercise equipment; Slauson Park (8.1 acres), which is approximately 0.74 mile northwest of the site, includes an aquatic park that includes a competition pool, kiddy pool, slides, basketball and volleyball courts, restrooms, dining area, and tiki bar; and Gladstone Park (8.01 acres), which is approximately 0.96 mile southwest of the site, includes a lighted baseball and softball field, picnic facilities, restrooms, playground structure, basketball court and volleyball courts, and a 0.25-mile walking path. As a result, approximately 25.21 acres of parkland are within the Project site's vicinity.

The General Plan has a goal to maintain a 1.14 acre per 1,000 persons ratio (see Policy 2.1 of the Natural Environment Element) and another goal to increase the ratio to 3.0 acres per 1,000 persons (see Policy 2.2 of the Natural Environment Element). Of the 116.72 acres of parkland within the City and a population of 48,383 in 2024, the current ratio under existing conditions is 2.41 acres of parkland per 1,000 residents. Moreover, the General Plan Natural Environment Element states that the City utilizes the National Recreation and Parks Association (NRPA) recommendations for parkland, which recommend a minimum of 0.6 to 1.0 acres of developed open space per

1,000 residents (City of Azusa 2004b). As such, under existing conditions, the City is meeting parkland per resident service ratios.

The City also operates various recreational facilities. The Azusa Bike Trail Head is a 0.9-mile long trail that starts at the corner of San Gabriel Canyon Road and North Ranch Road within the City, located approximately 1.85 miles northwest of the Project site, and which connects to the San Gabriel River Bike Trail (City of Azusa 2025a). Memorial Park Recreation Center and the Memorial Park North Recreation Center, located at 340 North Orange Place, approximately 1.3 miles west of the Project site, total 20.2 acres and include various amenities such as an indoor gymnasium, meeting rooms, lighted softball and baseball fields, a football field, lighted outdoor basketball courts, picnic shelters, and more (City of Azusa 2025a, 2025b, Appendix J-3). Furthermore, the San Gabriel Canyon Gateway Center, located at 1950 North San Gabriel Canyon Road, approximately 2.5 miles northwest of the Project site, totals 2.75 acres and includes a native garden and Memorial Grove (City of Azusa 2025a).

In addition, Los Angeles County Parks and Recreation operates two recreational areas in proximity to the Project site. The Lario Staging Area located at 15701 Foothill Boulevard within the City of Duarte, approximately 3 miles west of the Project site, offers a variety of recreational amenities such as equestrian and biking trails and picnic tables (LA County Parks and Recreation 2025b). The Santa Fe Dam Recreational Area, located at 15501 E. Arrow Highway in the City of Baldwin Park approximately 2.95 miles west of the Project site, and offers a variety of recreational amenities such as children's play structures, fitness zones, picnic tables, splash pads, barbecue areas, boat launches, campfire sites, and more (LA County Parks and Recreation 2025c).

4.14.1.2 Recreation Programs and Activities

The City Recreation Division's number one goal is to keep City residents' minds and bodies fit through programs and classes. As such, the Recreation Division operates a variety of recreational facilities and offers a wide variety of recreational programs and activities for residents including adult programs, aquatics programs, City special events, youth programs, and day camp programs, as well as the ability to rent out recreational facilities (City of Azusa 2025c). The James Slauson Community Pool offers The Learn to Swim Program, a Red Cross Certified swim program, as well as Lifeguard and Cardiopulmonary Resuscitation (CPR)/ Automated External Defibrillator (AED)/First Aid safety classes (City of Azusa 2025d).

The Azusa Senior Center provides a variety of social activities, healthy aging services, education programs, and special events in response to the needs of the local older adult population. The Azusa Women's Club can accommodate up to 250 guests for wedding receptions and special occasions. The Azusa Community Garden at the Memorial Park North Recreation Center offers 40 plots available to the community for rental.

4.14.2 Regulatory Requirements

4.14.2.1 Federal

There are no federal regulations related to the provision of recreational facilities that are applicable to the Project.

4.14.2.2 State

Quimby Act

California Government Code section 66477, Subdivision Map Act, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes for projects involving subdivisions. The required dedication and/or fee are based upon the residential density, parkland cost, and other factors. Land dedication and fees collected pursuant to the Quimby Act may be used for acquisition, improvement, and expansion of park, playground, and recreational facilities or the development of public school grounds. The Quimby Act only applies to development of residential subdivisions, and thus the Project would be subject to the Act, since the Project proposes to subdivide the Project site.

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971, PRC sections 5400 through 5409. Under the act, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation, land, or both, are provided to replace the parkland acquired.

The act only applies when a public agency both acquires real property that is in use as a public park, and the public agency uses the property for non-park purposes. The Project does not involve the public agency conversion of parkland to non-park uses. Therefore, the act does not apply. In addition, the proposed Project would not impact any existing land used for public park purposes.

4.14.2.3 Regional and Local

City of Azusa 2004 General Plan

The goals, policies, and objectives outlined in the General Plan Natural Environment Element that are relevant to the Project are as follows (City of Azusa 2004b):

Goal 1: Provide constructive and creative leisure opportunities for all Azusans.

> Policy 1.5: Provide the highest quality of services to park and recreation facilities users through adequate staffing and technically trained staff.

Goal 2: Provide adequately sized and located parklands and recreational facilities to meet local needs, and to preserve the natural resources within and adjacent to Azusa.

> Policy 2.1: Maintain the current park per capita ratio of 1.14 acre per 1,000 persons.
>
> Policy 2.2: Strive to achieve the National Parks and Recreation Association's recommended per capita ratio of 3.0 acres per 1,000 persons. When the City has met the 3.0 ratio, strive to achieve the National Parks and Recreation Association's suggested per capita ratio of 5.0 acres per 1,000 persons.

Azusa Municipal Code

Per Chapter 66, Article I, section 66-5, Subdivision Park and Recreation Area Fee, the subdivider shall design a lot within the subdivision for park and recreation purposes adequate for the general use of the lot owners in the subdivision. The subdivider shall offer for dedication to the City an easement for public park and recreation purposes upon and covering all lots so designed for such purposes. In lieu of such design and dedication, the subdivider may pay or tender to the City, prior to the approval of the final map and subject to such approval, a sum for each lot or dwelling unit contained in the subdivision as follows: $150 per one-bedroom unit; $300 per two-bedroom units; $450 per three-bedroom unit; $600 per unit with four or more bedrooms; and $150 for a mobile home unit. The sum specified in subsection (a) of this section shall be accepted by the City upon such final approval and shall be used or expended only for the purpose of acquiring or improving park or recreational land or facilities designed and located so as to serve the general use of the lot owners in the subdivision.

AMC Section 88.42.140(F) establishes open space standards applicable to multi-family and small-lot single-family residential development, requiring both private and common open space for residents. Pursuant to this section, projects must comply with the minimum per-unit open space requirements set forth in Table 4-3. For projects with 31 and more units, a minimum of 2,000 square feet of common open space is required. In addition, regardless of project size, the minimum private open space required is 150 square feet for each unit.

4.14.3 Thresholds of Significance

The significance criteria used to evaluate the project's impacts to recreation are based on Appendix G of the CEQA Guidelines, which states that a potentially significant impact to recreation would occur if the proposed project would:

1. 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.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.14.4 Impacts Analysis

Threshold 4.14a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. The Project is estimated to include approximately 397 new residents, as detailed in Section 4.12, Population and Housing, which has the potential to increase the use of existing neighborhood and regional parks or other recreational facilities and services. However, the Project would include on-site recreational and community amenities including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. In total, the Project would provide approximately 15,100 square feet of common open space (i.e. recreational community amenities and pathways) and 36,916 square feet of private open space (i.e. residential yards). As detailed in Section 3.2.3.2 of Chapter 3, Project Description, this would exceed the minimum requirements for provided common and private open space pursuant to Table 4-3 of the City's Development Code (Section 88.42.140 Multi-Family and Small Lot Single-Family Projects). These on-site amenities would provide an alternative to off-site public parks and recreational facilities, thereby reducing demand for off-site public parks and recreational facilities. As indicated in Appendix J-4, the City's Park and Recreation Division confirmed that the City's

existing park and recreational facilities are adequate to serve existing residents in addition to new residents generated by the Project.

As detailed above, the City has a goal to maintain a minimum of 1.14 aces per 1,000 residents. Based on the City's 2024 population of 48,383 residents and the current total parkland acreage of 116.72 maintained by the City, the current parkland per person ratio is 2.41 acres per 1,000 residents, which exceeds the minimum standard.[1] With the addition of 397 new residents generated by the proposed Project, the City's parkland per person ratio would only decrease to 2.39 acres per 1,000 residents, which would not cause the park per capita ratio to decrease below the City's standard of 1.14 acres per 1,000 persons as set forth in the General Plan.[2]

As discussed above, pursuant to Chapter 66, Article I, section 66-5 of the AMC, the Project Applicant would provide payment to the City for park redevelopment, which would offset the potential increase in use of parks, recreational facilities, and recreational programs that the Project may induce. Additionally, Project residents would have access to adequate on-site recreational facilities, which would offset increased use of existing parks and recreational facilities in the City. Therefore, with payment of required fees, implementation of the Project would not result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would be expected to occur. As such, impacts to neighborhood and regional parks would be less than significant.

Threshold 4.14b. Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project would develop on-site open space and recreational amenities including a tot lot, barbecue area, shaded gathering space, butterfly garden, and central paseo. In total, the Project would provide approximately 15,100 square feet of common open space (i.e. recreational community amenities and pathways) and 36,916 square feet of private open space (i.e. yards). As detailed in Section 3.2.3.2 of Chapter 3, Project Description, the Project would exceed the minimum requirements for provided common and private open space pursuant to Table 4-3 of AMC section 88.42.140, which would reduce the demand on recreational facilities serving the Project site. Impacts associated with construction of these open space areas and associated recreational amenities are analyzed as part of the Project throughout this Draft EIR, and mitigation measures have been prescribed where potentially significant impacts are identified as feasible. section Project implementation would not include the construction or expansion of new recreational facilities in the City to accommodate Project demand, and, as such, impacts would be less than significant.

4.14.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130 . The geographic context for the cumulative analysis as it relates to public services is the City of Azusa. The past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, and on Figure 2-4, Cumulative Projects Location Map, of Chapter 2, this Draft EIR.

1 116.72 / (48,383/1,000) = 116.72/48.383 = 2.41 (rounded)
2 116.72 / (48,780/1,000) = 107.62/48.780 = 2.39 (rounded)

Threshold 4.14a-Cumulative **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?**

As described above, the City is currently exceeding the park per capita ratio performance standard of 1.14 acres per 1,000 persons by providing 2.41 acres per 1,000 residents. Buildout of the Project along with cumulative projects would increase use of existing local and regional parks and could result in the accelerated deterioration of park and recreation facilities. As discussed, the Project itself would result in less than significant impacts to park and recreation facilities. The deterioration that would occur to local parks and recreational facilities from regional population growth may be offset with funding from new development through the City's fair share park and recreation redevelopment fees. Cumulative projects would be required to demonstrate compliance with CEQA prior to Project approval and would also be subject to the fair share fees to offset their contribution to the demand for park facilities. Therefore, cumulative impacts to existing neighborhood and regional parks or other recreational facilities, including Project impacts, would not result in substantial or accelerated physical deterioration of the facilities; impacts would be less than significant and would not be cumulatively considerable

Threshold 4.14b-Cumulative **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?**

The Project includes the construction of on-site open space and recreational amenities, the effects of which have been analyzed as short-term construction impacts throughout this EIR. Cumulative projects that propose similar facilities would be required to demonstrate compliance with CEQA prior to project approval, and provide mitigation measures as applicable and feasible. Therefore, cumulative impacts regarding the construction or expansion of recreational facilities would be less than significant and the Project's contribution would not be cumulatively considerable.

4.14.6 Mitigation Measures

No mitigation measures are required.

4.14.7 Level of Significance After Mitigation

Threshold 4.14a. The Project would result in **less-than-significant impacts** associated with the increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Threshold 4.14b. The Project would result in **less-than-significant impacts** associated with recreational facilities or the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

4.14.8 References

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4.15 Transportation

This section describes the existing conditions of the Project site and vicinity related to transportation, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation. Information contained in this section is based on publicly available data as well as the following:

- **Appendix K** Transportation Impact Study, prepared by LLG Engineers, dated May 27, 2026

Other sources consulted are listed in Section 4.15.8, References.

4.15.1 Existing Conditions

This section provides a summary of the existing street network, including the major roadways serving the Project site, the existing transit service, and bicycle and pedestrian facilities in the study area.

4.15.1.1 Existing Street Network

Regional access to the Project site is provided by the eastbound/westbound Foothill Freeway (Interstate [I-] 210) to the south, with the Citrus Avenue freeway access ramps located approximately 1,600 feet southeast of the Project site and the South Grand Avenue freeway access ramps located approximately 0.81 miles southeast of the Project site. The local street system serving the site includes Citrus Avenue, East Alosta Avenue, East Mauna Loa Avenue, and North Calera Avenue. Characteristics of the existing local roads within the study area are described below.

I-210 (Foothill Freeway) is an east-west freeway in the greater Los Angeles metropolitan area. The freeway connects the northeastern suburbs of Los Angeles with the Inland Empire. Access to I-210 is provided at an interchange with Citrus Avenue approximately 1,600 feet southeast of the Project site. Near the Project site, I-210 has four general purpose lanes and an HOV lane in each direction.

East Mauna Loa Avenue is a two-lane east-west local street that begins at North Citrus Avenue to the west and continues to the east. East Mauna Loa Avenue provides direct access to the Project site. Sidewalks and parking are provided along both sides of the street.

North Calera Avenue is a two-lane north-south local street that begins at Alosta Avenue to the north and continues south until its intersection with East Mauna Loa Avenue. North Calera Avenue provides direct access to the Project site. Sidewalks and parking are provided along both sides of the street.

East Alosta Avenue is an east-west road located north of the Project site. East Alosta Avenue is classified as a principal arterial and a designated truck route in the City. Within the vicinity of the site, Alosta Avenue has four lanes and sidewalks provided on both sides of the street and is identified by the General Plan to have a Class III bike lane.

North Citrus Avenue is a north-south oriented roadway located to the west of the Project site. Citrus Avenue is classified as a primary arterial from the southern City boundary to East Alosta Avenue. South of East Alosta Avenue, Citrus Avenue is also a designated truck route in the City. Two through travel lanes are provided in each direction

on Citrus Avenue. Exclusive left-turn lanes are provided at major intersections, including the intersection with East Alosta Avenue.

4.15.1.2 Existing Public Transit Services

Public transit in the Project vicinity is provided by the Metropolitan Transportation Authority (Metro) and Foothill Transit. Figure 4.15-1, Existing Transit Routes, shows the various bus routes that provide service in the study area. In addition, the Metro A (previously L and Gold) Line APU/Citrus Station is approximately 0.71 miles north of the Project site at the intersection of North Citrus Avenue and West Foothill Boulevard. Bus stops are also located along North Citrus Avenue and on East Alosta Avenue (Metro 2025; Foothill Transit 2025a, 2025b, 2025c, 2025d). A description of each service provider is presented below.

Metropolitan Transportation Authority Services (Metro)

Metro currently operates the Metro A Line in the vicinity of the Project site. The Metro A Line is a light rail line running between the cities within the San Gabriel Valley and the City of Long Beach. The A Line runs northeast/southwest with the closest station to the Project site (APU/Citrus Station) located at North Citrus Avenue and West Foothill Boulevard approximately 0.71 miles north of the Project site.

Foothill Transit Services

Within the study area, there are also four Foothill Transit bus lines that run within 0.25 miles of the Project site. Foothill Transit Line 188 provides service between Azusa and the City of Montclair and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025a). Foothill Transit Line 281 provides service between Glendora, Azusa, West Covina, and Puente Hills and runs along North Citrus Avenue, approximately 645 feet west of the Project site (Foothill Transit 2025b). Foothill Transit Line 284 provides service between Glendora, San Dimas, Covina, and West Covina and runs along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025c). Foothill Transit Line 488 provides service between Azusa, Glendora, West Covina, and El Monte Station and passes by the Project site along East Alosta Avenue, approximately 640 feet north of the Project site (Foothill Transit 2025d). There are multiple bus stops near the Project site, including near the intersections of North Citrus Avenue and East Alosta Avenue, North Calera Avenue and East Alosta Avenue, and near North Citrus Avenue and East Mauna Loa Avenue. These stops provide access to Foothill Transit Bus Line 188, Foothill Transit Bus Line 281, Foothill Transit Bus Line 284, and Foothill Transit Bus Line 488.

4.15.1.3 Existing Pedestrian and Bicycle Facilities

Sidewalks are generally present throughout the study area, and marked crosswalks are provided at all major arterial intersections. Pedestrian access to the Project is provided along all the roadways surrounding the Project site. As stated within the General Plan Built Environment, the City has few striped or exclusive bike routes in the City, many streets lack sidewalks, and there are few off-street pedestrian trails; although, the City has a vision to become a pedestrian-friendly, transit-oriented community where the congested, declining commercial strips become well-planned transit corridors that connect all neighborhoods and districts. North Citrus Avenue approximately 650 feet west of the Project site and East Alosta Avenue approximately 640 feet north of the Project site contain signed, Class III bike routes, while East Baseline Road, approximately 0.5 miles south of the Project site, contains a Class II bike lane (City of Azusa 2004).

Azusa has not previously prepared or adopted a bikeway master plan. However, the General Plan Built Environment Element identifies existing and planned bicycle routes within the City, including planned Class III routes near the Project site, including a route along North Citrus Avenue between Foothill Boulevard and Arrow Highway, and a route along East Alosta Avenue between North Citrus Avenue and Barranca Avenue (City of Azusa 2004). In addition, the Los Angeles County Bicycle Master Plan (County BMP) identifies planned Class II bike lanes for East Mauna Loa Avenue between North Citrus Avenue and La Serena Drive, and planned bike boulevards for Factor Avenue between East Mauna Loa Avenue and Baseline Road and East Mauna Loa Avenue between La Serena Drive and Vecino Drive (Appendix K).

4.15.2 Regulatory Requirements

4.15.2.1 Federal

There are no applicable federal regulations related to transportation that would apply to the proposed Project.

4.15.2.2 State

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas (TPAs) and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (PRC § 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of the level of service (LOS) methodology in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a roadway or the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing GHG emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis will shift from vehicle delay to vehicle miles traveled (VMT) within transit-priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released Updates to Technical Advisory on Evaluating Transportation Impacts in CEQA, to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR's Technical Advisory is not binding on

public agencies, CEQA allows lead agencies to "consider thresholds of significance … recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (CEQA Guidelines § 15064.7(c)).

In December 2018, the CEQA Guidelines were updated to add section 15064.3, Determining the Significance of Transportation Impacts, that describes specific considerations for evaluating a project's transportation impacts using the VMT methodology. This new methodology is required to be used for projects beginning on July 1, 2020.

CEQA Guidelines section 15064.3(b) is divided into four subdivisions as follows:

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

Sustainable Communities Act; Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, the California Air Resources Board (CARB) sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's Metropolitan Planning Organizations (MPOs). The CARB will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its Regional Transportation Plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. The CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the alternative planning strategy. Developers can get relief from certain CEQA requirements if their new residential and mixed-use projects are consistent with a region's SCS (or alternative planning strategy) that meets the targets (see PRC §§ 21155, 21155.1, 21155.2, and 21159.28).

4.15.2.3 Regional and Local

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated MPO for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City is one of the many jurisdictions that fall under SCAG.

Adopted in April 2024, Connect SoCal (the current Sustainable Communities Strategy (SCS)/Regional Transportation Plan (RTP) for the SCAG region) presents the land use and transportation vision for the region through the year 2050, providing a long-term investment framework for addressing the region's challenges. The following are the Connect SoCal goals: Mobility: Build and maintain an integrated multimodal transportation network; Communities: Develop, connect and sustain communities that are livable and thriving, Environment: Create a healthy region for the people of today and tomorrow, and; Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents (SCAG 2024).

Metro Long Range Transportation Plan

Los Angeles County Metropolitan Transportation Authority (Metro) is the county-level transportation planning and public transportation operating agency that was created by the State of California to set policy, coordinate, plan, fund, build, and operate transit services and transportation programs throughout Los Angeles County. The 2020 Long Range Transportation Plan (LRTP) provides a detailed roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP guides future funding plans and policies needed to move LA County forward for a more mobile, resilient, accessible and sustainable future.

City of Azusa 2004 General Plan

The Built Environment Element of the General Plan addresses the transportation network that allows people to move in and through Azusa, and the infrastructure that provides necessary urban service to residences, businesses, and institutions (City of Azusa 2004). The Mobility Element of the Built Environment Element complements the land use choices to reduce traffic congestion and pollution; create more prosperous and vital neighborhoods; and promote healthier environments. The goals and policies from the Built Environment Element that are relevant to the proposed Project include the following (City of Azusa 2004):

Goal 2: Fully develop the street system to allow access to all areas of the city Complete missing links in the city's street system.

Policy 2.5: Improve the operational efficiency of the roadway system, with implementation of traffic management measures, to minimize delay and congestion but without adversely impacting transit vehicles, bicyclists, and pedestrians.

Goal 3: Provide a connected, balanced, and integrated transportation system that enables Azusans to walk, bike, and take transit, rather than using their car.

Policy 3.1: Develop and maintain a citywide pedestrian network of both on-street and off-street walkways. Network shall link new neighborhoods with existing neighborhoods connect neighborhood centers, schools, parks, commercial centers, and citywide destinations such as Downtown, the San Gabriel River, and Civic Center.

Policy 3.3: Provide pedestrian amenities (such as benches, seats, water fountains, shady street trees, etc.) and conditions that enhance the pedestrian experience along the pedestrian network.

Policy 3.4: Develop and maintain a citywide bicycle network of both on-street bike lanes and off-street bike paths in accordance with the Bicycle Routes. The network provides for off-street paths along the San Gabriel River, railroad rights-of-way, alongside flood control channels, and within existing and new neighborhoods, where feasible. The network improves connections between residential neighborhoods, schools and commercial centers, as well as providing connections to citywide destinations such as Downtown, the University District, the San Gabriel River, and Civic Center.

Policy 3.5: Provide bicycle amenities (bicycle parking spaces, bike lockers, etc.) on/near the bicycle network.

Goal 4: Design/redesign streets to encourage pedestrians and bicycles and to accommodate vehicles. make city streets more pedestrian-friendly and bicycle-friendly.

Policy 4.1: Design/redesign streets to reflect the character of the surrounding neighborhood including roadway classification and roadway amenities/landscaping. This includes changing from Arterial to Collector, the following roads in residential areas: Vernon Avenue, San Gabriel Avenue, 5th Street, 9th Street, and Pasadena Avenue.

Policy 4.3: Provide sidewalks on all city streets, as appropriate.

Policy 4.4: Provide bicycle lanes where possible on city streets

Goal 5: Calm traffic in the city and design/ redesign residential streets to discourage through traffic and encourage residentially oriented traffic, walkers, and bikes.

Policy 5.2: Calm traffic (i.e. slow speed, limit through traffic, etc.) in residential neighborhoods including the use of various traffic calming devices or procedure.

Goal 7: Focus truck traffic onto appropriate arterial corridors within the City, and keep truck traffic out of residential neighborhoods.

Goal 8: Encourage walking, biking, and the use of transit through a variety of land use development and urban design measures.

Policy 8.1: Plan for an adequate amount, not an oversupply, of parking for autos, carpool vans, and bicycles for each land use.

Policy 8.2: Allow and encourage shared use parking in order to gain the maximum efficiency from the parking supply and to minimize the overall amount of parking provided in the city.

Policy 8.4: Plan land uses and design buildings to encourage transit, rideshare or carpool, bicycling, and walking. This includes but is not limited to:

- permitting higher densities along transit corridors and around transit stations;
- allowing a mix of uses to include residential and commercial uses in the same area in order to reduce the number of vehicular trips made;
- locating and designing new developments to encourage access by non-auto modes;
- requiring new development to provide direct and convenient pedestrian access to transit and adjacent land uses within walking distances;
- requiring the provision of transit facilities/amenities in larger scale developments;
- along corridors, requiring off street parking to be located behind buildings so barriers to pedestrians and transit users are not created between the building and the street; and
- locating buildings close to the street to be inviting to pedestrians and transit users, as appropriate.

Azusa has not previously prepared or adopted a bikeway master plan. However, the General Plan Built Environment Element includes Figure M-2, Bicycle Routes (Figure 3-1 of Appendix K), which identifies existing and planned bicycle routes within the City (City of Azusa 2004). Figure M-2 identifies planned Class III routes near the Project site, including a route along North Citrus Avenue between Foothill Boulevard and Arrow Highway, and a route along East Alosta Avenue between North Citrus Avenue and Barranca Avenue. In addition, the Los Angeles County Bicycle Master Plan (County BMP) identifies planned Class II bike lanes for East Mauna Loa Avenue between North Citrus Avenue and La Serena Drive, and planned bike boulevards for Factor Avenue between East Mauna Loa Avenue and Baseline Road and East Mauna Loa Avenue between La Serena Drive and Vecino Drive, as shown in Figure 3-2 of the Project's Transportation Impact Study (Appendix K).

City of Azusa Pedestrian Master Plan

Azusa Walks is the City's 2022 Pedestrian Master Plan that prioritizes and guides investments to create a safer and more walkable Azusa (City of Azusa 2022). The goals of the Plan are as follows:

- Transform Azusa into a more livable community,
- Educate the community on the benefits of a walkable community,
- Address mobility as population and congestion grows,
- Increase pedestrian access to key destinations, and

- Create more walkable communities alongside new transit and economic development investments.

The Pedestrian Master Plan identifies the segments of Citrus Avenue (Foothill Boulevard to Mauna Loa Avenue) and Alosta Avenue (Foothill Boulevard to Barranca Avenue) as priority roadway segments for pedestrian improvements, Priority intersections and segments represent locations and corridors that, if improved, would have the greatest impact towards equity, safety, connectivity, and access factors.

Los Angeles County Bicycle Master Plan

Los Angeles County Public Works is currently updating the Los Angeles County Bicycle Master Plan (BMP). The current BMP was last updated in 2012 and established a vision for the future of biking in the County (County of Los Angeles 2012). The BMP will serve as a guide for the development of safe and accessible bikeways and paths within unincorporated Los Angeles County and along County flood control district channels. The BMP will propose new bikeways, revisit the feasibility of unconstructed bikeways from the 2012 plan, incorporate new policies to share bikeway facilities with micro-mobility devices, identify first/last mile bikeway improvements to further connect to transit stations and bus stops, and prepare for the programmatic environmental impact report. Figure 3-2 of the Project's Transportation Impact Study (Appendix K) illustrates existing and proposed bikeways per the BMP near the Project. Per 2012 BMP, there is a planned Class II bicycle lane identified for Mauna Loa Avenue between Citrus Avenue and La Serena Drive and bike boulevard between La Serna Drive and Vencino Drive.

City of Azusa Municipal Code

In accordance with AMC Chapter 62, Streets, Sidewalks, and Other Public Places, work within a street or public right-of-way requires the issuance of a permit from the City Engineer. As part of these permit requirements, AMC section 62-50 requires that during work within the right-of-way, warning devices are placed to warn vehicular traffic and pedestrians of the work under construction. For work within the City, the nature and placement of the warning devices shall meet or exceed the requirements for the type of work as set forth in the latest edition of Work Area Traffic Control Handbook published by the Southern California Chapter of the American Public Works Association. Work within a state highway would require warning devices to be placed in accordance with the Caltrans MUTCD.

4.15.3 Thresholds of Significance

The significance criteria used to evaluate the Project's transportation impacts are based on Appendix G of the CEQA Guidelines which states that a project would have a significant transportation impact if it would:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
c) Substantially increase hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
d) Result in inadequate emergency access.

Methodology

OPR issued proposed updates to the CEQA Guidelines in November 2017 including a proposed amendment to the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead

refer to section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in VMT. The California Natural Resources Agency certified and adopted the revisions to the CEQA Guidelines in December of 2018, and as of July 1, 2020 the provisions of the new section are in effect statewide. Concurrently, OPR developed the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which provides non-binding recommendations on the implementation of the VMT methodology that have significantly informed the way VMT analyses are conducted in the State. The City of Azusa has not yet adopted transportation assessment guidelines for VMT analyses, therefore, the VMT assessment has been prepared in compliance with the methodology recommended in the Technical Advisory.

