

PUBLIC REVIEW DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

**CALIFORNIA WAREHOUSE DEVELOPMENT
2601 SOUTH CALIFORNIA AVENUE
MONROVIA, CALIFORNIA 91016**



**LEAD AGENCY:
CITY OF MONROVIA
COMMUNITY DEVELOPMENT DEPARTMENT, PLANNING DIVISION
415 SOUTH IVY AVENUE
MONROVIA, CALIFORNIA 91016**

**REPORT PREPARED BY:
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JULY 16, 2026

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PROJECT SUMMARY PAGE

PROJECT NAME: California Warehouse Development.

APPLICANT: Ignacio Crespo AIA, OC Design & Engineering, 7901 Crossway Dr., Pico Rivera, California 90660

PROJECT LOCATION: The Project site's primary legal address is 2601 South California Avenue, Monrovia, California 91016 and includes three parcels. The Assessor Parcel Numbers (APNs) that are applicable to the site includes 8534-016-045, 8534-016-046, and 8534-016-047.

CITY AND COUNTY: Monrovia, Los Angeles County.

PROJECT: The proposed Project involves the construction of a 27,078 square foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. A total of 33 parking stalls and three truck loading docks would also be provided. The property is located in the *Planned Development – Area 19 (Novice Lane Area)* General Plan designation and is zoned *PD-19 (Planned Development – Area 19)*. The new building would be used for warehouse and office purposes. The site's Assessor Parcel Numbers (APNs) are 8534-016-045, 8534-016-046, and 8534-016-047. The site's primary address is 2601 California Avenue, Monrovia, California 91016. Other addresses associated with the Project site include 213 and 217 Novice Lane.

CITY CONTACT: Questions and/or comments should be submitted to the following contact person:

City of Monrovia
Community Development Department
Attn: Jennifer Driver, Senior Planner
415 South Ivy Avenue
Monrovia, California 91016
Email: jdriver@monroviaca.gov



LIST OF ABBREVIATIONS & ACRONYMS

AB Assembly Bill
AQMP Air Quality Management Plan
CARB (California Air Resources Board)
BMP Best Management Practice
CAAQS California Ambient Air Quality Standards
CalEMA California Emergency Management Agency
CalEPA California Environmental Protection Agency
CAL FIRE California Department of Forestry and Fire Protection
Caltrans California Department of Transportation
CAP Climate Action Plan
CAPCOA California Air Pollution Control Officers Association
CBC California Building Code
CBSC California Building Standards Commission
CCAA California Clean Air Act
CCR California Code of Regulations
CDFW California Department of Fish and Wildlife
CEQA California Environmental Quality Act
CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
CFR Code of Federal Regulations
CGS California Geological Survey
CH₄ Methane
CHRS California Historical Resources Information System
CO carbon monoxide
CO₂ carbon dioxide
CO_{2e} carbon dioxide equivalent
County of Los Angeles
CRA Cultural Resources Assessment
CRHR California Register of Historical Resources
CRMP Cultural Resources Monitoring Plan
CVCC Coachella Valley Conservation Commission
CWA (Federal) Clean Water Act
dBA A-weighted decibels
DOC (California) Department of Conservation
DPR Department of Parks and Recreation
DTSC California Department of Toxic Substances and Control
EIC Eastern Information Center
EIR Environmental Impact Report
EO Executive Order
ESA Environmentally Sensitive Area
FAA Federal Aviation Administration
FCAA Federal Clean Air Act

LIST OF ABBREVIATIONS & ACRONYMS (CONTINUED)

FEMA Federal Emergency Management Agency
FIRM Flood Insurance Rate Map
FMMP Farmland Mapping and Monitoring Program
GHG greenhouse gas
GSA Groundwater Sustainability Agency
HPO Historic Preservation Ordinance
IS Initial Study
L_{max} maximum instantaneous noise level
LOS Level of Service
MBTA Migratory Bird Treaty Act
MLD Most Likely Descendant
MND Mitigated Negative Declaration
MRZ Mineral Resource Zone
MS₄ Municipal Separate Storm Sewer System
MT metric ton(s)
ND Negative Declaration
N₂O nitrous oxide
NAAQS National Ambient Air Quality Standards
NAHC Native American Heritage Commission
NO₂ nitrogen dioxide
NOI Notice of Intent
NO_x nitrogen oxides
NPDES National Pollutant Discharge Elimination System
NRCS Natural Resources Conservation Service
NRHP National Register of Historic Places
O₃ Ozone
OPR (California) Office of Planning and Research
PM₁₀ particulate matter less than 10 microns in diameter
PM_{2.5} particulate matter less than 2.5 microns in diameter
PPV peak particle velocity
PRC Public Resources Code
QGIS Quantum GIS
RCEM Roadway Construction Emissions Model
RCRA Resource Conservation and Recovery Act
RMP Risk Management Plan
RoadMod Roadway Construction Emissions Model
ROW right-of-way
RPS Renewables Portfolio Standard
RTP/SCS Regional Transportation Plan/Sustainable Community Strategy
RWQCB Regional Water Quality Control Board
SB Senate Bill
SCAG Southern California Association of Governments
SCAQMD South Coast Air Quality Management District
SGMA Sustainable Groundwater Management Act

LIST OF ABBREVIATIONS & ACRONYMS (CONTINUED)

SHMA Seismic Hazards Mapping Act
SIP State Implementation Plan
SLF Sacred Land File
SMARA Surface Mining and Reclamation Act
SMARTS Stormwater Multiple Application and Report Tracking System
SWPPP Storm Water Pollution Prevention Plan
SWRCB State Water Resources Control Board
TAZ Traffic Analysis Zones
TCR Tribal Cultural Resource
TMDL Total Maximum Daily Load
TMP Traffic Management Plan
USACE United States Army Corps of Engineers
USDA United States Department of Agriculture
USEPA United States Environmental Protection Agency
USFWS United States Fish and Wildlife Service
USGS United States Geological Survey
UWMP Urban Water Management Plan
VHFHSZ Very High Fire Hazard Severity Zone
VTM Vehicle Miles Traveled
VOC Volatile Organic Compound

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PROJECT PLANS

SECTION 1 INTRODUCTION

1.1 PURPOSE OF THIS INITIAL STUDY

This Initial Study analyzes the environmental impacts associated with the proposed construction and subsequent operation of a 27,078 square-foot warehouse building (24,932 square feet of warehousing use and 2,146 square feet of related office use) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) site. The site consists of three Assessor Parcels (APN): APN 8534-016-045, 8534-016-046 and 8534-016-047¹² and the Project includes the consolidation of these three parcels. The combined land area of APN's 8534-016-045 & 8534-016-046 is 54,397 square feet or 1.249 acres. APN 8534-016-047 has a total land area of 7,111 square feet or 0.163 acres. A total of 33 parking stalls and three truck loading docks would be provided. The property is located in the *Planned Development -Area 19 (Novice Lane Area)* General Plan designation and is zoned *PD-19 (Planned Development – Area 19)*. The new building would be used for warehouse and distribution purposes. The Applicant has agreed to condition the property and the improvements to “warehouse” only. The site's primary address is 2601 California Avenue, Monrovia, California 91016. Other addresses associated with the Project site include 213 and 217 Novice Lane. The Applicant is Ignacio Crespo AIA, OC Design & Engineering, 7901 Crossway Drive, Pico Rivera, California 90660.³

The City of Monrovia is the designated *Lead Agency* and will be responsible for the Project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a Project that may have a significant effect on the environment. As part of the proposed Project's environmental review, the City of Monrovia has authorized the preparation of this Initial Study. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed Project would have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Monrovia with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a Project;
- To facilitate the Project's environmental assessment early in the design and development of the proposed Project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated with the proposed Project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Monrovia, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed

¹ Seaboard Engineering Co. Site and Topographic Survey 2601 S. California Avenue & 213-217 Novice Lane. January 25, 2021.

² Los Angeles County Office of the Assessor. *Property Assessment Information System*. Website accessed June 13, 2022.

³ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

Project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other Project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines. This Initial Study and the *Notice of Intent to Adopt a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed Project and the findings of this Initial Study.⁴ Questions and/or comments should be submitted to the following contact person:

City of Monrovia
Community Development Department
Attn: Jennifer Driver, Senior Planner
415 South Ivy Avenue
Monrovia, California 91016
Email: jdriver@monroviaca.gov

1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the Project area and describes the proposed Project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and subsequent operation of the proposed Project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.

1.3 REFERENCE DOCUMENTS

The following key reference documents were used during preparation of this Initial Study and are incorporated into this document by reference.

- *Monrovia General Plan (November 2022)*. The Monrovia General Plan (General Plan), updated February 2020 and November 2022, is a long-range planning document that guides decisions related to land use. The General Plan includes the following eight elements: Land Use, Circulation, Housing, Safety, Noise, Open Space, Conservation, and Environmental Justice. The City completed a Focused General Plan Update in November 2022 that involved updating the Housing and Safety Elements and adopting the new Environmental Justice Element to the General Plan.

⁴ Ibid. Chapter 2.6, Section 2109(b). 2000.

- *Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (January 2008)*. The original Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (LUC EIR) (State Clearinghouse Number [SCH No. 2007021135]) evaluates the environmental effects associated with the adoption and implementation of the proposed Land Use and Circulation Elements initiated by the City of Monrovia.
- *Monrovia 2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment Mitigated Negative Declaration (October 2022)*. The Mitigated Negative Declaration from the City of Monrovia (State Clearinghouse Number [SCH No. 2022080729]), determined the environmental effects associated with the adoption and subsequent implementation of the City of Monrovia 2021 – 2029 Housing Element Update, Safety Element Update, and new Environmental Justice Element of the General Plan, and Zoning Text Amendment would be less than significant.
- *Monrovia Municipal Code*. The Monrovia Municipal Code (Municipal Code), codified through Ordinance 2003-15 Section 2, 2003, consists of codes and ordinances that have been adopted by the City. These include standards intended to regulate land use, development, health and sanitation, water quality, public facilities, and public safety.
- *Monrovia Zoning Ordinance*. Title 17, Zoning (Zoning Map and Ordinance), includes specific development standards and regulations that are applicable to properties in the City. The Zoning Map indicates the location and extent of permitted land uses and development.

These documents are available for review at the City of Monrovia Community Development Department (located at 415 South Ivy Avenue, Monrovia, California, 91016) or online at <https://www.monroviaca.gov/your-government/community-development/planning/general-plan> and <https://www.monroviaca.gov/your-government/community-development/planning/zoning>. Other references consulted in the preparation of this Initial Study/Mitigated Negative Declaration were noted using footnotes.



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SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of Monrovia is located in the San Gabriel Valley, approximately 14 miles northeast of Downtown Los Angeles. The City of Monrovia is bounded on the north by the Angeles National Forest; on the south by a community known as Mayflower Village within the unincorporated area of Los Angeles County; on the east by the cities of Duarte and Bradbury; and, on the west by Arcadia. The location of Monrovia in a regional context is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2. Regional access to Monrovia is possible from two area freeways: the Foothill Freeway (I-210), which traverses the central portion of the City in an east-west orientation; and, the San Gabriel River Freeway (I-605), which is a north-south freeway approximately 1.3 miles east of Monrovia's eastern boundary.⁵ The Project site is located approximately 1.21 miles south of the I-210 Freeway and approximately 1.3 miles west of the I-605 Freeway.

The Project site is located in an "island" in the southern portion of the City that is connected to the main geographic area of the City by Myrtle Avenue. This "island" is surrounded by unincorporated portions of Los Angeles County (refer to Exhibit 2-2). Vehicular access to the Project site would be provided by a driveway connection from California Avenue along Novice Lane, an easement on the subject property. In an east/west direction, Novice Lane, a 20-foot wide easement for the Project, connects Myrtle Avenue and California Avenue on the southern portion of the subject site and other properties to the west (refer to Exhibit 3-4). The Project site consists of three parcels with Assessor Parcel Numbers (APNs) are 8534-016-045, 8534-016-046, and 8534-016-047.⁶ The subject property has a reciprocal ingress egress easement granting access across the portion of Novice Lane that traverses the abutting properties to the west (APN's 8534-016-048 and 8534-016-049) but these properties do not have a reciprocal easement across the Project site. The Project site's primary address is 2601 South California Ave, Monrovia, California 91016. Other addresses associated with the Project site include 213 and 217 Novice Lane. The Project site's latitude and longitude is 34°7.07'4.04"N-118°0'0.79"W. A citywide map is provided in Exhibit 2-2 and a local map is provided in Exhibit 2-3.

2.2 LAND DESIGNATIONS (ZONING & GENERAL PLAN)

The Project site is designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan and is zoned *PD-19 (Planned Development – Area 19)*. This land use and zoning designation also applies to the properties located to the west between the subject site and Myrtle Avenue. The land use and zoning requirements state that PD-19 is a "mixed use area allowing industrial uses on the California Avenue side, vacant land, and single-family residential on the Myrtle Avenue side." In addition, the following development guidelines are included:

- "The industrial uses are permitted to expand from east to west but consideration of the single family homes on the west shall be given.
- The existing single family residential homes shall be treated as permitted uses and be allowed to expand and be upgraded as typically permitted. Conversion of existing residences to industrial uses shall not be permitted;
- Industrial uses shall be allowed but designed so the residential lots would not be adversely impacted; and,

⁵ Google Earth. Website accessed September 1, 2023.

⁶ Los Angeles County Office of the Assessor. *Property Assessment Information System*. Website accessed June 13, 2022.

- Any new development would trigger a review of access and the possible improvement(s) to Novice Lane.”

According to the Project Applicant, the proposed new building would house a warehouse use. Properties located in the PD zones are subject to the provisions outlined in the City of Monrovia Land Use Element of the General Plan. A use not specifically listed in the General Plan as permitted in a PD zone may be approved by the Development Review Committee; provided that the use is not expressly prohibited by the General Plan. The Development Review Committee may also determine that such a use will require approval of either a minor conditional use permit or major conditional use permit. Section 17.08.030 indicates the land uses that are permitted in the PD zone and the proposed warehouse use is permitted in Section 17.08.010 which states the following:

“Warehousing/Wholesaling. Places of business primarily engaged in warehousing, wholesaling, storage, distribution and handling of materials and equipment other than live animals and plants.”

The specific tenant has not yet been identified and the future occupant is unknown at this time. It has been assumed that the future occupant would adhere to the zoning definition of “warehouse” outlined in Section 17.08.010 of the Zoning Ordinance.

2.3 ENVIRONMENTAL SETTING

The Project site is located within an urbanized area within the City of Monrovia. The Project site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site’s boundaries. All of the structural improvements that previously occupied the site have been demolished. The zoning map is shown in Exhibit 3-4. Existing land uses and development found in the vicinity of the Project site are summarized below:⁷

- *North of the Project site.* A total of six single-family residential units are located adjacent to the Project site and just outside of the City’s boundaries in unincorporated Los Angeles County (referred to as the South Monrovia Islands). The addresses of these residential units are 208 Wyland Way, 214 Wyland Way, 220 Wyland Way, 226 Wyland Way, 232 Wyland Way, and 2547 California Avenue. These properties are zoned for single-family residential development and are in Los Angeles County’s R-1 (Residential) zoning district.
- *South of the Project site.* To the south of the site at 2640 – 2670 South Myrtle Avenue is a commercial and manufacturing use, Dootson Industrial Park. This property is designated as *Manufacturing* in the Monrovia General Plan and zoned as *M (Manufacturing)*. Approximately 300 feet south of the Project site in Irwindale is the Sawpit Wash, a concrete-lined flood control channel, which extends in a northeast-southwest orientation. The United Plant Quarry is located further southeast of the Project site, south of the aforementioned flood control channel.
- *East of the Project site.* To the east of the site is California Avenue and a single-family residential neighborhood within unincorporated Los Angeles County. The properties are within Los Angeles County’s R-1 (Residential) zoning district and improved with single-family residences. South of this single-family residential neighborhood at 2600 – 2620 South California Avenue is an industrial use, California Suites. The site is located within the City boundaries and is designated as *Manufacturing* in the Monrovia General Plan and zoned as *M (Manufacturing)*.

⁷ Blodgett Baylosis Environmental Planning, *Site Survey*. Survey was conducted on June 13, 2022 and September 15, 2023. Survey updated periodically in 2024, 2025, and 2026.

- *West of the Project site.* Three single-family residential properties are located directly to the west of the Project site. The addresses of these units are 2568 S. Myrtle Avenue, 203 Novice Lane, and 209 Novice Lane. The two units located on Novice Lane have frontage along the private street Novice Lane. These properties are designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan and are zoned as *PD-19 (Planned Development – Area 19)*.