As discussed in Chapter 2, Environmental Setting, the baseline conditions used in the impact analyses of this Draft EIR are the environmental conditions existing on the ground at the time of the issuance of the NOP, with the exception of the assumption that the W.R. Powell Elementary School (also referred to as Powell Elementary School), which is located on the Project site, is still occupied and operational. Powell Elementary School, currently vacant, is owned by Azusa Unified School District and was operated as an elementary school continuously from its opening in 1957 until 2023 (Appendix E-2). The Azusa Unified School District Board of Education voted to close Powell Elementary School as part of a reorganization effort due to declining enrollment (Patch 2022). Because the property operated as an elementary school until 2023, and is still appropriate and available for reoccupation and use as an elementary school consistent with its historic and permitted uses, it is appropriate to assume an operational school as part of the baseline conditions for the Project. It would be misleading to assume an undeveloped, vacant property as the baseline condition because the site is currently developed, and it is not reasonably foreseeable to assume the property would stay vacant in perpetuity. Consistent with CEQA Guidelines section 15125(a)(1), this Draft EIR uses the property's historic condition as an occupied, operational elementary school for purposes of determining the baseline in order to provide the most accurate picture practically possible of the proposed Project's impacts. As such, the baseline conditions and environmental analyses of the Project assume occupancy of the existing Powell Elementary School; the school's average student enrollment from the most recent five school years was used to establish the baseline conditions.

In accordance with this, the trip generation forecasts for the Project as detailed in the Project's Transportation Impact Study (Appendix K) were based on the Project's baseline: occupancy of the existing Powell Elementary School. During the most recent 5 school years of operation (i.e., 2018-2023), Powell Elementary School accommodated an average enrollment of 287 students. The trip generation forecasts for the occupied school included daily trips, and both AM and PM peak hour trips (Appendix K).

4.15.4 Impact Analysis

Threshold 4.15a **Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

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

RTP/SCS Consistency Analysis

The Project's consistency with Connect SoCal is assessed in Section 4.10, Land Use and Planning, of this Draft EIR. The Project site's vicinity is served by existing public transit. Specifically, five public transit bus routes provide service

along roadways in the vicinity of the Project and public light rail transit is provided by the LA Metro A (previously L/Gold) Line. The APU / Citrus College Station is located northwest of the Citrus Avenue / Foothill Boulevard intersection, approximately 0.71 miles from the Project. The Project would result in residential development that would complement and be cohesive with surrounding residential uses. For these reasons, and as shown in the analysis within Section 4.10, Land Use and Planning of this Draft EIR, the proposed Project would not conflict with the applicable goals in the RTP/SCS.

City of Azusa General Plan

The Project would be consistent with the applicable goals and policies of the General Plan. The Project would not hinder the City's goals, policies, and programs to promote pedestrian, bicycle, and transit usage throughout the City. Specifically, the Project would support the following goals and policies within the Built Environment Element of the General Plan: Mobility Goal 3, Mobility Policy 3.1, 3.3, and 3.4, Mobility Goal 4, Mobility Policy 4.3 and 4.4 as discussed further in Table 4.10-1. Potential to Conflict With Applicable General Plan Goals and Policies, in Section 4.10, Land Use and Planning.

Transit, Bicycle, and Pedestrian Facilities

The Project would provide sidewalks, curb, and gutter along all of its internal private roadways in order to accommodate pedestrian access to the planned residential dwelling units and central paseo. The internal sidewalks would connect to the public sidewalks provided along the Project site's North Calera Avenue and East Mauna Loa Avenue frontages. Thus, the access locations between the Project site and the public sidewalks would minimize the extent of pedestrian and bicycle interaction with vehicles at the Project site and would provide a comfortable, convenient, and safe environment which in turn could encourage walking and bicycling. Public sidewalks are provided along most roadways within the vicinity of the Project site, and traditional parallel bar or continental style pedestrian crosswalks with pedestrian signals are provided at the signalized intersections in the vicinity of the Project site.

Bicycle access to and from the Project site would also be provided via North Calera Avenue and East Mauna Loa Avenue and would be accommodated by the Project's internal roadway network. The Mobility section of the General Plan identifies planned Class III bicycle routes for Citrus Avenue between Foothill Boulevard and Arrow Highway, as well as for Historic Route 66 between Citrus Avenue and Barranca Avenue. Further, the 2012 Los Angeles County BMP identifies planned Class II bicycle lanes for Mauna Loa Avenue between Citrus Avenue and La Serena Drive, planned Class IV separated bicycle lanes for Baseline Road between Citrus Avenue and La Serena Drive, and planned bike boulevards for Factor Avenue between Mauna Loa Avenue and Baseline Road as well as for Mauna Loa Avenue between La Serena Drive and Vecino Drive. The Project would not preclude the City or County from constructing bicycle facilities or from pursuing bicycle network improvements along local roadways near the Project.

As shown on Figure 4.15-1, the Project is not located adjacent to any roadways currently served by public transit service. However, as described, regular public bus transit services are provided along Citrus Avenue to the west of the Project site and along Historic Route 66 to the north of the Project site. The Project would not affect access or safety at the existing bus stops, nor is it expected to hinder public transit service along Citrus Avenue and Historic Route 66 in the vicinity of the Project site.

The Project would not preclude the City from constructing pedestrian, bicycle, or transit improvements along local roadways, therefore the Project does not conflict with the goals, policies, and programs set forth in the General Plan.

In addition, the Project site is not adjacent to any of the priority intersections or priority roadway segments in the Azusa Walks Pedestrian Plan. The Project would not preclude the City from installing any of the infrastructure improvements recommended for the portions of Citrus Avenue and Historic Route 66 within the vicinity of the Project site. Development of the Project would not preclude the City from implementing any other systemic pedestrian improvements or pursuing effective roadway safety countermeasures. Therefore, the Project would not conflict with the Azusa Walks Pedestrian Plan.

Therefore, the Project would not result in a significant impact on active transportation or public transit in the vicinity of the Project site. The Project would not adversely affect, in a manner that conflicts with, an applicable program, plan, ordinance, or policy, addressing the performance of the circulation system, including public transit, roadway, bicycle or pedestrian facilities. Impacts would be less than significant.

Threshold 4.15b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines section 15064.3(b) focuses on VMT for determining the significance of transportation impacts. The following VMT analysis is based on the OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). The Project's VMT screening and analysis is discussed below.

Screening Criteria

In the Technical Advisory, OPR recommends various screening criteria which may be applied to screen proposed projects out of a more detailed VMT analysis. Proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. The following sections provide a detailed explanation of each screening criteria as it relates to the Project.

Transit Priority Area (TPA) Screening

CEQA Guidelines section 15064.3(b)(1) states in part: "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." OPR recommends additional screening criteria for projects which meet the statutory screening threshold, noting that certain project-specific or location-specific information might indicate that the presumption is not appropriate (OPR 2018). OPR states the presumption of a less than significant transportation impact may not be appropriate if the proposed project:

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

The San Gabriel Valley Council of Governments' (SGVCOG) Vehicle Miles Traveled Evaluation Tool (VMT Evaluation Tool), was prepared as part of the SB 743 VMT Implementation Study effort and is available for use in conducting VMT screening and evaluation in the City of Azusa.

The VMT screening worksheets generated by the VMT Evaluation Tool for the Project are provided in Appendix K. As shown on Page 1 of the VMT Evaluation Tool screening worksheets, the Project is located within a transit priority area (according to PRC § 21099(a)(7)).[1] However, a review of the current SCAG TPA and High-Quality Transit Corridors Interactive map (SCAG 2026) and bus transit service frequency was conducted and found that the Project site is not considered to be located within a TPA because the bus routes intersecting at the Citrus Avenue and Route 66 intersection do not have a service frequency of 20 minutes or less during the peak hours of operation. Furthermore, the Project's proposed floor area ratio (FAR) would be less than 0.75 which does not satisfy the sub-criteria for TPA screening. Based on the Project's proposed FAR and a detailed review of the existing major transit stops in the vicinity of the Project site, the Project does not satisfy the TPA screening criteria (Appendix K).

Project Type Screening

In the Technical Advisory, OPR recommends that projects which generate less than 110 daily vehicle trips may be presumed to have a less than significant transportation impact (OPR 2018). As shown in Table 4.15-1, the daily and peak hour trip generation for the existing and proposed uses on the Project site was estimated using the trip generation rates from the Institute of Transportation Engineers' ("ITE") Trip Generation Manual, 11th Edition.

The existing entitled land use daily trips for the school, based on the average of 287 students, was estimated to be 651 daily vehicle trips, and the Project's 128 multi-family housing units is estimated to be 863 daily vehicle trips, which results in net new trip generation of 212 net daily vehicle trips. The Technical Advisory does not specify if the small project screening criteria can be applied to net new trip generation from redevelopment of uses on a project site. Therefore, while the proposed Project is forecast to generate net daily trips less than 110 daily trips, it has been conservatively assumed that the Project does not satisfy the small project screening criteria (Appendix K).[2]

[1] PRC § 21099(a)(7) states: "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

[2] In 2025, the California Court of Appeals invalidated San Diego County's reliance on VMT significance thresholds recommended by the state Office and Planning and Research (OPR) in *Cleveland National Forest Foundation v. County of San Diego* (2025) 110 Cal.App.5th 948. In *Cleveland National Forest Foundation*, the Court of Appeals held that each lead agency must ensure that the VMT significance thresholds chosen for purposes of analyzing a project must be supported by substantial evidence. (*Id.* at 960-61.) In part, the Court of Appeals further held that the County had failed to justify with substantial evidence the use of OPR's "Small Project" thresholds applying to projects producing 110 trips or fewer per day. (*Id.* at 965-66.) In the absence of any such substantial evidence to support the appropriateness of OPR's "Small Project" thresholds, the City should avoid relying on such a generic, state-wide threshold for purposes of analyzing transportation impacts.

Table 4.15-1. Trip Generation Forecast

ITE Land Use Code/Project Description	Daily/ 2-way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Trip Generation Rates:							
220: Multi-Family Housing – Low Rise (TE/DU)	6.74	24%	76%	0.40	63%	37%	0.51
520: Elementary School (TE/Student)	2.27	54%	46%	0.74	46%	54%	0.16
Proposed Project Generation Forecast							
[A] – Mauna Loa Residential Project (128 DU)	863	12	39	51	41	24	65
Existing Entitled Land Use Generation Forecast							
[B] – W.R. Powell Elementary School (287 Students)	651	114	98	212	21	25	46
Total Net Trip Generation Forecast [A] – [B]	+212	-102	-59	-161	+20	-1	+19

Source: Appendix K
Notes: TE/DU = Trip End per Dwelling Unit; TE/Student = Trip End per Student

Low VMT Area Screening

It is assumed that projects which will be located within areas which currently exhibit low VMT, and that incorporate similar features pertaining to density, land use mix, and transit availability, will tend to exhibit similarly low VMT. In areas where the existing VMT generation already falls below the applicable thresholds, and where projects are likely to generate similar levels of VMT, projects may be screened out of preparing a more detailed VMT analysis. OPR notes that such screening is appropriate for residential and office projects (Appendix K).

Locations within the City of Azusa which qualify for the low VMT area screening may be identified through the VMT Evaluation Tool. The SCAG Travel Demand Forecasting Model was used to establish VMT performance for individual Traffic Analysis Zones (TAZ) in the VMT Evaluation Tool. The VMT values for each TAZ are then compared to the applicable City thresholds (i.e., VMT per capita, per employee, or per service population) to determine if the TAZ can be considered a low VMT area. VMT screening and evaluation worksheets generated by the VMT Evaluation Tool for the proposed Project are provided in Appendix K.

The Project is situated within TAZ 22354100, which exhibits 21.01 home-based work VMT per capita. The significance threshold is 20.67 VMT per capita. As such, the TAZ does not currently exhibit VMT below the applicable threshold and cannot be considered a low VMT area. Therefore, the Project site does not meet the low VMT area screening (Appendix K).

Summary of VMT Screening Results

Given the above, the proposed Project does not satisfy any of the VMT screening criteria and thus, is not screened out of further analysis. Therefore, a VMT analysis is required to determine whether the proposed Project would result in a significant VMT impact.

VMT Impact Analysis

The Technical Advisory recommends that residential projects be evaluated based on home-based VMT. The SGVCOG VMT Evaluation Tool is available for use in conducting VMT evaluations in the City of Azusa and provides an assessment of home-based VMT per capita for residential projects.

The Technical Advisory asserts that a reasonable threshold of significance would be a VMT per capita or VMT per employee which is 15% below that of existing development.

- A residential project between 0% to <15% below existing VMT per capita may indicate a significant VMT impact.

The City's baseline VMT for the SGVCOG subarea utilizes the 2024 SCAG RTP/SCS. The Baseline VMT per capita threshold used in the SGVCOG VMT Evaluation Tool is interpolated to be consistent with the year that the transportation study begins, which is 2025. The baseline VMT for the year 2025 is 24.32 Home-Based VMT per capita. Therefore, a significant VMT impact would result if the Project exceeds 20.67 Home-Based VMT per capita. VMT evaluation worksheets generated by the tool for the proposed Project are included in Appendix K.

The proposed Project's daily residential VMT per capita was forecast using the SGVCOG VMT Evaluation Tool. Copies of the VMT Evaluation Tool summary worksheets are contained in Appendix K. As stated on the summary worksheets, the Project is forecast to generate 21.01 VMT per capita, which exceeds the threshold of 20.67 VMT per capita. Therefore, the proposed Project would result in a potentially significant VMT impact.

VMT Reduction Measures

The SGVCOG VMT Evaluation Tool estimates the effectiveness of potential VMT reduction strategies in addition to estimating whether a development project exceeds the VMT thresholds. Strategies are built into the SGVCOG VMT Evaluation Tool, covering several categories including parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancements. These strategies address the potential VMT reductions available due to certain types of project site modifications, programming, and operational changes which are collectively known as Transportation Demand Management (TDM) strategies. The effectiveness of each strategy is primarily based on research documented in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (2024 Update). The VMT Estimation Tool utilizes the methodology provided in the CAPCOA document. The TDM strategies provided in the SGVCOG VMT Evaluation Tool were therefore reviewed for applicability to the proposed Project based on land use type, location, and feasibility of implementation (Appendix K). The measure which has been applied to reduce the Project-generated VMT is described in further detail below.

- **T-23 Provide Community-Based Travel Planning:** This strategy would require outreach that will provide households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles.

Based on the SGVCOG VMT Evaluation Tool, this TDM measure would result in a 2.28 percent reduction in the Project's VMT. The Home-Based VMT per capita for the proposed Project would subsequently be reduced to 20.53 Home-Based VMT per capita, which is below the calculated City significance threshold of 20.67 Home-Based VMT

per capita. Therefore, the TDM measure can be incorporated as MM-TRA-1, Implement Community Based Travel Planning (CBTP), and would reduce the Project's VMT impact to a less than significant level.

Table 4.15-2. Project Vehicle Miles Traveled Summary

Criteria	Home-Based VMT per capita
Subarea acreage (baseline) VMT	24.32
VMT threshold (15% below baseline)	20.67
Project VMT	21.01
VMT with TDM reduction measure/Mitigation (MM-TRA-1)	20.53
Potentially Significant Impact with Mitigation?	**No**

Source: Appendix K.

Notes: VMT = vehicle miles traveled; TDM = Traffic Demand Management.

Given the above, the Project would not conflict with CEQA Guidelines section 15064.3, subdivision (b) related to the VMT threshold. Impacts would be less than significant with mitigation incorporated.

Threshold 4.15c **Would the project substantially increase hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Less Than Significant Impact. The Project would not substantially increase hazards due to a geometric design feature or incompatible uses, as further described below.

The existing curb cuts to the Project site are along Calera Avenue. Vehicular access to the Project site is proposed to be accommodated by the northernmost existing driveway along Calera Avenue (elimination of the 2nd driveway on Calera Avenue) and one proposed new driveway along Mauna Loa Avenue at Fairvale Drive.

The existing northernmost driveway along the west side of Calera Avenue (i.e., along the Project site's easterly frontage) would be approximately 26 feet wide upon construction and occupancy of the Project. In addition, this driveway would accommodate one inbound and one outbound lane and would allow full vehicular access (i.e., left-turn and right-turn ingress and egress movements).

The proposed driveway along the north side of Mauna Loa Avenue at the Fairvale Drive / Mauna Loa Avenue intersection (i.e., along the Project site's southerly frontage) would be approximately 26 feet wide. The proposed driveway would be constructed as the north leg of the existing Fairvale Drive/Mauna Loa Avenue intersection and would accommodate one inbound and one outbound lane upon construction and occupancy of the Project. The proposed driveway would allow full vehicular access (i.e., left-turn and right-turn ingress and egress movements).

Internal access to the proposed residential units and the associated parking areas (i.e., covered and uncovered parking) would be accommodated by a network of internal private roadways. The proposed Project driveways and internal roadways would be constructed to the applicable City standards and would adequately accommodate emergency vehicles as required by the Fire Department. The Project's site plan and circulation has been reviewed by the City's Public Works and Fire Departments, ensuring that all City standards are met.

Construction of Project access would include new sidewalks, relocation of existing curb cuts, utility connections, and new or replacement street trees per City standards. The Project does not propose hazardous geometric design

features or incompatible uses. The Project would not increase hazards because of a geometric design feature or incompatible uses and impacts would be less than significant.

Threshold 4.15d Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project would not substantially result in inadequate emergency access, as further described below.

Construction

Construction of the Project would generate temporary traffic from construction employees, materials delivery and haul trucks. Construction activities could also temporarily result in lane closures along the Project site's frontage on North Calera Avenue to accommodate proposed utility connections and pedestrian improvements. Any construction work within public right-of-way would require a Traffic Control Plan (TCP) and traffic control permit pursuant to AMC section 62-50 and approval of the City engineer. The TCP shall ensure that warning devices are implemented to warn vehicular traffic and pedestrians of the work under construction. The nature and placement of the warning devices shall meet or exceed the requirements for the type of work set forth in the latest edition of Work Area Traffic Control Handbook (WATCH) Manual. This would ensure construction document specifications include measures for appropriate signing, flagging, and directing of traffic. The implementation of TCP and standard measures would ensure construction activities occurring within the public right-of-way would not result in inadequate access to emergency vehicles or road users.

Operation

All areas of the Project site would be accessible to emergency responders for the long-term operation of the Project. Local access to the Project site would be provided via Mauna Loa Avenue and Calera Avenue. Project access driveways would be constructed per City's applicable design standards to ensure adequate access to the Project site, including access for emergency vehicles and adequate turning radii. The internal drive aisles and loading and parking areas would be designed to comply with the City's width, clearance, and turning radius requirements of the Fire Department, which were established to ensure safe and efficient vehicular circulation. Because the Project would comply with all applicable local requirements related to emergency vehicle access and circulation, the Project would not result in inadequate emergency access. Therefore, operational impacts associated with inadequate emergency access would be less than significant.

4.15.5 Cumulative Impact Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by section 15130 of the CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, of Chapter 2, Environmental Setting, and in Table 2-2, List of Cumulative Projects, of this Draft EIR. The geographic context for the cumulative analysis as it relates to transportation is the City and the current RTP/SCS.

Threshold 4.15a-Cumualtive **Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

As described under the discussion for Threshold (a) and examined in Section 4.7, Greenhouse Gas Emissions, and Section 4.10 Land Use and Planning, the proposed Project is consistent with the following plans addressing the circulation system and would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities under cumulative conditions:

- SCAG Connect SoCal – the proposed Project's proximity to existing public transit such as various bus routes and the Metro A Line would increase transit accessibility and encourage sustainable land use patterns by redeveloping residential use near accessible transit.
- City of Azusa General Plan – approval of the proposed Project would ensure the proposed use is processed per requirements of General Plan Amendment and Zone Change implementation.

In addition, Metro developed the 2020 Long Range Transportation Plan (LRTP), which provides the funding plan and policies to provide a balanced comprehensive approach that considers the mobility needs of everyone in Los Angeles County and matches those access needs with Metro's expected resources to transform the County's transportation future (Metro 2020). Additionally, the 2014 Short Range Transportation Plan (SRTP) identifies projects and programs that will be implemented in accordance with the Project priorities and funding schedules through 2025 (Metro 2014). Metro is in the process of updating the SRTP to advance the 2020 LRTP. It is recognized that with these plans in place, Metro will continue to maintain and expand regional transit service to accommodate cumulative demand in the region. Although the Project (and other related projects) would cumulatively add transit ridership, Metro would continue to maintain and expand regional transit service to accommodate cumulative demand in the region; therefore, cumulative impacts on public transit would be less than significant.

Therefore, cumulative impacts related to a program, plan, ordinance, or policy related to addressing the circulation system would be less than significant.

Threshold 4.15b-Cumulative **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

According to Appendix K, cumulative impacts are determined through consistency with adopted regional plans, such as Connect SoCal, which demonstrates compliance with air quality conformity requirements and greenhouse gas reduction targets. As such, projects that are consistent with the Connect SoCal in terms of development location, density, and intensity are part of the regional solution for meeting air pollution and greenhouse gas goals. Projects that are deemed to be consistent with RTP/SCS can be presumed to have a less than significant cumulative impact on VMT. Developments in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. As discussed in this Draft EIR, the Project is not inconsistent with goals of the current SCAG RTP/SCS in terms of development location, density, and intensity and is part of the regional solution for meeting air pollution and greenhouse gas goals by providing housing in a developed area which is served by existing transportation network including transit facilities.

However, the Technical Advisory provides the following additional discussion of cumulative VMT impacts: "[M]etrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative

impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice-versa."

The proposed Project has been determined to have a potentially significant project-level impact in comparison to the applicable efficiency-based VMT impact thresholds. Therefore, it is conservatively concluded that the proposed Project potentially contributes toward a cumulative VMT impact. However, with implementation of MM-TRA-1, Implement Community Based Travel Planning (CBTP), the Project's cumulative impact would be mitigated to less than significant levels.

Threshold 4.15c-Cumulative **Would the project substantially increase hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The Project would develop an internal circulation system that would be in compliance with all Public Works and Fire Department requirements for safety and access. There would be no increases in road hazards or any dangerous design features due to Project implementation, and there are no identified deficiencies in safety or circulation infrastructure that could be affected by the Project. Further, development elsewhere in the City and adjacent jurisdictions would be required to comply with all applicable local provisions related to the circulation system and roadway hazards. Therefore, Project's impacts would be less than significant under cumulative conditions.

Threshold 4.15d-Cumulative **Would the project result in inadequate emergency access?**

As stated above under Threshold 4.15, the Project would result in less than significant impacts to emergency access. The Project would develop an internal circulation system that would be in compliance with all Public Works and Fire Department requirements for safety and access. The Project would also prepare a TCP in accordance with AMC section 62-50 to ensure construction activities occurring within the public right-of-way would not result in inadequate access to emergency vehicles or road users. Further, development elsewhere in the City and adjacent jurisdictions would be required to comply with all applicable local provisions related to emergency access, including preparation of a TCP and applicable design standards. Therefore, Project's impacts would be less than significant under cumulative conditions.

4.15.6 Mitigation Measures

MM-TRA-1 Implement Community-Based Travel Planning. The Project applicant shall prepare a community-based travel planning (CBTP) program for the City's review and approval. The CBTP shall include details about how residences within the Project will be provided with customized information and support to encourage the use of transportation alternatives such as transit, bike and pedestrian modes and available facilities, in place of single-occupancy vehicles. The CBTP shall include the frequency and duration of the CBTP implementation and the personnel/organization that would be responsible for implementing the CBTP programming for the Project, such as the Homeowner's Association (HOA). At a minimum, the CBTP shall be reviewed/updated annually to reflect changes in transit opportunities in the vicinity, provide clear guidance on available nearby transit services, as well as information of bike and pedestrian facilities that connect to important destinations in the area. The program shall require the annual disbursement of information to the residents via mailers, electronic mail, and/or meetings. The CBTP shall be approved by the City and ready for implementation prior to the issuance of the first Certificate of Occupancy.

4.15.7 Significance Conclusion

Threshold 4.15a. The Project would have a **less-than-significant impact** related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Threshold 4.15b. The Project would have a **less-than-significant impact with mitigation** related to conflicts or inconsistencies with CEQA Guidelines section 15064.3, subdivision (b).

Threshold 4.15c. The Project would have a **less-than-significant impact** related to a substantial increase in hazards due to a road design feature or incompatible uses. All other potential environmental impacts addressed under this threshold would be less than significant.

Threshold 4.15d. The Project would have a **less-than-significant impact** related to emergency access during construction. The Project would have a less-than-significant impact related to emergency access while operational.

4.15.8 References

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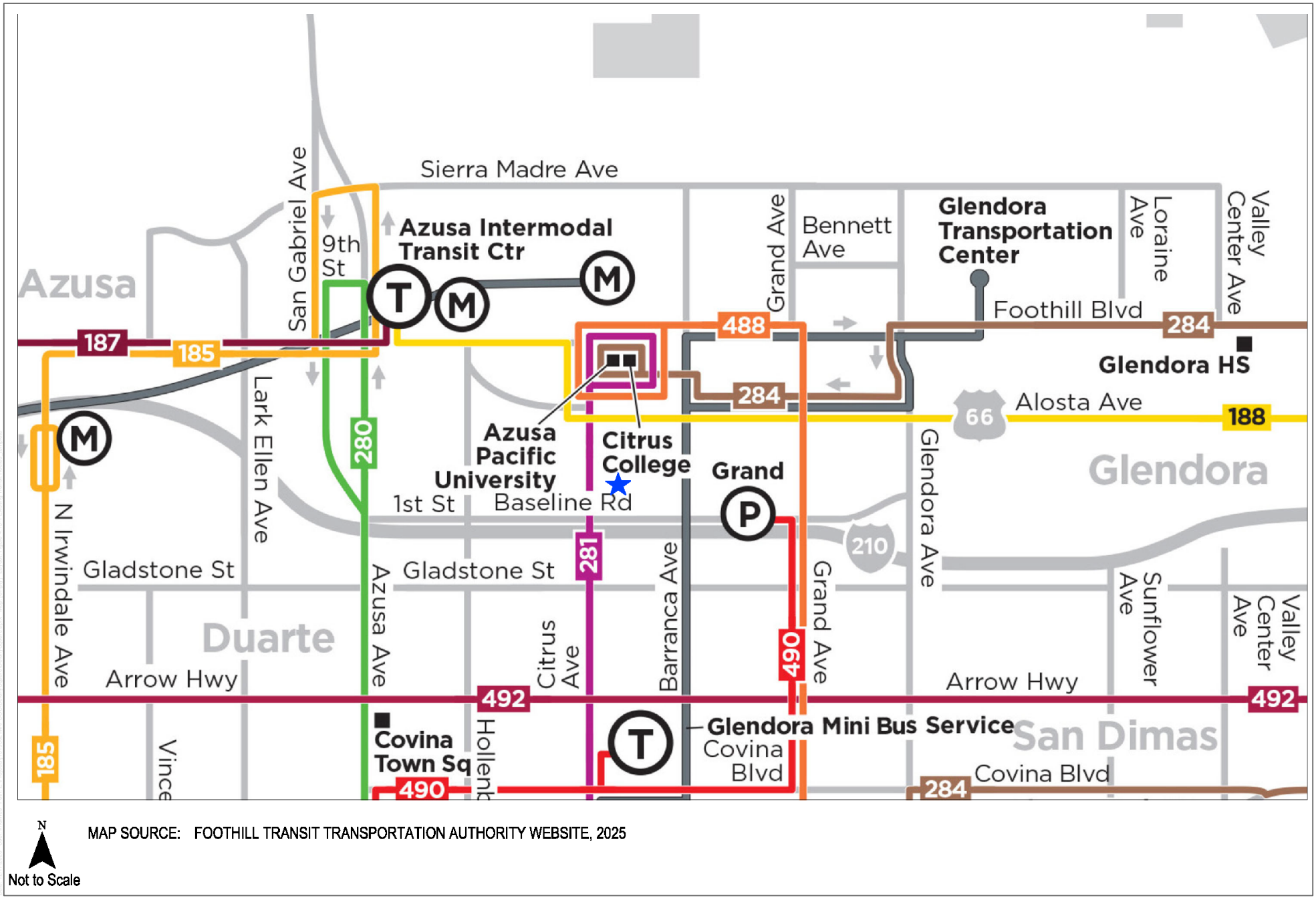
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SOURCE: Linscott, Law & Greenspan , 2025

FIGURE 4.15-1

Existing Transit Routes

Delaney Square Residential Project

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4.16 Tribal Cultural Resources

This section describes the existing tribal cultural resources (TCRs) conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures, level of significance after mitigation, and references. Information contained in this section is based on the following:

- **Appendix E-1** Archaeological Resources Inventory Letter Report, prepared by Dudek
- **Appendix L-1** Assembly Bill 52 and Senate Bill 18 Project Notification Letters
- **Appendix L-2** *CONFIDENTIAL*: Record of Assembly Bill 52 and Senate Bill 18 Consultation[1]

The Archaeological Resources Inventory Letter Report prepared by Dudek in 2025 includes the results of a CHRIS records search at the SCCIC; an archival information review; correspondence with the NAHC; and an archaeological resources pedestrian survey of the Project site. The report was prepared in conformance with the CEQA Guidelines and all applicable local regulations. In addition, the analysis contained in this section is based on information gathered through tribal consultation pursuant to AB 52 and SB 18 conducted by the City. Other sources consulted are listed in Section 4.16.8, References.

4.16.1 Existing Conditions

A summary of the existing conditions of the Project site, including the results of the CHRIS records search at the SCCIC, archival information review, correspondence with the NAHC, and archaeological resources pedestrian survey of the Project area, can be found in Appendix E-1 and is included in Section 4.4, Cultural Resources, of this Draft EIR. A summary of the prehistoric and historical setting is included in Section 4.4, Cultural Resources, of this Draft EIR. These existing conditions also apply to TCRs and are incorporated herein by reference to avoid repetition.

4.16.1.1 Ethnohistoric Overview

The following section has been prepared by technical specialists based on information gathered from academic, ethnographic, and archival literature with the intent of providing a baseline understanding of the Ethnohistoric period. Input from Native American representatives pertaining to contemporary Native American community values, and understandings of their histories is best provided through the process of consultation. The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief and generally peripheral accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Boscana 1846; Geiger and Meighan 1976; Harrington 1934; Laylander 2000; Sparkman 1908; White

[1] Any information submitted by a California Native American tribe during the environmental review process shall not be included in the environmental review document or otherwise disclosed without the prior consent of the tribe that provided the information (PRC § 21082.3). No document prepared for public examination shall include information about the location of sacred sites (CEQA Guidelines § 15120(d)). The Confidential Record of Assembly Bill 52 and Senate Bill 18 Consultations is on file with the City and is available for review by eligible individuals.

1963). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

4.16.1.2 Gabrielino (Gabrieleño)/Tongva

The archaeological record indicates that the proposed Project site and vicinity was occupied by the Gabrielino. Surrounding cultural groups included the Chumash and Tataviam to the north and west, the Serrano and Cahuilla to the north and east, and the Juaneño and Luiseño to the south and east.

The name "Gabrielino" (also spelled "Gabrieliño" and "Gabrieleño") denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrielino area proper as well as other social groups (Bean and Smith 1978; Kroeber 1925). Therefore, in the post-Contact period, the name does not necessarily identify a specific ethnic or tribal group. The names by which Native Americans in southern California identified themselves have, in some cases, been lost. Many modern Gabrielino identify themselves as the Tongva (King 1994), within which there are a number of regional bands. Though the names "Tongva" or "Gabrielino" are the most common names used by modern Native American groups, and are recognized by the Native American Heritage Commission, there are groups within the region that self-identify differently. To be inclusive of the majority of tribal entities within the region, the names "Tongva" or "Gabrielino" are used within this Draft EIR.

Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000, but recent ethnohistoric work suggests a number approaching 10,000 (O'Neil 2002). Houses constructed by the Tongva were large, circular, domed structures made of willow poles thatched with tule that could hold up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries. Cleared fields for races and games were created adjacent to Tongva villages (McCawley 1996). Archaeological sites composed of villages with various sized structures have been identified.

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds,

reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978: 546; Kroeber 1925; McCawley 1996).

A wide variety of tools and implements were used by the Tongva to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996).

Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

4.16.1.3 AB 52 Tribal Consultation

As further described in Section 4.16.2, AB 52 requires lead agencies to provide tribes (who have requested notification) with early notice of the proposed Project and, if requested, to formally consult with such tribes to inform the CEQA process with respect to TCRs.

On December 1, 2025, the City sent notification letters pursuant to AB 52 via U.S. Postal Service certified mail to the 9 California Native American Tribal representatives on the City's AB 52 Contact List. These notification letters included a project description, a project location map, an outline of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. AB 52 allows tribes no less than 30 days after receiving notification to request consultation. If a response is not received within the allotted 30 days, the initiating lead agency can accept consultation requests after the 30 days but is not required to do so. One response was received as a result of the City's AB 52 consultation notification. Table 4.16-1 summarizes the results of the AB 52 consultation efforts.

Table 4.16-1. Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Consultation Record
Charles Alvarez Gabrielino-Tongva Tribe	December 1, 2025 Letter sent via USPS certified mail	No response.
Scott Cozart, Chairperson Soboba Band of Luiseno Indians	December 1, 2025 Letter sent via email	No response.
Robert Dorame, Chairperson Gabrielino Tongva Indians of California Tribal Council	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Sandonne Goad, Chairperson Gabrielino/Tongva Nation	December 1, 2025 Letter sent via USPS certified mail and email	No response.

Table 4.16-1. Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Consultation Record
Jessica Mauck, Director of Cultural Resources Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)	December 1, 2025 Letter sent via USPS certified mail and email	**December 11, 2025** Email from Raylene Borrego, on behalf of the Yuhaaviatam of San Manuel Nation, to the City, acknowledging receipt of AB 52 notification letter for the Project and indicating that the Tribe does not wish to consult on the proposed Project.
Anthony Morales, Chairperson Gabrieleno/Tongva San Gabriel Band of Mission Indians	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Lovina Redner, Tribal Chair Santa Rosa Band of Cahuilla Indians	December 1, 2025 Letter sent via email	No response.
Andrew Salas, Chairperson Gabrieleno Band of Mission Indians - Kizh Nation	December 1, 2025 Letter sent via USPS certified mail and email	No response.
John Valenzuela, Chairperson San Fernando Band of Mission Indians	December 1, 2025 Letter sent via USPS certified mail	No response.

Sources: Appendix L-1; Appendix L-2 (Confidential).

4.16.1.5 Senate Bill 18 Tribal Consultation

As further described in Section 4.16.2, SB 18 requires lead agencies to provide early notice of the proposed Project to tribes that have been identified by the Native American Heritage Commission (NAHC) and, if requested, to consult with such tribes to inform the CEQA process with respect to Tribal "cultural places" (as defined by PRC §§ 5097.9 and 5097.995), which are generally inclusive of TCRs, as defined within AB 52. See Section 4.16.2.1, State, for further details regarding the SB 18 process.

Because of the General Plan Amendment sought for the Project, the City is required to notify eligible tribes under SB 18. On December 1, 2025, the City sent notification letters pursuant to SB 18 via U.S. Postal Service certified mail to the 8 California Native American Tribes and their Tribal representatives who were identified by the NAHC as being traditionally or culturally affiliated with the geographic area of the proposed Project. These notification letters included a project description, a project location map, an outline of SB 18 timing, an invitation to consult, and contact information for the appropriate lead agency representative. SB 18 allows tribes no less than 90 days after receiving notification to request consultation. If a response is not received within the allotted 90 days, the initiating lead agency can accept consultation requests after the 90 days but is not required to do so. Table 4.1-2 summarizes the results of the SB 18 consultation efforts.

Table 4.16-2. Senate Bill 18 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Consultation Record
Andrew Salas, Chairperson Christina Swindall Martinez, Secretary Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation)	December 1, 2025 Letter sent via USPS certified mail and email	**December 8, 2025** The Kizh Nation acknowledged receipt and expressed interest in participating in consultation pursuant to SB 18. **March 4, 2026** Initial consultation meeting via email communication between City staff and Tribal representatives to discuss the Project and areas of cultural concern. **March 4, 2026** The Kizh Nation submitted written comments and proposed Tribal Cultural Resources mitigation measures to the City. **March 10, 2026** The City responded to the Kizh Nation via email, acknowledging receipt of the proposed measures. City accepted and incorporated the Kizh Nation's proposed Tribal Cultural Resources mitigation measures into the Project's Draft Environmental Impact Report. **June 9, 2026** Formal consultation closeout letter issued by City.
Anthony Morales, Chairperson Gabrieleño/Tongva San Gabriel Band of Mission Indians	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Sadonne Goad, Chairperson Gabrielino/Tongva Nation	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Robert Dorame, Chairperson Christina Conley, Cultural Resource Administrator Gabrielino Tongva Indians of California Tribal Council	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Charles Alvarez, Chairperson Sam Dunlap, Cultural Resource Director	December 1, 2025 Letter sent via USPS certified mail and email	No response.

Table 4.16-2. Senate Bill 18 Native American Tribal Outreach Results

Native American Tribal Representatives	Method and Date of Notification	Consultation Record
Gabrielino-Tongva Tribe		
Steven Estrada, Tribal Chairman Mercedes Estrada, Cultural Director Vanessa Minott, Tribal Administrator Santa Rosa Band of Cahuilla Indians	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Joseph Ontiveros, Tribal Historic Preservation Officer Jessica Valdez, Cultural Resource Specialist Soboba Band of Luiseno Indians	December 1, 2025 Letter sent via USPS certified mail and email	No response.
Erica Schenk, Chairperson BobbyRay Esparaza, Cultural Director Anthony Madrigal, Tribal Historic Preservation Officer Cahuilla Band of Indians	December 1, 2025 Letter sent via USPS certified mail and email	No response.

Source: Appendix L-1; Appendix L-2 (Confidential).

4.16.2 Regulatory Requirements

4.16.2.1 Federal

No federal regulations are known to pertain to this Project.

4.16.2.2 State

California Register of Historical Resources (CRHR)

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering,

scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC § 5020.1(j)). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC § 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated as follows. According to PRC section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity" and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 Cal. Code Regs. (CCR) § 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

Cultural Resources

The following CEQA statutory provisions and CEQA Guidelines sections are relevant to the analysis of archaeological, historic, and tribal cultural resources:

- PRC section 21083.2(g) defines "unique archaeological resource."
- PRC section 21084.1 and CEQA Guidelines section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines section 15064.5(b) defines the phrase "substantial adverse change in the significance of a historical resource;" it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC section 21074(a) defines "tribal cultural resources."
- PRC section 5097.98 and CEQA Guidelines section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC sections 21083.2(b) and 21083.2(c) and CEQA Guidelines section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the

archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC § 21084.1; CEQA Guidelines § 15064.5(b)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (CEQA Guidelines § 15064.5(b)(1); PRC § 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following (CEQA Guidelines § 15064.5(b)(2)):

1. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC section 5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC §21083.2(a)–(c)).

PRC section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC § 21083.2(a); CEQA Guidelines § 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a TCR (PRC §§ 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC section 5097.98.

Assembly Bill 52

AB 52 of 2014 amended PRC section 5097.94 and added PRC sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. "Consultation" is defined as the "meaningful and timely process of seeking, discussing, and considering carefully the view of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement." (Gov. Code, § 65352.4.) Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR. The consultation requirement only applies if the tribe: (1) requested in writing to be informed of proposed projects in the tribe's geographic area; and (2) requests consultation by responding in writing within 30 days of receipt of the formal notification. The lead agency must begin the consultation process within 30 days of receiving the tribe's request for consultation.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC § 21080.3.2(a)). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC § 21082.3(a)).

Senate Bill 18

The Local and Tribal Intergovernmental Consultation process, commonly known as SB 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 requires the local government to consult with California Native American tribes prior to adopting or amending a general plan, specific plan, or open space designation. SB 18 refers to PRC sections 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC § 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC § 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that are on the contact list maintained by the NAHC, and request consultation after local government outreach as stipulated in Government Code section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code section 65560 to "allow the protection of cultural places in open space element of the general plan" and amended Civil Code section 815.3 to add California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code section 7050.5 and PRC section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code § 7050.5(b)). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code § 7050.5(c)). In accordance with California PRC section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

Native American Historic Cultural Sites

The Native American Historic Resources Protection Act (PRC § 5097, et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the California NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains

and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

4.16.2.3 Local

City of Azusa Municipal Code

Historic Preservation Ordinance of the City of Azusa

The Azusa Historic Preservation Ordinance, codified as Chapter 55, Article II, Historic Preservation in the AMC, applies to all cultural and historical resources within the corporate boundaries of the city. The City acknowledges the recognition, preservation, protection and use of all historical resources in the city are required in the interests of and to promote the public health, prosperity, safety, enrichment and general welfare. The Ordinance sets forth designation criteria for historic landmarks and districts (Sec. 55-41), designation procedures (Sec. 55-42), review procedures (Sec. 55-43 through 55-49), maintenance and care (Sec. 55-51), historic preservation incentive programs -- such as the Mills Act contracts (Sec. 55-52(3)) -- and enforcement and penalties (Sec. 55-53).

Section 88.30.012, Archaeological Resource Protection

The City's Development Code (AMC Chapter 88, Development Code) applies to all proposed development and new land uses. Section 88.30.012, Archaeological Resource Protection, regulates construction activities when archeological resources are unearthed or discovered. The following standards apply:

A. Construction activities shall cease, and the department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, approved by the city, and funded by the applicant, and disposition of artifacts may be accomplished in compliance with state and federal law.

B. In the event archeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the county coroner shall be notified in addition to the department so proper disposition may be accomplished.

City of Azusa 2004 General Plan

The City's Built Environment Element includes policies designed to protect and preserve tribal cultural resources (City of Azusa 2004). The City recognizes the importance of its historical and cultural diversity, as represented by prehistoric sites, buildings, places, and activities, which must be preserved and enhanced. The policies presented in this section focus on the preservation of physical reminders of the past; the treatment of links with the past as important not only to understanding history but to forging a better future; promotion of cultural diversity, and encouragement of public participation in preserving the past while building for the future.

The following General Plan goals, policies, and implementation measures pertaining to tribal cultural resources would be applicable to the Project:

Goal 1: Acknowledge, preserve, and protect the City's Native American heritage.

> Policy 1.1: Determine early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.

4.16.3 Thresholds of Significance

The significance criteria used to evaluate Project impacts to TCRs are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to TCRs would occur if the Project would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.16.4 Impacts Analysis

Threshold 4.16a ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

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

Less Than Significant Impact**.** As described under Section 4.4, Cultural Resources, of this Draft EIR, while the NAHC does have records of Native American cultural resources in the larger search radius, it is important to note that the Sacred Lands File (SLF) is maintained at a public land survey system section level, meaning that positive results are respective of a general area covering approximately 1 square mile (640 acres), rather than the exact area of study; therefore, a positive result does not necessarily equate to the existence of resources within the specific area occupied by the Project site. Additionally, no previously recorded cultural resources of Native American origin or TCRs listed on the California Register of Historical Resources or local register were identified within the Project site as a result of the CHRIS records search at the SCCIC, archival information review, or archaeological resources pedestrian survey.

An appropriate approach to potential impacts to TCRs is developed in response to the identified presence of a TCR by California Native American tribes through the process of consultation. The AB 52 and SB 18 process requires consideration of impacts to TCRs as part of the CEQA process and requires lead agencies notify and consult with California Native American tribal representatives who are traditionally or culturally affiliated with the geographic area of the Project. As a result of the City's AB 52 and SB 18 notification efforts, one tribal organization responded expressing with a request to consult on the proposed Project: The Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation).

Andrew Salas, Chairperson for the Kizh Nation, responded to the SB 18 Project notification on behalf of the Kizh Nation with a statement that the Project is within their Ancestral Tribal Territory and a request to consult further. Through email correspondence, Mr. Salas provided a series of proposed tribal cultural resources mitigation measures for the Project. The City responded to the Kizh Nation via email, acknowledging receipt of the proposed measures, and accepted and incorporated the Kizh Nation's proposed Tribal Cultural Resources mitigation measures into the Draft EIR (see Section 4.16.6, below). Consultation between the City and the Kizh Nation concluded on June 9, 2026.

No additional information has been provided to support the presence of specific, geographically defined TCRs that could be affected by Project-related construction or operation. Therefore, the Project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts would be less than significant.

Threshold 4.16b ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

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

Less-Than-Significant Impact with Mitigation Incorporated. No known cultural resources of Native American origin or association have been identified within areas that would be affected by the Project. While the City acknowledges that the landscape surrounding the Project was traditionally used by Indigenous peoples, no substantial evidence was provided during consultation conducted pursuant to AB 52 and SB 18 demonstrating that the Project has the potential to affect known TCRs, as defined in PRC section 21074(a).

However, in acknowledgement of information provided through consultation and in an effort to protect TCRs that may be inadvertently discovered during Project-related ground disturbance, the Project would require the implementation of MM-TCR-1 through MM-TCR-3, to address potential impacts related to the inadvertent discovery of tribal cultural resources during construction. These mitigation measures were proposed by the Kizh Nation during consultation with the City pursuant to SB 18.

With implementation of MM-TCR-1 through MM-TCR-3, which provide for Native American monitoring during initial ground-disturbing activities and inadvertent discovery protocols, potentially significant impacts to unknown tribal cultural resources would be reduced to less than significant.

4.16.5 Cumulative Impacts Analysis

Cumulative impacts on TCRs consider whether impacts of the Project together with other past, present, and reasonably foreseeable future projects identified within the vicinity of the Project site, when taken as a whole, significantly impact cultural or tribal resources and considers whether there is a significant cumulative impact to which a project would make a cumulatively considerable contribution. Impacts to cultural and tribal cultural resources, if any exist, tend to be site specific. The past, present, and reasonably foreseeable future projects (i.e.,

cumulative projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, and Figure 2-5, Cumulative Projects Location Map, of Chapter 2, Environmental Setting, of this Draft EIR.

Threshold 4.16a ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

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

As discussed above in this section, there are no known TCRs on the Project site and as such, there are no resources listed or eligible for listing on the CRHR or in local register as defined in PRC section 5020.1(k). Therefore, the Project site is not a part of an existing or known grouping or district of cultural or tribal cultural resources that would be impacted as part of the cumulative impacts of other projects. For these reasons, cumulative impacts would be considered less than significant.

Threshold 4.16b ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

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

Although there are no known TCRs on the Project site, the potential to encounter TCRs during construction activities is still possible. For archaeological resources of Native American origin, past, present, and reasonably foreseeable cumulative projects may require extensive excavation in culturally sensitive areas and, thus, may result in adverse effects to known or previously unknown, inadvertently discovered archaeological resources of Native American origin. Because all TCRs are unique and nonrenewable resources, projects that cause a substantial adverse change in the significance of a TCR have the potential to erode a general tribal cultural landscape to which the resources belong. Therefore, if an impact to an unknown TCR occurs due to implementation of the Project, a cumulative significant effect on TCRs could result when combined with other cumulative development in the area due to the loss of identified or unknown TCRs through the physical destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired.

Any tribal cultural resources inadvertent discoveries associated with the Project would be protected to the extent required by law and as outlined in MM-TCR-1 through MM-TCR-3. Upon implementation of these measures, the Project would not have a significant impact on any resources that may be inadvertently discovered during construction. Because there are no known significant TCRs at the Project site, the mitigation is for Native American

monitoring and protocols for treatment of inadvertent discoveries. As such, the Project would not result in a cumulatively considerable contribution to any significant cumulative effects on such resources.

The cumulative projects that would occur in accordance with the General Plan growth and buildout, as applicable, are all subject to PRC section 21083.2 and other the regulatory requirements that mandate evaluation and consideration of potential impacts to TCRs prior to approval of any discretionary permit for site development. Other individual projects occurring in the vicinity of the Project site would also be subject to the same requirements of CEQA as the proposed Project and any impacts to cultural or tribal cultural resources would be mitigated, as applicable. For these reasons, cumulative impacts would be considered less than significant with mitigation.

4.16.6 Mitigation Measures

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

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Grounddisturbing 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 grounddisturbing 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.

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

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

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

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

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

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

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

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

4.16.7 Significance Conclusion

Threshold 4.16a(i). The Project would result in **less than significant impacts** regarding the potential to cause a substantial adverse change in the significance of a TCR that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC § 5020.1(k).

Threshold 4.16a(ii). The Project would result in **less than significant impacts with mitigation** regarding the potential to cause a substantial adverse change in the significance of a TCR that is a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1.

4.16.8 References

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4.17 Utilities and Service Systems

This section describes the existing utilities and service systems conditions of the Project site and vicinity, and identifies associated regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, and references. Information contained in this section is based on the following appendices:

- **Appendix C-1** Air Quality and Greenhouse Gas Emissions CalEEMod Outputs, prepared by Dudek, dated November 6, 2025
- **Appendix H** Hydrology & LID Report, prepared by Kimley Horn, dated June 16, 2025
- **Appendix M-1** Azusa Delaney Square Sewer System Analysis Memorandum, prepared by Kimley Horn, dated August 2025
- **Appendix M-2** Proposed Flow – Azusa Delaney Square, prepared by Kimley Horn, dated September 25, 2025
- **Appendix M-3** Delaney Square Project Will-Serve Letters, provided by Athens Services, Azusa Light & Water, and Los Angeles County Sanitation Districts
- **Appendix M-4** Electric Division Conditions of Approval, prepared by Azusa Light & Water, dated February 13, 2025

Other sources consulted are listed in Section 4.17.8, References.

4.17.1 Existing Conditions

4.17.1.1 Water

The City is served by Azusa Light & Water (ALW) for water services (ALW 2025a). ALW's main sources of water include local groundwater from wells in the Main San Gabriel Basin and surface water from the San Gabriel River, which is treated at the Canyon Filtration Plant prior to distribution to customers. The City can also purchase raw water from either the Metropolitan Water District (MWD) through the Upper San Gabriel Valley Municipal Water District (the Upper District) or from the San Gabriel Valley Municipal Water District (SGVMWD). The current and projected water supplies are provided in Table 4.17-1, as included in the City's 2025 Urban Water Management Plan (ALW 2025 UWMP) (ALW 2026).

Table 4.17-1. Azusa Water Supplies (Current and Projected) (acre-feet)

ALW 2025 UWMP						
Water Supply Source	2025	2030	2035	2040	2045	2050
Groundwater (Main Basin)	11,083	18,389	12,108	12,336	12,566	12,802
Surface Water (San Gabriel River)	6,200	7,000	7,000	7,000	7,000	7,000
Purchased or Imported Water	--	--	--	--	--	--
Total (AF)	**17,283**	**18,389**	**19,108**	**19,336**	**19,556**	**19,802**

Source: ALW 2026, Table 6-8 and 6-9
Notes: All current and projected water supplies in Table 4.17-1 are given as acre-feet (AF). Not applicable = "-"

Historically, the amount of water obtained from each of the City's main water sources varies from year to year and water obtained from the San Gabriel River is dependent on the releases from the San Gabriel Reservoir and Morris Reservoir (ALW 2026). Water storage is essential for the City to supply water during high demand conditions and for firefighting and emergencies. The total freshwater storage capacity of the Main Basin is estimated to be approximately 8.7 million acre-feet (AF). The Main Basin is replenished as described below. The City owns 13 groundwater wells, 11 of which are active groundwater wells that pump water (ALW 2026).

Potable Water Demand

The City is an urban water supplier and is a sub-agency of the Upper District, a wholesale water agency (ALW 2026). According to the ALW 2025 UWMP, in 2025, the service area population for the City was approximately 107,000 people, and the gross water use production was 17,283 AF (ALW 2026).

Groundwater

City water wells tap into the adjudicated Main San Gabriel Basin (Main Basin), which is the City's primary groundwater source and provides approximately 65% of the City's supply on average (ALW 2026).[1] The Main Basin (adjudicated by the Main Basin Watermaster) is a large groundwater basin replenished by stream runoff from the adjacent mountains and hills, by rainfall directly on the surface of the valley floor, by subsurface inflow from the Raymond Basin and Puente Basin, and by return flow from water applied for overlying uses. Additionally, the Main Basin is replenished with imported water (ALW 2026). The Main Basin serves as a natural storage reservoir, transmission system, and filtering medium for wells.

The City obtains its groundwater supply through 11 active wells. The City's adjudicated groundwater basin pumping directly from the Main Basin is 11,083 acre-feet per year (AFY) (ALW 2026).[2] From 2020 to 2025, the City produced an average of 11,307 AFY from the Main Basin. When the City withdraws more than the annual safe operating yield for the relevant groundwater basin, the City—as a sub-agency of the Upper District—can purchase treated, imported water for the purposes of groundwater replenishment (ALW 2026). The Operating Safe Yield is 150,000 AFY, and ALW's share of the Operating Safe Yield is approximately 6.9% (ALW 2026).

Imported Water

The Upper District, the retail supplier of treated imported water to the City, obtains its supply from the MWD connection (USG- 8) located at Badillo Street east of Vincent Avenue (ALW 2026). MWD obtains water from the State Water Project (SWP), which is the delivery system for water from Northern California through the California Aqueduct (ALW 2026). Due to a variety of factors, including complications induced by climate change, the availability of imported water supplies can be highly variable (DWR 2025a). However, the City relies primarily on local groundwater and surface water and therefore has not had to import water from CAMWD since 2007 (ALW 2026).

1 When water users within a basin are in dispute over legal rights to the water, a court can issue a ruling known as an adjudication. Adjudications can cover an entire basin, a portion of a basin, or a group of basins and all non-basin locations between (DWR 2025a).

2 The legal judgment establishing the Main Basin as an adjudicated basin (i.e., the Main Basin Judgment) does not restrict the quantity of water, which parties may extract from the Main Basin. Rather, it provides a means for replacing all annual extractions in excess of a party's annual right to extract water with supplemental water (e.g., through purchase of imported water for groundwater replenishment) (ALW 2026).

Recycled Water

The City currently does not have a direct or indirect recycled water system due to the lack of recycled water mains from downstream wastewater treatment plants to the City. However, the Main Basin Watermaster, which actively manages the basin, has declared its support for a new recycled water supply project for Main Basin replenishment. When completed, the project could supply up to 100 percent of the overall imported replenishment water requirements (ALW 2026).

Project Site Water Demand

As shown on Figure 3-4, Preliminary Utility Plan, in Section 3.0, Project Description of this Draft EIR, the potable water infrastructure near the Project site includes a 12-inch water pipe within East Mauna Loa Avenue and an 8-inch water pipe within North Calera Avenue (Appendix M-1). These mains are available for domestic water and/or fire services. The Project site currently contains seven existing buildings associated with the Powell Elementary School. For the purposes of environmental analysis, utilizing the proposed Project's baseline, Powell Elementary School is being analyzed as if the school is still in operation (see Chapter 2 of this EIR for a discussion regarding the use of this baseline). The estimated water generation for the Project site is based on Los Angeles County's Estimated Average Daily Sewage Flows for Various Occupancies generation factor. As determined within Appendix M-2, the existing water generation for the Project site is an average of approximately 2,870 gallons per day (GPD).[3]

4.17.1.2 Wastewater

Sewer/wastewater collection is provided by the City and the Los Angeles County Sanitation Districts (Districts), specifically District 22, except for the northern areas of the City that rely on septic tank systems. The City owns, maintains, and operates all local sewer lines within the City, which connect to the Districts' main sewer trunk lines. The trunk sewer lines ultimately connect to the Districts' San Jose Creek Water Reclamation Plant (SJCWRP) located in the City of Whittier (Appendix M-3; City of Azusa 2004).

City Facilities

According to the ALW 2020 UWMP, the City's sewer system conveyed approximately 20.5 million gallons per day (MGD) of wastewater on average in 2020 and has approximately 80 miles of trunk sewer lines ranging from six to 24 inches in diameter (ALW 2021). The City's sewer system serves existing developments in the City and unincorporated Los Angeles County (County) areas within the City's Sphere of Influence (SOI), which allows for sewage conveyance through the Azusa system to the SJCWRP and the A.K. Warren Resource Facility (formerly known as the Joint Water Pollution Control Plant) in the City of Carson, which have a combined total treatment capacity of approximately 400 MGD of wastewater (ALW 2026; City of Azusa 2004).

Los Angeles County Sanitation Districts Facilities

District No. 22 serves the City and fully or partially serves the surrounding cities of Duarte, Bradbury, Irwindale, Glendora, Covina, West Covina, San Dimas, Charter Oak, and portions of unincorporated Los Angeles County (LAFCO 2024). The City's sewer lines and related facilities generally convey wastewater westerly and southerly on major streets toward the downstream wastewater reclamation plants (City of Azusa 2004).

[3] According to the analysis presented in Appendix M-2, it is assumed for the purposes of this analysis that the total existing water and sewer flow are the same for indoor uses.

The Districts operate the San Jose Creek Water Reclamation Plant wastewater treatment facility in the City of Whittier that treats wastewater generated in the City of Azusa. The SJCWRP has a design capacity of 100 MGD of wastewater and currently processes approximately 60.1 MGD. The wastewater generated by the proposed Project would be treated at the SJCWRP (Appendix M-3).