TABLE 2-1 ENVIRONMENTAL SETTING SUMMARY TABLE

Location	Land Use	General Plan	Zoning
Project Site	Vacant	Monrovia: Planned Development – Area 19 (Novice Lane Area)	Monrovia: PD-19 (Planned Development – Area 19)
North of Project Site	Single-Family Residential	County: H9 (Residential 9)	County: R-1 (Single-Family Residence)
East of Project Site	Manufacturing and Single-Family Residential	County: H9 (Residential 9) Monrovia: Manufacturing	County: R-1 (Single-Family Residence) Monrovia: M (Manufacturing)
South of Project Site	Manufacturing and Commercial	Monrovia: Manufacturing	Monrovia: M (Manufacturing)
West of Project Site	Single-Family Residential	Monrovia: Planned Development – Area 19 (Novice Lane Area)	Monrovia: PD-19 (Planned Development – Area 19)

Sources: Los Angeles County Office of the Assessor. *Property Assessment Information System*.
 City of Monrovia. *Zoning Map*; LA County Zoning Map⁸

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS

The proposed Project would involve the construction and operation of a warehouse development within the City of Monrovia. The site plan and building elevations are shown in Exhibit 2-6 and Exhibit 2-7, respectively. The proposed Project is summarized in Table 2-2 and would consist of the following elements:

- *Project Site.* The Project site is located at 2601 South California Avenue. Other addresses associated with the site include 213 and 217 Novice Lane. The Project site consists of three Assessor Parcel Numbers, and three site parcels, with a gross area of 1.41 acres (61,508 square feet) (refer to Exhibit 2-4 Site and Topographic Survey)⁹. The APN does not exactly match the site parcels. APN 8534- 016-045 includes all of Parcel 1 and a portion of Parcel 2 as shown on the subject site survey. APN 8534-016-046 includes the remaining portion of Parcel 2. The combined area of Parcels 1 and 2 is 54,397 square feet, or 1.249 acres. APN 8534-016-047 includes all of Parcel 3 and has a total land area of 7,111 square feet, or 0.163 acres. A 20-foot wide, 6,436 square-foot access easement (“Novice Lane”) is located along the southern portion of the Project site resulting in a total net lot area of 1.26 acres (55,072 square feet).

⁸ https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public

⁹ Seaboard Engineering Co. Site and Topographic Survey 2601 S. California Avenue & 213-217 Novice Lane. January 25, 2021.

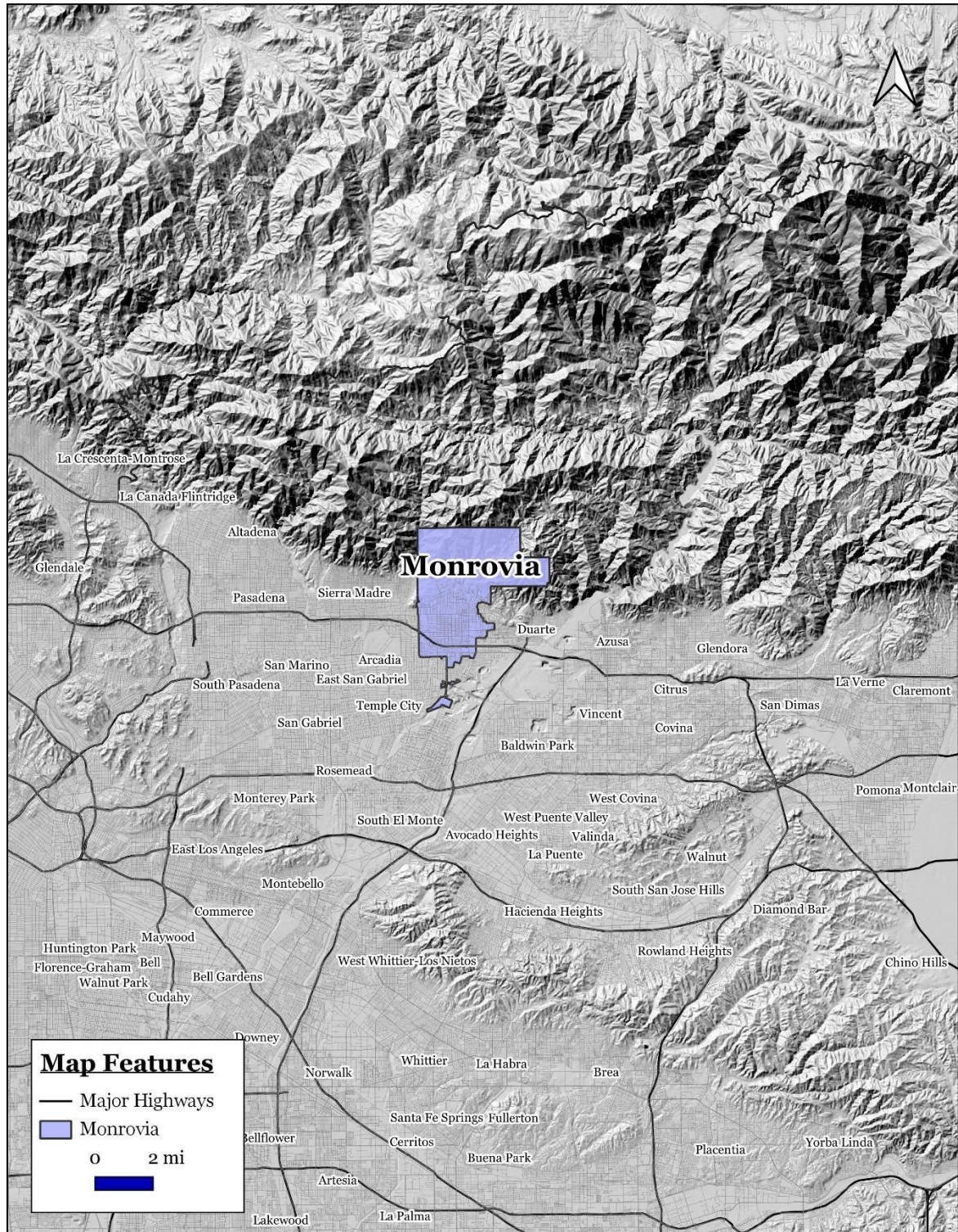


EXHIBIT 2-1 REGIONAL LOCATION MAP
 SOURCE: QUANTUM GIS

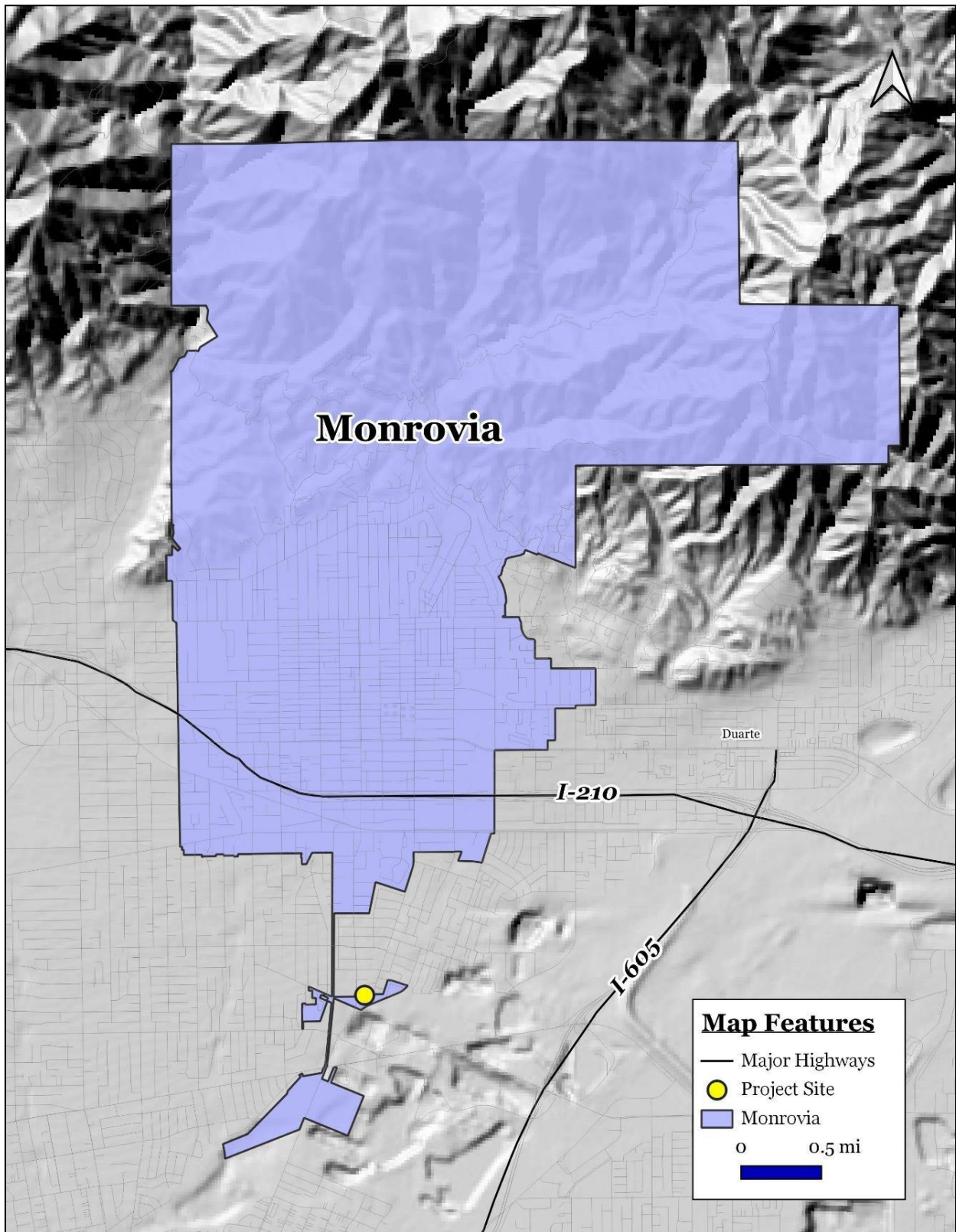


EXHIBIT 2-2 CITYWIDE MAP
SOURCE: QUANTUM GIS

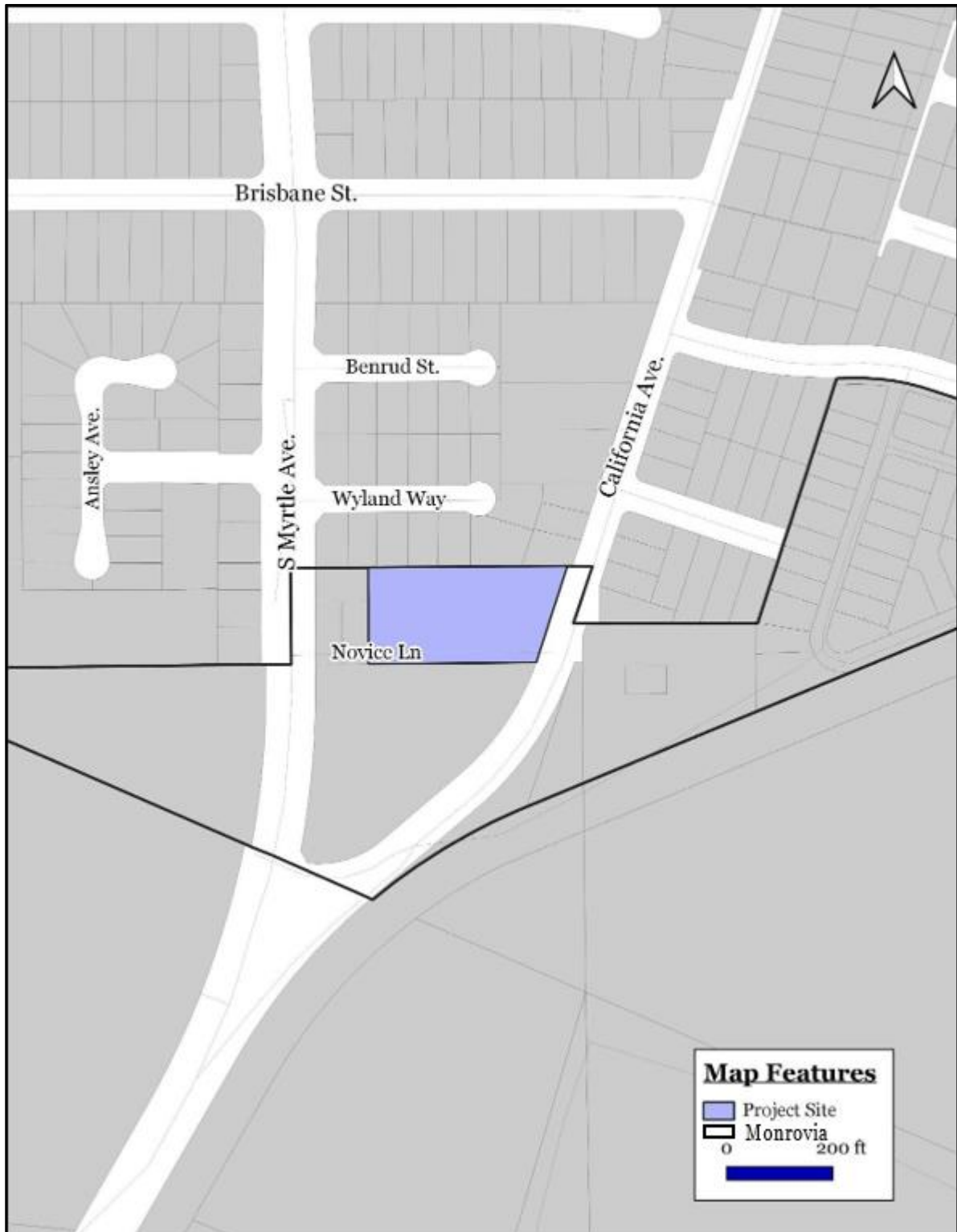


EXHIBIT 2-3 LOCAL MAP
SOURCE: QUANTUM GIS

The site was formerly occupied by an automotive repair business (Don's Automotive) and two single-family residential units that have all been demolished. The site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site's boundaries. The site is currently secured by a chain link (construction) fence along the south and east sides. A concrete block wall extends along the site's north and west sides, separating the existing vacant site from the adjacent homes to the north and west. The site's existing topography is shown in Exhibit 2-4. Photographs of the Project site and the surrounding area are provided in Exhibit 2-5.

The proposed Project would consist of a new building with a total floor area of 27,078 square feet. The new building would be located in the north central portion of the site while parking and the truck maneuvering area would be located in the southerly and westerly portions of the site. The proposed Project's floor area ratio (FAR) would be 0.49 (27,078/55,072). The building's lot coverage would be 47.4% (26,080/55,072). The new building would be setback 20 feet from the northern residential property line, 61 feet from the western residential property line, 56 feet from the southern property line, and 10 feet from the eastern property line fronting on California Avenue. A total of three truck loading docks would be located on-site. Two, 9' x 10' docks, would be located in a recess in the building along the building's south elevation and a third, 12' x 14' dock, would be located adjacent to parking on the south elevation.¹⁰ The larger trucks and trailers (with trailers up to 53 feet in length) would use the recessed dock-high doors. The larger 12' x 14' dock is a grade level sliding door. Shorter box trucks (16 foot to 24 foot with a capacity of up to 10,000 pounds) would use the grade level opening (larger tractor trailer trucks would not be permitted to use this grade level loading position). The dimensions of the parking area in front of the sliding door would be approximately 20 feet by 10 feet. Two wrought-iron sliding gates would be installed to prevent through traffic between Myrtle Avenue and the site: one across Novice Lane at the west property line and another across the driveway on the east. A "Knox-box" would be provided at the gates to allow the Fire Department and other emergency services to access the site from Myrtle Avenue across Novice Lane. Additionally, a fire turnaround would be located on a 35-foot section of Novice Lane on the abutting parcel (APN 8534-016-048), where the subject property has a recorded ingress and egress easement.¹¹ Key project elements are described below and on the following pages:

- *Landscaping and Perimeter Walls.* A total of 10,808 square feet of landscaping would be provided. The landscaped areas are located around the site's perimeter with the majority located along the California Avenue frontage, within the 20-foot wide setback along the building's north side, and within the 10-foot wide setback along the west property line. As outlined in Exhibit 2-6 The landscaping plan has been reviewed and approved by the City. The landscape plan would consist of drought-tolerant robust landscape with native trees and shrubs including but not limited to: Crape Myrtle (*Lagerstroemia* i. 'Tuscarora'), Brisbane Box (*Lophostemon confertus*), Australian Willow (*Geijera parvifolia*), Forest Pansy (*Cercis* c. 'Forest Pancy'), Foxtail Agave (agave attenuate), Texas Privet (*Ligustrum* j.'Texanum'), Raspberry Ice Bougainvillea (*Bougainvillea* 'Raspberry Ice'), Basket- Of-Gold, (*Aurinia saxatilis*), Little Rev Flax Lily (*Dianella* 'Little Rev'), Moor Grass (*Sesleria autumnalis*), Emerald Blanket (*Carissa* m. 'Emerald Blanket'), Dwarf Coyote Bush (*Baccharis* p. 'Coyote Bush'), and Irene Trailing Rosemary "*Rosmarinus officinalis* "Irene"). A new eight (8) foot high decorative concrete wall would be located along the site's north and west sides. Trees and shrubs would also be used in those areas located next to

¹⁰ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

¹¹ Exhibit A of Document Number 20210578349 as recorded in Los Angeles County, Parcel 3a is "an easement for ingress and egress in common with others, over the South 20.00 feet of the North 142.22 feet of that portion of Lot 5 of I. H. Polk Tract, in the City of Monrovia, County of Los Angeles, State of California, as per map recorded in Book 15 Page 17 of Maps, lying Easterly of the Easterly line of Myrtle Avenue, 100 feet wide, as described in the Deed to the City of Los Angeles, recorded October 4, 1949 in Book 31153 Page 278, except the east 403.25 of said land.

the residential uses as a means to provide additional buffering. Two eight (8) foot tall wrought-iron sliding gates would be installed across Novice Lane on the east and west side of the site to prevent through traffic between Myrtle Avenue and the site.