As shown on Figure 3-4, sewer lines exist in streets near the Project site, including an 8-inch sewer line within Calera Avenue, and an 8-inch sewer line within East Mauna Loa Avenue that the Project would connect to. This local sewer line within Mauna Loa flows westward to North Citrus Avenue and then south to East Baseline Road where it connects to the Districts' 18-inch Joint Outfall H – Unit 8L Trunk Sewer, which eventually connects to the Districts' SJCWRP (Appendix M-1; Appendix M-2, City of Azusa 2004). For the purposes of environmental analysis, utilizing the proposed Project's baseline, Powell Elementary School is being analyzed as if the school is still in operation (see Chapter 2 of this EIR for a discussion regarding the use of this baseline). The estimated sewer generation for the Project site is based on Los Angeles County's Estimated Average Daily Sewage Flows for Various Occupancies generation factor. As determined within Appendix M-2, the existing sewer generation for the Project site is an average of approximately 2,870 gallons per day (GPD).[4]

4.17.1.3 Stormwater

Storm drainage in the City is provided by curbs and gutters along streets which drain all stormwater flows into applicable receiving waters such as the Little Dalton Wash or the Big Dalton Wash (City of Azusa 2004). According to the Rio Hondo/San Gabriel River Water Quality Group (RH/SGRWQG) Enhanced Watershed Management Program (EWMP) Management Plan, there are approximately 28 structural and/or institutional best management practices (BMPs) currently being implemented in the City. These include BMPs related to green infrastructure (e.g., infiltration trenches, cultic storm filters, infiltration facilities, and infiltration drywells), and source control (e.g., gross pollutant separators and catch basin inserts, screens, and filters), as well as institutional BMPs (e.g., covered trash bins, enhanced street sweeping, dog parks, and signage and stenciling) (RH/SGRWQG 2016). As shown on Figure 4.9-2, Existing Drainage Conditions, the Project site contains two drainage sub areas: DA-1, an 8.15-acre area that drains to East Mauna Loa Avenue at the southwest corner of the Project site, and DA-2, a 1.02-acre area that drains to the southeast corner of the Project site. Based on the topographic survey there is no existing storm drain infrastructure at the southwest corner of the property (Appendix H).

4.17.1.4 Solid Waste

Waste Collection and Transport

The City contracts with private hauler Athens Services for solid waste disposal services that are processed of at County landfills and/or other integrated waste management facilities, as overseen or managed by the Districts (City of Azusa 2004). Single-family (4 units or fewer), multi-family (5 units or more), and non-residential (i.e., commercial) collection in the City, including waste generated by demolition and/or construction activities, is also disposed of through the City's contract with Athens Services (ALW 2025b). These contracted waste management providers and the City offer waste and recycling collection, green waste recycling programs, special waste transportation, and transfer and materials recovery services to the City as well as many other areas Southern California (ALW 2025b).

[4] According to the analysis presented in Appendix M-2, it is assumed for the purposes of this analysis that the total existing water and sewer flow are the same for indoor uses.

Hazardous Waste

Hazardous waste associated with construction activities, as well as any commercial users, is subject to a number of existing regulations outlining proper disposal, including the Hazardous Material Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Waste Control Act, a Certified Unified Program Agency (CUPA), and the California Accidental Release Prevention Program. The City also offers residents special collection for household hazardous waste materials (e.g., antifreeze, gas and diesel fuels, household batteries, paints/stains, cleaners, fluorescent tubes, etc.) (ALW 2025c). For further discussion of hazardous waste disposal, please see Section 4.8, Hazards and Hazardous Materials, of this EIR.

Solid Waste Disposal Facilities

Solid waste that is not hazardous is transported to municipal landfills and/or other integrated waste management facilities, as coordinated by the Districts and municipally contracted waste management service providers. Solid waste generated in the County may be disposed of at both in-County and out-of-County facilities (County of Los Angeles 2024). In 2023, the total amount of solid waste disposed of at in-County landfills, transformation facilities, and out-of-County landfills was approximately 11.3 million tons (County of Los Angeles 2024). The remaining daily disposal capacity at in-County landfills serving the City is 7,168 tons, while the remaining daily disposal capacity at out-of-County landfills available for use by the City is 41,849 tons (County of Los Angeles 2024). Table 4.17-2, Permitted Solid Waste Disposal Facilities, below, provides information on disposal facilities that are permitted to accept solid waste from the City and other municipalities in the County, including the estimated total daily and remaining disposal capacity.

Table 4.17-2. Permitted Solid Waste Disposal Facilities

Facility Name	Permit No.	Maximum Permitted Daily Capacity (tons)	Average Daily Disposal (tons)	Remaining Capacity (tons)
In-County Facilities				
Lancaster Landfill and Recycling Center	19-AA-0050	3,000	371	Daily: 2,629 Total: 10.79 million
Sunshine Canyon City/County Landfill	19-AA-2000	12,100	7,561	Daily: 4,539 Total: 53 million
In-County Subtotal		*15,100*	*7,932*	*Daily: 7,168* *Total: 63.8 million*
Out of County Facilities				
Mesquite Regional Landfill[a]	13-AA-0026	4,000	—	Daily: 4,000 Total: 660 million
Other Facilities[b]	—	62,057	40,208	Daily: 21,849 Total: —
Out-of-County Subtotal		*66,057*	*40,208*	*Daily: 25,849* *Total:* 660 million
All Facilities				
Total		**81,157**	**48,140**	**Daily: 33,017** **Total: 723.6 million[c]**

Source: County of Los Angeles 2024.

Notes: Data presented in this table is based on year 2023 capacity and disposal rates as provided in the Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report (County of Los Angeles 2024); — = information not available or provided in the Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report.

a. This facility is permitted, but not yet operational. This is an out-of-county facility that has a permitted capacity of 20,000 tons per day but would only accept up to 4,000 tons per day of solid waste from various municipalities in the County. Operation of this facility, as part of the waste-by-rail system, is entirely dependent on the availability of in-County and near-County disposal capacity, diversion from landfills, and the cost of disposal. The waste-by-rail project was completed in 2022. When the Mesquite Regional Landfill/waste-by-rail disposal capacity is needed and when the tipping fees make it economically viable, then the system would begin operation (County of Los Angeles 2024).
b. Other out-of-County landfills currently available for use by jurisdiction in the County include: Lost Hills Environmental Waste Facility in Kern County; Frank R. Bowerman Sanitary Landfill, Olinda Alpha Sanitary Landfill, and Prima Deshecha Sanitary Landfill in Orange County; El Sobrante Landfill in Riverside County; Mid-Valley Sanitary Landfill and San Timoteo Sanitary Landfill in San Bernadino County; and Simi Valley Landfill & Recycling Center in Ventura County. This table only quantities disposal capacity for Mesquite Regional Landfill.
c. "Total" disposal capacity includes Mesquite Regional Landfill, Lancaster Landfill and Recycling Center, Sunshine Canyon City/County Landfill. It does not include the total remaining capacity the "Other" out-of-County landfills available to County jurisdictions listed above in footnote b, as this data was not provided in the Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report.

As shown in Table 4.17-2 above, there is a remaining solid waste disposal capacity of 7,168 tons per day at in-County facilities. Approximately 25,849 tons per day of disposal capacity is currently available at out-of-County facilities. An additional disposal capacity of up to 4,000 tons per day will become available once the Mesquite Regional Landfill/waste-by-rail system is deemed economically viable (County of Los Angeles 2024). The total remaining capacity for in-County solid-waste disposal facilities currently permitted to accept waste from the City is 63.8 million tons and the total for out-of-County facilities is 600 million tons.

In addition to the above in- and out-of-County facilities, construction may be disposed of at inert landfills and debris recycling facilities, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. The Azusa Land Reclamation Co., an inert debris facility in the City of Azusa, has a maximum permitted daily capacity of 8,000 tons per day and receives an average of 1,018 tons of inert waste per day, for a remain estimated daily disposal capacity of 6,982 tons per day (County of Los Angeles 2024). The Azusa Land Reclamation Co. landfill has an estimated total remaining capacity of 44.8 million tons (County of Los Angeles 2024).

4.17.1.5 Dry Utilities

Electricity

The Project site and the City are served by ALW for electric services. ALW serves approximately 16,500 customers within the City with an annual power consumption of over 250,000 megawatts (ALW 2025b). Underground and overhead electrical distribution lines are present within City streets and yard easements. Overhead power transmission and pole mounted transformer units are currently servicing the existing buildings on the Project site.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas services to the City and provides service connections on the Project site. As shown on Figure 3-4, there is an existing 3-inch gas line within East Mauna Loa Avenue and 2-inch gas line within North Calera Avenue (Appendix M-1).

Telecommunications

There are existing telephone, telecommunication, and cable television lines and facilities throughout the City. Cable and telecommunication services for the Project site are available from private providers such as Spectrum, Frontier, and T-Mobile (HSI 2025).

4.17.2 Regulatory Requirements

4.17.2.1 Federal

Water

Federal Safe Drinking Water Act of 1974

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the Act and oversees public water system quality statewide. DHS establishes legal drinking water standards for contaminants that could threaten public health.

Clean Water Act

The federal Clean Water Act, United States Code, Title 33, sections 1251 et seq. requires that wastewater be treated prior to being discharged to waters of the United States. The Clean Water Act is described in further detail in Section 4.9, Hydrology and Water Quality, of this Draft EIR.

Stormwater

National Pollutant Discharge Elimination System Permit Program

The National Pollutant Discharge Elimination System (NPDES) permit program was established as part of the Clean Water Act to regulate municipal and industrial discharges to surface waters of the United States. A discharge from any point source is unlawful unless the discharge is in compliance with an NPDES permit. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. The City, along with the Los Angeles County Flood Control District, the County, and 84 incorporated cities within the coastal watersheds of the County are permittees under the NPDES Permit for Municipal Separate Storm Sewer System (MS4) discharges within the Coastal Watersheds of Los Angeles County (Order No. R4-2021-0105, NPDES Permit No. CAS004004).

Solid Waste

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (Code of Federal Regulations., Title 40, section 268(D)), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs that include federal landfill criteria. The federal regulations address the location, operation, design, and closure of landfills, as well as groundwater monitoring requirements.

4.17.2.2 State

Water

Water Conservation Landscaping Act

AB 1881, the Water Conservation in Landscaping Act of 2006, requires DWR to prepare an updated Model Water Efficient Landscaping Ordinance (MWELO) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated MWELO or a local landscape ordinance that is at least as effective in conserving water as the MWELO. Pursuant to State law, the City amended its Landscape Regulations (AMC Chapter 78, Article VI, Division 7) and Landscape Standards to expand water conservation in landscaping. The Landscape Standards implement the requirements of the Landscape Regulations. All landscape plans and installations are required to comply with the Landscape Standards.

California Urban Water Management Planning Act

The California Urban Water Management Planning Act (California Water Code Division 6, Part 2.6, §§ 10610–10656) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires "urban water suppliers" to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban water suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 AFY of water to customers. The City is an Urban Water Supplier pursuant California Urban Water Management Planning Act. As it provides water to more than 3,000 customers.

California Safe Drinking Water Act of 1976

California enacted its own Safe Drinking Water Act in 1976. As of July 2014, the State Water Resources Control Board is responsible for the administration of the California Safe Drinking Water Act. Title 22 of the California Administrative Code establishes the California Department of Public Health authority and stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than the federal standards.

Senate Bill X7-7 (Water Conservation Act of 2009)

Senate Bill (SB) X7-7, also known as the Water Conservation Act of 2009, was enacted in November 2009 and requires that all water suppliers increase water use efficiency. The main features of this legislation are divided into two sectors, Urban Water Conservation and Agricultural Water Conservation. The law requires, among other things,

that the California Department of Water Resources (DWR), in consultation with other state agencies, develop a single standardized water use reporting form to be used by both urban and agricultural water agencies.

SB X7-7 implements water use reduction goals to achieve a 20% statewide reduction in urban per capita water use. The bill requires each urban retail water supplier to develop urban water use targets to help meet the 20% goal by 2020 and an interim 10% goal by 2015. The bill establishes methods for urban retail water suppliers to determine targets to help achieve reductions in water use. The retail agency may choose to comply with SB X7-7 as an individual or as a region in collaboration with other water suppliers. Under the regional compliance option, the retail water supplier must report the water use target for its individual service area. The City's 2020 Water Use Target pursuant to SB X7-7 was 168 gallons per capita per day (GPCD) (ALW 2021). As of 2020, the City's per-capita water use was 147 GPCD, which meets the City's 2020 Water Use Target (ALW 2021).

Senate Bill 610 and Senate Bill 221

SB 610 and SB 221 became effective January 1, 2002, amending sections 10910–10915 of the State Water Code, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written verification of sufficient water supply to serve proposed large development projects in their jurisdiction. Pursuant to SB 610, the types of projects that are required to obtain water supply assessments include the following:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons
- A proposed commercial office building of more than 250,000 square feet of floor space of employing more than 1,000 persons
- A proposed hotel or motel of more than 500 rooms
- A proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor areas, or employing more than 1,000 persons
- A mixed-use project that falls in one or more of the above-identified categories
- A project not falling in one of the above-identified categories but that would demand water equal to or greater than that required by a 500-dwelling unit project

The public water system's written verification of either its ability or inability to provide sufficient water supplies to meet the projected demand must be supported by "substantial evidence." The "substantial evidence" may include any of the following: (1) the public water system's most recently adopted UWMP; (2) a water supply assessment completed pursuant to State Water Code section 10910; or (3) other information relating to the sufficiency of the water supply that contains analytical information that is substantially similar to the assessment required by section 10635 of the State Water Code (California Government Code § 66473.7(c)).

Sustainable Groundwater Management Act

On September 16, 2014, former Governor Jerry Brown signed into law a three-bill legislative package—AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley)—collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, sustainability

should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the DWR provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for medium- and high-priority groundwater basins in California. SGMA identifies the Main San Gabriel Basin as an adjudicated basin, which is exempt from the requirements of developing Groundwater Sustainability Plans, and subsequently designated as very-low priority basins pursuant to SGMA (ALW 2026). In compliance with SGMA, the Main Basin Watermaster submits annual reports to DWR (ALW 2026).

California Code of Regulations

Title 20, Division 2, Article 4, Appliance Efficiency Regulations

Title 20, Division 2, Article 4, section 1605.3 establishes water efficiency standards (i.e., maximum flow rates, maximum gallons per flush) for all new plumbing fittings and fixtures (e.g., showerheads, sink faucets, water closets, urinals). Among the standards, the maximum flow rate for showerheads and lavatory faucets manufactured after July 1, 2018, are 1.8 gallons per minute at 80 pounds per square inch with an optional temporary flow of 2.2 gallons per minute at 60 pounds per square inch for kitchen faucets and aerators. The standard for public lavatory faucets and aerators is 0.5 gallons per minute at 60 pounds per square inch. The standard for water closets and urinals is 1.28 gallons per flush. In addition, section 1605.3(h) establishes state efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

Wastewater

Porter-Cologne Water Quality Control Act

In California, the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the Clean Water Act and the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act authorizes the State Water Resources Control Board to implement programs to control polluted discharges into state waters. In compliance with the Porter-Cologne Act, the nine RWQCBs establish wastewater concentration limits for a number of specific hazardous substances in treated wastewater discharge.

SWRCB Waste Discharge Requirements Program

The SWRCB Waste Discharge Requirements (WDR) Program regulates the discharge of waste that could affect water quality in California. Under this program, waste discharges that can be exempted from the California Code of Regulations (CCR) requirements are issued WDRs and are regulated by the WDR Program. Typical discharge types include domestic or municipal wastewater, food processing related wastewater, and industrial wastewater.

Solid Waste

Assembly Bills 939 and 341: Solid Waste Reduction

The California Integrated Waste Management Act of 1989 (Assembly Bill (AB) 939) was enacted as a result of a national crisis in landfill capacity, as well as a broad acceptance of the desired approach to solid waste management of reducing, reusing, and recycling. AB 939 mandated local jurisdictions to meet waste diversion goals of 25% by 1995 and 50% by 2000 and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. AB 939 requires cities and counties to prepare,

adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a source reduction and recycling element to demonstrate how the jurisdiction will meet the diversion goals. Other elements included encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions under California Integrated Waste Management Board (CIWMB) regulatory oversight. Since the adoption of AB 939, landfill capacity is no longer considered a statewide crisis. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health, safety, and the environment from landfills operations and solid waste facilities.

In 2011, AB 341 was passed, requiring CalRecycle to require that local agencies adopt strategies that will enable 75% diversion (e.g., reduced, recycled, composted) of all solid waste by 2020.

Senate Bill 1374: Construction and Demolition Waste Reduction

SB 1374 requires that annual reports submitted by local jurisdictions to CIWMB include a summary of the progress made in diversion of construction and demolition waste materials. In addition, SB 1374 requires the CIWMB to adopt a model ordinance suitable for adoption by any local agency that required 50% to 75% diversion of construction and demolition waste materials from landfills. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CIWMB's model by default.

Assembly Bill 1327: California Solid Waste Reuse and Recycling Access Act of 1991

AB 1327, which was established in 1991, required CalRecycle to develop a model ordinance for the use of recyclable materials in development projects. Local agencies were then required to adopt the model ordinance, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects.

Assembly Bill 1826: Mandatory Commercial Organics Recycling

In October 2014, former Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. (Organic waste is defined as food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.) This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. This law phases in the mandatory recycling of commercial organics over time. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to recycle organic waste.

Dry Utilities

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates natural gas utility rates and services provided by SoCalGas, among many other gas utilities. The natural gas services regulated by CPUC include in-state transportation of natural gas over the utilities' extensive transmission and distribution pipeline systems, gas storage, procurement, metering and billing. The CPUC ensures that intra-state natural gas and liquid petroleum gas

pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the federal government. The CPUC enforces natural gas and liquid petroleum gas safety regulations; inspects construction, operation, and maintenance activities; and makes necessary amendments to regulations to protect and promote the safety of the public, the utility employees that work on the gas pipeline systems, and the environment. State and federal regulators are tasked with ensuring that pipeline and hazardous materials operators have risk management programs in place, that those programs are designed in conformance with state and federal laws and regulations, that the programs are effective in enhancing public safety, the operator's employee's safety, environmental safety, and that the safety of the entire system and operation continues to improve. The CPUC conducts operation and maintenance compliance inspections, accident investigations, reviews utilities' reports and records, conducts construction inspections, conducts special studies, and takes action in response to complaints and inquiries from the public on issues regarding gas pipeline safety.

California Code of Regulations

Title 24 Building Standards Code, Part 6 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Non-residential Buildings were established in 1978 in response to a mandate to reduce the State's energy consumption. These standards are promulgated under California Code of Regulations Title 24, Part 6 and are commonly referred to as the Title 24 Building Energy Efficiency Standards or "Title 24". The current Title 24 standards became effective on January 1, 2023. The 2022 title standards build on the 2019 standards by encouraging electric heat pump technology and use, establish electric-ready requirements when natural gas is installed, expanding solar photovoltaic system and battery storage requirements and strengthening ventilation standards to improve indoor air quality. A new development project is required to incorporate the most recent Title 24 standards in effect at the time the building permit application is submitted.

Title 24, Building Standards Code, Part 11, California Green Building Standards Code

The purpose of the California Green Building Standards Code (CALGreen) is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met for a building to be approved. Per CALGreen standards, 65% of construction and demolition (C&D) waste from new construction must be diverted from landfills and either recycled or salvaged for reuse. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

Section 5.408, Construction Waste Reduction, Disposal and Recycling, of CALGreen outlines three methods of compliance for the C&D diversion requirement, with two options below being potentially applicable to the proposed Project. First, owners/builders can comply with the C&D diversion requirement by developing and submitting a construction waste management plan to the City that identifies the C&D waste materials to be diverted from disposal by recycling, reuse on the project, or salvage. Alternatively, owners/builders may use a waste management company that can provide verifiable documentation that the percentage of C&D waste material diverted from the landfill meets CALGreen's 65% requirement.

Title 24, Building Standards Code, Part 5, California Plumbing Code

The 2022 California Plumbing Code sets forth safety requirements and regulations for plumbing systems, including but not limited to plumbing fixtures and fittings, water heaters, water supply and distribution systems, sanitary drainage, indirect wastes (e.g., food preparation), vents, traps and interceptors, storm drainage, fuel gas piping, health care facilities, firestop protection, alternative water sources for non-potable applications, and non-potable rainwater catchment systems. It also sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

Title 27, Environmental Protection, Division 2, Solid Waste

Division 2 of Title 27 of the California Code of Regulations sets forth regulatory standards promulgated by the CIWMB that apply to all disposal sites meaning active, inactive closed or abandoned. It governs the handling and disposal of solid waste and operation of landfills, transfer stations, and recycling facilities.

4.17.2.3 Regional and Local

Water Supply

Urban Water Management Plans

As discussed above, the Urban Water Management Planning Act requires every "urban water supplier" to prepare and adopt a UWMP and to review it at least once every five years and make any amendments and changes, which are required by the review (California Water Code §§ 10610—10657). UWMPs are required to provide a framework for long term water planning and to inform the public of the supplier's plans to ensure adequate water supplies for existing and future demands. UWMPs are required to assess the reliability of the agency's water supplies over a 20-year planning horizon and report its progress on 20% reduction in per-capita urban water consumption by the year 2020, as required in by SB X7-7. The DWR reviews agency UWMPs to ensure that the requirements are completed.

City of Azusa Urban Water Management Plan (2025)

As an urban water supplier pursuant to the Urban Water Management Planning Act, the City is required to develop an UWMP and update it every five years based on applicable growth/demand projections and supply conditions. The ALW 2025 UWMP was prepared to meet the mandates of the California Urban Water Management Planning Act (ALW 2026). The City UWMP identifies historic and projected water supplies available to the City; existing and projected water demand; available water rights; and programs to meet demand during an average year, single-dry year, and multiple-dry years. The ALW 2025 UWMP draws, in part, upon growth projections provided in the Southern California Association of Government's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (ALW 2026). As such, the ALW 2025 UWMP incorporates demographic trends, existing land use, General Plan land use policies, and projections from the Department of Finance and the U.S. Census Bureau through 2050 (ALW 2026).

As discussed above in Section 4.17.1, Existing Conditions, the City's water supply sources include groundwater from the Main Basin, surface water from the San Gabriel River treated in the Canyon Filtration Plant, and direct delivery of treated imported water from the MWD through the Upper District. In addition, the City has a treated water connection and has access to MWD water as an additional source of supply (ALW 2026).

City of Azusa Water Shortage Contingency Plan (2025)

A required component of the ALW 2026 UWMP, the City's Water Shortage Contingency Plan, presents a detailed approach outlining how the City intends to act or respond in the case of an actual water shortage contingency. The City will manage water supplies to minimize the adverse impacts of water shortages. The plan for water usage during periods of shortage is designed to incorporate six water shortage levels corresponding to progressive ranges from up to a 5, 10, 15, 20, and 50% shortage, and greater than a 50% shortage. For each declared water supply shortage level, customers would be required to reduce their consumption by the percentage specified in the corresponding water supply shortage level. Table 4.17-3 summarizes the water rationing stages and reduction goals.

Table 4.17-3. City of Azusa Water Shortage Contingency Planning Levels

Shortage Phase	Percentage Shortage Range
I	Up to 5%
II	Up to 10%
III	Up to 15%
IV	Up to 20% or greater

Source: ALW 2026.

Note: Phases I through IV may be declared by the director of utilities if it has been determined that there is need to reduce water consumption from the Baseline Water Conditions based on available water supply and demand information.

Annual Water Supply and Demand Assessment (2022/2023)

As of July 1, 2022, in addition to preparation of the Water Shortage Contingency Plan, the City is required to submit an Annual Water Supply and Demand Assessment (Annual Shortage Report) in accordance with DWR's guidance and requirements. The most recent Annual Shortage Report covers July 1, 2025, through June 30, 2026, and includes a review of the City's unconstrained water demands (i.e., water demands prior to any projected response actions the City may trigger under the Water Shortage Contingency Plan) for the current year and the upcoming (potential single dry) year. The Annual Shortage Report also includes information regarding anticipated shortages, triggered shortage response actions, and compliance and enforcement actions consistent with the City's Water Shortage Contingency Plan. According to the 2025/2026 Annual Shortage Report, the City implemented Water Shortage Contingency Plan actions to facilitate demand reduction include limiting water use for landscaping purposes, prohibiting use of potable water for construction and dust control, and prohibiting vehicle washing except at facilities that use recycled or recirculated water (DWR 2025b).

According to the Water Shortage Contingency Plan, based on the extent of the water shortage, the following prohibitions are to be implemented in Phase I through Phase IV to reduce water demand:

- No hosing or washing sidewalks, walkways, driveways, etc.
- No landscape watering between the hours of 9:00 am and 6:00 pm on any day of the week. Lawn watering shall be limited to no more than 30 minutes per location per day.
- No excessive irrigation to the extent to cause run-off into adjacent streets, parking lots or alleys is prohibited.
- Indoor and outdoor Plumbing to be inspected and repaired if needed within 48 hours.

- No washing of motor vehicles, boats, trailers or other type of mobile equipment except at a commercial car wash, or with reclaimed water unless such vehicle is washed by using hand-held bucket or water hose equipped with automatic shutoff nozzle.
- No water used in decorative fountains without a recirculating system.
- There shall be no watering during rain events or within 48 hours after rain events.

With implementation of all applicable Water Shortage Contingency Plan demand reduction actions, the City estimates a total water demand savings of approximately 10% during Phase II and up to 20% or greater by Phase IV (ALW 2026).

Upper San Gabriel Valley Municipal Water District Urban Water Management Plan (2020)

The 2020 UWMP for the Upper District (Upper District UWMP) was prepared in compliance with the Urban Water Management Planning Act. The Upper District's UWMP addresses the future of the Upper District's water supplies and demand through the year 2045. As a member agency of MWD, the Upper District provides wholesale potable water to 18 cities and portion of unincorporated Los Angeles County through municipal water departments, investor-owned water companies and landowner held mutual water companies that in turn provide the water at retail water rates to their residential, commercial, and industrial customers. The Upper District's 144-square-mile service area includes approximately 876,069 residents in communities throughout northeastern Los Angeles County, including the City. The service population for the Upper District is projected to grow from 876,069 residents in 2020 to an estimated 949,791 by fiscal year 2045; however, the Upper District UWMP estimates that total water demand will decrease by approximately 27% in this period, from 34,642 AF in 2020 to 25,366 AF in 2045 (Upper District 2021).

Metropolitan Water District of Southern California Regional Urban Water Management Plan (2025)

The Metropolitan Water District of Southern California's (MWD's) 2025 Regional UWMP (MWD UWMP) provides an assessment and summary of MWD's water service reliability outlook through 2045. In the MWD UWMP, MWD has determined that it has supply capabilities sufficient to meet expected demands from 2030 through 2050 under a single-dry year condition and a multiple-dry year condition (MWD 2026). MWD has plans for supply implementation and continued development of a diversified resource portfolio including programs in the Colorado River Aqueduct, State Water Project, Central Valley storage and transfers programs, local resource projects, and in-region storage that would enable the region to meet its water supply needs (MWD 2026). MWD has also developed comprehensive plans for stages of actions it would undertake to address frequent and severe periods of drought, consisting of six standard water shortage levels corresponding to progressive ranges of up to 10, 20, 30, 40, and 50% shortages and greater than 50% shortages (see also Metropolitan Water District of Southern California Water Surplus and Drought Management Plan, below) (MWD 2026). As reported in the MWD UWMP, MWD plans to continue investing in water efficiency measures that have helped the region achieve and exceed the target reductions (MWD 2026).

MWD continues to set forth plans for emergency and catastrophic scenarios and has recently revised an Emergency Storage Objective to manage against potential interruption in water supplies resulting from catastrophic occurrences within the southern California region, including seismic events (MWD 2026). In addition, MWD continues to work with the state on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project deliveries (MWD 2026).

Metropolitan Water District of Southern California Water Surplus and Drought Management Plan

In 1999, MWD incorporated a water shortage contingency analysis, which is required as part of any UWMP, into a separate, more detailed plan, called the Water Surplus and Drought Management (WSDM) Plan. The overall

objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water; first inside and then outside of the region. The Shortage Actions of the WSDM Plan are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as a part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.

Metropolitan Water District of Southern California Water Shortage Contingency Plan

The Water Shortage Contingency Plan is a guide for MWD's intended actions during water shortage conditions and is meant to improve preparedness for droughts and other water supply impacts by describing the process used to address varying degrees of water shortages. Elements of this Water Shortage Contingency Plan are required by the California Water Code, including response actions that align with six standard water shortage levels based on water supply conditions, and shortages resulting from catastrophic supply interruptions. This Water Shortage Contingency Plan also outlines MWD's procedures for conducting an Annual Water Supply and Demand Assessment that is required by the California Water Code (MWD 2026).