- *New Building.* The new building would have a total floor area of 27,078 square feet. The first floor would consist of 24,932 square feet of warehouse space and 1,148 square feet of office space located in the eastern side of the building. The total floor area of the first floor would be 26,080 square feet.¹² The mezzanine would consist of a 998 square-foot mezzanine style office space located on the eastern side of the building above the first floor office space.¹³ Primary access to the building would occur through the office portion on the eastern façade whereas secondary access to the warehouse portion would occur on the southern, western and northern façades. While no specific tenant has been identified, the building's use would be limited to warehousing. The maximum height of the new building would be approximately 33 feet. The new building would be fully sprinkled and would consist of Type III-B tilt-up concrete construction. The proposed Project's site plan is shown in Exhibit 2-7. The building exterior elevations would consist of recessed panels with colored accents (refer to Exhibits 2-8 and 2-9).
- *Parking.* Uncovered parking spaces would be provided on surface areas located on the south and western sides of the Project site. For the proposed warehouse Project, Monrovia Municipal Code requires 54 parking spaces (one space per 500 square feet of floor area). However, with approval of a Conditional Use Permit, the parking requirement can be reduced to 27 parking spaces (one space per 1,000 square feet of floor area). The Project includes a request for a CUP to utilize the lower parking requirement and would include a total of 33 parking stalls. The Project would provide 25 standard stalls, two (2) ADA stalls, three (3) clean air vehicle stalls, and three (3) electric vehicle stalls. In addition, three (3) truck loading and parking stalls would be situated on-site. Two, 9' x 10' docks, would be located in a recess in the building along the building's south elevation and a third, 12' x 14' dock, would be located adjacent to parking on the south elevation.¹⁴ A total of four (4) bicycle spaces would be provided: two (2) long-term bike spaces located inside the building and two (2) short-term bike spaces located outside the building.
- *Site Access and Circulation.* Vehicle access to the Project site would be provided from California Avenue through a new, single 29-foot wide two-way driveway utilizing the existing ingress egress easement (Novice Lane) along the southern portion of the Project site. In addition, the driveway utilizing Novice Lane would serve as a fire lane, truck access, and vehicular access to the parking areas. A 35-foot fire turnaround extension of this fire lane would be located on the ingress/egress easement on the abutting property (APN 8534-016-048) to the west. All warehouse use related truck maneuvering would occur on-site in an area located to the south of the loading docks. The main pedestrian access to the building would be provided on the eastern side of the building. Additional access doors are provided on the north, south, and west of the building.

¹² C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

¹³ Ibid.

¹⁴ Ibid.

TABLE 2-2 PROJECT SUMMARY TABLE

Project Element	Description
Site Net Area	1.26 acres (55,072 sq. ft.)
Site Gross Area	1.41 acres (61,508 sq. ft.)
Total Building Area	27,078 sq. ft.
First Floor Warehouse Space	24,932 sq. ft.
First Floor Office Space	1,148 sq. ft.
Mezzanine Office Space	998 sq. ft.
Floor Area Ratio (FAR)	0.49
Lot Coverage	47.3%
Building Height	33 ft.
Landscaping	10,808 sq. ft.
Total Parking Spaces	33 spaces
Standard Spaces	25 spaces
ADA Spaces	2 spaces
Clean Air Vehicles	3 spaces
Electric Vehicles	3 spaces
Bicycle Parking	4 spaces
Truck Loading Spaces	3 spaces

Source: C.E.G. Construction.

- Wet Utilities.** Water and sewer lines would be extended to the Project site from existing water and sewer lines located in Novice Lane and California Avenue. All the building floors and rooms would have sprinklers. There is an existing water line in California Avenue that would serve the proposed Project. The proposed Project would extend water laterals for domestic water and fire flow from the existing water line to the new building. The proposed Project would require a will serve letter from the City Department of Public Works Water. There is also an existing sewer line in Novice Lane that would serve the Project. The proposed Project would run a sewer lateral from this existing sewer line to the new building. The City has adopted the State of California's Model Water Efficient Landscape Ordinance (MWELO) and all new irrigation for landscaping would be required to comply with the State's Water Efficiency Landscape Ordinance (Ordinance 2016-01). The proposed Project would be required to provide a complete Landscape Ordinance Documentation Package including the items listed in Section 492.3 of the Ordinance. Stormwater in the Project area flows southerly and easterly to curbs and gutters on California Avenue and drains to Sawpit Wash via a storm drain. The City would need to approve the landscaping and stormwater retention plan.
- Power Utilities (Electricity and Gas).** Southern California Edison (SCE) is granted a two-foot wide easement on the northern portion of the site for the purpose of power lines and poles. The area of easement is 739 square feet. Existing power utilities include an overhead electrical line along the north side of the Project site. Southern Counties Gas Co. is granted a 20-foot wide easement for the purpose of gas lines. The area of easement is 6,436 square feet. There is an underground gas line located on the south side of the Project site within Novice Lane and an above-ground power line along the east side of California Avenue. Both the Southern California Edison and SoCal Gas would need to approve the location and engineering details of electrical and gas extensions, respectively, to supply the proposed Project.

EXHIBIT 2-4 SITE'S TOPOGRAPHY

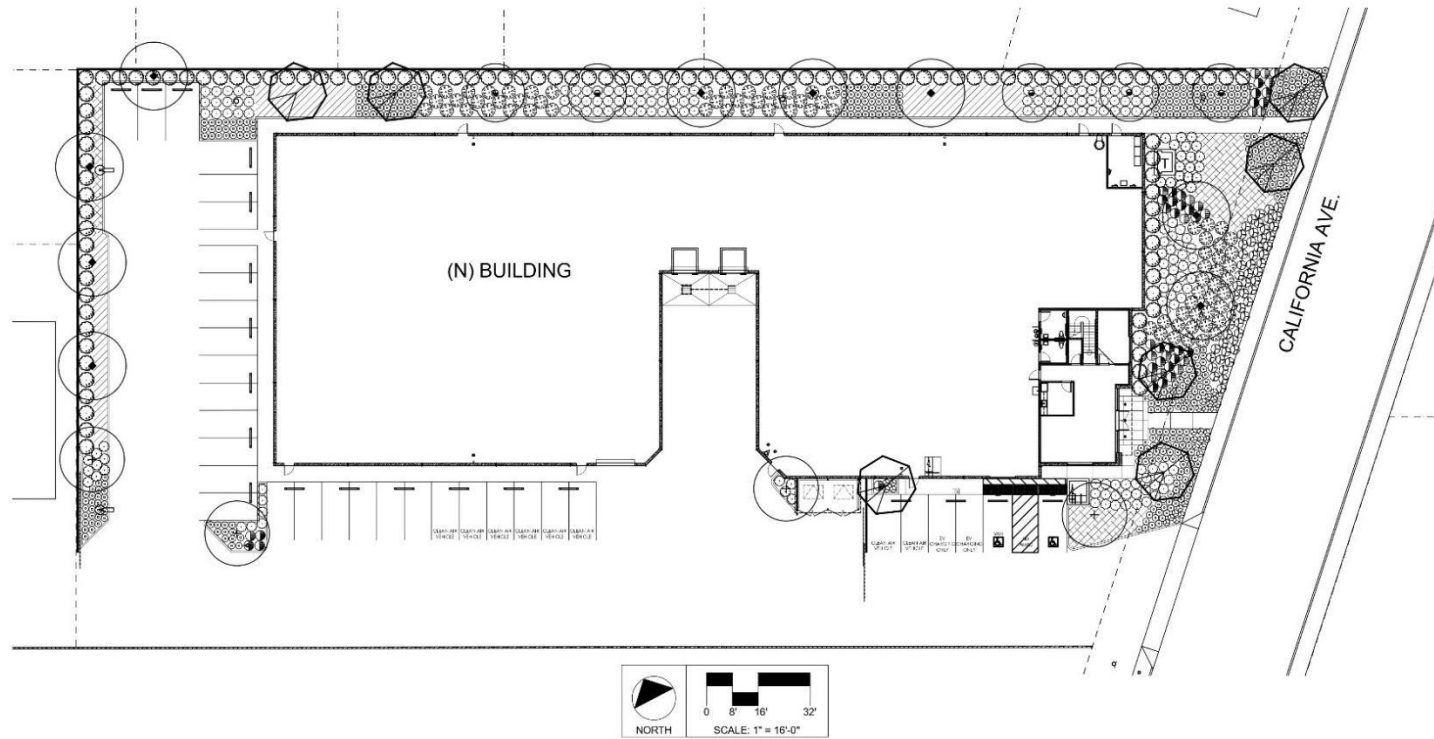
SOURCE: SEABOARD ENGINEERING CO.



EXHIBIT 2-5 PHOTOGRAPHS OF THE PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

CITY OF MONROVIA • PUBLIC REVIEW DRAFT • INITIAL STUDY & MITIGATED NEGATIVE DECLARATION
CALIFORNIA WAREHOUSE DEVELOPMENT • 2601 SOUTH CALIFORNIA AVENUE



PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	QTY.	SIZE	WUCOLS PLANT FACTOR	REMARKS
TREES						
	Logestromia l. 'Tuscarora'	Crape Myrtle	5	24" box	M	Standard trunk
	Lophostemon confertus	Brisbane box	9	24" box	M	Standard trunk
	Geijera parvifolia	Australian Willow	4	24" box	L	Standard trunk
	Cercia c. 'Forest Pansy'	Forest Pansy	7	24" box	M	Standard trunk
SHRUBS						
	Agave attenuata	Foxtail Agave	48	5 gal	L	
	Ligustrum j. 'Texanum'	Texas Privet	108	5 gal	L	
	Bougainvillea 'Raspberry Ice'	Raspberry Ice Bougainvillea	74	5 gal	L	
	Callistemon 'Little John'	Dwarf Bottlebrush	32	5 gal	L	
	Westringia fruticosa 'Smokey'	Dwarf Coastal Rosemary	153	5 gal	L	
PERENNIALS						
	Aurinia saxatilis	Basket-Of-Gold	83	1 gal	L	
	Dianella 'Little Rev'	Little Rev Flax Lily	223	1 gal	L	
	Sesleria autumnalis	Moor Grass	192	1 gal	L	
GROUND COVER						
	Carissa m. 'Emerald Blanket'	Emerald Blanket	55	1 gal	L	plant @ 36" o.c.
	Baccharis p. 'Coyote Bush'	Dwarf Coyote Bush	68	1 gal	L	plant @ 48" o.c.
	Rosmarinus officinalis 'Irene'	Irene Trailing Rosemary	60	1 gal	L	plant @ 48" o.c.

EXHIBIT 2-6 LANDSCAPE PLAN

SOURCE: PHIL MAY LANDSCAPE ARCHITECTURE

CITY OF MONROVIA • PUBLIC REVIEW DRAFT • INITIAL STUDY & MITIGATED NEGATIVE DECLARATION
CALIFORNIA WAREHOUSE DEVELOPMENT • 2601 SOUTH CALIFORNIA AVENUE

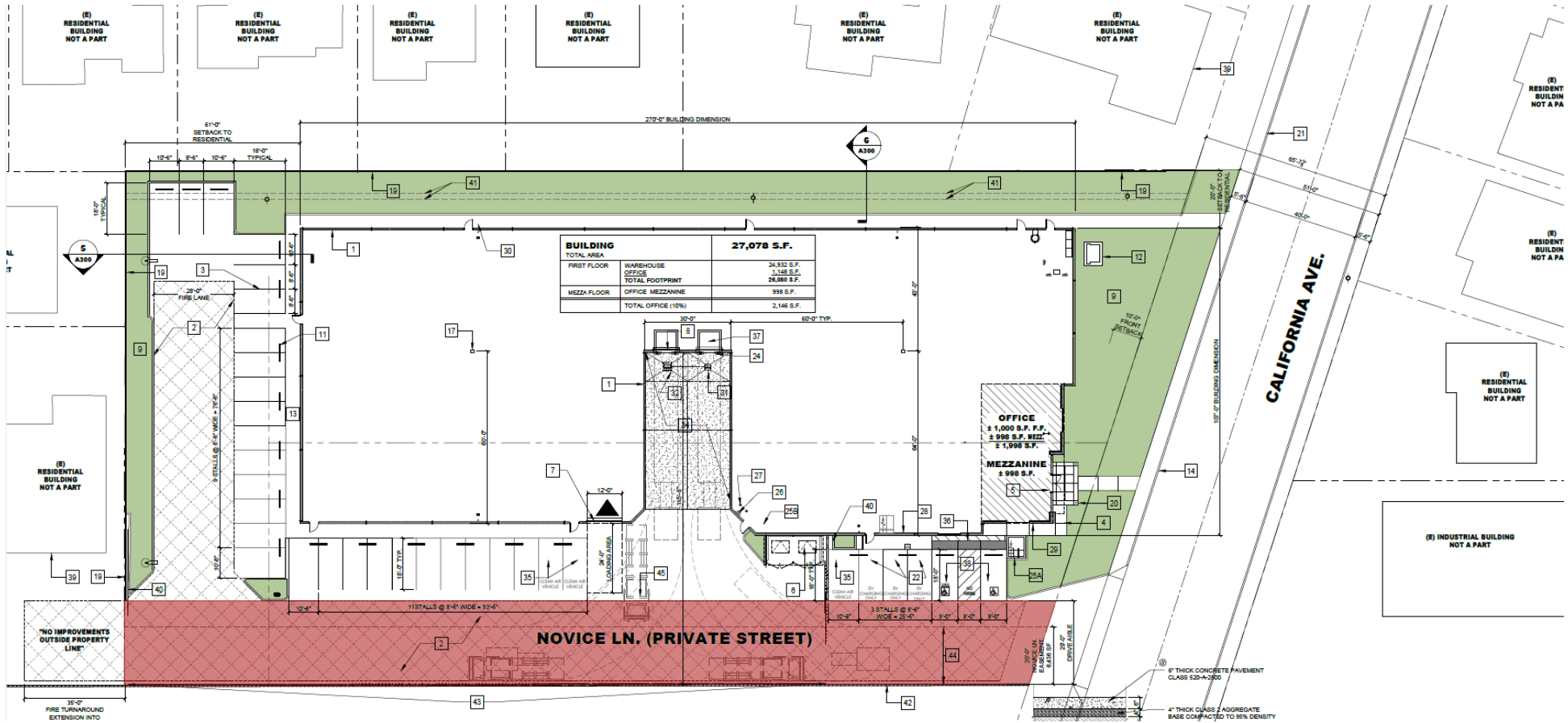
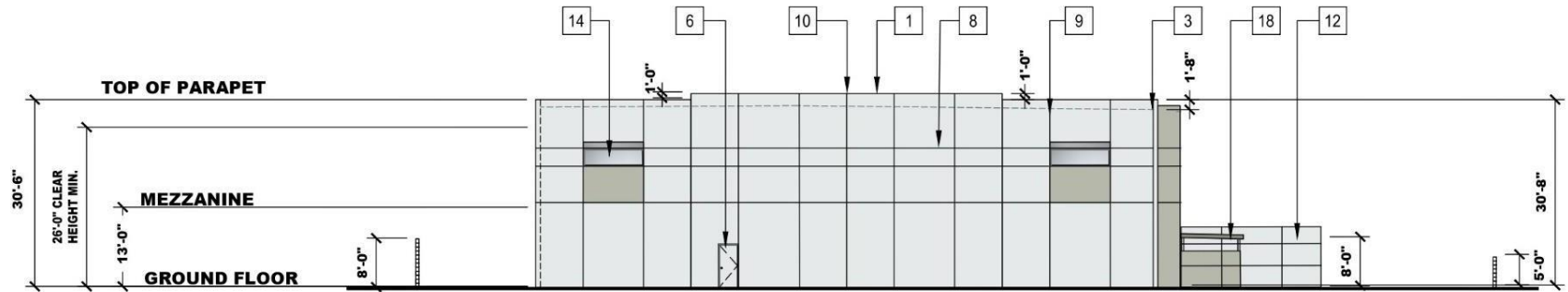
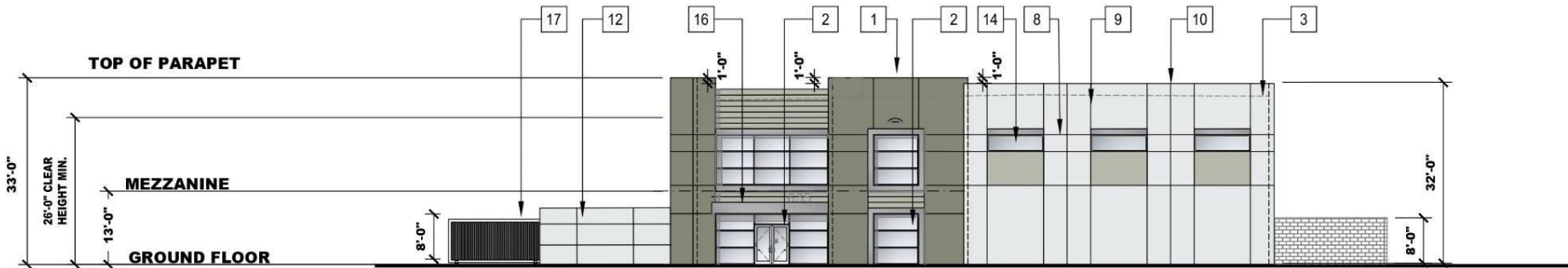


EXHIBIT 2-7 SITE PLAN
 SOURCE: C.E.G CONSTRUCTION



1 - WEST ELEVATION

SCALE 1/16" = 1'-0"



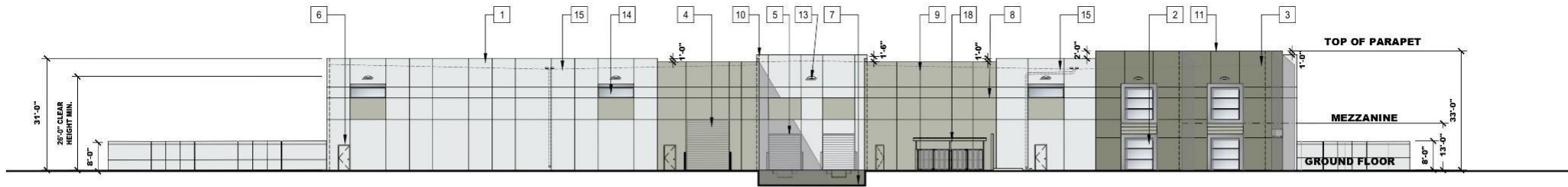
2 - EAST ELEVATION

SCALE 1/16" = 1'-0"

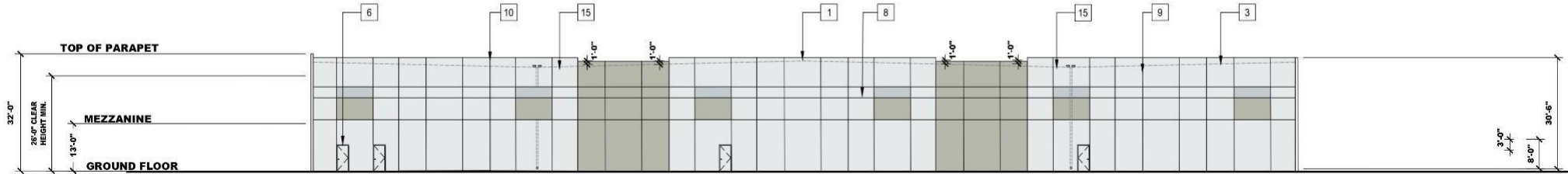
EXHIBIT 2-8 PROJECT ELEVATIONS

SOURCE: C.E.G CONSTRUCTION

CITY OF MONROVIA • PUBLIC REVIEW DRAFT • INITIAL STUDY & MITIGATED NEGATIVE DECLARATION
CALIFORNIA WAREHOUSE DEVELOPMENT • 2601 SOUTH CALIFORNIA AVENUE



3 - SOUTH ELEVATION
SCALE 1/16" = 1'-0"



4 - NORTH ELEVATION
SCALE 1/16" = 1'-0"

EXHIBIT 2-9 PROJECT ELEVATIONS
SOURCE: C.E.G CONSTRUCTION

2.4.2 OPERATIONAL CHARACTERISTICS

While the proposed Project's tenant and operations are not known at this time, the Project applicant is limiting the use of the property and future improvements to warehouse uses only; no industrial uses, light or heavy, would be permitted. Additionally, the requested CUP calls for a reduction in the number of parking spaces that would further restrict the use to warehouse land use. The Applicant is envisioning a smaller warehouse development that would be local serving. No heavy manufacturing, intensive distribution, or processing activities are envisioned given the building's small floor area (27,078 square feet) and the limited number of truck loading docks (three loading docks). There would be no retailing and commercial functions, including customer related actions. As a result, any future use would be required to conform to these limitations on warehouse uses.

The proposed Project is anticipated to be primarily open for business during normal business hours (8:00 am to 5:00 pm). No operations would occur between 12:00 AM to 6:00 AM. In the event night-time work activities might take place (after 5:00 pm), all work would occur inside the new building and all activities would be required to adhere to all pertinent Municipal Code requirements. These restrictions would reduce the potential for increased traffic, noise, and after-hour activities. No after-hour truck deliveries (after 12:00 AM or before 6:00 AM) would be permitted.

This facility would employ approximately 20 employees assuming one employee for every 1,366 square feet of floor area.¹⁵ The Project also proposes 33 parking spaces.

2.4.3 CONSTRUCTION CHARACTERISTICS

The construction for the proposed Project would take approximately nine months to complete. Access via Novice Lane would not be impacted during the entirety of the construction phase. Access to the single-family residential units located to the west of the Project site would continue to be possible from Myrtle Avenue. The key construction phases are outlined below:

- *Grading and Site Preparation.* This phase would involve limited grading of the site. The building's footings, utility lines, and other underground infrastructure would be placed during this phase. The project site would also be readied for the construction of the proposed project. The proposed project's implementation would require limited grading since the site is level and has already undergone development. Construction would require limited grading, to a depth of up to three (3) feet, and would result in approximately 3,515 cubic yards of cut and 8,200 cubic yards of fill (including the 3,200 cubic yards of over excavation). The total amount imported would be 2,905 cubic yards (cy) of fill and no export would occur. All onsite earth cut will be re-used on site as fill and no export of soil will occur. The 2,905 cy of import will be used to level and fill the site due to compaction of the cut and the over excavated soil on site and bring the site to street level and accommodate on site drainage control. The typical heavy equipment used during this construction phase would include bulldozers, off-road trucks, backhoes, and trenching equipment. This phase would take approximately two months to complete. After earthmoving or excavation operations, fugitive dust emissions shall be controlled by revegetating and watering portions of the construction area that would remain inactive longer than three months. During the Site Preparation phase, eight one-way worker trips are projected with 18.5 miles per trip projected per day. During the Grading phase, 10 one-way-worker trips are projected with 18.5 miles per trip and 59 one-way hauling trips with 20 miles per trip are projected per day. The anticipated 2,905 cy of import will be transported to the site in 20 cy capacity trucks and will result in 146 trips to the site.

¹⁵ Based on a ratio of 1.0 employee per 1,366 square feet derived from the SCAG Employment Density Report.

- *Construction.* The new warehouse building would be constructed during this phase. The typical heavy equipment used during this construction phase would include off-road trucks, cranes, and fork-lifts. This phase would take approximately four months to complete. During the Construction phase, 11 one-way worker trips are projected with 18.5 miles per trip and 4 one-way vendor trips with 10.2 miles per trip are projected per day. Where appropriate, construction equipment would utilize Tier IV technology as a means to reduce noise and air emissions.
- *Paving, Landscaping, and Finishing.* The project site would be paved during this phase. This phase would involve the planting of landscaping, painting of the new buildings, and the completion of other on-site improvements on the 61,508 square-foot (1.41 gross acres) lot. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. This phase would last approximately three months to complete. During the Paving phase, 10 one-way worker trips are projected with 18.5 miles per trip projected per day. During the Architectural Coating phase, two one-way worker trips are projected with 18.5 miles per trip projected per day.

For analytical purposes, construction of the project is expected to commence in January 2027 and would last through September 2027. The construction schedule utilized in the analysis, shown in Table 4, represents a “conservative” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent¹⁶. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*. The construction for the proposed project would take approximately 9 months to complete. Access via Novice Lane from Myrtle Avenue would not be impacted during the entirety of the construction phase.

2.5 DISCRETIONARY ACTIONS

A *discretionary action* is an action taken by a government agency (for this Project, the government agency is the City of Monrovia) that calls for an exercise of judgment in deciding whether to approve a Project. The following discretionary action approvals are required:

- *Conditional Use Permit* for the new construction of over 10,000 square feet of floor area and/or with an occupant load of 30 persons or more;
- *Conditional Use Permit* to utilize a reduced parking ratio of 1 space per 1,000 square feet for the warehouse use in-lieu of the otherwise required parking ratio of 1 space per 500 square feet for a manufacturing, industrial, warehouse, and storage land use;
- *Tentative Parcel Map* to allow for the consolidation of three parcels into one; and,
- *Minor Exception* to allow for a wall on the northern property line to exceed six feet in height.
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

¹⁶ As shown in the CalEEMod User's Guide Version 2022, Appendix G “Table G-11. Statewide Average Annual Offroad Equipment Emission Factors” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Other permits that would be required for the proposed Project would include, but may not be limited to, demolition permits, grading permits, building permits, occupancy permits, and permits for new utility connections.



SECTION 3 ENVIRONMENTAL ANALYSIS

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The Project was evaluated according to its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the Project on each element of the overall factor. The Initial Study checklist includes a formatted analysis that provides a determination of the effect of the Project on the factor and its elements. The effect of the Project is categorized into one of the following four categories of possible determinations:

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

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

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the Project's approval to reduce these impacts to a level below significance.

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the attached Initial Study.

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

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

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

Signature

Date

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Except as provided in Public Resources Code Section 21099, would the Project have a substantial adverse effect on a scenic vista?				×
B. Except as provided in Public Resources Code Section 21099, would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				×
C. Except as provided in Public Resources Code Section 21099, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?		×		
D. Except as provided in Public Resources Code Section 21099, would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		×		

METHODOLOGY

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination). Changes to the existing aesthetic environment associated with the proposed Project's implementation are identified and *qualitatively* evaluated based on the proposed modifications to the existing setting and the viewers' sensitivity. The Project-related impacts are then compared to the context of the existing setting, using the threshold criteria discussed above.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Except as provided in Public Resources Code Section 21099, would the Project have a substantial adverse effect on a scenic vista? • No Impact.

The new building would have a total floor area of 27,078 square feet. The first floor would consist of 24,932 square feet of warehouse space and 1,148 square feet of office space located in the eastern side of the building. The total floor area of the first floor would be 26,080 square feet.¹⁷ The second-floor mezzanine would consist of a 998 square foot mezzanine style office space located on the eastern side of the building above the first floor office space.¹⁸ The main pedestrian access to the building would be provided on the eastern side of the building through the office space. Additional access doors are provided on the north,

¹⁷ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

¹⁸ Ibid.

south, and west of the building. While no specific tenant has been identified, the building's use would be limited to warehousing. The maximum height of the new building would be approximately 33 feet. The new building would be fully sprinkled and would consist of Type III-B tilt-up concrete construction. The building elevations would consist of recessed panels with colored accents.

The dominant physiographic features in the area that may be considered as viewsheds include the San Gabriel Mountains, located approximately four miles to the north of the Project site.¹⁹ The Sawpit Wash, which traverses the area located to the southeast is fully channelized and is used as a flood control channel. The Project site is located in the midst of urban development and there are no protected views along California Avenue or in the immediate vicinity of the Project site. Views of the San Gabriel Mountains are currently partially and intermittently obscured by the existing development located along both sides of California Avenue. The nearest uses that would be sensitive to a loss of views (i.e., residential uses) are located adjacent to the Project site on the north and west sides, and across California Avenue, approximately 70 feet away and the proposed warehouse building would not be oriented in such a way to obstruct these views. The proposed warehouse building would have a maximum height of 33 feet and would be comparable in height to the surrounding industrial and commercial building that are approximately 25 feet in height. The size and mass of the new structures would not be great enough to obstruct scenic views beyond the current level of obstruction of these views. *As a result, no impacts would occur.*

B. *Except as provided in Public Resources Code Section 21099, 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.*

According to the California Department of Transportation (Caltrans), neither Myrtle Avenue nor California Avenue are designated scenic highways.²⁰ The Project site was formerly developed as two single-family homes on the western side and an automotive repair shop on the eastern side of the site. The site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site's boundaries. There are neither rock outcroppings nor historic buildings located within the Project site as concluded in a Historic Resource Analysis Report prepared by Urbana Preservation & Planning LLC.²¹ The construction of the proposed Project would not result in any impact on any protected trees or Heritage trees. There are no parkway trees located adjacent to the Project site. The nearest designated or eligible State scenic highway is State Route 39 (SR-39), located approximately 5.6 miles west of the Project site. *As a result, no impacts would occur.*

C. *Except as provided in Public Resources Code Section 21099, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? • Less than Significant Impact with Mitigation.*

The site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site's boundaries. The proposed Project would involve changing the visual character of the existing Project area from an undeveloped property to a warehouse development. The

¹⁹ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was conducted on June 13, 2022 and September 15, 2023. Survey updated periodically in 2024, 2025, and 2026.

²⁰ California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov.

²¹ California Office of Historic Preservation. *California Historical Resources*. <http://ohp.parks.ca.gov/ListedResources>. Secondary Source: Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was conducted on June 13, 2022 and September 15, 2023.

Project area is located in a mixed-use neighborhood of one-story single-family structures to the north, east and west and 20 to 25-foot tall industrial buildings to the south and east. The height, as well as the mass, bulk, and scale of future structure in the Project area has the potential to be inconsistent with the style and scale of the existing one-story residential buildings in the neighborhood.

With the proposed improvements and mitigation measure AES-3, the proposed Project would not degrade the character or quality of the Project site, nor would the proposed Project contribute to an overall degradation of the visual character or quality of the surrounding area. Once constructed, the proposed Project would improve the visual appearance of the Project site and the surrounding areas because the new building would feature modern architecture and extensive landscaping which currently does not exist on-site. The City's architectural design policies are outlined in the Monrovia General Plan while specific development standards are identified in the City's Zoning Ordinance. Table 3-1 summarizes the proposed Project's conformity with the City of Monrovia General Plan.

TABLE 3-1 AESTHETIC IMPACTS – PROJECT'S CONFORMITY WITH GENERAL PLAN

General Plan Policy	Conformity Analysis
Land Use Element Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed Project.	The City worked closely with the Project architect to reduce the size and scale of the new building to facilitate its compatibility with the neighboring residential uses. The applicant reduced the number of loading docks and oriented them away from the adjacent residential uses. The building height was reduced from 38 feet to 33 feet to better match the scale of the other nonresidential buildings within the vicinity of the proposed Project.
Land Use Element Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed Project.	The City worked closely with the Project architect to reduce the size and scale of the new building to facilitate its compatibility with the neighboring residential uses. The City sponsored community workshops and CEQA scoping meetings. The major community concern was related to truck traffic on Novice Lane and the building's height. The building's height was reduced to 33-feet and loading areas were moved to a recess of the building on the south elevation. Furthermore, due to the proposed gate along the western property line, truck traffic is unable to use the Novice Lane easement in front of the adjacent residential properties.
Land Use Element Policy 6.4: Evaluate the location of new industrial uses on residential uses. Require noise reduction strategies for industrial uses such as block walls, restricting hours of operation, and other measures as appropriate.	The proposed Project includes an eight-foot high decorative block wall along the north and west sides. Shrubs including Texas Privet are proposed to be installed along the west and north side of the Project site to reduce noise. In addition, two loading docks would be recessed into the building's south elevation to reduce noise emissions. The wrought-iron sliding gate located on the western property line prevents through traffic on Novice Lane in front of the adjacent residential properties. Finally, the facility's hour of operation and permitted hours for deliveries are to be determined through a discretionary process. At a minimum, no activity can occur between 12 am to 6 am.