Metropolitan Water District of Southern California Water Supply Allocation Plan

While the WSDM includes a set of general actions and considerations for MWD staff to address during water shortage conditions, that plan did not include a detailed water supply allocation plan or implementation approach. Therefore, MWD adopted the Water Supply Allocation Plan in February 2008, which has been implemented three times, with the most recent implementation in April 2015. The Water Supply Allocation Plan includes a formula for determining reductions of water deliveries to member *agencies* during extreme water shortages conditions (i.e., drought conditions or unforeseen cuts in water supplies) in MWD's service area. The formula allocates shortages of MWD supplies and seeks to balance the impacts of a shortage at the retail level, while maintaining equity on the wholesale level, and takes into account growth, local investments, changes in supply conditions, the demand aspects of non-potable recycled water use, and the implementation of conservation savings programs. The allocation period covers 12 consecutive months, from July of a given year through the following June.

Wastewater

Sanitation Districts of Los Angeles County Wastewater Ordinance

In 1972, the Districts adopted a Wastewater Ordinance, which was most recently amended in 1998, for the operation and financing of the District's wastewater conveyance, treatment, and disposal facilities. The Wastewater Ordinance applies to all direct and indirect discharges of wastewater to any part of the sewerage system and regulates industrial wastewater discharges to protect the public sewerage system. The Districts also charges Connection Fees and Surcharges. The connection fee program requires all new users of the Districts' sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The Districts use the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments.

Stormwater

Municipal Separate Storm Sewer System (MS4) Permit

The Los Angeles Regional Water Quality Control Board (LARWQCB) initially adopted waste discharge requirements for Municipal Separate Storm Sewer System (MS4) discharges within the Coastal Watersheds of Los Angeles County on June 18, 1990 (Order No. 90-079; NPDES Permit No. CA0061654). The current MS4 Permit (Order No. R4-2021-0105; NPDES Permit No. CAS004004) was adopted on July 23, 2021, and became effective on September 11, 2021. The County of Los Angeles and the cities within the County are co-permittees under the MS4 permit and have legal authority to enforce the terms of the permit in their jurisdictions.

The MS4 Permit contains effluent limitations, receiving water limitations, minimum control measures, and total maximum daily load (TMDL) provisions, and outlines the process for developing watershed management programs, including the Enhanced Watershed Program. The MS4 Permit incorporates the TMDL waste load allocations applicable to dry- and wet-weather as water quality-based effluent limitations and/or receiving water limitations. The MS4 Permit adopts low-impact development (LID) principles and requires development and redevelopment projects to incorporate stormwater management strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, cisterns, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.

Enhanced Watershed Management Program

The County and cities in the San Gabriel River and Los Angeles River Watersheds are responsible for the implementation of watershed improvement plans or EWMP to improve water quality and assist in meeting the TMDL milestones. In response to the Phase I Los Angeles County MS4 Permit, Order No. R4-2012-0175, the RH/SGRWQG was formed and subsequently developed an EWMP (RH/SGRWQG 2016). The RH/SGRWQG is comprised of the cities of Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, the County of Los Angeles, and the LACFCD. The EWMP addresses water quality priorities in portions of the Rio Hondo and San Gabriel River, and their respective tributaries. A comprehensive stormwater management plan that optimizes stormwater and financial resources was produced and implemented through the EWMP process. The EWMP integrates existing planning efforts and identifies additional opportunities for water quality enhancement through both programmatic and structural controls. In addition, the EWMP incorporates multi-benefit projects that improve water quality, as well as providing aesthetic, recreational, water supply, and/or community enhancements (RH/SGRWQG 2016).

Low-Impact Development Standards Manual

The County prepared the 2014 LID Standards Manual (LADPW 2014) to comply with the requirements of the MS4 Permit (No. R4-2021-0105, CAS004004). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. The LID Standards Manual is an update and compilation of the following documents:

- Development Planning for Storm Water Management: A Manual for the Standard Urban Storm Water Mitigation Plan (September 2002)
- Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (2004 Design Manual, February 2004)
- Stormwater Best Management Practice Design and Maintenance Manual (2010 Design Manual, August 2010)
- Low Impact Development Standards Manual (February 2014)

The LID Standards Manual addresses the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies. It is intended to minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies. The LID Standards Manual is intended to minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies. The LID Standards Manual is applicable to this Project.

Solid Waste

Countywide Disposal Rate and Assessment of Disposal Capacity Report

Pursuant to AB 939, each county is required to prepare and administer a County Integrated Waste Management Plan, including preparation of an Annual Report. The County Integrated Waste Management Plan is comprised of the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. Los Angeles County Public Works is responsible for preparing and administering the Summary Plan and the CSE.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the Countywide Disposal Rate and Assessment of Disposal Capacity Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report, provides disposal analysis and facility capacities for 2023, as well as projections to the horizon year of 2038. Given that solid waste disposal is an essential public service, it must be provided without interruption to protect the health and safety of the public as well as the environment (County of Los Angeles 2024). Individual jurisdictions within the County must continue to pursue a variety of strategies, including mandatory commercial recycling, diversion of organic waste, development of additional in-County solid waste management infrastructure, out-of-County disposal, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion) to maintain adequate disposal capacity through the 2038 horizon (County of Los Angeles 2024).

City of Azusa Municipal Code

Water Supply

Chapter 78, Article VI of the AMC regulates water system connection and fees. The City's Water Efficient Landscaping Ordinance is discussed in further detail below.

City of Azusa Water Efficient Landscaping Ordinance

According to Chapter 88, Article 3, Chapter 88.34, section 88.34.080, Adoption of Model State Water Efficient Landscaping Ordinance, the Project would be subject to the City's Water Efficient Landscaping Ordinance. The City has adopted by reference the California State Model Water Efficient Landscape Ordinance (codified at California Code of Regulations, Title 23, Division 2, Chapter 2.7, § 490 et seq.) and any amendments thereto, as the law of the City.

Wastewater

Chapter 78, Article IV of the AMC regulates sewer line design, connection to the City's sewer system, fees, and permits.

Stormwater

As described further in Section 4.9, Hydrology and Water Quality, Chapter 60 of the AMC regulates stormwater and urban runoff pollution, best management practices, and stormwater discharges.

Solid Waste

Chapter 58 (Solid Waste), of the AMC regulates collection, hauling, and disposal of solid waste, recyclables, and organic waste, including required payment of services for residential and non-residential development. For non-residential development, section 58-45 outlines reporting requirements for any company or waste hauler removing recyclable material from the waste stream. Except for developments that meet the City's self-hauler requirements, commercial and multifamily development (including mixed-use projects) must participate in the City's two-container collection services, which requires source separation of organic waste (e.g., food waste) and source separation of recyclables (AMC Chapter 58.40).

The City's Development Code (Chapter 88, Article III, Chapter 88.30 of the AMC) contains standards for the provision of recyclables collection and loading areas, which require lots developed with more than one dwelling unit and non-residential developments to provide an area for the collection and loading of recyclables.

City of Azusa 2004 General Plan

The following General Plan Built Environment Element goals, policies, and implementation programs related to utilities and system services would be applicable to the Project (City of Azusa 2004):

Goal 1: Provide an electrical supply system that is able to meet the projected electrical demands; upgrade and expand supply, transmission, and distribution facilities; and pursue funding sources to reduce the cost of electrical provision for the City.

> Policy 1.1: Monitor the demands on the electrical system, manage development to mitigate impacts and/or facilitate improvements to the energy supply and distribution system, and maintain and expand energy supply and distribution facilities.
>
> Policy 1.4: Minimize electrical consumption through site design, use of efficient systems, and other techniques.

Policy 1.6: Continue to require the incorporation of electrical conservation features in the design of all new construction and site development. Encourage the retro-fit to existing buildings and development to include electrical conservation features including, but not limited to, wireless technology and solar energy.

Policy 1.7: Continue to underground all overhead electrical lines.

Policy 1.8: Ensure the costs of improvements to the existing electrical supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Goal 2: Provide a water supply system that is able to meet the projected water demands; upgrade and expand water treatment, supply, and distribution facilities; and pursue funding sources to reduce the cost of water provision for the City.

Policy 2.1: Monitor the demands on the water system, manage development to mitigate impacts and/or facilitate improvements to the water supply and distribution system, and maintain and expand water supply and distribution facilities.

Policy 2.4: Require that new development and retro-fit existing developments to contain safeguards and measures preventing water supply degradation.

Policy 2.5: Require all new development to connect to the sewer system.

Policy 2.6: Minimize water consumption through site design, use of efficient systems, and other techniques.

Policy 2.8: Continue to require the incorporation of water conservation features in the design of all new construction and site development.

Policy 2.10: Require the use of reclaimed water for landscaped irrigation, grading, and other non-contact uses in new developments, where available or expected to be available.

Policy 2.11: Ensure the costs of improvements to the existing water supply and distribution facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Goal 3: Provide a wastewater (sewer) collection and treatment system that is able to support permitted land uses, upgrading existing deficient systems, and pursue funding sources to reduce costs of wastewater provision in the city.

Policy 3.5: Ensure the costs of improvements to the existing sewer collection and treatment facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Goal 4: Provide a flood control system that is able to support the permitted land uses while preserving the public safety, upgrade existing deficient systems, and pursue funding sources to reduce the costs of flood control provision in the City.

Policy 4.1: Maintain existing public storm drains and flood control facilities, upgrade and expand storm drain and flood control facilities.

Policy 4.4: Monitor the demands and manage development to mitigate impacts and/or facilitate improvements to the storm drainage system.

Policy 4.7: Require improvements to the existing storm drain and flood control facilities necessitated by new development to be borne by the new development benefiting from the improvements, either through the payment of fees, or the actual cost of construction, or both in accordance with State Nexus legislation.

Policy 4.8: Require new developments to employ the most efficient drainage technology to increase ground percolation, control drainage, and minimize damage to environmentally sensitive areas.

Policy 4.10: Encourage using construction methods and technologies that will reduce the size or decrease the number of impervious surfaces in both new development and the retro-fit of existing development.

Goal 5: Maintain solid waste collection and disposal services in accordance with the California Integrated Waste Management Act of 1989, pursue funding sources to reduce the cost of the collection and disposal services in the City.

Policy 5.1: Maintain adequate solid waste collection for commercial, industrial, and residential developments in accordance with state laws.

4.17.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to utilities and service systems are based on Appendix G of the CEQA Guidelines, which states that a significant impact related to utilities and service systems would occur if the Project would:

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

4.17.4 Impacts Analysis

Threshold 4.17a **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant Impact. For the reasons discussed below, impacts related to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

Water Conveyance

As shown in Figure 3-4, the Project's proposed water infrastructure would include new water pipelines within the Project site, beneath the internal roadways, and new lateral pipelines connections to each home. The new on-site water pipelines would extend off-site beneath the driveways at East Mauna Loa Avenue and at North Calera Avenue to connect to the existing 12-inch water main pipeline in East Mauna Loa Avenue and the existing 8-inch water main pipeline in North Calera Avenue. These water pipelines would provide domestic water, fire water, and irrigation water to the Project site.

Water meters would be installed on site to monitor water flow, and a private fire hydrant and fire water line would be installed and connected to the proposed water main. Other than sewer and water pipeline connections to existing pipeline infrastructure in the public right-of-way, no additional off-site infrastructure improvements would be required. As discussed in further detail in Section 4.9, Hydrology and Water Quality, of this Draft EIR, the Project would comply with applicable water quality regulatory requirements, including implementation of a Stormwater Pollution Prevention Plan, stormwater BMPs, and LID design, which would minimize potential water quality impacts. The construction of the proposed watermains and pipeline connections are accommodated within the construction assumptions included in the construction-related impact analyses throughout this Draft EIR, and no new or more significant impacts would occur. In addition, and in accordance with the General Plan, utility connection fees would be provided to ALW as required, which would support ongoing system maintenance and potential future upgrades associated with incremental increases in water demand from the project. Impacts would be less than significant, and no mitigation is required.

Sewer Infrastructure and Wastewater Treatment

As included in Appendix M-1, a sewer study was conducted for the Project. The Project's estimated average peak sewer generation was based on communication and coordination with LA County Public Works (utilizing a generation rate of 0.001 cubic feet per second (CFS)/unit), resulting in 0.128 CFS estimated flow and 82,729 GPD. Peak daily flow for the existing uses located on the Project site was estimated using the County's Estimated Average Daily Sewage Flows for Various Occupancies, resulting in 2,870 GPD (Appendix M-2). The resulting net increase (increase over existing conditions) in peak daily wastewater flow due to the Project would be approximately 82,729 GPD.[5]

As shown in Figure 3-4, the Project proposes a new sewer connection between the proposed onsite sewer pipeline system and the existing 8-inch sewer main within Mauna Loa Avenue. Per Appendix M-1, the City determines available capacity in a sewer mainline less than 15 inches in diameter to be considered full when the depth to

[5] 82,729 GPD (Project estimated water flow) – 2,870 GPD (Project site existing flow) = 82,729 GPD (Appendix M-2).

diameter ratio (d/D) exceeds 0.50 for pipelines less than 15 inches in diameter and 0.75 d/D for pipelines 15 inches and larger. As determined within Appendix M-1, the capacity of the existing 8-inch sewer main within East Mauna Loa Avenue and downstream sewer system including the proposed Project flows would be no greater than 0.44 d/D. Therefore, the existing pipelines can accommodate existing plus Project flows. No significant impact would result.

Wastewater from the City is ultimately conveyed to Districts' conveyance and treatment facilities. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' sewerage system or to increase the strength or quantity of wastewater discharged from connected facilities. Fees are paid by residential and commercial dischargers to cover the annual cost of operation and maintenance of the Districts' wastewater system and to pay for upgrade capital facilities that benefit those users (Districts 2025). Payment of a connection fee may be required before this Project is permitted to discharge to the Districts' sewerage system. Potential impacts related to wastewater treatment facilities are discussed in further detail under Threshold 4.17c, below.

Stormwater Drainage

As discussed above in Section 4.17.2, Regulatory Requirements, the City is within the jurisdiction of the LARWQCB and is subject to the County's MS4 Permit for discharges of urban runoff in public storm drains. As discussed in further detail in Section 4.9, Hydrology and Water Quality, of this Draft EIR, the drainage patterns of the Project site would not substantially change relative to existing conditions. Project design, construction, and operation would be completed consistent with the Rio Hondo/San Gabriel River Water Quality Group Enhanced Watershed Management Program, and in accordance with Chapter 60, Stormwater and Urban Runoff Pollution Prevention, of the AMC, and the County's Low Impact Development Best Management Practices Handbook, with the goal of capturing stormwater runoff for infiltration and reducing the amount of pollutants in stormwater and urban runoff. As described in Section 4.9, Hydrology and Water Quality, the Project's Geotechnical Report and LID Report determined that the proposed on-site drainage system, including on-site catch basins, gutters running along proposed drive aisles, and infiltration chambers, is feasible for stormwater treatment and would satisfy the City and County LID requirements. The Project's proposed infiltration chamber and pretreatment device would be constructed just south of the center of the Project site, as shown on Figure 4.9-3, Proposed LID Plan. Any overflow from a storm event greater than the 85th percentile event would be discharged to an existing 36-inch storm drain line running along Mauna Loa Avenue and then to the 60-inch storm drain line within Baseline Road. The proposed drainage would be within the allowable flow rate set by Los Angeles County for the existing 36-inch storm drain and the 60-inch storm drain; therefore, it was determined that the existing storm drain system has adequate capacity to accommodate the proposed Project (Appendix H).

As the Project would not substantially modify the existing on-site drainage patterns, would incorporate low impact development features, and would be required to comply with applicable regulatory requirements, the Project would not contribute a substantial amount of new stormwater runoff relative to existing conditions. Thus, the Project would not require the construction or expansion of off-site stormwater drainage facilities. The Project's proposed on-site drainage and LID improvements are accommodated within the construction assumptions included in the construction-related impact analyses throughout this Draft EIR, and no new or more significant impacts would occur. Therefore, impacts would be less than significant, and no mitigation measures are required.

Dry Utilities

As discussed above in Section 4.17.1, SoCalGas currently provides natural gas to the Project site via local distribution lines and laterals on and adjacent to the Project site. However, no on- or off-site improvements for natural gas infrastructure are anticipated with implementation of the Project, as the Project proposes all-electric housing units without any natural gas connections, as described in Section 4.5, Energy, of this Draft EIR.

Electrical power is provided by ALW and is currently provided to the Project site via overhead power lines along East Mauna Loa Avenue and North Calera Avenue, as shown on Figure 3-4. In compliance with the General Plan, utilities must be placed underground. Overhead power distribution lines and pole mounted transformer units are currently servicing the existing buildings on-site and would need to be undergrounded as part of the Project, except for the overhead power lines that run north-south on the western boundary of the site, which would be left as is. The undergrounding of overhead power service linkages and the location of on-site utility pad transformers would need to be coordinated with the Azusa Electric Division (Appendix M-4). No off-site improvements for electric power or telecommunications infrastructure are anticipated with the implementation of the Project. No adverse physical effects beyond those already disclosed in this Draft EIR would occur as a result of implementation of the Project's proposed utility system connections. Therefore, impacts relating to dry utilities would be less than significant.

Threshold 4.17b **Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

Less Than Significant Impact. As stated in Section 4.17.1, Existing Conditions, ALW supplies water service connections within the City. The City's three main sources of water include groundwater from wells in the Main San Gabriel Basin, surface water from the San Gabriel River, and direct delivery of treated imported water from the Upper District (wholesaler of imported water).

Table 4.17-4 below presents the City's projected water demands in AFY. The ALW 2025 UWMP determined the City's water demand based on projected populations in the City's service area, including data by the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal), existing land uses and general plan policies, demographic trends and projections from the Department of Finance (DOF), and the U.S. Census Bureau for cities and unincorporated areas within Southern California and ALW's service area (ALW 2026). The ALW 2025 UWMP states that ALW's water supply would meet its demand under all year projections for all climatologic classifications (i.e. wet, normal, dry, and multiple dry years) and water supply source scenarios. As detailed in the ALW 2025 UWMP, the City has been able to provide sufficient water supplies to its customers, including during long-term droughts and years with historically higher water demands (ALW 2026).

Table 4.17-4. ALW UWMP Projected Water Supply and Demand

ALW 2025 UWMP						
Description	2025 (Actual)	2030 (Projected)	2035 (Projected)	2040 (Projected)	2045 (Projected)	2050 (Projected)
Normal Year (acre-feet per year)						
Water Supply	17,283	18,389	19,108	19,336	19,556	19,802
Water Demand	17,283	18,389	19,108	19,336	19,556	19,802

Table 4.17-4. ALW UWMP Projected Water Supply and Demand

Surplus (Supply – Demand)	*0*	*0*	*0*	*0*	*0*	*0*
Normal-Year Demand Allocated by Use Type (acre-feet per year)						
Single- and Multi-Family	8,159	9,065	9,419	9,531	9,645	9,761
Commercial	3,271	3,479	3,615	3,659	3,702	3,747
Industrial	2,088	2,222	2,309	2,336	2,364	2,392
Landscape	853	907	943	954	965	977
Other Potable	5	6	6	6	6	6
Water Losses	2,547	2,711	2,816	2,850	2,884	2,919
TOTAL	*17,283*	*18,389*	*19,108*	*19,336*	*19,556*	*19,802*
Growth in Demand (acre-feet)		**2025 to 2030**	**2030 to 2035**	**2035 to 2040**	**2040 to 2045**	**2045 to 2050**
Single- and Multi-Family Only	—	906	354	112	114	116
Commercial Only	—	208	136	44	43	45
Industrial Only	—	134	87	27	28	28
Landscape Only	—	54	36	11	11	12
Other Potable Only	—	1	0	0	0	0
Water Losses Only	—	164	105	34	34	35
TOTAL	—	*1,106*	*719*	*228*	*220*	*246*

Source: ALW 2026
Notes: — = not applicable; Total values may not sum due to rounding.

Table 4.17-4 above includes details related to the City's anticipated demands for potable water for the specific land uses of single- and multi-family residential, commercial, industrial, landscaping, other potable, and water losses. During this time, the proposed Project is anticipated to be constructed and would be operational in 2029. As stated within Appendix M-2, the anticipated peak potable water demand for the proposed Project is approximately 82,729 GPD, or 92.7 AFY. This analysis is based on coordination with LA County of Public Works. The existing water demand for the Project site is approximately 2,870 GPD or 3.2 AFY (Appendix M-2). Consequently, the Project's net water demand would be approximately 89.5 AFY, which is below the estimated 210 AFY benchmark for determining whether a Water Supply Assessment is required under SB 610 for a water use equivalent to a 500-dwelling-unit development.[6] As such, the Project would not meet the threshold for the preparation of a Water Supply Assessment.

As detailed in the ALW 2025 UWMP, ALW is anticipating to meet water demands over the next 25 years for normal, dry, and multiple dry years. In addition, ALW indicated that there are sufficient water supplies available to serve the proposed Project (Appendix M-3). Further, should there be a water shortage, imported water from MWD can be utilized as a supplemental source of water. It is important to note that the Main Basin is adjudicated and that there is no limit to the amount of groundwater which can be produced annually. Consequently, in the event treated

[6] SB 610 requires preparation of a Water Supply Assessment for projects that have a potential to generate a potable water demand equivalent to 500 dwelling units. Assuming 2.5 persons per household consuming 150 gallons per day within 500 dwelling units, a reasonable estimation of the potable water demand for 500 dwelling units would be 187,500 gallons per day (210 acre-feet per year).

imported water may be limited, the City has the flexibility to increase groundwater production from the Main Basin.[7] Therefore, the City has the mechanism and ability to increase its supply, through the process outlined above, to meet the future demands for normal, dry, and multiple dry years. This would ensure that the Project, along with existing uses within the City, would have sufficient water supplies available to serve the Project and reasonably foreseeable future development.

AMC section 88.34.040, Landscape and Irrigation Plans, requires that a Landscape Design Plan be prepared by a qualified professional for new nonresidential, single-family tract, and multi-family residential projects. The Project would be required to comply with all water-efficient landscaping requirements included in local regulations.

The proposed Project would adhere to the water conservation methods established in Title 24 of the California Building Code. The Project would also adhere to the City's Water Efficient Landscaping Ordinance, per Chapter 88.34, section 88.34.080 of the AMC. Additionally, the proposed Project would be subject to a development impact/connection fee, which would serve as the Project's fair share contribution to water infrastructure improvements in the City. For the reasons detailed above, the proposed Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant, and no mitigation is required.

Threshold 4.17c **Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Less Than Significant Impact. Wastewater generated by the proposed Project would be treated at the SJCWRP located in the City of Whittier, which has a design capacity of 100 MGD and currently processes an average flow of 60.1 MGD (Appendix M-3). The remaining capacity at SJCWRP is approximately 39.9 MGD, or approximately 40% of its total capacity. As discussed above, the existing school facility on the Project site generates an average daily flow of approximately 2,870 GPD. Implementation of the Project would increase the peak daily wastewater flow from the Project site by approximately 82,729 GPD, which represents approximately 0.21% of the remaining capacity of the SJCWRP's remaining capacity.[8]

Based on the capacity of the SJWRP, the wastewater generated by the proposed Project would be nominal given the capacity of SJCWRP. As such, the proposed Project would not exceed current capacities of the wastewater treatment system and would not significantly impact existing wastewater treatment systems such that new facilities would be required. Finally, water conservation measures established at the local and state level would be implemented and would help reduce the amount of wastewater generated by the Project.

All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast as set forth in the applicable RTP/SCS. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, the Districts would provide service and wastewater treatment up to the levels that are within the legally

[7] The Main Basin Judgment does not restrict the quantity of water, which parties may extract from the Main Basin. Rather, it provides a means for replacing all annual extractions in excess of a Party's annual right to extract water with Supplemental Water. The Main Basin Watermaster annually establishes an Operating Safe Yield for the Main Basin which is then used to allocate to each Party its portion of the Operating Safe Yield which can be produced free of a Replacement Water Assessment. If a producer extracts water in excess of its right under the annual Operating Safe Yield, it must pay an assessment for Replacement Water, which is sufficient to purchase one acre-foot of Supplemental Water to be spread in the Main Basin for each acre-foot of excess production. All water production is metered and is reported quarterly to the Main Basin Watermaster (ALW 2021).

[8] (82,729 GPD / 39,900,000 GPD) x 100 = 0.207% (or 0.21%)

permitted capacity and any proposed expansion of the Districts' facilities (Appendix M-3). As described in Section 4.12, Population and Housing, of the Draft EIR, the Project is within the growth assumptions set forth in the applicable RTP/SCS. Finally, as discussed in Appendix M-3, the Districts charge a connection fee that would be required before the Project is permitted to discharge to the Districts' system. The fee would be used by the Districts for operation, maintenance, and improvements of its capital facilities, including SJCWRP. Therefore, impacts related to wastewater treatment would be less than significant, and no mitigation is required.

Threshold 4.17d **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Less Than Significant Impact. For the reasons discussed below, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and impacts would be less than significant.

Construction

As shown in Figure 3-5, Preliminary Grading and Drainage Plan, the Project would require approximately 4,600 cubic yards of cut and 4,600 cubic yards of fill, resulting in a 'balanced' site that would not require any import or export of soils. Demolition and construction activities associated with the Project would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. Per AMC Article XVIII, Construction and Demolition Waste Recycling and Diversion, 65% of construction and demolition waste generated by the Project must be diverted from landfills. CALGreen requires for 65% waste diversion, which would require the Project Applicant/developer to either submit a construction waste management plan to the City that identifies the construction and demolition waste materials to be diverted from the landfills or use a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill meets CALGreen's 65% diversion requirement. Additionally, any hazardous wastes that are generated during demolition and construction activities would be managed and disposed of in compliance with all applicable federal, State, and local laws, including the Hazardous Material Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Waste Control Act, and the California Accidental Release Prevention Program (refer to Section 4.8, Hazards and Hazardous Materials, of this Draft EIR for further details on potential Project construction impacts related to hazards and hazardous materials).

The remaining 35% of construction and demolition material that is not required to be recycled would either be disposed of in a regional landfill or voluntarily recycled at a solid waste facility with available capacity. As described in Section 4.17.1, Existing Conditions, inert landfills and debris facilities in the County have available capacity to receive construction and demolition debris generated by the Project. The Azusa Land Reclamation Co. landfill has an estimated total remaining capacity of 44.80 million tons (County of Los Angeles 2024). Due to (1) required compliance with CALGreen and the AMC regulations applicable to garbage, refuse and recycling (i.e., Article XVIII and Chapter 58) and (2) the available capacity of local inert landfills and debris facilities, Project construction and demolition would not generate waste in excess of standards or in excess of the capacity of local infrastructure and would not otherwise impair the attainment of solid waste reduction goals. Thus, Project related construction impacts would be less than significant, and no mitigation is required.

Operation

Once operational, the Project would produce solid waste on a regular basis, in association with operation and maintenance activities. Based on the CalEEMod solid waste generation rates, the Project would generate approximately 97 tons of solid waste per year (approximately 0.266 tons per day). Solid waste generation from the operation of the school is estimated to generate 39 tons per year. Therefore, a total net increase of approximately 58 tons of solid waste would be generated per year resulting from the Project (Appendix C-1).[9] This amount does not assume mandatory compliance with AB 939, requiring 50% waste diversion from landfills, or AB 1826, requiring additional recycling of organic waste. Solid waste generated by the Project would be collected and transported to a local or regional solid waste disposal facility, such as those listed in Table 4.17-2, Permitted Solid-Waste Disposal Facilities, in Section 4.17.1.2, Utility Infrastructure, above. As shown in Table 4.17-2, the remaining daily capacity of local solid waste disposal facilities is 7,168 tons per day (County of Los Angeles 2024). Therefore, the Project's operational solid waste generation would account for approximately 0.0037% of the total remaining available daily disposal capacity, which is not a substantial share of the existing remaining daily capacity and would not be in excess of capacity of local infrastructure capacity (i.e., existing solid waste disposal facilities listed in Table 4.17-2) (County of Los Angeles 2024; Appendix C-1).[10]

Furthermore, according to the latest annual report for the Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report, there are additional out-of-County landfills permitted for use the County with up to 100 years of remaining life to complement the County's waste management infrastructure (County of Los Angeles 2024). For example, the Mesquite Regional Landfill in Imperial County would provide an additional daily capacity of 4,000 tons per day once the County's waste-by-rail system is deemed necessary (County of Los Angeles 2024). Existing facilities in Kern, Orange, Riverside, San Bernardino, and Ventura counties are also currently accepting waste from County municipalities, such as the City (County of Los Angeles 2024). As such, other landfills in the region would also be able to accommodate solid waste from the proposed Project, and regional planning efforts would ensure continued landfill capacity into the foreseeable future.