**TABLE 3-1 AESTHETIC IMPACTS – PROJECT’S CONFORMITY WITH GENERAL PLAN
(CONTINUED)**

General Plan Policy	Conformity Analysis
Land Use Element Policy 7.6: Encourage the location of clean industrial uses in the City and more aesthetic design solutions to traditional industrial uses.	The new warehouse building replaces an older dilapidated commercial use and two single-family residences that have been demolished. While the General Plan Land Use designation calls for industrial uses at the site, more intensive industrial uses are not appropriate given the proximity to sensitive receptors. To reduce potential impacts on the adjacent residents, the Project is limited to warehouse use only. Industrial uses would not be allowed by Mitigation Measure LU-1. Other Project elements on the site also serve as a buffer, such as the perimeter walls and gates. In addition, two loading docks would be recessed into the building’s south elevation to reduce noise emissions. The wrought-iron sliding gate located on the western property line prevents through traffic on Novice Lane in front of the adjacent residential properties. The future use is also required to conform to the most current environmental and design requirements.
Land Use Element Policy 7.7: Encourage the development of light industrial, offices, and warehouses on Myrtle Avenue between Duarte Road and the southern city limits. Homes on Novice Lane should transition to Light Industrial land uses, but new development shall provide adequate landscaping, setbacks, and walls to buffer negative impacts on the existing residential uses.	While the General Plan Land Use designation calls for industrial uses at the site, more intensive industrial uses are not appropriate given the sensitive receptors. To reduce potential impacts on the adjacent residents, the Project is limited to warehouse use only. Industrial uses would not be allowed by Mitigation Measure LU-1. Additionally, the Project would be buffered with adequate landscaping, setbacks, and walls to reduce negative impacts on the existing residential uses. Additionally, Mitigation Measures AES-1 through AES-5 reduce impacts on the existing single-family homes located to the Project’s north and west side.
Land Use Element Policy 13.3: In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.	The Project architect worked with the City to develop a Project that follows the City’s commercial and industrial architectural, site design and landscape guidelines. The City sponsored community workshops and CEQA scoping meetings. The major community concern was related to truck traffic on Novice Lane and the building’s massing. The building’s height was reduced from 38 feet to 33 feet, the floor area was reduced and the setbacks from the residential uses were increased. Furthermore, the number of loading areas was reduced and the location of the loading areas was moved to a recess in the building on the south elevation. Lastly, a proposed gate along the western property line prevents truck traffic from using the Novice Lane easement in front of the adjacent residential properties. As a result, the City’s design review comments are reflected in the Project’s architectural design and site plan.
Land Use Element Policy 13.7: In specified zones permitting outside storage, an aesthetic combination of decorative block wall and landscaping should be required.	No outside storage would occur with this Project. However, an eight-foot high decorative block wall would be constructed along the site’s north and west sides and would screen the proposed use from abutting single-family residences. The proposed Project would also provide a row of Texas Privet hedges along the property lines and several evergreen trees. The proposed Project would also conform to the most recent Model Water Efficient Landscape Ordinance (MWELO).

Source: Monrovia General Plan

The warehouse development is consistent with, and implements, the overall General Plan vision for the Novice Lane Planned Development Area (PD-19) that permits industrial uses to expand to the east with consideration given to the single-family homes on the west. In addition, the proposed Project complies with all pertinent zoning standards. The new building will be setback 20-feet from the northern property line that abuts the residential properties located to the north and 61-feet from the residential properties located to the west.

Additionally, construction of the proposed Project requires excavation, grading, and construction activities and has the potential to create short-term impacts. Construction activities would be visible to travelers along South California Avenue and South Myrtle Avenue; residents north and west of the site; and surrounding businesses. Mitigation Measure AES-1 and NOI-1 requires that temporary construction fencing is installed along the perimeter of the site to visually screen construction activities from the street level. Noise and construction barriers, temporary pedestrian walkways, and/or vehicle access ways during construction have the potential to affect the visual character of the area over the short-term should the barriers not be properly maintained (e.g., become sites of graffiti or trash). Mitigation Measure AES-1 will ensure that they are maintained in a visually attractive manner throughout the construction period and that any inappropriate material is removed. Visual impacts during construction would be temporary in nature and would cease upon Project completion. *As a result, the impacts would be less than significant with mitigation measures.*

D. *Except as provided in Public Resources Code Section 21099, 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 with Mitigation.*

Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as *light trespass* which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land uses or driver's vision. The exterior facade would consist of non-reflective materials, such as concrete and stucco.

Nighttime glare and illumination has the potential to result in potentially significant impacts to sensitive receptors. Many sources of light contribute to the ambient nighttime lighting conditions. These sources of nighttime light include street lights, security lighting, wall packs and vehicular headlights. With the implementation of Mitigation Measures AES-2 through 5, the proposed Project would not introduce nighttime lighting that could potentially impact nearby residential uses. The Project site is located within a mixed residential and industrial area with the nearest sensitive receptors (single-family residences) located adjacent to the Project site on the north and west sides, and across California Avenue, approximately 70 feet away. Section 17.32.080 of the Monrovia Municipal Code requires lighting be arranged to reflect away from adjoining property or any public way and be arranged so as not to cause a nuisance. The proposed Project would adhere to the Municipal Code, but to further reduce the amount of glare, spillover lighting, and other possible intrusive lighting during and after business hours, Mitigation Measures AES-2 through 5 are required. Adherence to these measures would reduce the impacts to levels that are less than significant and the proposed Project's lighting levels would be compatible with surrounding uses. *As a result, the impacts would be less than significant with mitigation incorporated.*

MITIGATION MEASURES

To reduce the amount of glare, spillover lighting, and other possible intrusive lighting during and after business hours the following mitigation is required:

Mitigation Measure AES-1. Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: “During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian walkway, the Construction Contractor shall remove such items within 48 hours.”

Mitigation Measure AES-2. Automatic shut off for exterior lights and light shields must be installed so as to reduce the amount of glare, spillover lighting, and other possible intrusive lighting during periods of darkness.

Mitigation Measure AES-3. Reflective glass, metallic, and other highly reflective and glare producing materials, shall not be used in new building construction as a measure to prevent glare to traffic on California Avenue, Myrtle Avenue, and nearby residential uses.

Mitigation Measure AES-4. Prior to the issuance of a building permit, the applicant shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America [IESNA]) and shall be in compliance with applicable standards of the City’s Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, onsite driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer: 1. Exterior onsite lighting shall be shielded and confined within site boundaries; 2. No direct rays or glare are permitted to shine onto public streets or adjacent sites; 3. Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted; and 4. The site shall not be excessively illuminated based on the illumination recommendations of the Illuminating Engineering Society Of North America (IESNA).

Mitigation Measure AES-5. No after-hour truck deliveries shall be permitted as a means to eliminate nuisance light and glare after hours. The City Code prohibits operations, including truck deliveries, from occurring between 12:00 AM and 6:00 AM. All proposed uses of the site shall be reviewed by the City of Monrovia’s Development Review Committee. Permitted hours for truck deliveries and normal operations shall be identified as conditions of approval upon determination of specific occupant.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				×
B. Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?				×
C. Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				×
D. Would the Project result in the loss of forest land or conversion of forest land to non-forest use?				×
E. Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				×

METHODOLOGY

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county government to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with Los Angeles County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? • No Impact.

The proposed Project involves the construction of a 27,078 square foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on

61,508 square foot (1.41 gross acres) lot. No agricultural activities are located within the Project site and the City of Monrovia General Plan does not provide for any agricultural land uses within the Project site.²² The Project site is located within the *Planned Development – Area 19 (Novice Lane Area)* General Plan designation, which allows for industrial development (Warehousing). The Project site is zoned as PD-19 (*Planned Development – Area 19*). No conversion of farmland soils would result from the proposed Project's implementation. *As a result, no impacts would occur.*

B. Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?
• *No Impact.*

As indicated previously, the Project site and the adjacent properties are not being used for agricultural purposes. The City's General Plan land use and Zoning designations applicable to the properties do not permit farming or agricultural land uses. According to the State Department of Conservation, Division of Land Resource Protection, the Project site is not subject to a Williamson Act Contract.²³ *As a result, no impacts would occur.*

C. Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? • *No Impact.*

According to the California Public Resources Code, "forest land" is land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. "Timberland" is defined as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products. "Timberland Production Zone" or "TPZ" means an area which has been zoned and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.²⁴ The Project site is located in the midst of a larger urban area with the City of Monrovia having the Angeles National Forest within the northern portion of the City. The City of Monrovia General Plan and the Monrovia Zoning Code does provide for forest land preservation in Chapter 17.18, but due to the proximity of the Project site from the Angeles National Forest lands, the zoning development standards do not apply to this proposed Project. *As a result, no impacts would occur.*

D. Would the Project result in the loss of forest land or conversion of forest land to non-forest use? • *No Impact.*

The Angeles National Forest is found within the northern portion of the City of Monrovia. As indicated above, the Project site is located in the midst of a larger urban area outside of the Los Angeles National Forest's boundaries. *As a result, no impacts would occur.*

²² City of Monrovia. *Monrovia General Plan Land Use Element.*

²³ California Department of Conservation. *State of California Williamson Act Contract Land.*
<https://www.conservation.ca.gov/dlrp/wa>

²⁴ California Public Resources Code. Sections 12220(g), 4526 and 51104(g).

E. *Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? • No Impact.*

No farmland or forest lands are located within the Project site. As a result, the proposed Project would not involve the conversion of any existing farmland or forest area to urban uses. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no significant adverse impacts on these resources would occur as part of the proposed Project and no mitigation is required.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project conflict with or obstruct implementation of the applicable air quality plan?				✗
B. 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?			✗	
C. Would the Project expose sensitive receptors to substantial pollutant concentrations?			✗	
D. Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?		✗		

METHODOLOGY

Air quality impacts may occur during the construction or operation phase of a Project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., water heaters) sources. The South Coast Air Quality Management District (SCAQMD) is the main regulatory authority in the region (the South Coast Air Basin, which includes the City of Monrovia) with regard to air quality issues. In April 1993, the SCAQMD adopted a CEQA Air Quality Handbook that provides guidance for the CEQA analysis of potential air quality impacts of new Projects. The SCAQMD has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- *Ozone* (O_3) is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon monoxide* (CO) is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.
- *Nitrogen dioxide* (NO_x) is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen.
- *Sulfur dioxide* (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- *PM_{10} and $PM_{2.5}$* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.

Projects in the South Coast Air Basin (Basin) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

A Project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen dioxide;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM₁₀;
- 55 pounds per day of PM_{2.5}; or,
- 150 pounds per day of sulfur oxides.

The City of Monrovia is located within the South Coast Air Basin (Basin), which covers a 6,600 square-mile area within all of Orange County, the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Measures to improve regional air quality are outlined in the SCAQMD's Air Quality Management Plan (AQMP). The most recent AQMP was adopted in December 2022 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).²⁵ The SCAB is in nonattainment for federal O₃ standards (1-hour and 8-hour), PM₁₀, and PM_{2.5} standards, and nonattainment for State O₃ (1-hour and 8-hour and PM_{2.5} standards, as well as partial nonattainment for lead.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project conflict with or obstruct implementation of the applicable air quality plan? • No Impact.

The proposed Project involves the construction of a 27,078 square foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot. The SCAQMD's Air Quality Management Plan (AQMP) will help the SCAQMD maintain focus on the air quality impacts of major Projects associated with goods movement, land use, energy efficiency, and other key areas of growth. The 2022 AQMP was developed to address the requirements for meeting this standard and was adopted December 2, 2022 by the South Coast AQMD Governing Board. The Air Quality Handbook refers to the following criteria as a means to determine a Project's conformity with the AQMP:²⁶

- *Consistency Criteria 1* refers to a proposed Project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.
- *Consistency Criteria 2* refers to a proposed Project's potential for exceeding the assumptions included in the AQMP or other regional growth Projections relevant to the AQMP's

²⁵ South Coast Air Quality Management District. *Final 2022 Air Quality Plan*. Adopted December 2, 2022.

²⁶ South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993.

implementation.

In terms of Criteria 1, the short-term (construction) and long-term (operational) airborne emissions associated with the construction and operation of the proposed Project would be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the short-term and long-term emissions for the proposed Project are summarized in Table 3-2 and Table 3-3, respectively).

The proposed Project would also conform to Consistency Criteria 2 since it would not affect any regional population, housing, and employment Projections prepared for the City because the proposed Project would not directly result in an increase in population or a need for housing. The proposed Project would not prohibit or preclude the policies outlined above relating to air quality and greenhouse gas emissions. Based on the findings made above, no violation of an air quality plan would occur.

The City's existing General Plan does not establish specific goals, policies, or standards related to air quality; however, the City's Monrovia General Plan Proposed Land Use and Circulation Elements EIR (City of Monrovia 2008) included the following strategies and measures related to air quality as listed below.

- *General Plan EIR Mitigation Measure AIR-A:* The City shall require applicants to analyze the air quality impacts of construction for each project. Construction-related air quality impacts have been analyzed in this Air Quality Study using CalEEMod and evaluated against SCAQMD thresholds. *As shown in Table 3-2, construction emissions would not exceed applicable thresholds. The project would be consistent with this mitigation measure.*
- *General Plan EIR Mitigation Measure AIR-B:* If a Project-level analysis demonstrates that the NO_x emissions would be significant, the Project shall provide a plan, for approval by the City, demonstrating that the heavy duty (> 50 horsepower) offroad vehicles to be used in the construction Project, including owned, leased and subcontractor vehicles, will utilize all feasible measures to reduce the emissions to a less than significant level. Acceptable options for reducing emissions may include use of late model low emission diesel engines, alternative fuels, engine retrofit technology, and/or other options as they become available. The SCAQMD website provides specific information on mitigation options for off-road and on-road construction equipment. *As shown in Tables 3-2 and 3-3, the proposed Project would not exceed the NO_x emissions. The Project would be consistent with this measure.*
- *General Plan EIR Mitigation Measure AIR-C:* The following measure shall be incorporated into all project specifications to reduce diesel engine emissions of O₃ precursors including ROG and NO_x, PM₁₀, PM_{2.5}, and diesel PM: Idling of diesel-powered vehicles and equipment shall not be permitted during periods of nonactive vehicle use. This is also a SCAQMD Rule. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:
 - When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;
 - When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
 - To bring the equipment to the manufacturer's recommended operating temperature;
 - When the ambient temperature is below 40 degrees F or above 85 degrees F; or,
 - When equipment is being repaired.

As shown in Tables 3-2 and 3-3, the proposed Project would not exceed the thresholds for NO_x

emissions. The Project would be consistent with this measure.

- *General Plan EIR Mitigation Measure AIR-D.* The City shall require that all new residential fireplaces shall be fueled by natural gas. Wood stoves and wood-burning fireplaces shall be prohibited. *This mitigation measure is not relevant to the proposed Project.*
- *General Plan EIR Mitigation Measure AIR-E:* The City shall require applicants to analyze the potential for creating a local CO hotspot due to traffic congestion that could result from implementation of projects anticipated in the proposed General Plan amendments to the Land Use and Circulation Elements. *As discussed in the Hot Spot Analysis section, the proposed project would not result in the creation of a carbon monoxide hotspot. The project would be consistent with this mitigation measure.*
- *General Plan EIR Mitigation Measure AIR-F.* The City shall require applicants to complete a Health Risk Assessment (HRA) to determine the cancer risk to sensitive receptors for all residential Projects located within 500 feet of Interstate 210 (I-210). *This mitigation measure is not relevant to the proposed Project.*
- *General Plan EIR Mitigation.* The City shall require applicants to assess the potential impacts to children's respiratory health for all residential Projects located within 500 feet of I-210. *This mitigation measure is not relevant to the proposed Project.*

Based on the findings made above, no violation of an air quality plan would occur. As a result, no impacts would occur.

B. *Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard? • Less than Significant Impact.*

CONSTRUCTION (SHORT-TERM) AIR QUALITY IMPACTS

The Project site and the entire City are located in a non-attainment area for ozone and particulates; therefore, the construction of the proposed Project would be required to comply with the requirements of SCAQMD Rule 403, Fugitive Dust (see Standard Condition SC AIR-1), which requires the implementation of Best Available Control Measures (BACM) for all fugitive dust sources, and the 2022 AQMP, which identifies BACMs and Best Available Control Technologies (BACT) for area sources and point sources, respectively. According to SCAQMD Rule 403, Fugitive Dust, all unpaved demolition and construction areas shall be regularly watered down to three times per day during excavation, grading, and construction as required (depending on temperature, soil moisture, wind, etc.). Watering could reduce fugitive dust by as much as 55 percent. Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of fugitive dust.

Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls (see Standard Condition SC AIR-2). The SCAQMD regulations are standard conditions required for every construction Project undertaken in the City as well as in the cities and counties governed by the SCAQMD. The Project construction would occur over a nine-month period. The assumptions regarding the length of construction followed the construction characteristics identified in Section 2.4.2. The analysis of construction and operational emissions was prepared utilizing the California Emissions

Estimator Model (CalEEMod V.2022.1.1.39) and the complete report is included as Attachment A, in Appendix A. As shown in Table 3-2, daily construction emissions are not anticipated to exceed the SCAQMD significance thresholds when mitigated with SC AIR-1 and SC AIR-2.

TABLE 3-2 ESTIMATED DAILY CONSTRUCTION EMISSIONS IN LBS./DAY

Construction Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Total Site Preparation	0.22	1.04	12.3	0.02	6.40	3.07
With Mitigation	0.22	1.04	12.3	0.02	1.77	0.84
Total Grading	0.32	6.07	16.6	0.05	8.40	3.85
With Mitigation	0.32	6.07	16.6	0.05	3.16	1.32
Total Building Construction	0.24	3.74	11.2	0.02	0.22	0.08
With Mitigation	0.24	3.74	11.2	0.02	0.22	0.08
Total Paving	0.17	0.88	5.22	0.01	0.14	0.04
With Mitigation	0.17	0.88	5.22	0.01	0.14	0.04
Total Architectural Coatings	8.43	0.65	1.10	--	0.03	0.01
With Mitigation	4.38	0.65	1.10	--	0.03	0.01
Maximum Daily Emissions	8.43	6.07	16.6	0.05	8.40	3.85
With Mitigation	4.38	6.07	16.6	0.05	3.16	1.32
Daily Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Attachment A, Appendix A, CalEEMod V.2022.1.1.39

The estimated daily construction emissions shown in Table 3-2 assume compliance with the following applicable SCAQMD rules and regulations for the control of fugitive dust and architectural coating emissions:

- Excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures using the applicable procedures outlined in the SCAQMD's Rules and Regulations.
- Ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune.
- All trucks associated with construction activities shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2), and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.
- The Project shall comply with SCAQMD Rule 402 that limits the generation of airborne pollutants that would cause injury, detriment, or result in a nuisance. This has been identified as a Standard Condition (SC) AIR-1.

OPERATIONAL (LONG-TERM) AIR QUALITY IMPACTS

Long-term emissions refer to those air quality impacts that would occur once the development is operational and that would continue over the operational life of the proposed Project. The analysis of long-term operational impacts also used the CalEEMod V.2022.1.1.39 computer model. Table 3-3 depicts the estimated operational emissions generated by the proposed Project.

TABLE 3-3 ESTIMATED OPERATIONAL (LONG-TERM) EMISSIONS IN LBS./DAY

Emission Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile (lbs./day)	0.20	0.18	1.95	0.01	0.48	0.13
Area (lbs./day)	0.85	--	1.18	--	--	--
Energy (lbs./day)	0.01	0.14	0.12	--	0.01	0.01
Total (lbs./day)	1.06	0.32	3.25	0.01	0.50	0.14
Daily Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Attachment A, Appendix A, CalEEMod V.2022.1.1.39

As indicated in Table 3-3, the projected long-term emissions are below thresholds considered to represent a significant adverse impact. Therefore, the proposed Project would not contribute to an existing air quality violation. In addition, the implementation of the SCAQMD's and the City's standard conditions would further reduce the potential short-term (construction) emissions (refer to SC AIR-1 and SC AIR-2, which include the standard construction related rules and regulations). *The impacts would be less than significant.*

C. Would the Project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include residences, board and care facilities, schools, playgrounds, hospitals, parks, childcare centers, and outdoor athletic facilities, and other facilities where children or the elderly may congregate.²⁷ These population groups are generally more sensitive to poor air quality. The nearest sensitive receptors to the Project site include residential uses adjacent to the site to the north and west, and located across California Avenue, approximately 70 feet east of the Project site. These nearby sensitive receptors are shown in Exhibit 3-1.

The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project would result in an exceedance of *localized emissions thresholds* or LSTs (Localized Significance Thresholds). The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4.²⁸ LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the *LST Methodology*.²⁹ LSTs apply to short-term (construction) and long-term (operations) emissions at a fixed location and do not include off-site or area-wide emissions.

²⁷ South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix to Chapter 9*. April 1993.

²⁸ The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, the SCAQMD defines Environmental Justice as "...equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution."

²⁹ Southern California Association of Governments. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. [Online] September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_o.pdf?1606001176

For this project, the appropriate SRA for the LST analysis is the SCAQMD East San Gabriel Valley (SRA 9). The pollutants that are the focus of the LST analysis include the conversion of NO_x to NO₂ from construction and operation; carbon monoxide (CO) emissions from construction; PM₁₀ emissions from construction and operation; and PM_{2.5} emissions from construction and operation. For purposes of the LST analysis, the receptor distance used was 25 meters since the nearest residences or sensitive receptors are located less than 25 meters (0 feet) to the north and west. While the nearest sensitive receptors are less than 25 meters away, it should be noted that the LST Methodology explicitly states that “Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.”³⁰ As shown in Table 3-4, the proposed project would not result in any exceedance in LST thresholds with mitigation.

TABLE 3-4 LOCALIZED MITIGATED CONSTRUCTION AND OPERATION EMISSIONS

Emissions	Construction/ Operational Emissions (lbs./day)	Type	Allowable LST Emissions Threshold (lbs./day) at a Specified Distance from Receptor (in meters)***					Exceeds Thresholds?
			25	50	100	200	500	
NO _x	6.07/0.32	Construction/Operation	89	112	159	251	489	No
CO	16.6/3.25	Construction/ Operation	623	945	1,914	4,803	20,721	No
PM ₁₀	3.16*	Construction	5	14	34	75	199	No (with Mitigation)
PM ₁₀	0.50	Operation	2	4	9	19	48	No
PM _{2.5}	1.32**	Construction	3	5	9	22	94	No (with Mitigation)
PM _{2.5}	0.14	Operation	1	2	3	6	23	No

Source: Attachment A, Appendix A, CalEEMod V.2022.1.1.39; Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

*PM₁₀ unmitigated value: 8.40

**PM_{2.5} unmitigated value: 3.85

***values correspond to thresholds for a 1-acre site for SRA 9 (East San Gabriel Valley)

As indicated in Table 3-4, the proposed Project’s construction emissions would not exceed any LSTs based on the information included in the Mass Rate LST Look-up Tables provided by the SCAQMD.

Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions; therefore, high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards. These areas of high CO concentration are referred to as *hot spots*. Two variables influence the creation of a hot-spot and these variables include traffic volumes and traffic congestion. Typically, a hot-spot may occur near an intersection that is experiencing severe congestion (a LOS E or LOS F).³¹ The SCAQMD stated in its CEQA Handbook that a CO hot-spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the Basin. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions. The projected peak hour traffic would not significantly degrade any local intersection’s level of service to LOS E or F. In addition, Project-generated traffic would

³⁰ South Coast Air Quality Management District. *Final Localized Significance Threshold Methodology*. As revised July 2008. Chapter 3.

³¹ “LOS” refers to “Level of Service.” Refer to Section 3.2.17.A.

not result in the creation of a carbon monoxide *hot-spot* (refer to Section 3.17, Transportation).

The Air Toxics [Hot Spots] Act requires that each local Air Pollution Control District or Air Quality Management District determine which facilities are required to prepare a health risk assessment (HRA). As defined under the Act, a HRA includes a comprehensive analysis of the dispersion of hazardous substances in the environment, their potential for human exposure, and a quantitative assessment of both individual and population-wide health risks associated with those levels of exposure. Senate Bill 1731, which amends the "Hot Spots" Program, requires the Office of Environmental Health Hazard Assessment (OEHHA) to adopt risk assessment guidelines for the program using a full public review process. The modelling protocols outlined by the OEHHA do not apply to the proposed Project (refer Notice of "Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015") given that the Project is not subject to a 1401 Permit. The proposed Project would not be subject to the requirements of a Rule 1401 Permit (New Source Review of Toxic Air Contaminants) at this time.

The Project site is located in Southern California and the majority (if not all) of the diesel trucks travelling to and from the proposed Project would be employing *clean diesel trucks* to reduce diesel particulates. The U.S. trucking fleet is transitioning to newer clean diesel technology which translates into fuel savings, lower greenhouse gas emissions and a reduction in diesel particulate emissions. This newest generation of clean diesel trucks would have NO_x emissions that are 99 percent lower than older generations of larger trucks along with 98 percent fewer diesel particulate emissions, resulting in significant clean air benefits. Beginning in 2011, all heavy-duty diesel trucks sold had to meet NO_x emissions of no more than 0.20 grams per brake horsepower hour (g/BHP-hr.). This is in addition to particulate emissions levels of no more than 0.01 g/HP-hr. established in 2007. The new more restrictive emissions requirements, together with the SCAQMD's regulations limiting truck idling times to 5 minutes would mitigate potential impacts related to truck diesel emissions. While the use of "clean diesel" trucks were not identified as a mitigation, all heavy-duty trucks sold in California since 2011 must meet NO_x emissions of no more than 0.20 grams per brake horsepower hour (g/BHP-hr.). California will also require new trucks to be zero-emissions in 2040.

Furthermore, fugitive dust emissions during construction, which is responsible for PM₁₀ and PM_{2.5} emissions, would further be reduced through the implementation of SCAQMD regulations related to fugitive dust generation and other construction-related emissions.³² These SCAQMD regulations are standard conditions required for every construction Project undertaken in the City as well as in the cities and counties governed by the SCAQMD. *As a result, the impacts would be less than significant.*

D. Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)? • Less than Significant Impact with Mitigation.

Truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes (see Standard Condition AIR-2).³³ Adherence to the aforementioned regulations would minimize odor impacts from diesel trucks. In addition, the Project's contractors must adhere to SCAQMD Rule 403 regulations, which significantly reduce the generation of fugitive dust.

³² South Coast Air Quality Management District. *Rule 403, Fugitive Dust*. As Amended June 3, 2005.

³³ California, State of. *California Code of Regulations, Title 13, Section 2485 Airborne Toxic Control Measure to Limit Diesel- Fueled Commercial Motor Vehicle Idling*.

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be less than significant with mitigation incorporated.

The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding.³⁴ Mitigation Measure AIR-1 and Standard Condition AIR-3 would prevent any land uses that cause odors. *As a result, the impacts would be less than significant with mitigation incorporated.*

MITIGATION MEASURES

The following mitigation measure included in the air quality section would prohibit uses that would potentially cause odors:

Mitigation Measure AIR-1. All proposed uses of the site shall be reviewed by the City of Monrovia's Development Review Committee. No land uses that cause odors are allowed.

STANDARD CONDITIONS

Standard Condition AIR-1: Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the Project stipulates that, in compliance with SCAQMD Rule 402 and Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques from Rules 403 and 402 are as follows:

³⁴ South Coast Air Quality Management District. *CEQA Air Quality Handbook, Appendix to Chapter 9*. April 1993.

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

Standard Condition AIR-2: Prior to issuance of any Grading Permit, the City of Monrovia Public Works Department shall confirm that the Project complies with Mitigation Measure AIR-B of the *2021-2029 Housing Element Update, Safety Element Update, New Environmental Justice Element, and Zoning Text Amendment State Clearinghouse No. 2022080729 Final Initial Study and Mitigated Negative Declaration* to reduce diesel engine emissions of ozone precursors ROG and NO_x, particulate matter less than 10 microns in size (PM₁₀), particulate matter less than 2.5 microns in size (PM_{2.5}), and diesel particulate matter (DPM). The following measures shall be incorporated into all Project specifications to reduce diesel engine emissions of O₃ precursors including ROG and NO_x, PM₁₀, PM_{2.5}, and diesel PM:

- *Idling Restrictions.* Idling of diesel-powered vehicles and equipment shall not be permitted during periods of non-active vehicle use. Diesel-powered engines shall not be allowed to idle for more than 5 consecutive minutes in a 60-minute period when the equipment is not in use, occupied by an operator, or otherwise in motion, except as follows:
 - When equipment is forced to remain motionless because of traffic conditions or mechanical difficulties over which the operator has no control;

- When it is necessary to operate auxiliary systems installed on the equipment, only when such system operation is necessary to accomplish the intended use of the equipment;
- To bring the equipment to the manufacturer's recommended operating temperature;
- When the ambient temperature is below 40 degrees F or above 85 degrees F; or
- When equipment is being repaired.

Standard Condition AIR-3: Throughout operation of the Project, the Director of the City of Monrovia Community Development Department, or designee, shall *ensure* that the Project complies with applicable provisions of Section 8.10.030 of the City's Municipal Code, which requires that every person in control of the day-to-day operations at any commercial premise provide for the collection and proper disposal of solid waste at least once per week.

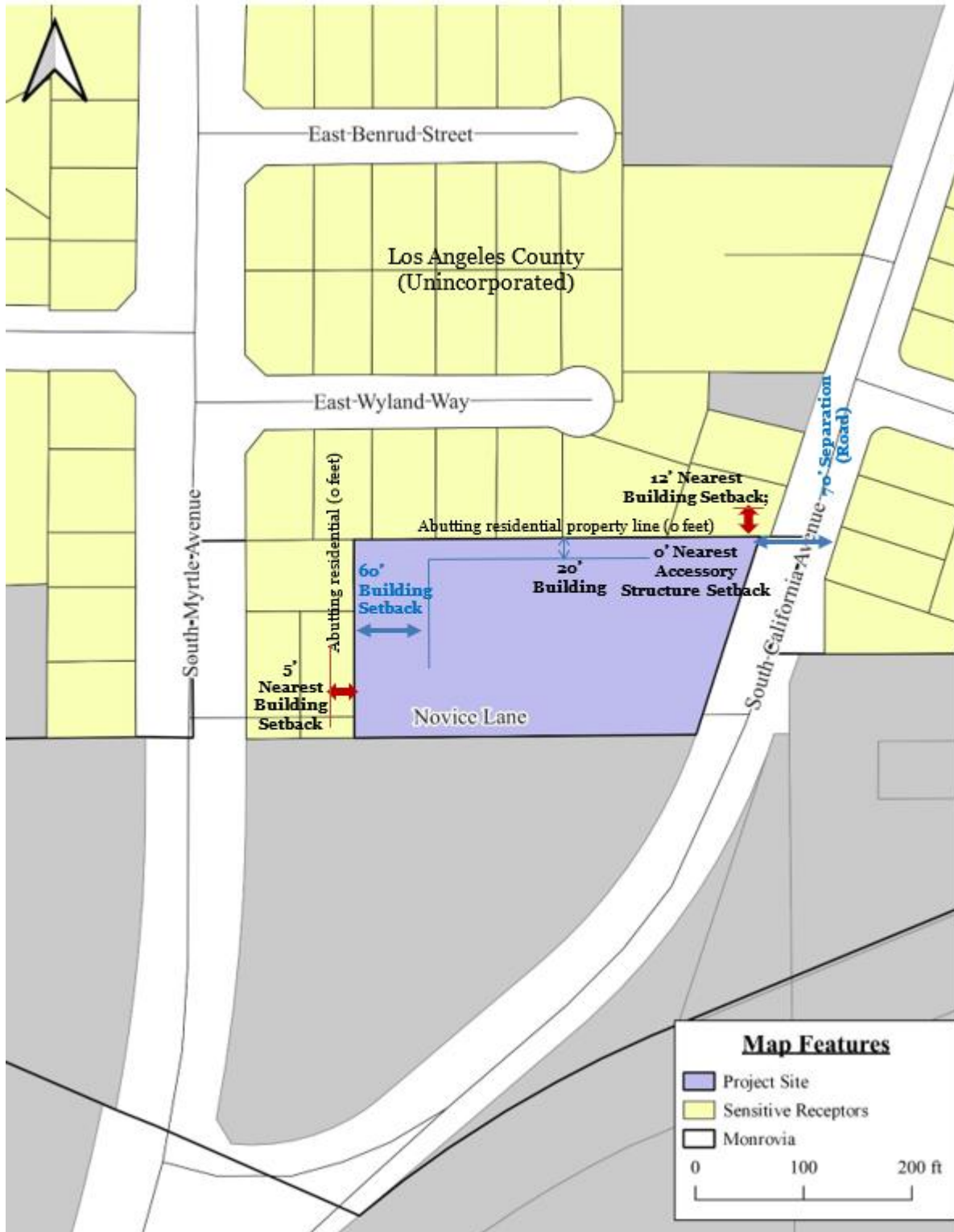


EXHIBIT 3-1 SENSITIVE RECEPTORS MAP

SOURCE: QGIS AND GOOGLE MAPS

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				×
B. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				×
C. Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				×
D. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				×
E. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				×
F. Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				×

METHODOLOGY

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are generally considered vulnerable and can become candidates for future listing as threatened or endangered.

A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDDB) Bios Viewer for the Monrovia Quadrangle indicated that there are nine federally- or State-recognized threatened or endangered species located within the Monrovia Quadrangle.³⁵ The majority of these threatened or endangered species are not likely to be found on-site due to the lack of suitable habitat. These species include:

³⁵ California Department of Fish and Wildlife. *Bios Viewer*. <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>

- The *California gnatcatcher* is not likely to be found on-site due to the lack of habitat suitable for the California gnatcatcher. The absence of coastal sage scrub, the California gnatcatcher's primary habitat, further diminishes the likelihood of encountering such birds.
- The *least Bell's vireo* lives in a riparian habitat, with a majority of the species living in San Diego County. As a result, it is not likely that any least Bell's vireos will be encountered in the Project area due to the lack of riparian habitat in the surrounding area.
- The *Santa Ana sucker* will not be found on-site because the Santa Ana sucker is a fish and there are no bodies of water present on-site.
- The *California red-legged frog* will not be found on or near the Project site due to its specific habitat requirements. According to the National Wildlife Federation, California red-legged frogs can be found near still or slow-moving ponds, pools, or streams (wetland areas). The chances of encountering this species within the Project site are limited since there are no natural wetlands or habitats present in the Area.
- The *Willow Flycatcher's* habitat consists of marsh, brushy fields, and willow thickets. These birds are often found near streams and rivers and are not likely to be found on-site due to the lack of marsh habitat.
- The *Braunton's Milkvetch* was not identified on-site. The only vegetation present on-site consists of ornamental species.
- The *Slenderhorned Spineflower* was not identified on-site. The only vegetation present on-site consists of ornamental species.
- The *Southern California Steelhead Trout* will not be found on-site since the Southern California Steelhead Trout is a fish and there are no bodies of water present on-site.
- The *Mountain Yellow Legged Frog* is found in the headwaters of streams or tributaries. As indicated previously, the Project site is located in the midst of an urban area. There are no bodies of water located on-site that would be capable of supporting populations of Mountain Yellow Legged Frog nor does the site have the capacity to form vernal pools during wet seasons.