For the reasons described above, Project operations would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, operational impacts would be less than significant, and no mitigation is required.

Threshold 4.17e **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

Less Than Significant Impact. The Project would be required to comply with all applicable local and State regulations related to solid waste. The state has set a goal of 75% recycling, composting, and source reduction of solid waste. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organics recycling. Further, the local solid waste disposal facilities listed in Table 4.17-2 all hold current solid waste facility permits issued by CalRecycle, the agency that regulates solid waste handling, processing, and disposal activities in the state. Compliance with applicable federal, State, and local laws is required for issuance of a solid waste facility permit, which is subject to review every five years. Additionally,

9 97 tons per year (Project estimated solid waste) – 39 tons per year (Project site estimated existing solid waste) = 58 tons of solid waste per year (Appendix C-1).

10 To calculate the percent of available capacity, the daily estimated tonnage of operational solid waste generated by the Project (approximately 0.266 tons per day, calculated using CalEEMod default rates provided in Appendix C-1 of this Draft EIR) was divided by the existing daily remaining capacity of the in-County solid waste disposal facilities available to the Project (7,168 tons per day) to arrive at approximately 0.0037% of existing daily disposal capacity.

the City is required to comply with the solid waste reduction and diversion requirements set forth by the state and listed above in Section 4.17.2, Regulatory Requirements, including AB 939, AB 341, AB 1327, and AB 1826. As discussed above, any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws.

Waste generated by the Project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 341 or AB 1826, because the Project's waste generation would represent a nominal percentage of the waste created within the City and because the businesses and residents at the Project site would be subject to recycling and diversion requirements. In addition, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards. The private waste haulers contracted by the City, Athens Services, are required to adhere to AB 341 as well as AMC waste management reporting requirements to help track compliance with applicable solid waste diversion targets (AMC Article XVIII).

Following Project compliance with federal, State, and local management and reduction statues and regulations related to solid waste, impacts would be less than significant, and no mitigation is required.

4.17.5 Cumulative Impacts Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by CEQA Guidelines section 15130. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 2.4, Cumulative Impacts, of Chapter 2, Environmental Setting, and in Table 2-2, List of Cumulative Projects, of this Draft EIR.

Threshold 4.17a- Cumulative **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The Project would generate additional demands for water, wastewater, stormwater, electricity, and communications services, which would incrementally increase demands for the facilities that provide these services. However, the Project would not significantly affect existing services such that new off-site facilities would be required to provide these services to the Project site. There is not an existing cumulative impact associated with any existing significant deficits related to these facilities in the Project area. Furthermore, the Project and cumulative projects in and around the City would be required to pay various utility connection fees to cover the annual cost of operation and maintenance and to pay for upgrades to capital facilities (Appendix M-3; City of Azusa 2025; Districts 2025). The Project's incremental contribution to impacts related to water, wastewater, electricity, and communications services infrastructure would not be cumulatively considerable.

Threshold 4.17b- Cumulative **Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

Implementation of the Project, in conjunction with cumulative projects, would increase demand for water services provided by ALW. ALW (through the ALW 2020 UWMP) anticipates its projected water supplies will meet demand through the year 2045. As such, and as demonstrated under Threshold 4.17b above, there are adequate water

supplies to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Similar to the Project, each cumulative project would be required to comply with City and State Water Code and conservation programs for water supply to account for the cumulative demand for water. As a result, no significant cumulative water supply impacts are anticipated from development of the Project and cumulative projects, and the Project's incremental contribution to water demands would not be cumulatively considerable.

Threshold 4.17c- Cumulative **Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

The Project area and each cumulative project would incrementally increase the amount of wastewater that is being generated in the area. Wastewater generated by the proposed Project would be treated at the SJCWRP. Implementation of the Project would increase the net peak wastewater flows from the Project site by 82,729 GPD, which represents approximately 0.21% of the remaining capacity of the SJCWRP. Based on the capacity of the SJWRP, the wastewater generated by the proposed Project would be nominal of capacity. Furthermore, as stated above under Threshold 4.17(c) in Section 4.17.4, Impact Analysis, regarding regional facilities, the Districts charge a connection fee that is required before projects are permitted to discharge into the Districts' system. The fee would be used by the Districts for operation, maintenance, and improvements of their capital facilities. Moreover, the Districts provided a will-serve letter to the Project applicant, which has been included as Appendix M-3. As cumulative increases in wastewater treatment demand within the service area require facility upgrades, the City would continue to regulate public sewer facilities as outlined in the 2010 City of Azusa Sewer Master Plan, and any affected treatment plants would continue to assess potential expansions to their treatment facilities in accordance with regulatory permit requirements. As such, the Project's incremental contribution to impacts to wastewater services would not be cumulatively considerable.

Threshold 4.17d- Cumulative **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Development of the Project in combination with cumulative projects would increase land-use intensities in the area, resulting in increased solid waste generation. However, due to the built-out nature of the City, the Project and cumulative projects are considered urban infill and/or redevelopment projects. As such, solid waste is already being generated at the Project site and the majority, if not all, of the cumulative project sites within the City. There is also a remaining total local landfill capacity of approximately 63.8 million tons, which is sufficient to accommodate the incremental increase in solid waste associated with the Project and cumulative development without exceeding capacity.

Further, AB 939 mandates that cities divert from landfills 50% of the total solid waste generated to recycling facilities. In order to satisfy CALGreen requirements of diverting 65% of solid waste and to offset impacts associated with solid waste, the proposed Project and all cumulative projects would be required to implement waste reduction, diversion, and recycling during both demolition/ construction and operation. Through compliance with City and State solid waste diversion requirements, together with the City's Source Reduction and Recycling Element and applicable regulations outlined in Article V, Chapter 1, of the AMC, the Project's incremental contribution to impacts to solid waste services would not be cumulatively considerable.

Threshold 4.17e- Cumulative **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

The Project and all cumulative projects would be required to comply with all applicable local and State regulations related to solid waste, including the mandatory recycling set forth in AB 341 and AB 1826. Compliance with applicable federal, State, and local laws is required for issuance of a solid waste facility permit, which is subject to review every five years. Additionally, the City is required to comply with the solid waste reduction and diversion requirements set forth by the state and listed above in Section 4.17.2, Regulatory Requirements, including AB 939, AB 341, AB 1327, and AB 1826. All residents at the Project site would be subject to recycling and diversion requirements. In addition, waste diversion and reduction during Project construction and operations would be completed in accordance with CALGreen standards. The private waste haulers contracted by the City, Athens Services, are required to adhere to AB 341 as well as AMC waste management reporting requirements to help track compliance with applicable solid waste diversion targets (AMC Article XVIII and Chapter 58). Therefore, the Project's incremental contribution to impacts to compliance with solid waste regulations would not be cumulatively considerable.

4.17.6 Mitigation Measures

As described in greater detail above, the Project would not have any significant impacts with respect to utilities and service systems, and no mitigation measures are required.

4.17.7 Significance Conclusion

Threshold 4.17a. The Project would result in a **less than significant** impact related to relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Threshold 4.17b. The Project would result in a **less than significant** impact related to sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Threshold 4.17c. The Project would result in a **less than significant** impact related to 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.

Threshold 4.17d. The Project would result in a **less than significant** impact related to generation 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.

Threshold 4.17e. The Project would result in a **less than significant** impact related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.17.8 References

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5 Other CEQA Considerations

This chapter of the Draft EIR for the Project has been prepared in furtherance of the content requirements set forth in CEQA Guidelines section 15126.2. As such, this chapter discusses the following:

- Significant and Unavoidable Environmental Impacts (Section 5.1)
- Significant and Irreversible Environmental Effects (Section 5.2)
- Growth-Inducing Impacts of the Project (Section 5.3)
- Potential Secondary Effects of Mitigation (Section 5.4)
- Effects Found Not to Be Significant (Section 5.5)

5.1 Significant and Unavoidable Environmental Impacts

CEQA Guidelines section 15126.2(c) requires that an EIR describe any significant impacts which cannot be avoided. Specifically, section 15126.2(c) states the following:

> Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Implementation of the Project-specific mitigation measures identified in Chapter 4 of this Draft EIR would reduce all potentially significant impacts to below a level of significance. Therefore, no Project-specific impacts would be considered significant and unavoidable.

5.2 Significant and Irreversible Environmental Impacts

The CEQA Guidelines require an EIR to address any significant irreversible environmental changes that would result from the Project should it be implemented. Pursuant to CEQA Guidelines section 15126.2(d), significant irreversible environmental impacts could involve any of the following:

- Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- Irreversible damage from environmental accidents associated with the project;
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

5.2.1 Large Commitment of Non-Renewable Resources

Examples of irreversible commitments provided in the CEQA Guidelines include the use of nonrenewable resources (e.g., natural gas and other fossil fuels, lumber, and steel) during initial and continued phases of Project construction and operation. The Project's potential energy consumption is discussed in greater detail in Section 4.5, Energy, of this Draft EIR.

Construction equipment used by the Project would result in single event consumption of diesel fuel during short-term construction. Construction worker trips would result in fuel consumption during construction. Diesel fuel would be supplied by City and regional commercial vendors. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive. In addition, Project construction equipment would conform to the applicable California Air Resources Board (CARB) emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport, and use of construction materials. The 2025 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on- and off-road vehicle engines due to more stringent government requirements, and Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

With regard to building materials, even though construction would result in the commitment of materials, these materials are not expected to require replacement during the Project's lifespan. Furthermore, per California Green Building Standards Code (CALGreen) 65% of all demolition and construction materials must be recycled (CalRecycle 2025). This regulation would ensure that portions of the existing materials on site are recycled and reused.

Nonrenewable resources would also be consumed during Project operation. Resources used during operation would consist primarily of water, natural gas, and other fossil fuels required for off-site electrical generation and vehicles traveling to and from the Project site. While some building materials may be consumed for building maintenance purposes, such use would be limited and would be reduced by the Project's use of durable materials for building materials, as described above. While the existing site generates some demand for electricity, gasoline, diesel fuel, and natural gas, the Project would increase this demand due to intensification of the land uses on the site. The Project's use of fossil fuels during operation is discussed in detail in Section 4.5, Energy, of this Draft EIR. As concluded in that section, the Project would not result in inefficient or wasteful use of electricity, natural gas, and petroleum, and would result in a less-than-significant energy impact. Over the lifetime of the Project, the fuel efficiency of vehicles as well as the use of electric vehicles is expected to increase. As such, the amount of petroleum consumed due to vehicular trips to and from the Project site during operation would decrease over time. In addition, the Project would comply with the 2025 Title 24 Building Energy Efficiency Standards electric vehicle (EV) parking requirements for residential construction to be EV-ready with conduit capable of supporting a Level 2 charger. The required EV infrastructure would support the use of alternative -fuel vehicles and help in reducing operational fuel demand over time. As such, operation of the Project is expected to use decreasing amounts of petroleum over time due to advances in vehicle fuel economy standards. Therefore, impacts to energy resources during operation would be less than significant.

The Project would also comply with the following applicable regulations:

- All new buildings must be designed to be energy efficient to meet or exceed Title 24 requirements.
- The Project must include storm water management practices that treat storm water runoff in compliance with the AMC and all applicable laws.
- The Project's landscaping and street trees would be required to comply with the AMC's Water Efficient Landscaping Ordinance.
- Exterior lighting must be energy efficient and designed to minimize light pollution.

In addition to the above considerations, compliance with state and local laws and regulations would further reduce the Project's use of nonrenewable resources over time. Specifically, electricity consumed at the Project site would be increasingly sourced from renewable energy, pursuant to Senate Bill (SB) 100. SB 100, which passed in 2018, states that 44% of the total electricity sold to retail customers in California per year must be secured from qualifying renewable energy sources by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. SB 100 also sets forth a state policy that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045 and requires that achieving 100% zero-carbon electricity does not increase carbon emissions elsewhere in the western grid or is not fulfilled through resource shuffling. As such, the Project's consumption of nonrenewable energy is anticipated to significantly decrease over time, as SB 100 is implemented statewide and overall nonrenewable energy consumption decreases.

Furthermore, the City and state have policies in place to support decreased use of personal vehicles, to be replaced with alternative modes such as transit, walking, and biking policies which are incentivized at the local level by the Project's provision of new sidewalk improvements. It stands to reason that assuming compliance with existing policies, the number of vehicles traveling to and from the site would decrease over time. The Project would also be subject to compliance with the California Building Energy Efficiency Standards and CALGreen.

In conclusion, while the Project would result in the use of nonrenewable resources, such use would be limited primarily to building materials, fossil fuels, and natural gas. During operation, use of such resources is expected to decrease over time, as increasingly stringent efficiency requirements are implemented at the local and state level. Therefore, although the Project would require the use of nonrenewable resources, it would not require such a large commitment of nonrenewable resources during the initial and/or continued phases of the Project such that removal or nonuse thereafter would be unlikely. The Project would not construct a new land use that requires the commitment of a large amount of nonrenewable resources, such as a new fossil fuel consuming power plant. Land uses within urban centers tend to be redeveloped over time, especially when the property is underutilized and could be put to a more efficient use that better addresses the needs of the community. The redevelopment of underutilized buildings and surface parking lots would result in changes to the current land uses in a manner that is consistent with the General Plan goals and policies. Such development is commonplace and encouraged in areas near urban centers and transit facilities and would not result in a large commitment of nonrenewable resources such that removal or nonuse thereafter would be unlikely.

5.2.2 Commitment to Future Uses

Redevelopment of Powell Elementary School and associated surface parking lots a into new residential units would be a change from the existing condition; however, because the Project is a redevelopment project within a fully developed and urbanized portion of the City, it would not commit future generations to new urban land uses in undeveloped areas. The replacement of the existing uses would result in changes to the current land uses in a

manner that is consistent with the General Plan goals and policies (see Section 4.10, Land Use and Planning). Such in fill development is commonplace and encouraged in areas near urban centers and transit nodes and would not result in primary and secondary impacts that would commit future generations of people to similar uses because it would not be creating a new use in an undeveloped area.

5.2.3 Irreversible Damage from Environmental Accidents

Operation of the Project would only require limited use of commercially available hazardous materials, including janitorial and landscaping products. Should the amount of on-site hazardous materials, including hazardous wastes, be greater than reporting thresholds (55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas), a Hazardous Material Business Plan would be required under California Health and Safety Code sections 25404–25404.9. The Hazardous Material Business Plan, which would be submitted to the Los Angeles County Fire Department (the local Certified Unified Program Agency) via the California Environmental Reporting System, would include emergency and spill prevention and response measures, thereby reducing the potential for an upset or accident condition. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated. Project operational impacts are not anticipated to result in irreversible damage due to environmental accidents.

5.2.4 Consumption of Resources Justified

While the Project would result in increased resource consumption during construction and operation, the Project would also result in some long-term benefits associated with resource consumption in the region. As demonstrated in Section 4.12, Population and Housing, of this Draft EIR, growth in population, housing, and employment is expected to occur in the City, in Los Angeles County, and throughout the southern California region into the foreseeable future. The Project falls well within regional growth projections for population and housing and would locate this growth on an infill site within walking distance of a wide range of services and employment opportunities. Regarding population growth, the Southern California Association of Governments (SCAG) estimates that Los Angeles County would have 10,793,000 residents by 2050 (SCAG 2024). The Project's contribution of an additional 397 permanent residents would be a negligible amount of the County's overall projected population growth estimates through 2050.[1]

The Project would not require the use of undeveloped greenspace through development in undeveloped areas. The latter development pattern generally results in permanent loss of naturalized lands and open space, as well as increased fossil fuel consumption attributable to longer commuting distances and lack of transit options. While the Project would result in some irretrievable commitment of nonrenewable resources, it would also help accommodate growth in a manner that would reduce irreversible environmental changes in the region. Furthermore, the irretrievable commitment of resources attributable to the Project would not be considered unusual when compared to typical urban infill development of the same size and scope. For these reasons, the irreversible commitment of resources attributable to the Project would not be considered significant.

[1] This estimated number of new residents conservatively assumes full occupancy of all units. A total of 128 new housing units multiplied by the California Department of Finance's average occupancy in the City of Azusa in 2025 (3.1 persons per household) results in 397 residents accommodated by the proposed Project (DOF 2025).

5.3 Growth-Inducing Impacts of the Project

CEQA requires a discussion of ways in which the Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or results in the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines § 15126.2(e)). New employees from non-residential development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors.

Direct growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. The extension of such infrastructure into a non-serviced area can represent the elimination of a growth-limiting factor, thereby inducing growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities and ultimately resulting in an increase in the pace of development or the density of the existing surrounding development. Indirect growth-inducing impacts include an increased demand for housing, commodities, and services that new development causes or attracts by increasing the population or job growth in an area.

The Project would directly result in building new housing where housing currently does not exist and would include minor utility connections to existing infrastructure adjacent to the Project site. However, the Project would not increase employment growth in the City or region. Utilizing the Project's baseline of an occupied school (see Section 2.2.1 of this Draft EIR), the Project would result in a decrease of 23 jobs associated with the Powell Elementary School, which would not contribute to any employment growth in the City and would not exceed any employment projections.

The area surrounding the Project site is already developed with commercial and residential uses which would not be removed as a result of the Project. Thus, the Project would not remove impediments to growth, such as extending new infrastructure into an area that has been undeveloped. Additionally, the Project would not require any roadway developments that could stimulate urban sprawl. The Project site is located within an urban area that is currently served by existing utilities and infrastructure.

The Project site is in a highly urbanized area and is surrounded by a mix of commercial, educational, and residential uses, and within proximity to bus services along East Alosta Avenue and North Citrus Avenue. The Project would not require any major roadway or utility improvements, nor would the Project open any large undeveloped areas for new use. Therefore, the proposed infrastructure improvements would support applicable goals and policies under local plans (e.g., the General Plan and Housing Element) and applicable regional plans, such as the SCAG's Regional Transportation Plan/Sustainable Communities Strategy, as discussed in Section 4.10, Land Use and Planning, and would not result in significant impacts to the environment.

5.4 Potential Secondary Effects of Mitigation Measures

CEQA Guidelines section 15126.4(a)(1)(D) states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but, in less detail, than the significant effects of the project as proposed." With regard to this

section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project were reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

5.4.1 Biological Resources

MM-BIO-1 would require actions be taken during the Project's construction phase to avoid disturbance of nesting birds. MM-BIO-1 would implement temporary procedures to reduce potential impacts to nesting birds, such as establishing suitable buffers around identified nesting areas. The requirement for a biologist to monitor for nesting birds in compliance with MM-BIO-1 would result in additional worker(s) traveling to and from the Project site during construction, but this activity would be temporary and would not result in any significant adverse environmental impacts. Additionally, the impacts of these trips were accounted for throughout the Draft EIR. This mitigation measure is proposed to reduce potential impacts to biological resources and includes short-term mitigative actions that would not result in any significant effects on the environment. Implementation of this mitigation measure would not result in any physical changes to the environment that could cause any long-term secondary impacts.

5.4.2 Cultural Resources

MM-CUL-1 requires that in the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Under this measure, avoidance and/or preservation in place should be considered the preferred management approach wherever possible, and if the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. If applicable, a data recovery plan shall be developed by the qualified archaeologist in consultation with the City and consulting parties. Ground disturbance can continue only after the resources have been properly mitigated with approval by the City. This mitigation measure is proposed to reduce potential impacts associated with archaeological resources and includes short-term mitigative actions that would not result in significant effects on the environment. Implementation of this mitigation measure would not result in any physical changes to the environment that could cause any long-term secondary impacts.

5.4.3 Geology and Soils

MM-GEO-1 requires that the recommendations provided for in the Preliminary Geotechnical Evaluation and Recommendations Report (Appendix F-1) be incorporated into Project design and implementation. This mitigation measure would result in the integration of construction and building practices that would lead to increased structural integrity and would create a safer environment during Project construction, as well as through the Project's operational lifetime. MM-GEO-2 requires the Applicant, prior to commencement of any on-site grading activities, to retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines to prepare a Worker Environmental Awareness Program (WEAP) and a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project. In addition, a qualified paleontological monitor shall be on site during all ground-disturbing activities (including augering) below a depth of 5 feet. In the event paleontological resources are unearthed during grading, MM-GEO-2 would require construction to temporarily halt and/or divert grading activity in that area and wait to allow recovery of paleontological resources by a paleontological monitor. In addition, the area of discovery would be roped off with a 50-foot radius buffer and construction could commence again once documentation and collection of the

find is completed. This mitigation measure is required to reduce potential impacts associated with paleontological resources and includes short-term mitigative actions that would not result in significant effects on the environment. Implementation of these mitigation measures would not result in any physical changes to the environment that could cause any long-term secondary impacts.

5.4.4 Hazards and Hazardous Materials

MM-HAZ-1, Hazardous Building Materials Survey, requires that, prior to issuance of a demolition permit, the Applicant retain a qualified environmental specialist to conduct a survey for asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury, and other hazardous building materials, such as universal wastes and refrigerants, to document the presence of any potentially hazardous materials within the structures. If wastes are identified in the buildings to be demolished, the wastes must be addressed in accordance with applicable regulations, and the contractor must ensure implementation of the abatement requirements specified through the contract specifications for all confirmed and suspected hazardous materials which require abatement. This mitigation measure would reduce impacts associated with Project site development, as assessed throughout this Draft EIR, and would not result in additional significant adverse environmental impacts.

5.4.5 Noise

MM-NOI-1 requires the Project applicant/developer to ensure temporary noise barriers are included in the construction contractor's contract specifications, prior to the issuance of a demolition permit, and are implemented and monitored for compliance throughout construction. MM-NOI-1 includes requirements for muffling devices, construction hours, staging areas, noise barriers, and minimum distances to sensitive receptors. MM-NOI-1 is required to reduce potential noise impacts during construction and includes short-term mitigative actions that would not result in significant effects on the environment. Construction activities associated with noise barriers have been accounted for in the overall short-term impacts analysis associated with site development, as assessed throughout this Draft EIR, and this measure would not result in additional significant adverse environmental impacts. Implementation of this mitigation measure would not result in any physical changes to the environment that could cause any secondary impacts.

5.4.6 Transportation

MM-TRA-1 requires the Project applicant to prepare a community-based travel planning (CBTP) program for the City's review and approval. The CBTP shall include details about how residences within the Project will be provided with customized information and support to encourage the use of transportation alternatives such as transit, bike and pedestrian modes and available facilities, in place of single-occupancy vehicles. MM-TRA-1 is required to reduce project-level vehicle miles traveled (VMT) impacts during operation, and is based on a Transportation Demand Management (TDM) measure recommended by the San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool that would reduce the Project's VMT by 2.28 percent. At a minimum, the CBTP shall be reviewed/updated annually to reflect changes in transit opportunities in the vicinity, provide clear guidance on available nearby transit services, as well as information of bike and pedestrian facilities that connect to important destinations in the area. The program shall require the annual disbursement of information to the residents via mailers, electronic mail, and/or meetings. The CBTP shall be approved by the City and ready for implementation prior to the issuance of the first Certificate of Occupancy. Implementation of this mitigation measure would not result in any physical changes to the environment that could cause any secondary impacts.

5.4.7 Tribal Cultural Resources

MM-TCR-1 requires the retention of a Native American monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) prior to ground disturbing activities. The monitor must complete daily monitoring logs that 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. MM-TCR-2 requires procedures for an unanticipated discovery of tribal cultural resource (TCR) objects (non-funerary/non-ceremonial) during construction activities, and upon discovery, 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. If human remains and associated funerary objects are unearthed during construction, MM-TCR-3 outlines required procedures in accordance with the PRC and Health and Safety Code. These mitigation measures are required to reduce potential impacts associated with tribal cultural resources and include short-term mitigative actions that would not result in significant effects on the environment. Implementation of these mitigation measures would not result in any physical changes to the environment that could cause any long-term secondary impacts.

5.5 Effects Found Not to Be Significant

CEQA Guidelines section 15128 requires that an EIR briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. As discussed in the Notice of Preparation , released for public review from November 20, 2025, through December 22, 2025 (*see* Appendix A-1), implementation of the Project would not result in any significant impacts to agriculture and forestry resources; mineral resources; or wildfire.

A summary of the analysis provided in the Notice of Preparation, for these issue areas, is provided below.

5.5.1 Agriculture and Forestry Resources

The Project site is located in an urban area on a site that is fully developed with school buildings and asphalt paving and is entirely within the Institutional/School zone and General Plan land use designation, with adjacent Low Density Residential and University District – Residential Medium zone parcels within the City, as well as Single-Family Residence (R-1-6000 [minimum lot size 6,000 square feet] and R-1-8000 [minimum lot size 8,000 square feet]) zone parcels in unincorporated County. There are no existing agriculture or forestry activities on the site. No readily available opportunities for agricultural or forestry operations exist on site or in the surrounding area. According to the California Department of Conservation's California Important Farmland Finder, the Project site is not mapped as part of the state's Farmland Mapping and Monitoring Program; thus, the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of State Importance (collectively "Important Farmland") (DOC 2025a), nor does it contain any parcels under a Williamson Act contract (DOC 2025b). Additionally, the Project site nor the surrounding area contain forestland or timberland. Therefore, impacts associated with agricultural and forestry resources would not occur.

5.5.2 Mineral Resources

There are no oil wells or oil/mineral extraction activities on or near the Project site (CalGEM 2025). Current on-site land uses do not allow for oil/mineral extraction. According to the General Plan Natural Environment Element, the

Project site is within a Mineral Resources Zone-3 area, which is classified as an area where the significance of mineral deposits cannot be determined from available data (City of Azusa 2004a). Thus, the Project would not result in the loss of mineral resources of known state or local importance. Furthermore, as the site does not allow for mineral extraction, and as there are no oil wells or oil extraction activities on the site, Project impacts associated with mineral resources would not occur.

5.5.3 Wildfire

According to the California Department of Forestry and Fire Protection's Fire Hazard Severity Zone Viewer, the Project site is not within a Fire Hazard Severity Zone or a State Responsibility Area (CAL FIRE 2025; City of Azusa 2004b). Portions of the City located approximately 1.25 miles north of the Project site are within a Very High Fire Hazard Severity Zone (VHFHSZ); however, due to the urban setting of the Project site away from those zones, the potential for wildland fire hazards in the immediate Project vicinity is extremely limited (City of Azusa 2003). The Project would result in an increase in permanent residents in the City, which could potentially have an impact on Citywide evacuation routes designated by the Los Angeles County Department of Public Works (LADPW). The Project is located along East Mauna Loa Avenue within the City, which is not an LADPW-designated disaster route (LADPW 2008). However, the nearby Interstate (I-) 210 (running east-west through the City), East Alosta Avenue (running east-west through the City), and San Gabriel Canyon Road are designated disaster routes within the City (LADPW 2008). The Project would introduce a substantial number of new permanent residents; although, it would not significantly impact the ability of the nearby I-210 (approximately 1,600 feet southeast of the Project site) to serve as a disaster evacuation route. Further, as identified by CAL FIRE, most of the Fire Hazard Severity Zones within and adjacent to the City are north of the I-210, as are the VHFHSZs in the northern part of the City where residents would need to utilize San Gabriel Canyon Road in the event of a wildfire evacuation (CAL FIRE 2025). The Project site is located 1,600 feet north of the I-210 and approximately 640 feet south of East Alosta Avenue. As such, in the event of an evacuation within the City, potential residents of the Project would likely not impact existing evacuation routes given the distance between the Project site and the neighborhoods in and around the VHFHSZs. As such, the Project would not exacerbate or expose people or structures to wildfire risks or substantially impair an adopted emergency response plan.

5.6 References

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6 Alternatives

This chapter describes and evaluates alternatives to the proposed Project. This chapter implements the requirements set forth in the CEQA Guidelines and identifies the Environmentally Superior Project Alternative, as required by CEQA Guidelines section 15126.6(e)(2).

6.1 Introduction

CEQA requires that environmental impact reports "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6(a)). The CEQA Guidelines direct that the selection of alternatives is governed by "a rule of reason" (CEQA Guidelines § 15126.6(a) and (f)). As defined by CEQA Guidelines § 15126.6(f):

> The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project.