The proposed Project would not impact the aforementioned species because the Project site is located in the midst of an urban area and the site was formerly developed and occupied. The site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site's boundaries.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot. The Project site is covered in patches of weeds and ruderal vegetation that is scattered throughout the Project site. No native or natural habitats are located within the Project site or within the surrounding area.³⁶ Animal life within the area consists of species commonly found in an urban area. The EIR prepared for the City's 2021 General Plan Update does not identify any protected species within the Project site.³⁷ However, the Monrovia General Plan Background Report noted several occurrences of threatened or endangered species as late as 1987. There are no recent occurrences. There are no other local or regional plans, policies, or regulations that identify candidate, sensitive or special status species except those identified by the California Department of Fish and Wildlife. The proposed Project would not impact the aforementioned species as the Project site is located in the midst of an urban area and the site was formerly developed and occupied. The site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site's boundaries. The Project site and the surrounding areas are not conducive to the survival of the aforementioned species due to the lack of suitable habitat. *As a result, no impacts would occur.*

B. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? • No Impact.

The surrounding areas are developed and the Project site was formerly developed and occupied. There are no local or regional plans, policies, or regulations that identify any riparian habitat or other sensitive natural community within the Project site, nor does the California Department of Fish and Wildlife identify any such habitat. A review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper confirmed that the nearest body of water is the Sawpit Wash, which is located approximately 250 feet south of the Project site (refer to Exhibit 3-2).³⁸ However, the concrete-lined Sawpit Wash is classified as a *riverine* channel that is primarily used as a flood control channel and is not classified as a wetland with any riparian value. *As a result, no impacts would occur.*

C. Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.

As previously mentioned, the Project site is located in the midst of an urbanized setting and no wetlands are located within the Project site boundaries. The construction and operation of the proposed Project would be limited to the Project site and would not affect any wetlands. *As a result, no impacts would occur.*

³⁶ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was conducted on June 13, 2022 and September 15, 2023. Survey updated periodically in 2024, 2025, and 2026.

³⁷ City of Monrovia. *City of Monrovia General Plan Amendment*. March 2021.

³⁸ U.S. Fish and Wildlife Service. National Wetlands Inventory – V2. <https://www.fws.gov/Wetlands/data/Mapper.html>.

D. *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? • No Impact.*

There are no areas of natural open space or areas of significant biological value within or adjacent to the Project site. In addition, there are no bodies of water that could provide a habitat for migratory birds. As indicated on the National Wetlands Inventory, the Sawpit Wash is classified as a riverine but does not serve as a wetland in the City of Monrovia. The Sawpit Wash, located approximately 250 feet southeast of the Project site, is a concrete-lined flood control channel. The proposed development would not impact the existing flood channel. Therefore, the proposed Project would not infringe upon any bodies of water or habitats. The Project site does not function as a migratory corridor for the movement of native or migratory animals since there are no areas of natural open space within one mile of the Project site. Constant disturbance (noise and vibration) from vehicles traveling on the adjacent roadways further limit the Project site's utility as a migration corridor. The proposed Project would not affect wildlife migration in the area or otherwise impede the use of native wildlife nursery sites. *As a result, no impacts would occur.*

E. *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • No Impact.*

Oak Trees are designated by the City for preservation under Section 17.20.040 of the City's Municipal Code. According to that section of the Municipal Code, the preservation of healthy oak trees is necessary to preserve the present scenic beauty and heritage of Monrovia, maintain property values, and promote conservation of natural resources. The proposed Project's implementation would not involve the removal of any oak trees, or street trees. No such trees are located within the Project site. *As a result, no impacts would occur.*

F. *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? • No Impact.*

The City of Monrovia designated 1,416 acres of City owned land in 2016 for the creation of the Monrovia Hillside Wilderness Preserve. This preserve is located in the northernmost portion of the City along the base of the San Gabriel Mountains. The proposed Project's implementation would not affect the Monrovia Hillside Wilderness Preserve since the proposed development site is currently undeveloped and covered in ruderal vegetation and broken hardscape. The Project is also located more than four miles south of the Monrovia Hillside Wilderness Preserve. Daily operations such as the loading and unloading of trucks would be limited to the Project site and the proposed Project's operation would not affect the Monrovia Hillside Wilderness Preserve. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis indicated that the proposed Project would not result in any significant adverse impacts on biological resources. As a result, no mitigation measures are required.

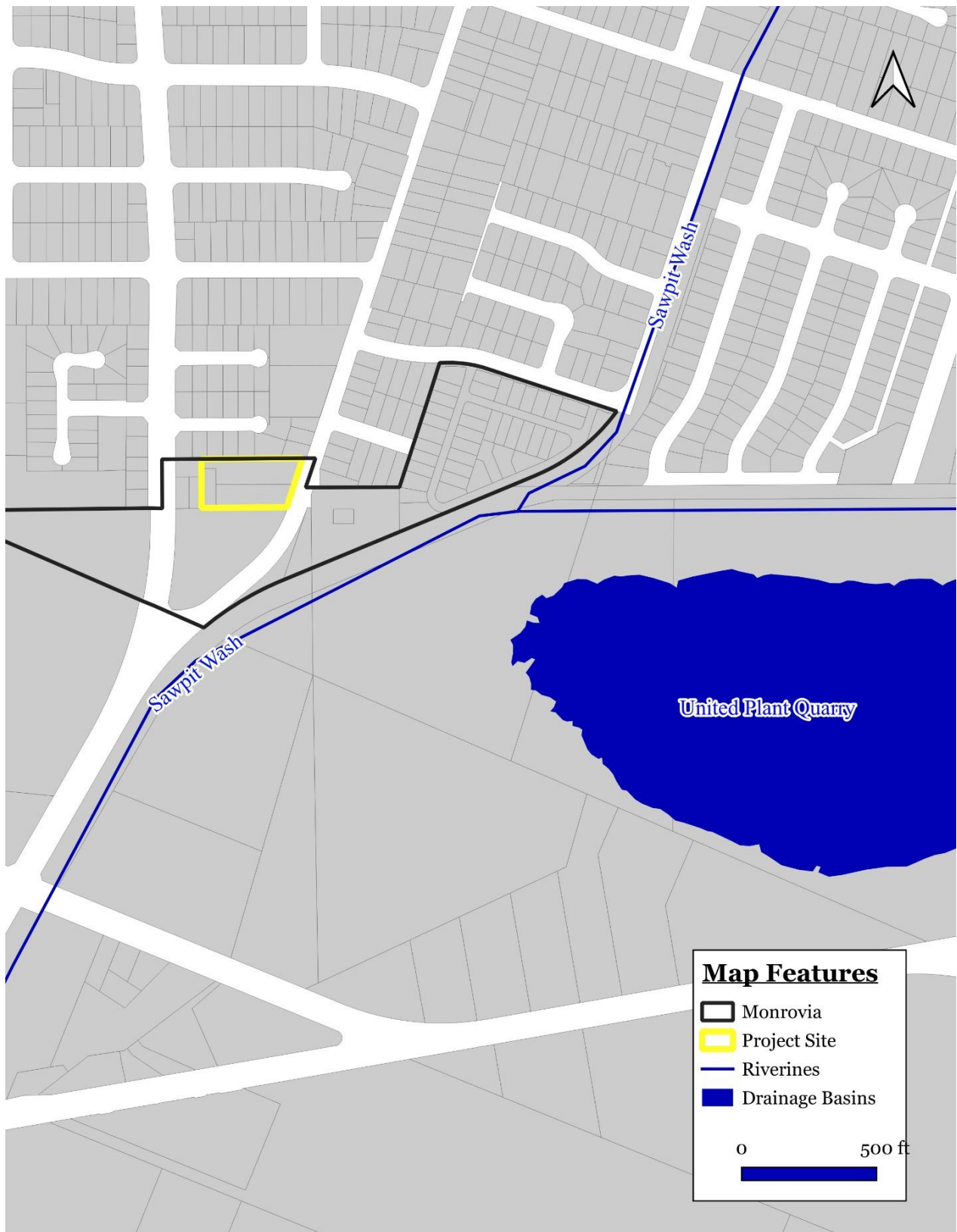


EXHIBIT 3-2 WETLANDS MAP
SOURCE: NATIONAL WETLANDS INVENTORY

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				×
B. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		×		
C. Would the Project disturb any human remains, including those interred outside of formal cemeteries?		×		

METHODOLOGY

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects 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,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;

- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.³⁹

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. A site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. The California State Historic Preservation Office (SHPO) maintains an inventory of those sites and structures that are considered to be historically significant. Finally, the U.S. Department of Interior has established specific Federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places.⁴⁰

To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. State historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, which is historically or archaeologically significant. The State regulations that govern historic resources and structures include Public Resources Code (PRC) Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is the principal statute governing the environmental review of Projects in the State.

In 1995, the Monrovia City Council adopted the Historic Preservation Ordinance (HPO). In addition to the criteria and regulations for local historic landmarks, the Ordinance established a Historic Preservation Commission (HPC) to provide oversight of the program. The HPC consists of seven Monrovia citizens appointed by the City Council to a three-year term. The centerpiece of the HPO is the designating of local historic landmarks. There are currently 169 properties that have been determined to be historically significant based on one of the seven criteria in the HPO. The Planning Division is responsible for the day-to-day administration of the Historic Preservation Program. The City of Monrovia Land Use Element also has several criteria for development standards:⁴¹

³⁹ U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. <https://www.nps.gov/subjects/nationalregister/database-research.htm>. 2010.

⁴⁰ U.S. Department of the Interior, National Park Service. *National Register of Historic Places*. <https://www.nps.gov/subjects/nationalregister/index.htm>. 2010.

⁴¹ City of Monrovia. *Land Use Element*. Updated March 2021.

Goal 9 Preserve the character of existing neighborhoods and historic residences.

Policy 9.1 Continue to implement the historic preservation ordinance for designating, preserving, safeguarding historic structures, and creating historic districts in the city.

Policy 9.6 Encourage the continued effort in the downtown to preserve its historic quality. New development shall be designed in harmony with existing buildings.

The Project site is not included on a list of historic resources compiled by the either the City, State or the United States Department of the Interior, National Park Service.⁴²

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? • No Impact.*

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot.

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. California Points of Historical Interest have a similar definition, except they are deemed of local significance. The Project site is not located in areas that meet any of the National or State criteria and are not listed on the National or State Historic Register. A historic resource analysis was prepared by Urbana Preservation & Planning LLC for this Project site and has found the residential structures that formerly occupied the western portion of the Project site to be culturally insignificant.⁴³ Furthermore, the City of Monrovia Historic Preservation Commission approved the historic assessment and a DPR form for the properties, which was assigned a California Historical Resource Status (CHRS) code of 6Z to each property on February 23, 2022. The proposed Project would be limited to the Project site and would not affect any existing resources listed on any historical register or those identified as being eligible for listing on a historical register. *As a result, no impacts would occur.*

B. *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.*

The greater Los Angeles Basin was previously inhabited by the Gabrieleño people, named after the San Gabriel Mission. The Gabrieleño tribe has lived in this region for around 6,958 years. Prior to Spanish contact, approximately 5,421 Gabrieleño people lived in villages throughout the Los Angeles Basin. Villages were typically located near major rivers such as the San Gabriel, Rio Hondo, or Los Angeles Rivers. In the unlikely event that human remains are uncovered by construction crews and/or the Native American Monitors, all excavation and grading activities shall be required to stop, and the City of Monrovia Police Department would be contacted (the Department would then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological

⁴² National Park Service. *National Register of Historic Places*. <https://www.nps.gov/subjects/nationalregister/index.htm>. Website accessed May 15, 2023.

⁴³ Historic Resource Analysis Report 213-217 Novice Lane Monrovia Ca. Urbana Preservation & Planning LLC.

resources and their salvage. As part of the AB-52 requirements, the Gabrieleno Band of Mission Indians – Kizh Nation responded and indicated that the Project area is located within the Tribe’s ancestral territory. The Tribe considers the area to be sensitive for cultural resources, and requested the mitigation in Mitigation Measure CUL-1 to be included to have a qualified Native American Monitor on-site during construction-related ground disturbance activities. *As a result, the impacts would be less than significant with mitigation incorporated.*

C. Would the Project disturb any human remains, including those interred outside of formal cemeteries? • Less than Significant Impact with Mitigation.

In the unlikely event that human remains are uncovered by construction crews and/or the Native American Monitors, all excavation/grading activities shall be halted and the City of Monrovia Police Department would be contacted (the Department would then contact the County Coroner). Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. Adherence to *Mitigation Measure CUL-2* would ensure the potential impacts would be less than significant. There are no cemeteries located within or adjacent to the Project site. The closest cemetery is approximately 3,500 feet north of the Project site, Turner & Stevens Live Oak Mortuary & Memorial Park. The proposed Project’s construction is unlikely to uncover human remains due to the limited excavation that is to be performed in the designated sites. Notwithstanding, the requirement is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4) and is included as Mitigation Measure CUL-2. Additionally, Section 5097.98 of the Public Resources Code states:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with(b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

As a result, the impacts would be less than significant with mitigation incorporated.

MITIGATION MEASURES

The Gabrielino-Kizh Nation indicated that the Project area is located within the Tribe's ancestral territory. The Tribe considers the area to be sensitive for cultural resources, and requests the following mitigation measures be implemented:

Mitigation Measure CUL-1. The Project Applicant would be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, potholing or auguring, boring, grading, excavation, and trenching, within the Project area. The monitor(s) must be approved by the tribal representatives and would be present on-site during the construction phases that involve any ground disturbing activities. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

Mitigation Measure CUL-2. In the event cultural resources are encountered during construction, the contractor(s) shall comply with California Code of Regulations (CCR) Section 15064.5(b)(4) which states that "A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures."

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?			✗	
B. Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✗

METHODOLOGY

Energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod in Attachment A of Appendix A (Air Quality, Greenhouse Gas, and Energy Impact Analysis). In addition, it was assumed the new building would be constructed pursuant to the 2022 CALGreen standards, which was considered in the CalEEMod inputs.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot. Existing power utilities include an overhead electrical line and an underground gas line located along the north side of the Project site. All connections would be through underground service connections. Existing infrastructure exists in the South California Avenue right-of-way (ROW). Southern California Edison and SoCal Gas would need to approve the location and engineering details of electrical and gas extensions, respectively, to supply the proposed Project.⁴⁴ Table 3-5 provided below provides an estimate of electrical and natural gas consumption for the proposed Project. As indicated in the table, the proposed Project is estimated to consume approximately 185,000 kilowatts (kWh) of electricity and 534,471 cubic feet of natural gas on an annual basis. The energy and natural gas consumption were estimated using default energy intensities by building type in CalEEMod in Attachment A of Appendix A (Air Quality, Greenhouse Gas, and Energy Impact Analysis).

TABLE 3-5 ESTIMATED ANNUAL ENERGY CONSUMPTION

Project	Electricity	Natural Gas
Unrefrigerated Warehouse-No Rail	116,541 kWh/year	479,976 kBTU/year
General Office Building	38,314 kWh/year	54,495 kBTU/year
Parking Lot	30,145 kWh/year	0 kBTU/year
Project Totals	185,000 kWh/year	534,471 kBTU/year

Source: Attachment A, Appendix A, CalEEMod V 2022.1.1.39.

⁴⁴ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

According to the California Commercial End-Use Survey that was prepared for the California Energy Commission, the biggest single end use with warehouse uses is interior lighting, followed by cooling and ventilation.⁴⁵ The report also indicates that heating accounts for most of the natural gas consumption. It is important to note that the proposed Project would include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2022 California Building and Green Building Code requirements. The proposed Project would be constructed in accordance with the City's Building Code requirements and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. The proposed Project would include new light standards and fixtures that would be used as operational and security lighting and would conform to all state and local building code and lighting regulations. *As a result, the impacts would be less than significant.*

B. Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? • No Impact.

The California Public Utilities Commission prepared an updated Energy Efficiency Strategic Plan in 2011 with the goal of promoting energy efficiency and a reduction in Greenhouse Gases (GHG). Assembly Bill 1109, which was adopted in 2007, also serves as a framework for lighting efficiency. This bill would require the State Energy Resources Conservation and Development Commission to adopt minimum energy efficiency standards structured to reduce average statewide electrical energy consumption by not less than 50% from the 2007 levels for indoor residential lighting and not less than 25% from the 2007 levels for indoor commercial and outdoor lighting by 2018. According to the Energy Efficiency Strategic Plan, lighting comprises approximately one-fourth of California's electricity use while nonresidential sector exterior lighting (parking lot, area, walkway, and security lighting) usage comprises 1.4% of California's total electricity use, much of which occurs during limited occupancy periods.⁴⁶ As indicated in the previous subsection, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Therefore, the proposed Project would not conflict with or obstruct the state's goal of promoting energy and lighting efficiency. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis determined that the proposed Project would not result in significant impacts related to energy and mitigation measures are not required.