As presented in prior sections of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Consistent with CEQA, the analysis presented in this chapter considers a reasonable range of alternatives to the proposed Project and evaluates their comparative environmental impacts. The selection of alternatives and their discussion must "foster informed decision making and public participation" (CEQA Guidelines § 15126.6(a)). Therefore, this chapter identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

This Draft EIR includes the analysis of three alternatives to the proposed Project:

- Alternative A – No Project/No Development (current condition remains)
- Alternative B – Adaptive Reuse of the Existing School
- Alternative C -- Adaptive Residential Reuse of the Existing School and Multi-Family Residential

6.2 Overview of Significant Project Impacts

Alternatives should meet some of the Project's main objectives and focus on reducing or avoiding significant environmental impacts associated with the Project as proposed. As described in Chapter 4, Environmental Analysis, the Project would result in the following potentially significant environmental impacts. All of these impacts would be reduced to a less-than-significant level through incorporation of mitigation measures.

- **Threshold 4.3a (Biological Resources): Nesting Migratory Birds and Raptors.** The Project could potentially cause a substantial adverse effect on breeding or reproduction of bird and/or raptor species on or adjacent to Project site during construction.

- **Threshold 4.4b (Cultural Resources): Archaeological Resources.** The Project could potentially cause a substantial adverse change in the significance of an archeological resource in the event of an inadvertent discovery during ground disturbance activities during construction.
- **Threshold 4.6a(ii) (Geology and Soils): Strong seismic ground shaking.** The Project could potentially directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.
- **Threshold 4.6a(iv) (Geology and Soils): Landslides.** The Project could potentially directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.
- **Threshold 4.6(c) (Geology and Soils): Unstable Geologic Unit.** The Project could potentially be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- **Threshold 4.6f (Geology and Soils): Paleontological Resources.** The Project could potentially directly or indirectly impact a unique paleontological resource in the event of an inadvertent discovery during ground disturbance activities during construction.
- **Threshold 4.8a (Hazards and Hazardous Materials): Demolition and Abatement Procedures.** Demolition of structures that contain asbestos, lead-based paint, or other hazardous materials/wastes could potentially result in a hazard to the public or the environment during transport and disposal of construction debris.
- **Threshold 4.11a (Noise): Temporary Increase in Ambient Noise Levels.** The Project could potentially result in a substantial temporary increase in ambient noise levels during construction.
- **Threshold 4.15b (Transportation): Conflict with CEQA Guidelines section 15064.3(b).** The Project could potentially result in significant vehicle-miles-traveled (VMT) impacts.
- **Threshold 4.16b (Tribal Cultural Resources): Tribal Cultural Resources.** The Project could potentially cause a substantial adverse change in the significance of a tribal cultural resource in the event of an inadvertent discovery during ground disturbance activities during construction.

6.3 Project Objectives

CEQA Guidelines section 15124(b) requires an EIR to include a statement of objectives sought by the Project. The objectives assist the City in developing a reasonable range of alternatives to be evaluated in the EIR and also aid decision makers in preparing Findings of Fact and a Statement of Overriding Considerations, if necessary. The statement of objectives includes the underlying purpose of the project and may discuss a project's benefits. The Project's specific objectives are as follows:

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.
2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 (NG-3) zone.
3. To provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.
4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

6.4 Significant and Unavoidable Impacts

As discussed throughout Chapter 4 of this EIR, implementation of the Project would not result in any significant and unavoidable impacts on the environment. Prior to mitigation, the Project would result in potentially significant impacts related to biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources. However, with implementation of mitigation measures provided in Table ES-1, Summary of Project Impacts, of Chapter ES, Executive Summary, all potentially significant impacts would be mitigated to a less than significant level.

6.5 Alternatives Considered and Eliminated During the Project Planning Process

CEQA Guidelines section 15126.6(c) recommends that an EIR identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons for their rejection. Among the factors described by CEQA Guidelines section 15126.6 in determining whether to exclude alternatives from detailed consideration in an EIR are failure to meet most of the basic objectives of a project, infeasibility, or inability to avoid significant environmental impacts.

With respect to the feasibility of potential alternatives to a project, CEQA Guidelines section 15126.6(f)(1) states the following:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries… and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

In determining an appropriate range of Project alternatives to be evaluated in this EIR, two alternatives for the Project were considered but ultimately rejected from further analysis in this EIR, consistent with section 15126.6(c) of the CEQA Guidelines. A description of the potential alternatives considered, but not carried forward, and the rationale for rejection is provided below.

6.5.1 Alternative Location

Pursuant to CEQA Guidelines section 15126.6(f)(2), the City considered the potential for alternative locations to the Project. As stated in section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of a project would be avoided or substantially lessened by putting that project in another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need to be considered in the EIR. There are no significant and unavoidable impacts associated with the Project that relate to the location of the Project site. Due to the generally built-out nature of the City, it is likely that demolition of existing buildings and paved areas would be required at any property within the City (excluding potentially undeveloped land in the foothill areas). Most properties within the City would be located in proximity to sensitive receptors (e.g. residences, schools, daycares, hospitals) due to the urban nature of the City. Therefore, development of the Project on another site in the City is not likely to lessen or avoid the environmental impacts that required mitigation.

Additionally, one of the factors for feasibility of an alternative under CEQA Guidelines section 15126.6(f) is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." The Project's proposed location is in an entirely built-out area of the City surrounded predominantly by residential and commercial uses. Due to the largely built-out nature of the City, consolidation of smaller sites sufficient to accommodate the Project's 128 units is uncertain and the Applicant does not control any other candidate sites in the City that would allow for construction of 128 units. Given this, this alternative was rejected and is not further analyzed in this Draft EIR.

6.5.2 Increased Density

In accordance with CEQA Guidelines section 15126.6(c), the following provides a brief description of an alternative Project design considered and rejected as infeasible, along with the reasons underlying the lead agency's determination.

In December 2024, the Project Applicant proposed an alternate site plan for development on the Project site. The site plan included development of 153 residential units, comprising attached 3-story townhomes, attached 2-story townhomes, and single-family detached 2-story cluster homes. The density of this proposal was 17.53 dwelling units per acre. The proposal included 38,862 square feet of private open space (254 square feet per unit blended) and 18,487 square feet of common open space (120 square feet per unit), with a total of 362 parking stalls (2.4 stalls per unit). This proposal was reviewed and rejected by the City due to the height of the proposed townhomes and its lack of compatibility with the nearby residential uses. Subsequently, the Project Applicant reduced the unit count to 128 units and eliminated the 3-story residential structures, resulting in the proposed Project submittal. The proposed Project includes 36,916 square feet of private open space (288 square feet per unit blended) and 15,100 square feet of common open space (118 square feet per unit), with a total of 326 parking stalls (2.5 stalls per unit). Therefore, the 2024 increased-density design was considered by the City but was eliminated from further consideration.

Due to the similar scope, size, and location, this alternative would likely have the same potentially significant impacts as the Project. However, this alternative would result in some increases in utility and public service demands and additional vehicle miles traveled (and associated air pollutants) compared to the Project due to the increased number of dwelling units and associated generation of additional residents. According to CEQA Guidelines section 15126.6(b), the purpose of considering alternatives to the Project is to identify alternatives that are capable of avoiding or substantially lessening any significant effects of the Project. Due to its inability to substantially lessen or avoid significant environmental impacts, this alternative was rejected and is not further analyzed in this Draft EIR.

6.6 Alternatives Selected for Further Analysis

This section discusses a reasonable range of alternatives to the Project, including a no project alternative in compliance with CEQA Guidelines section 15126.6(e). These alternatives include the following:

- Alternative A – No Project/No Development
- Alternative B – Adaptive Reuse of the Existing School
- Alternative C -- Adaptive Residential Reuse of the Existing School and Multi-Family Residential

Pursuant to section 15126.6(d) of the CEQA Guidelines, each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the

corresponding impacts of the Project. Each alternative is also evaluated to determine whether the Project objectives would be substantially attained.

CEQA requires that EIRs "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126(a)). Therefore, in addition to Alternative A, this Draft EIR analyzes two additional alternatives.

6.6.1 Alternative A – No Project/No Development

6.6.1.1 Alternative Description

CEQA Guidelines section 15126.6(e) requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As stated in section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the no project alternative will be the continuation of the plan, policy, or operation into the future.

Accordingly, Alternative A assumes the proposed Project would not proceed, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be maintained. The current General Plan land use designation and zoning for the property allow for and are consistent with the operation of a school. Further, Powell Elementary School is owned by Azusa Unified School District and has been operated as an elementary school until 2023. Because the property has been operational as an elementary school in recent years, it is still appropriate for use as an elementary school, and could theoretically come back into operation at any point. The existing educational uses would remain in place and be operational, the existing surface parking lots would be retained, and no new buildings would be constructed. For the purposes of this Alternative A, no site improvements are assumed.

6.6.1.2 Ability to Meet Project Objectives

Because the "No Project" alternative assumes that the proposed Project does not obtain Project approval by the Lead Agency, an evaluation of consistency between the Alternative A and the Project Objectives is provided for informational purposes only.

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.

   Alternative A would not satisfy this Project Objective. Alternative A assumes existing educational buildings and surface parking located on site would remain and that the Project site would not be redeveloped. Therefore, Alternative A would not redevelop the property into a residential development with associated open space and parking to support residents.

2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 (NG-3) zone.

Alternative A would not satisfy this Project Objective. Alternative A assumes existing school buildings and surface parking would remain. Therefore, Alternative A would not develop a medium density residential community that reflects the density of the surrounding homes and adjacent zoning.

3. To provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.

   Alternative A would not satisfy this Project Objective. Alternative A would not provide for additional housing opportunities, and therefore, would not provide housing opportunities consistent with the goals and/or policies set forth in the Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.

4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

   Alternative A would not satisfy this Project Objective. Alternative A would not provide for additional housing opportunities, and therefore, would not provide new multifamily residential housing that could help meet the City's RHNA requirements.

6.6.1.3 Comparison of the Effects of Alternative A to the Project

Aesthetics

Alternative A would result in the continued operations of the elementary school on the Project site as a school. Since no changes would occur under Alternative A, changes to the scenic quality of baseline conditions would not occur. Alternative A would not introduce new sources of glare and light to the Project site and surrounding area, and no tree removals or encroachments upon existing trees would occur under Alternative A. As such, this alternative would not conflict with existing regulations governing scenic resources. Given that there would be no changes related to aesthetics under Alternative A, aesthetic impacts would be **less than** those anticipated from the Project.

Air Quality

Alternative A would not alter the baseline conditions of the Project site or require any construction activities, and, therefore, would not result in any construction emissions associated with construction worker and construction truck traffic, or the use of heavy-duty construction equipment. Therefore, impacts under Alternative A would be **less than** those anticipated from the Project.

Under Alternative A, operations and operational emissions would remain in the current condition, whereas the proposed Project would generate additional emissions of criteria pollutants. Under Alternative A, the on-site Powell Elementary School would continue operations, which would not generate any new employees or residents. Under Alternative A, no residential development would occur, and thus fewer operational emissions from operational vehicle trips from residents would result. As such, impacts under Alternative A would be **less than** those anticipated from the Project.

Biological Resources

Under Alternative A, the Project site would remain in its baseline conditions and potential impacts to biological resources would not occur. MM-BIO-1 set forth in Section 4.3, Biological Resources, would not be required under Alternative A. Because Alternative A would result in no impacts to biological resources, impacts under Alternative A would be **less than** anticipated under the Project.

Cultural Resources

Similar to the proposed Project, Alternative A would not impact historical resources. Alternative A would not have the potential to impact previously undiscovered culturally significant resources because no ground disturbance would occur on the Project site. The Project site would remain as is and potential construction impacts (including ground-disturbing activities such as grading or other earthwork) that could result in disturbance of previously unknown resources, would not occur. Therefore, MM-CUL-1 would not be applicable to Alternative A for the unanticipated discovery of archaeological resources and although the Project would comply with section 7050.5 of the California Health and Safety Code if human remains are found, Alternative A would result in no potential impacts to human remains because no ground disturbing activities would occur. Therefore, impacts under this alternative would be **less than** those anticipated from the Project.

Energy

Although the Project would have no significant impacts on energy and no mitigation measures were required, there would be no construction activity and no temporary use of electricity, and/or petroleum under Alternative A. Therefore, construction impacts under this alternative would be **less than** those anticipated from the Project.

Natural gas and electricity usage would not increase under Alternative A compared to the proposed Project. Although the Project would be constructed in compliance with applicable regulations governing energy efficiency and would have no significant impacts on energy and no mitigation measures were required, because the Project would result in an increase in population and intensity of energy use, impacts under Alternative A would be **less than** those anticipated from the Project.

Geology and Soils

Alternative A would not result in erosion or loss of topsoil because no ground disturbance would occur on the Project site. Alternative A would not introduce new development to the Project site, and therefore, would not introduce new earthwork or structures that could have the potential to exacerbate geologic hazards. The Project site would remain as is and potential construction impacts (including grading, excavations, and trenching) that could risk potential disturbance of paleontological resources, would not occur. Therefore, MM-GEO-1, requiring adherence to the recommendations set forth in the Preliminary Geotechnical Evaluation and Recommendations Report (Appendix F-1), and MM-GEO-2, requiring measures to reduce potential impacts to previously undiscovered paleontological resources, would not be required under Alternative A. Therefore, impacts under Alternative A would be **less than** those anticipated from the Project.

Greenhouse Gas Emissions

Alternative A would not alter the baseline conditions of the Project site or require any construction activities, and, therefore, would not generate any short-term construction-related greenhouse gas (GHG) emissions. Even though

no significant impacts would result, and no mitigation was required for the Project, because Alternative A would result in no construction impacts to GHG emissions, impacts under Alternative A would be **less than** those anticipated from the Project.

Under Alternative A, operational emissions would remain the same as in the baseline conditions. Under the Project, operational emissions would be greater than that of baseline conditions; however, impacts would be less than significant, and no mitigation measures would be required. Under Alternative A, the Project site would remain in its baseline conditions as an operational school and the potential benefits of the Project related to providing housing opportunities proximate to transit would not occur. Although no significant impacts would result and no mitigation was required for the Project, Alternative A would have no operational impact on GHG emissions; therefore, impacts under Alternative A would be **less than** those anticipated from the Project.

Hazards and Hazardous Materials

Under Alternative A, there would be no construction activity and no potential use or release of hazards and hazardous materials resulting from demolition and construction would occur. Alternative A would not result in the demolition of the existing surface parking lots and buildings where asbestos-containing materials and lead based paint could be present, and other universal wastes are likely present. Therefore, mitigation requirements related to short-term construction, including MM-HAZ-1, requiring abatement procedures for the removal of materials containing asbestos, universal wastes, and hazardous materials for offsite disposal, as set forth in Section 4.8, Hazards and Hazardous Materials, would not be required under Alternative A. Therefore, construction impacts related to hazards and hazardous materials under this alternative would be **less than** those anticipated from the Project.

Under Alternative A, operations would remain the same as in the baseline conditions. Although the Project would not create a significant operational hazard to the public or the environment, the Project would likely increase routine transport, use, and disposal of hazardous materials and/or wastes on the Project site compared to the baseline conditions under Alternative A due to increased intensity of use. Therefore, operational impacts on hazards and hazardous materials under Alternative A would be **less than** those anticipated from the Project.

Hydrology and Water Quality

Alternative A would not alter the baseline conditions of the Project site or require any construction activities, and, therefore, would not generate any short-term construction-related hydrology or water quality impacts. Even though no significant impacts would result, and no mitigation was required for the Project, because Alternative A would result in no construction impacts to hydrology and water quality, impacts under Alternative A would be **less than** those anticipated from the Project.

Under Alternative A, the Project site would remain the same as in baseline conditions and there would be no increase in surface water runoff nor alterations to existing water drainage systems. The Project proposes on-site drainage improvements, including on-site catch basins, gutters running along proposed drive aisles, and infiltration chambers, which would be consistent with the requirements of applicable Low Impact Development (LID) requirements. However, under baseline conditions, approximately 50 percent of the site is greenfield, which provides greater natural infiltration than the Project's infiltration chambers. Alternative A would not result in a violation of water quality standards or waste discharge requirements nor would the alternative increase runoff resulting in flooding, substantial erosion or siltation on or off site. Therefore, operational impacts to hydrology or water quality under Alternative A would be **less than** those anticipated from the Project.

Land Use and Planning

Alternative A would allow for the continued operations of the Project site, and the existing parking lot and educational buildings would continue to operate under baseline conditions. Since no changes would occur under Alternative A, no General Plan Amendment, Zone Change, Variance, Design Review, or Tentative Tract Map would be required. Unlike the Project, Alternative A would not redevelop the Project site and would not provide residential units, which would help the City to achieve state and regional goals and policies related to land use, circulation, economic development, and housing. However, the Project site is not a site identified in the Housing Element Site Inventory. Therefore, impacts under Alternative A would be **less than** those anticipated from the Project because it would not require any discretionary land use approvals.

Noise

Construction noise and vibrations generated by the Project would be less than significant with the implementation of MM-NOI-1. Alternative A would not involve construction that could result in noise from the temporary use of heavy-duty construction equipment or generation of construction traffic, including worker and haul truck trips to the Project site. Because Alternative A would not involve construction, MM-NOI-1 would not be required. Impacts related to noise under Alternative A would be **less than** those anticipated from the Project.

Under Alternative A, the Project site would remain the same as under baseline conditions. Addition of Project traffic to the roadway network would not result in a discernable increase in noise, while noise impacts from increased stationary operational noise would be less than significant. However, the Project would be louder than that of noise produced from school HVAC systems (i.e. baseline condition), which would also be de-activated during nighttime hours or operated at minimal capacities less than when school is in session. Further, both the Project and Alternative A would result in less than significant impacts in regards to off-site traffic noise. However, off-site traffic noise resulting from Alternative A would be less than the Project given the reduction in vehicle trips generated by the school (see Table 2-1 to Appendix K of this Draft EIR). While both the Project and Alternative A (i.e. baseline condition) would result in less than significant operational impacts on noise, operational impacts on noise under this alternative would be **less than** those anticipated from the Project.

Population and Housing

Alternative A would not generate part-time and full-time jobs associated with construction, because no construction would occur, whereas the Project would require a temporary construction workforce. Therefore, impacts would be **less than** the Project.

Under Alternative A, no change from the baseline conditions would occur, and therefore, no population growth or new residential units would result as part of implementing Alternative A. Comparatively, the Project would result in population growth from the proposed 128 residential units. Because Alternative A would result in no changes to population or housing, impacts under Alternative A would be **less than** those anticipated from the Project.

Public Services

Alternative A would not alter the baseline conditions of the Project site or require any construction activities, and therefore, would not generate increased demand for fire protection and police services, or library services. Alternative A would not result in changes to existing uses on the Project site. While the Project site currently places some demand on fire protection and police services and library services due to the occupied educational buildings,

the Project would increase demands relative to baseline conditions, as schools generally close in the evenings and over holidays and residential uses are more consistently occupied. Even though no significant impacts would result, and no mitigation was required for the Project, because Alternative A would result in reduced impacts to public services, impacts under Alternative A would be **less than** those anticipated from the Project.

Recreation

The Project is estimated to include approximately 397 new residents, which would generate additional residents in the City and, therefore, have the potential to increase the use of existing neighborhood and regional parks or other recreational facilities. However, the Project would include common open space and associated amenities for the residents to use; no significant impacts would result, and no mitigation is required for the Project. Similarly, Alternative A would not result in any impacts to recreation and would not require mitigation. Alternative A would not alter the baseline conditions of the Project site, which includes an open playing field for the students, or require any construction activities, and, therefore, would not generate increased demand for parks. Because Alternative A would result in no impacts to recreation, impacts under Alternative A would be **less than** those anticipated from the Project.

Transportation

Alternative A would not generate short-term traffic or transportation impacts because no construction would occur. Construction activities associated with the Project do not have the potential to temporarily impact emergency vehicle access to the Project site. However, to ensure adequate safeguards for pedestrian, bicycle and vehicular circulation during short-term construction activities, preparation of a TCP is required in accordance with the AMC. Because Alternative A would not generate excessive traffic as no construction would occur, a TCP would not be required. Therefore, construction impacts related to transportation under this alternative would be **less than** those anticipated from the Project.

Under Alternative A, the Project site would remain the same as under baseline conditions (an operational school), whereas the Project would generate new vehicle trips from the proposed residential use. The San Gabriel Valley Council of Governments (SGVCOG) VMT Evaluation Tool determined the proposed Project is forecast to generate 21.01 VMT per capita, which would exceed the 20.67 Home-Based VMT per capita baseline VMT for the year 2025. As such, the Project incorporated MM-TRA-1, Implement Community Based Travel Planning (CBTP), which would reduce the Project's VMT impact to less than significant. However, under Alternative A, MM-TRA-1 would not be required. Therefore, impacts under Alternative A would be **less than** those anticipated from the Project.

Tribal Cultural Resources

The Project would require earthwork for the excavation associated with the Project, which would result in the potential to impact tribal cultural resources. Alternative A would not impact culturally significant tribal cultural resources because there would be no ground-disturbing activities and no excavation into native soils. Because this alternative would not affect tribal resources, impacts under Alternative A would be **less than** those anticipated from the Project.

Utilities and Service Systems

Alternative A would not result in changes to the baseline condition, and therefore, would not result in an additional demand for potable water, generation of wastewater, or generation of solid waste. Alternative A would not require

the construction of new on-site water, sewer, or stormwater infrastructure and would not require the construction of any utility connections or improvements. Instead, Alternative A would continue to utilize the existing utilities serving the Project site. The Project would result in an intensification of use on-site, which requires additional wet and dry utilities, and water supplies, whereas development under Alternative A would not. Because Alternative A would not increase demand on existing utilities and service systems, impacts under Alternative A would be **less than** those anticipated from the Project.

6.6.2 Alternative B – Adaptive Residential Reuse of the Existing School

6.6.2.1 Alternative Description

As presented in prior sections of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Therefore, Alternative B considers an alternative design that would reduce the short-term construction-related environmental impacts of the Project as well as the long-term operational impacts that require mitigation. Specifically, Alternative B would reduce the impacts associated with demolition of the Powell Elementary School by proposing reuse of the school's seven buildings and developed areas as a residential complex, which constitutes approximately 50% of the property. Under Alternative B, the existing playground areas and open field area could be converted to common open space maintained by the Homeowner's Association (HOA) for the residential uses.

It is anticipated that approximately 21 single-level residential condominium units could be accommodated through the adaptive reuse of the existing buildings, which would be a substantial reduction of approximately 107 residential units when compared to the Project's proposed 128 units. Under Alternative B, the Project would generate approximately 66 residents, which is 331 fewer residents than the proposed Project. Alternative B would result in substantially reduced construction noise and emissions impacts to nearby sensitive receptors to the north and west of the Project site, as the construction equipment would be reduced and the distance to sensitive receptors would be greater with the reuse of the existing playground areas and open field area to common open space. This Alternative would also reduce operational impacts, such as reduced VMT, utility, and public service demands, due to the reduced unit count.

6.6.2.2 Ability to Meet Project Objectives

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.

   Alternative B would partially satisfy this Project Objective. Alternative B would redevelop existing educational buildings and surface parking lots into an approximately 21-unit residential development and would provide common open space maintained by the HOA and parking to support the residents. Therefore, Alternative B would redevelop the underutilized infill property into a residential community with adequate residential open space and parking. However, Alternative B would not fully utilize the potential of the property by leaving approximately 50% of the land underutilized and only developing one residential single-story type of development, which would reduce the vibrancy of the community.

2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 (NG-3) zone.

   Alternative B would not satisfy this Project Objective. Alternative B would still redevelop the existing school buildings into approximately 21 single-level residential condominiums. However, the adjacent medium density residential zone has a density range of 8.1 to 15 dwelling units per acre, as set forth in the General Plan Housing Element. Given that the Project site is 9.77 acres, Alternative B would have a density of approximately 2.1 dwelling units per acre, which would be considered low density (1 to 8 dwelling units per acre). Therefore, Alternative B would not efficiently develop a medium density residential community which maximizes the development of residential units that reflects the density of surrounding homes and zoning.

3. To provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.

   Alternative B would partially satisfy this Project Objective. Alternative B would develop an approximately 21-unit residential development which would still have access to existing multi-modal infrastructure and transit opportunities. Alternative B would also redevelop an underutilized infill property and provide 21 new units of housing. Therefore, Alternative B would provide housing opportunities consistent with the goals and/or policies set forth in the Housing Element, General Plan, and SCAG's RTP/SCS, albeit less effectively than the Project.

4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

   Alternative B would partially satisfy this Project Objective. Alternative B would develop 21 new residential dwelling units. However, this number is substantially less than the proposed 128 units and Alternative B would not provide for a mix of housing types. Therefore, Alternative B would still help meet the City's RHNA requirements, albeit less effectively than the Project.

6.6.2.3 Comparison of the Effects of Alternative B to the Project

Aesthetics

Alternative B would not result in changes to the scenic quality, as this Alternative proposes reuse of the one-story school buildings. As with the proposed Project, views of the San Gabriel Mountains are already partially obstructed, and so impacts under this Alternative would be less than significant and require no mitigation. The glare and light impacts of Alternative B and the tree removals and encroachments upon existing trees would be less than significant and would be comparable to the Project due to similar proposed uses with implementation of Alternative B. As such, this alternative would not conflict with existing regulations governing scenic quality. Given that there would be fewer changes to aesthetics with reuse of the one-story school buildings under Alternative B, aesthetic impacts would be **less than** those anticipated from the Project.

Air Quality

Under Alternative B, there would be less construction in terms of duration and intensity compared to the Project. Retrofitting including utility hookups and structural retrofitting would be required, but construction equipment would be reduced and distance to sensitive receptors would be greater. As such, impacts under Alternative B would be **less than** those anticipated from the Project.

Under Alternative B, operational emissions would be incrementally reduced compared to the Project as the decrease in 107 units would result in less operational vehicle trips generated. With this unit reduction, Alternative B would generate 721 fewer total vehicle trips, a reduction of approximately 83.5% of total vehicle trips compared to the Project. Estimated emissions under both scenarios are anticipated to remain under the thresholds of significance and impacts related to operational air quality emissions under Alternative B would be less than significant, and no mitigation is required. Given this, long-term operational impacts under Alternative B would be **less than** those anticipated from the Project.

Biological Resources

Implementation of the Project would result in potentially significant temporary impacts to biological resources prior to mitigation due to the removal of vegetation and elevated noise levels associated with construction that could adversely impact nesting bird and raptor species. With the inclusion of MM-BIO-1, the Project would have less than significant impacts related to biological resources.

Under Alternative B, there would be less construction in terms of duration and intensity, as there would be a substantial reduction in number of units and demolition of existing buildings would no longer occur. However, given that construction, including utility connections and retrofitting, would still occur, MM-BIO-1 would continue to be required. Under Alternative B, impacts to biological resources would still be less than significant with mitigation; however, the potential to disturb nesting and migratory birds would be reduced due to reduced vegetation and tree removal/encroachment. Therefore, impacts under Alternative B would be **less than** the Project.

Cultural Resources

Alternative B would not require the demolition of existing buildings, thus resulting in less opportunities for potential cultural resources or human remains to be discovered. However, minimal ground disturbance would still be required for retrofitting. Therefore, MM-CUL-1 related to the salvage and treatment requirements of potential archaeological resources would continue to be required under Alternative B. However, impacts to cultural resources or human remains under Alternative B would be reduced overall due to the reduced duration and intensity of ground disturbing activities during construction. Therefore, impacts under Alternative B would be **less than** those anticipated from the Project.

Energy

Under Alternative B, there would be less construction in terms of duration and intensity compared to the Project. Retrofitting including utility hookups and structural retrofitting would be required, but construction equipment would be reduced and distance to sensitive receptors would be greater. As such, impacts under Alternative B would be **less than** those anticipated from the Project.

Operational activity under Alternative B would decrease due to the decrease in residents and employees on-site. As such, there would be a decrease in demand for the use of electricity and petroleum during operations. Consequently, operational impacts under this alternative would be **less than** those anticipated from the Project.

Geology and Soils

Under Alternative B, similar earthwork and building development would occur. Therefore, MM-GEO-1 related to the adherence to the recommendations set forth in the Project-specific Geotechnical Evaluation would continue to be required under Alternative B. Additionally, Alternative B would include retrofitting and renovations and would not require full demolition and grading of the existing buildings on site. As such, it is less likely that impacts to previously undiscovered paleontological resources would occur under Alternative B. However, potential construction impacts (including grading and utility trenching) that could risk potential disturbance of previously undiscovered paleontological resources may still occur under Alternative B, consistent with the Project. Therefore, MM-GEO-2 requiring measures to reduce impacts to paleontological resources would continue to be required under Alternative B. Impacts under Alternative B would be **less than** those anticipated from the Project.

Greenhouse Gas Emissions

As described under Air Quality, overall construction activity would be reduced under this alternative. Alternative B would result in improvements to the existing buildings, which would likely involve reduced equipment needs when compared to the Project. Overall, GHG emissions associated with construction activity would likely be lower under Alternative B than the Project. However, as GHG construction emissions are amortized over 30 years, the decrease in amortized construction emissions associated with Alternative B would be marginal. As such, construction impacts under Alternative B would be **less than** the Project.

Under Alternative B, operational impacts would be incrementally reduced when compared to the Project as less vehicle trips would be generated given the reduction of 107 residential units. Alternative B would generate 721 fewer total vehicle trips, a reduction of approximately 83.5% of total vehicle trips compared to the Project. As such, operational emissions associated with Alternative B would be incrementally reduced for GHGs and the number of automotive trips generated and would therefore result in a slightly lower amount of GHGs emitted. GHGs emitted under both scenarios are anticipated to remain under the thresholds of significance and impacts related to operational GHG emissions under Alternative B would be less than significant, and no mitigation is required. Given this, long-term operational impacts under Alternative B would be **less than** those anticipated from the Project.

Hazards and Hazardous Materials

Alternative B would involve the conversion of buildings from school to residential uses, which would involve substantial renovation of the existing buildings. Implementation of MM-HAZ-1, Hazardous Building Materials Survey, would still be required to reduce potential releases of hazardous materials within the building, including asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury, and other hazardous building materials. However, because Alternative B would not require complete demolition of the existing buildings and structures (and would therefore involve less exposure of hazardous building materials), construction impacts related to hazards and hazardous materials would be **less than** those anticipated from the Project.

Assuming retrofitting would occur under Alternative B, thereby ensuring the existing buildings would be habitable for residential use, Alternative B would have similar operational impacts as the Project, and the redevelopment of

the Project site would not substantively alter any operational aspects of hazards-related impacts. Therefore, impacts under this alternative would be **the same as** those anticipated from the Project.

Hydrology and Water Quality

As Alternative B would not include complete demolition of the school buildings on-site, it would result in less construction and ground disturbing activities on-site, thereby resulting in less associated short-term erosion and associated siltation that could discharge into adjacent storm drainage infrastructure. Thus, impacts under Alternative B would be **less than** those anticipated from the Project.

As Alternative B would result in a reduction of 331 residents when compared to the Project, it is likely this could result in a decreased potential for water pollutants from oil, grease, petroleum products, and automobile-related pollutants, pathogens/bacteria from pets to be released into the environment. As with the Project, operational impacts to hydrology and water quality under Alternative B would be less than significant. Alternative B would implement design features considered under the Project, including a proposed drainage system with gutters along the proposed drive aisles that would direct water flow to proposed on-site catch basins and proposed infiltration chamber and pretreatment device, which would control and treat off-site stormwater runoff from the Project site. These design features would be able to capture the required runoff volume and treat that volume as quickly as it enters the stormwater treatment features. As such, upon construction and operation of the stormwater treatment features on-site, groundwater recharge at the site would be comparable to the Project and consistent with the requirements of applicable LID requirements. However, due to the reduction in impervious surfaces and reduced unit count and associated potential to release water pollutants into the environment, impacts under Alternative B would be **less than** those anticipated from the Project.

Land Use and Planning

While the types of land uses would be modified under Alternative B, neither the Project nor Alternative B would result in any significant land use impacts, and neither would require any mitigation. Both scenarios would require a General Plan Amendment to change the current General Plan land use designation from Institutional/School to Medium Density Residential. In addition, both the Project and Alternative B would require a Zone Change from the Project site's current zoning designation as Institutional/School, which does not allow for residential use, to Residential Medium and Residential Low, respectively. As such, impacts related to land use and planning under Alternative B would be **the same as** those anticipated from the Project.

Noise

Under Alternative B, the existing buildings would require much less construction activity and therefore decrease construction noise to nearby sensitive receptors, as negligible demolition would be required. However, construction work would still be required for exterior improvements, including building renovation and parking areas. As such, MM-NOI-1 would likely still be required to reduce noise impacts from construction activities. Under Alternative B, construction equipment would still be reduced and the distance to sensitive receptors would be greater. As such, noise and vibration impacts under Alternative B would be **less than** those anticipated from the Project.

Under Alternative B, the Project site, including traffic associated with vehicle trips, would be reduced when compared to the Project as there would be fewer vehicle trips generated from the reduced unit count. Alternative B would generate 721 fewer total vehicle trips, a reduction of approximately 83.5% of total vehicle trips compared to the Project. Therefore, noise generated from operational traffic under Alternative B would incrementally reduce compared

to the Project. Additionally, Alternative B would result in a decrease of 107 units and approximately 331 fewer residents compared to the Project. This reduction in density would also decrease noise associated with on-site activity. As such, impacts under Alternative B would be **less than** those anticipated from the Project.

Population and Housing

Similar to the Project, Alternative B would generate part-time and full-time jobs associated with the construction of the Project between the start and end of construction. However, Alternative B would require fewer construction workers as the existing school buildings would be reused instead of fully demolished and reconstructed, thereby resulting in less construction activity and thus, fewer part-time and full-time construction jobs. Therefore, construction impacts under Alternative B would be **less than** those anticipated from the Project.

Once operational, Alternative B would generate approximately 66 residents associated with 21 units reserved for residential uses associated, which is approximately 331 fewer residents than the Project. As with the Project, Alternative B would not result in the displacement of people or housing. As with the Project, no significant impacts would result, and no mitigation would be required. Given the above, impacts under Alternative B would be **less than** those anticipated from the Project.

Public Services

Because construction activity under Alternative B would be reduced when compared to the Project, there would be a reduced short-term demand for public services. As such, construction impacts would be **less than** the Project.

The decrease in residents under Alternative B would generate a decreased demand on police, fire, and library services. Overall, level of impacts to public services under Alternative B would be **less than** those anticipated from the Project.

Recreation

Both the Project and Alternative B would include common open space maintained by the HOA for residents to use. Alternative B would generate 331 fewer residents than the Project. As such, Alternative B would generate a reduction in demand for parks and recreational services compared to the Project. However, in both instances, all impacts would be less than significant, and no mitigation would be required. Impacts under Alternative B would be **less than** those anticipated from the Project.

Transportation

Alternative B would result in fewer construction impacts related to the amount of construction traffic from truck deliveries and construction employees given the reuse of existing buildings and structures compared to full demolition and redevelopment as proposed under the Project. It is anticipated that renovation of the existing uses would require less off-road equipment and truck trips than demolition, grading, and building construction of the Project. Therefore, as Alternative B would result in fewer construction transportation impacts, impacts under Alternative B would be **less than** those anticipated from the Project.

Both the Project and Alternative B characteristics (e.g., infill development, its proximity of nearby destinations, pedestrian and bicycle connections, etc.) would encourage localized trips and trips made by walking, biking, carpool, or transit. Under the proposed Project, it is estimated that the VMT per capita would exceed the Home-Based VMT per capita baseline VMT for the year 2025. As such, the Project incorporated MM-TRA-1, Implement Community

Based Travel Planning (CBTP), which would reduce the Project's VMT impact to less than significant. Similar to the Project, Alternative B would further the goals of the General Plan to develop a currently underutilized property. Alternative B would result in 331 fewer residents due to the reduced unit count, resulting in a greater reduction of VMT overtime as compared to the Project. However, a significant VMT impact would occur if the Alternative's VMT exceeds 20.67 Home-Based VMT per capita. The VMT analysis uses an efficiency metric (i.e., per capita) rather than an absolute numeric threshold. Therefore, Alternative B would result in the same average VMT per capita as the Project that exceeds the baseline threshold of 24.32 Home-Based VMT per capita. Given this, MM-TRA-1 would still be required under Alternative B to reduce project-generated VMT. Overall, impacts under Alternative B would be **less than** those anticipated from the Project.

Tribal Cultural Resources

Under Alternative B, minimal earthwork would be required as the existing school buildings would only require renovations and minor demolition as opposed to full demolition and grading of the site as required by the Project. Mitigation related to the salvage and treatment requirements of potential tribal resources would continue to be required under Alternative B. Similar to the Project, impacts would be less than significant after mitigation. As less grading would be required, which would have the potential to impact tribal cultural resources, impacts under Alternative B would be **less than** those anticipated from the Project.

Utilities and Service Systems

The new development associated with Alternative B would result in new water service connections, sewer laterals, on-site stormwater infrastructure, and underground utility systems for electricity, similar to the Project. However, impacts related to the demand for potable water, generation of wastewater, and generation of solid waste would be reduced compared to the Project because this alternative would result in 107 fewer units. Therefore, impacts under Alternative B would be **less than** the Project.

6.6.3 Alternative C – Adaptive Residential Reuse of the Existing School and Multi-Family Residential

6.6.3.1 Alternative Description

As presented in prior sections of this Draft EIR, the Project would not result in significant and unavoidable impacts after implementation of all mitigation measures. Therefore, Alternative C considers the development of Alternative B (i.e. adaptive reuse of the Powell Elementary School by proposing reuse of the school's seven buildings and developed areas as 21 single-level residential condominium units) but would also add the construction of new housing on the approximately 50% of the site that is currently an open field.

Under Alternative C, it is anticipated that approximately 70 two-story residential condominium units could be accommodated within open space field area, resulting in a total of approximately 91 units. This would be a reduction of approximately 37 units when compared to the Project's proposed 128 units. The 91 units would generate approximately 283 residents, which is a reduction in 104 residents compared to the proposed Project. On-site circulation improvements and off-site utility connections would still be necessary for the Project. This alternative would incrementally reduce the short-term construction related environmental impacts of the Project due to the elimination of the demolition of the Powell Elementary School buildings. This Alternative would also reduce operational impacts, such as reduced VMT, utility, and public service demands, due to the reduced unit count.

6.6.3.2 Ability to Meet Project Objectives

1. To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.

   Alternative C would satisfy this Project Objective. Alternative C would redevelop existing educational buildings, surface parking lots, and open field into an approximately 91-unit residential development and would provide common open space that would meet City requirements and parking to support the residents. Therefore, Alternative C would redevelop the underutilized infill property into a vibrant residential community with adequate residential open space and parking.

2. To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 (NG-3) zone.

   Alternative C would satisfy this Project Objective. Alternative C would redevelop the existing school buildings and open field into approximately 91 residential condominiums. The adjacent Medium Density Residential land use designation has a density range of 8.1 to15 dwelling units per acre, as set forth in the General Plan. Given that the Project site is 9.77 acres, the Project under this Alternative would have a density of approximately 9.3 dwelling units per acre, which would fit within this range. Therefore, the Project would efficiently develop a medium density residential community that reflects the density of surrounding homes zoning.

3. To provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.

   Alternative C would satisfy this Project Objective. Alternative C would develop an approximate 91-unit residential development which would have access to existing multi-modal infrastructure and transit opportunities. Alternative C would also redevelop underutilized infill property and provide 91 new units of housing. Therefore, Alternative C would provide housing opportunities consistent with the goals and/or policies set forth in the Housing Element, General Plan, and SCAG's RTP/SCS.

4. To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.

   Alternative C would partially satisfy this Project Objective. Alternative C would develop 91 new residential dwelling units, which is less than the proposed 128 units. Alternative C would also not provide for a mix of housing types. Therefore, Alternative C would help meet the City's RHNA requirements, though not to the same extent as the Project because of the reduction in proposed units.

6.6.3.3 Comparison of the Effects of Alternative C to the Project

Aesthetics

Alternative C would result in changes to the scenic quality compared to baseline conditions, as this Alternative proposes the construction of 70 two-story units in addition to reuse of the one-story school buildings. These changes

would be comparable to the Project due to similar building heights (two stories), only this Alternative would result in fewer visual impacts, as construction would be limited to the open field area. As with the Project, views of the San Gabriel Mountains are already partially obstructed, and so impacts under this Alternative would be less than significant and require no mitigation. The glare and light impacts of Alternative C and the tree removals and encroachments upon existing trees would be less than significant and would be comparable to the Project due to similar proposed uses with implementation of Alternative C. Thus, while Alternative C would result in visual changes to the Project site on the open field, these changes would be less than the Project due to reuse of the existing school buildings. Therefore, impacts under Alternative C would be **less than** the Project.

Air Quality

Under Alternative C, there would be incrementally less construction in terms of duration and intensity compared to the Project. Utility connections and structural retrofitting would be required, and there would be construction associated with the 70 two-story units, but construction equipment would be reduced and distance to sensitive receptors would be greater than the Project. As such, impacts under Alternative B would be **less than** those anticipated from the Project.

Under Alternative C, operational emissions would be incrementally reduced compared to the Project as the reduction of 37 units overall would result in less operational vehicle trips generated. With the reduced unit count, Alternative C would generate 249 fewer total vehicle trips, a reduction of approximately 28.9% of total vehicle trips compared to the Project. Estimated emissions under both scenarios are anticipated to remain under the thresholds of significance and impacts related to operational air quality emissions under Alternative B would be less than significant, and no mitigation is required. Given this, long-term operational impacts under Alternative B would be **less than** those anticipated from the Project.

Biological Resources

Implementation of the Project would result in potentially significant temporary impacts to biological resources prior to mitigation due to the removal of vegetation and elevated noise levels associated with construction that could adversely impact nesting bird and raptor species. With the inclusion of MM-BIO-1, the Project would have less than significant impacts related to biological resources.

Under Alternative C, similar construction impacts would occur to develop the open field into 70 condominium units. Therefore, MM-BIO-1 would continue to be required. Under Alternative C, impacts to biological resources would be less than significant with mitigation. Therefore, impacts under Alternative C relative to biological resources would be **the same as** the Project.

Cultural Resources

Under Alternative C, the demolition of the existing school buildings would not occur as proposed by the Project, resulting in less ground disturbance that could have the potential to impact cultural resources. However, it is anticipated that some ground disturbing development associated with the construction of the 70 two-story condominiums would occur. Therefore, MM-CUL-1 related to the salvage and treatment requirements of potential archaeological resources would continue to be required under Alternative C. Therefore, impacts under Alternative B would be **less than** those anticipated from the Project.

Energy

Under Alternative C, there would be incrementally less construction in terms of duration and intensity compared to the Project. Utility connections and structural retrofitting would be required, and there would be construction associated with the 70 two-story units, which would be a reduction of approximately 37 units. As such, impacts under Alternative B would be **less than** those anticipated from the Project due to the reduction of units proposed for construction.

Operational activity under Alternative C would be decreased due to the decrease in residents and employees on-site. As such, there would be a decrease in demand for the use of electricity and petroleum during operations. Consequently, operational impacts under this alternative would be **less than** those anticipated from the Project.

Geology and Soils

Under Alternative C, similar earthwork and building development would occur. Therefore, MM-GEO-1 related to the adherence to the recommendations set forth in the Project-specific Geotechnical Evaluation would continue to be required under Alternative C. However, the demolition of the existing school buildings would not occur as proposed by the Project, resulting in less ground disturbance that could have the potential to impact paleontological resources. However, it is anticipated that some ground disturbing development associated with the construction of the 70 two-story condominiums would occur. Therefore, MM-GEO-2 requiring measures to reduce impacts to paleontological resources would continue to be required under Alternative C. Impacts under Alternative C would be **less than** those anticipated from the Project.

Greenhouse Gas Emissions

As described under Air Quality, overall construction activity would be incrementally reduced under this alternative. Alternative C would result in improvements to the existing buildings, which would likely require reduced equipment needs when compared to the Project, but still require additional construction of the 70 two-story condominium units. Overall, GHG emissions associated with construction activity would likely be lower under Alternative B than the Project. However, as GHG construction emissions are amortized over 30 years, the decrease in amortized construction emissions associated with Alternative C would be marginal. Nonetheless, construction impacts under Alternative C would be **less than** the Project.

Under Alternative C, operational impacts would be incrementally reduced when compared to the Project as less vehicle trips would be generated given the reduction of 37 residential units. Alternative C would generate 249 fewer total vehicle trips, a reduction of approximately 28.9% of total vehicle trips compared to the Project. As such, operational emissions associated with Alternative C would be incrementally reduced for GHGs and the number of automotive trips generated and would therefore result in a slightly lower amount of GHGs emitted. GHGs emitted under both scenarios are anticipated to remain under the thresholds of significance and impacts related to operational GHG emissions under Alternative C would be less than significant, and no mitigation is required. Given this, long-term operational impacts under Alternative C would be **less than** those anticipated from the Project.

Hazards and Hazardous Materials

Alternative C would include the conversion of existing buildings from school to residential use, as well as additional construction for the 70 two-story condominium units on the site's open field. It is likely that implementation of MM-HAZ-1 would still be required to reduce potential impacts from asbestos-containing materials, lead-based paint,

polychlorinated biphenyls, mercury, and other hazardous building materials. However, because Alternative C would not require complete demolition of the existing buildings and structures (and would therefore involve less exposure of hazardous building materials), construction impacts related to hazards and hazardous materials would be **less than** those anticipated from the Project.

Assuming retrofitting would occur under Alternative C, thereby ensuring the existing buildings would be habitable for residential use, Alternative C would have similar operational impacts as the Project, and the redevelopment of the Project site would not substantively alter any operational aspects of hazards-related impacts. Therefore, impacts under this alternative would be **the same as** those anticipated from the Project.

Hydrology and Water Quality

As Alternative C would not include full demolition of the existing school buildings on-site, it would result in less construction and ground disturbing activities on-site, thereby resulting in incrementally less associated short-term erosion and associated siltation that could discharge into adjacent storm drainage infrastructure. As with the Project, no mitigation would be required for construction impacts to hydrology or water quality. Thus, impacts under Alternative B would be **less than** those anticipated from the Project.

As Alternative C would result in a reduction of 37 units and associated residents when compared to the Project, it is likely this could result in a decreased potential for water pollutants from oil, grease, petroleum products, and automobile-related pollutants, pathogens/bacteria from pets to be released into the environment. Thus, as with the Project, operational impacts to hydrology and water quality under Alternative C would likely be less than significant. Alternative C would implement design features considered under the Project, including a proposed drainage system with gutters along the proposed drive aisles and proposed infiltration chamber and pretreatment device, which would control and treat off-site stormwater runoff from the Project site. These design features would be able to capture the required runoff volume and treat that volume as quickly as it enters the stormwater treatment features. As such, upon construction and operation of the stormwater treatment features on-site, groundwater recharge at the site would be comparable to the Project and consistent with the requirements of applicable LID requirements. However, due to the slightly decreased potential for release of water pollutants due to reduce unit count, impacts under Alternative C would be **less than** those anticipated from the Project.

Land Use and Planning

While the types of land uses would be modified under Alternative C, neither the Project nor Alternative C would result in any significant land-use impacts, and neither would require any mitigation. Both alternatives would require a General Plan Amendment to change the current General Plan land use designation from Institutional/School to Medium Density Residential. In addition, both the Project and Alternative C would require a Zone Change from INS to NG3-MED. As such, impacts related to land use and planning under Alternative C would be **the same as** those anticipated from the Project.

Noise

Construction of the Project was determined to result in potentially significant impacts from temporary increases in ambient noise levels prior to implementation of MM-NOI-1. It is likely that MM-NOI-1 would still be required, as construction activity proximate to City and unincorporated Los Angeles County residents would still occur for the construction of the 70 two-story units. However, under Alternative C, there would be incrementally less construction

activity because demolition of the existing buildings would no longer occur. As such, noise impacts under Alternative C would be **less than** those anticipated from the Project.

Under Alternative C, operational noise, including traffic associated with vehicle trips, would be incrementally reduced when compared to the Project as there would be reduced vehicle trips associated with the decrease of 37 units. Alternative C would generate 249 fewer total vehicle trips, a reduction of approximately 28.9% of total vehicle trips compared to the Project. Therefore, noise generated from operational traffic under Alternative C would incrementally reduce compared to the Project. As such, impacts under Alternative C would be **less than** those anticipated from the Project.

Population and Housing

Similar to the Project, Alternative C would generate part-time and full-time jobs associated with the construction of the Project between the start and end of construction. However, it is likely that Alternative C would require fewer construction workers on-site as the existing school buildings would be reused instead of fully demolished and reconstructed, thereby resulting in less construction activity and thus, fewer associated part-time and full-time jobs. As construction employment generated by Alternative C would be incrementally less than the Project, it is not expected to increase the residential population of the City and would not induce population growth or require permanent housing. Therefore, construction impacts under Alternative C would be **less than** those anticipated from the Project.

Once operational, Alternative C would result in 104 fewer residents than anticipated by the Project. As with the Project, Alternative C would not result in the displacement of people or housing. As with the Project, no significant impacts would result, and no mitigation would be required. As Alternative C would introduce fewer residents, impacts under this alternative would be **less than** those anticipated from the Project.

Public Services

Because construction activity under Alternative C would be incrementally reduced when compared to the Project, as demolition of the existing school buildings would no longer occur, there would be a reduced short-term demand for public services. As such, construction impacts would be **less than** the Project.

The decrease of residents under Alternative C would generate an incrementally reduced demand on police and fire services. The decrease in residences on-site would also likely result in an incrementally reduced demand on library services. For the Project, all impacts would be less than significant, and no mitigation would be required. Overall, level of impacts to public services under Alternative C would be **less than** those anticipated from the Project.

Recreation

Alternative C would generate 104 fewer residents as the Project would. As such, Alternative C would generate an incrementally reduced demand for parks and recreational services compared to the Project. However, in both instances, all impacts would be less than significant, and no mitigation would be required. Impacts under Alternative C would be **less than** those anticipated from the Project.

Transportation

Alternative C would result in incrementally fewer construction impacts related to the amount of construction traffic from truck deliveries and construction employees due to plans to reuse existing school buildings instead of fully demolishing and rebuilding the site as proposed under the Project. It is anticipated that reuse of the existing

buildings would require less off-road equipment and truck trips than demolition, grading, and building construction of the Project. As Alternative C would result in fewer construction transportation impacts, impacts under Alternative C would be **less than** those anticipated from the Project.

Both the Project and Alternative C characteristics (e.g., infill development, its proximity of nearby destinations, pedestrian and bicycle connections, etc.) would encourage localized trips and trips made by walking, biking, carpool, or transit. Under the proposed Project, it is estimated that the VMT per capita would exceed the Home-Based VMT per capita baseline VMT for the year 2025. As such, the Project incorporated MM-TRA-1, Implement Community Based Travel Planning (CBTP), which would reduce the Project's VMT impact to less than significant. Alternative C would further the goals of the General Plan to develop currently under-utilized property. Additionally, overall trip generation and VMT would be incrementally reduced under Alternative C than the Project due to the decrease in residents. However, a significant VMT impact would occur if the Alternative's VMT exceeds 20.67 Home-Based VMT per capita. The VMT analysis uses an efficiency metric (i.e., per capita) rather than an absolute numeric threshold. Therefore, Alternative C would result in the same average VMT per capita as the Project that exceeds the baseline threshold of 24.32 Home-Based VMT per capita. Given this, MM-TRA-1 would still be required under Alternative C to reduce project-generated VMT. Overall, impacts under Alternative C would generally be **less than** those anticipated from the Project.

Tribal Cultural Resources

Under Alternative C, there would be less earthwork during construction as the demolition of existing school buildings would no longer occur. However, earthwork associated with construction of the 70 two-story condominium units on the open field would still occur. Therefore, MM-CUL1 and MM-TCR-1 through MM-TCR-3 related to the salvage and treatment requirements of potential tribal resources would continue to be required under Alternative C. Similar to the Project, impacts would be less than significant after mitigation. As less grading would be required, which would have the potential to impact tribal cultural resources, impacts under Alternative B would be **less than** those anticipated from the Project.

Utilities and Service Systems

The new development associated with Alternative C would result in new water service connections, sewer laterals, on-site stormwater infrastructure, and underground utility systems for electricity, similar to the Project. However, impacts related to the demand for potable water, generation of wastewater, and generation of solid waste would be slightly reduced compared to the Project because this of the reduction in 37 units under this Alternative. Therefore, impacts under Alternative B would be **less than** the Project.

6.7 Summary of Alternatives to the Proposed Project

Table 6-1 below summarizes the potential environmental impacts associated with Alternative A, Alternative B, and Alternative C when compared to the proposed Project, as suggested in CEQA Guidelines section 15126.6(d). Table 6-2 below highlights any changes in impacts if the given alternative *eliminated* the need for mitigation or required *new* mitigation. Because no additional mitigation measures were determined to be necessary under any of the considered alternatives, none of the alternatives would be considered to have impacts greater than those of the proposed Project.

Table 6-1. Summary of Alternatives Impacts Comparison

Environmental Issue Area	Proposed Project	Alternative A - No Project/No Development	Alternative B - Adaptive Residential Reuse of Existing School	Alternative C – Adaptive Residential Reuse of Existing School and Multi-Family Residential
Aesthetics	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Air Quality	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Biological Resources	LTS-MM	Reduced impacts	**MM-BIO-1:** Reduced impacts	**MM-BIO-1:** Same impacts
Cultural Resources	LTS-MM	Reduced impacts	**MM-CUL-1:** Reduced impacts	**MM-CUL-1:** Reduced impacts
Energy	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Geology and Soils	LTS-MM	Reduced impacts	**MM-GEO-1 and MM-GEO-2:** Reduced impacts	**MM-GEO-1 and MM-GEO-2:** Reduced impacts
Greenhouse Gas Emissions	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Hazards and Hazardous Materials	LTS-MM	Reduced impacts	**MM-HAZ-1:** Reduced impacts	**MM-HAZ-1:** Reduced impacts
Hydrology and Water Quality	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Land Use and Planning	LTS	Reduced impacts	Same impacts	Same impacts
Noise	LTS-MM	Reduced impacts	**MM-NOI-1:** Reduced impacts	**MM-NOI-1:** Reduced impacts
Population and Housing	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Public Services	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Recreation	LTS	Reduced impacts	Reduced impacts	Reduced impacts
Transportation	LTS-MM	Reduced impacts	**MM-TRA-1:** Reduced impacts	**MM-TRA-1:** Reduced impacts
Tribal Cultural Resources	LTS-MM	Reduced impacts	**MM-CUL-1 and MM-TCR-1 through MM-TCR-3:** Reduced impacts	**MM-CUL-1 and MM-TCR-1 through MM-TCR-3:** Reduced impacts
Utilities and Service Systems	LTS	Reduced impacts	Reduced impacts	Reduced impacts

Notes:
MM mitigation measure
LTS less than significant impact
LTS-MM less than significant impact with mitigation

Table 6-2 compares the alternatives in terms of whether they meet the Project objectives.

Table 6-2. Summary of Project Objectives Comparison

Does the Alternative Meet the Following Project Objectives?	Alternative A	Alternative B	Alternative C
To redevelop an underutilized infill property into a vibrant residential community that provides adequate open space and parking to support the residents.	No	Partially	Yes
To efficiently develop a medium density residential community, which maximizes the development of residential units while reflecting the density of the surrounding homes and the adjacent Neighborhood General 3 (NG-3) zone.	No	No	Yes
To provide housing opportunities consistent with the goals and/or policies set forth in City of Azusa's Housing Element, General Plan, and SCAG's RTP/SCS, located proximate to existing roadway infrastructure and public transit options.	No	Partially	Yes
To provide a mix of residential housing types that helps meet the City's Regional Housing Needs Allocation (RHNA) requirements.	No	Partially	Partially

6.8 Environmental Superior Alternative

An EIR must identify an "environmentally superior" alternative; and, where the no project alternative is environmentally superior, the EIR is then required to identify an alternative from among the others evaluated as environmentally superior (CEQA Guidelines § 15126.6(e)(2)).

As shown in Table 6-1, Alternative A would result in reduced impacts to all environmental topics in the short-term because construction activity would not occur. Alternative A would therefore eliminate all mitigation requirements for short-term construction activity. Similarly, Alternative A would result in reduced environmental impacts to most environmental topics in the long-term because no operational changes would occur. The elimination of all construction impacts and reduction of operational impacts associated with the Project would result in an environmentally superior alternative when compared to the Project or Alternative B or C.

As required under CEQA Guidelines section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. The Project has no significant unavoidable impacts that could be addressed by the adoption of any alternative. Alternatives B and C would have similar environmental impacts when compared to the Project for hazards and hazardous materials and land use and planning. Alternative B would also have similar impacts when compared to the Project for biological resources. Neither Alternative B nor C would eliminate the need for any proposed mitigation measures. However, Alternatives B and C would result in reduced and slightly reduced impacts associated with almost all other environmental impacts. Between Alternatives B and C, Alternative B would result in the least environmental impacts. Thus, Alternative B would be considered the environmentally superior alternative.

6.9 References

CEQA Guidelines § 15000 et seq.

7 Preparers

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