⁴⁵ Intron. *California Commercial End-Use Survey*. Report dated March 2006.

⁴⁶ California Public Utilities Commission. *Energy Efficiency Strategic Plan*. Plan updated January 2011.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides?			✗	
B. Would the Project result in substantial soil erosion or the loss of topsoil?			✗	
C. Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			✗	
D. 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?			✗	
E. Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✗
F. Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✗		

METHODOLOGY

Public safety planning generally focuses on how an agency or community members would prepare for, respond to, and/or recover from a disaster. Hazard mitigation planning focuses on how the impact of a disaster might be lessened. The City of Monrovia Safety Element was adopted in 2022. The City of Monrovia adopted the 2017 Local Hazard Mitigation Plan (LHMP) and is currently being updated. The LHMP includes an assessment of the City's risk related to natural hazard impacts such as drought, seismic events, extreme heat, and flooding. The LHMP also includes a comprehensive set of actions the City would complete to mitigate, or reduce, the impacts of those hazards. Following the 1971 San Fernando earthquake, the State legislature passed the Alquist-Priolo Earthquake Fault Zoning (AP) Act, which regulates developments near known active faults due to hazards associated with surface ruptures. Pursuant to the Alquist-Priolo Earthquake Fault Zoning Act, development areas in or near the Alquist-Priolo Earthquake Fault Zone require evaluation for potential surface ruptures in order to ensure public safety. The State legislature passed the Seismic Hazards Mapping Act (SHMA) to ensure public safety in regard to the effects of strong ground shaking, liquefaction, landslides, and other seismic hazards. Pursuant to the SHMA, the California Geological Survey (CGS) has established a statewide mapping program for cities and counties to aid in identifying areas subject to these seismic hazards. The California Building Code (CBC) provides procedures for earthquake resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. The seismic design parameters presented below are based on the soil profile and the proximity of known faults with respect to the subject site. Based on standards in place at the time of the various studies, the proposed development is required to be designed in accordance with the requirements of the 2022 edition of the CBC, which was

adopted on January 1, 2023.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides? • Less than Significant Impact.*

The City is located in a seismically active region. Many major and minor local faults traverse the entire Southern California region, posing a threat to millions of residents, including those who reside in the City. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.⁴⁷ A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Monrovia is on the list.⁴⁸ Fault traces that traverse the City are connected to two fault zones. It is important to note that while the City contains two fault traces, the Project site is not within any of the two Alquist-Priolo Zones and would not directly be impacted by fault rupture. These faults include the Raymond Fault, located 2.9 miles to the northwest of the Project site and the Sierra Madre Fault, located 2.5 miles northeast of the Project site (refer to Exhibit 3-3). The impacts from fault rupture would be no greater for the Project site than for the surrounding areas. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The proposed improvements would be constructed in compliance with the 2022 Building Code, which the city adheres to, which contains standards for building design to minimize the impacts from ground shaking. Other potential seismic issues include ground failure, liquefaction, and lateral spreading. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The Project site is not located within a liquefaction zone (refer to Exhibit 3-3). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid and the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. Lastly, the Project site is not subject to the risk of landslides (refer to Exhibit 3-3). Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading would not affect the proposed Project since the Project site is not located within an area that may be subject to liquefaction. Therefore, lateral spreading caused by liquefaction would not affect the proposed Project. Lastly, the underlying soils are not prone to shrinking and swelling (refer to Section 3.7.2.D). *As a result, the impacts would be less than significant.*

⁴⁷ California Department of Conservation. *What is the Alquist-Priolo Act.* <https://www.conservation.ca.gov/cgs/alquist-priolo>.

⁴⁸ California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp>.

B. Would the Project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.

According to the soil maps prepared for Los Angeles County by the United States Department of Agriculture, the Project site is underlain by soils comprised primarily of Urban Land, Palmview, Tujunga, San Emigdio, and Typic Xerothents soil associations. These soils have a slight erosion hazard; however, current development and the placement of landscaping have reduced the soil's erosion risk. In addition, limited excavation would be required for the clearance of the site, and the installation of the new building footings and utility connections. The proposed Project would not present a new runoff or erosion risk because the Project site is currently paved and the new buildings would not introduce new significant impermeable land cover to the Project site. *As a result, the impacts would be less than significant.*

C. Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? • Less than Significant Impact.

The UC Davis SoilWeb soil survey was consulted to determine the nature of the soils that underlie the Project site. According to the SoilWeb, the site is underlain by Urban Land, Palmview, Tujunga, San Emigdio, and Typic Xerothents complex soils. These soils are excessively drained and are characterized by very slow runoff and very rapid permeability. The entire Project site is, and would continue, to remain level and covered over in impervious surfaces. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading would not affect the proposed Project because the Project site is not located within a liquefaction zone. The soils that underlie the Project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics expand according to the moisture content present at the time. Since the underlying soils are not prone to shrinking and swelling, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading would be further reduced since the proposed Project's implementation would not require grading and excavation that would extend to depths required to encounter groundwater. In addition, the proposed Project would not result in the direct extraction of groundwater located below ground surface (BGS) since it would continue to be connected to the City's water system. As stated previously, the soils that underlie the Project site are not prone to subsidence. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink. No groundwater would be drained to accommodate the implementation of the proposed Project. In addition, the proposed Project would not result in the direct extraction of groundwater located below ground surface (BGS). Therefore, the likelihood of on-site subsidence is remote. *As a result, the impacts would be less than significant.*

D. 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.

The shrinking and swelling of soils is influenced by the amount of clay present in the underlying soils.⁴⁹ If soils consist of expansive clay, damage to foundations and structures may occur.

⁴⁹ Natural Resources Conservation Service Arizona. *Soil Properties Shrink/Swell Potential*. http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/az/soils/?cid=nrcs144p2_065083.

As previously mentioned, the Project site is underlain by soils comprised primarily of Urban Land, Palmview, Tujunga, San Emigdio, and Typic Xerothents associations. These soils are described as being used almost exclusively for development, as evident by the current level of urbanization present within the Project site and surrounding areas. The soils that underlie the Project site consist of a very small percentage of clay.⁵⁰ The local and State regulations mentioned throughout this section (Section 3.7) would further minimize potential geologic impacts. *As a result, the impacts would be less than significant.*

E. 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 septic tanks would be used in conjunction with the proposed Project. The proposed Project would connect with the sanitary sewer system located in Novice Lane easement. *As a result, no impacts would occur.*

F. Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? • Less than Significant Impact with Mitigation.

The likelihood of the discovery of paleontological resources or site or unique geologic features is considered to be low given the extensive ground disturbance that has occurred throughout the City. The upper sediments that underlie the Project area consist of younger Quaternary Alluvium, which have a low paleontological sensitivity. These younger sediments, however, overlie Older Quaternary Alluvium which is considered to be sensitive.⁵¹ The likelihood of the discovery of paleontological materials would increase where the excavations would extend into the Older Quaternary Alluvium. In the event that intact paleontological resources are located within the Project site, ground-disturbing activities associated with construction of the proposed Project have the potential for destroying a unique paleontological resource or site. In the absence of mitigation, the potential damage to paleontological resources or sites during Project construction would be a potentially significant impact. Therefore, Mitigation Measure GEO-1 is required. *As a result, the impacts would be less than significant with mitigation incorporated.*

MITIGATION MEASURES

The potential damage to paleontological resources or sites during Project construction would be a potentially significant impact. Therefore, the following mitigation is required:

Mitigation Measure GEO-1. Prior to commencement of any grading activity on site, the Applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Community Development Director, or designee. The qualified paleontologist shall be on-site during grading and other significant ground disturbance activities that impact Pleistocene alluvial deposits, which could occur at depths below six feet. The monitoring shall apply to the areas of the site where excavation shall extend at depths of six feet or more.

⁵⁰ UC Davis. *SoilWeb: Soil Survey Browser*. <https://casoilresource.lawr.ucdavis.edu/gmap/>.

⁵¹ Los Angeles, City of. *L.A. CEQA Thresholds Guide. Section D.1 Paleontological Resources*. <http://www.environmentla.org/programs/Thresholds/D-Cultural>.

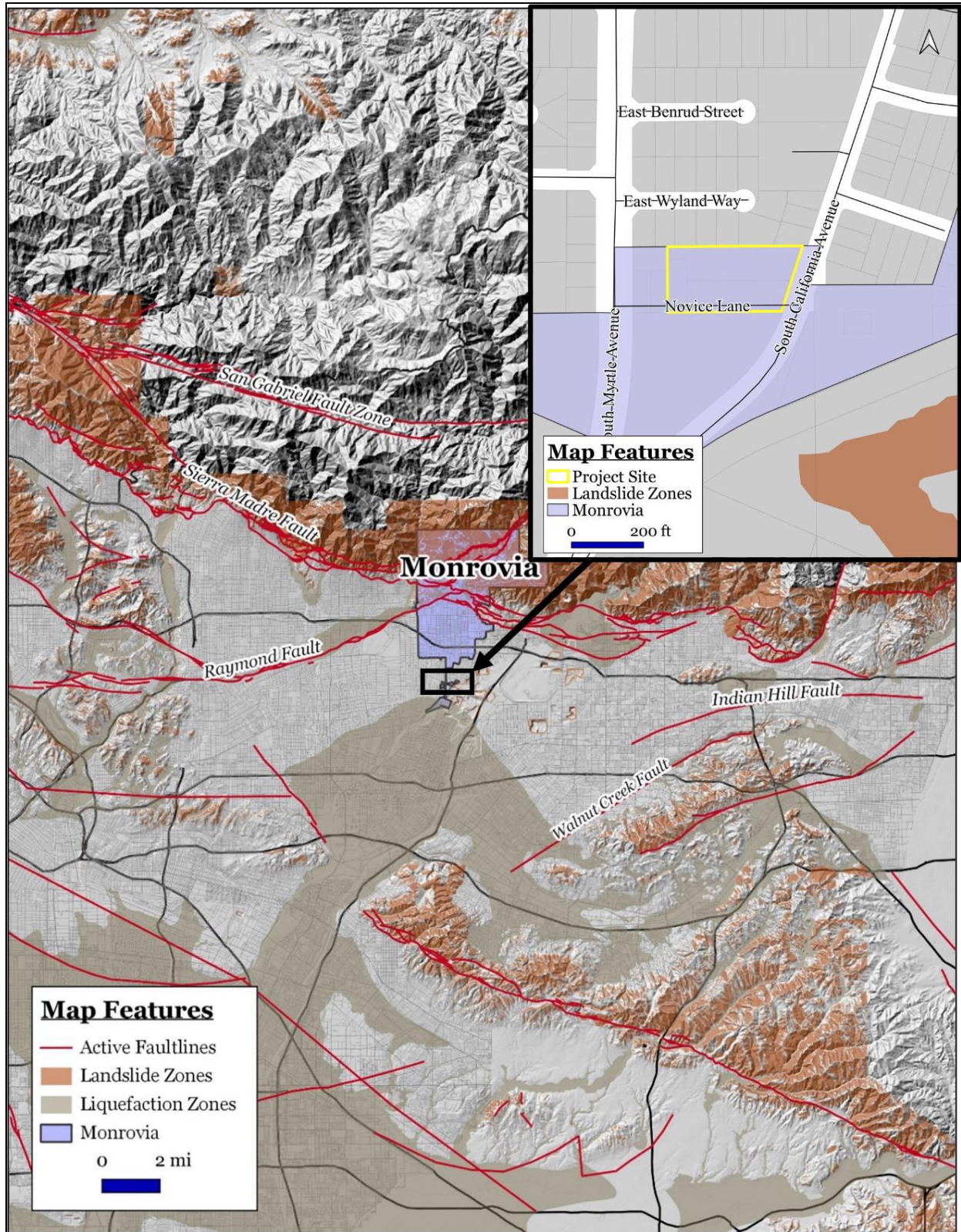


EXHIBIT 3-3 GEOLOGIC HAZARDS MAP
 SOURCE: UNITED STATES GEOLOGICAL SURVEY

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			×	
B. Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				×

METHODOLOGY

The SCAQMD has adopted Interim GHG thresholds for development Projects within the South Coast Air Basin. The Project would be less than significant if Project emissions are below one of the following screening thresholds⁵²:

- *Residential and Commercial land uses*: 3,000 MTCO₂e per year; or,
- *Industrial /Stationary land uses*: 10,000 MTCO₂e per year; or,
- Based on land use type: residential: 3,500 MTCO₂e per year; commercial: 1,400 MTCO₂e per year; mixed use: 3,000 MTCO₂e per year.

For the proposed Project, the threshold that will be used is 10,000 MTCO₂e per year. The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHGs that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to “hold” more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. When water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation. This will allow less energy to reach the Earth’s surface thereby affecting surface temperatures.

⁵² South Coast AQMD. CEQA Significance Thresholds. <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>.

- *Carbon Dioxide (CO₂)*. The natural production and absorption of CO₂ is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO₂ include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased the atmospheric concentrations of CO₂ with a similar percentage contribution for the increase during the period 2000 to 2010.
- *Methane (CH₄)*. CH₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO₂. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO₂, N₂O, and Chlorofluorocarbons (CFCs)). CH₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other human-related sources of methane production include fossil-fuel combustion and biomass burning.
- *Nitrous Oxide (N₂O)*. Concentrations of N₂O also began to increase at the beginning of the industrial revolution. N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is also commonly used as an aerosol spray propellant.
- *Chlorofluorocarbons (CFC)*. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.
- *Hydrofluorocarbons (HFC)*. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. HFCs are manmade and used for applications such as automobile air conditioners and refrigerants.
- *Perfluorocarbons (PFC)*. PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.
- *Sulfur Hexafluoride (SF₆)*. SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF₆ has the highest global warming potential of any gas evaluated; 23,900 times that of CO₂. SF₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O).

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot.⁵³ Industrial and warehousing uses are only permitted under the PD-19 zoning designation. The Project would be limited to warehouse use only. The State of California requires CEQA documents include an evaluation of greenhouse gas (“GHG”) emissions or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler.

The passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, established the California target to achieve reductions in GHG to 1990 GHG emission levels by the year 2020.⁵⁴ The SCAQMD has established a single quantified threshold of 10,000 metric tons of CO₂e (MTCO₂e) per year for new industrial development.⁵⁵

Carbon dioxide equivalent, or CO₂e, is a term that is used for describing different greenhouses gases in a common and collective unit. Table 3-6 summarizes annual greenhouse gas emissions from the construction and operation of the proposed Project. As indicated in Section 3.6, Energy, A, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Table 3-6 summarizes annual GHG (CO₂e) emissions from the construction and operation of the proposed warehouse Project.

⁵³ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

⁵⁴ California, State of. OPR Technical Advisory – *CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review*. June 19, 2008.

⁵⁵ SCAQMD. *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15*.

https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.39_SCAQMD%20GHG%20Meeting%2015.pdf.

TABLE 3-6 GREENHOUSE GAS EMISSIONS INVENTORY

Source	GHG Emissions (metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Long-Term – Mobile Emissions	75.7	--	0.09	76.8
Long-Term - Area Emissions	0.55	--	--	0.55
Long-Term - Energy Emissions	73	0.01	--	73.2
Long-Term – Waste Emission	12.2	0.20	--	18.7
Long-Term – Water Emissions	2.27	0.23	--	7.93
Long-Term - Total Emissions	163.8	0.44	0.09	177.2
Total Construction Emissions	170.7	0.01	0.01	173.7
Construction Emissions Amortized Over 30 Years				5.79
Operational Emissions w/ Amortized Construction				182.99
Significance Threshold for Warehouse/Industrial				10,000

Source: Attachment A, Appendix A, CalEEMod V.2022.1.1.39

As indicated in Table 3-6, the CO₂e operational emissions with amortized total for the proposed Project is 182.99 MTCO₂e per year. Since the proposed Project's construction and operational emissions would be below the quantified threshold of significance. *As a result, the impacts would be less than significant.*

B. Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? • No Impact.

AB 32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28 percent reduction in "business as usual" GHG emissions for the entire State. The proposed Project would not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no significant adverse impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are anticipated. The City of Monrovia's Energy Action Plan was made to establish energy conservation and GHG reduction goals with a strong goal of achieving a 25% reduction in greenhouse gas emissions by 2030 within the Plan's Section 4. In this section, policies such as rebate programs, Federal Tax incentives, and bond measures are introduced to achieve this goal. Another even more significant strategy is to use long-term Power Purchase Agreements (PPA) which is legal agreements/contracts between the organizations to buy power from a company for 10-20 years. Often the PPA can be paid off sooner since the energy savings can be used to reduce the time of the contract. Along with this legal contract, there are economic and accounting analytical tools called "life cycle analysis" which can provide details as to the Return on Investment (ROI) and measure the time along with "externalities" (e.g., other costs) to pay for the renewable energy systems. A more recent strategy has come from the Clinton Climate Initiative (CCI) in Washington DC whereby private companies that contract for energy services are identified and screened in order to bid and contract for renewable energy and demand management services to non-profit or government organizations. This approach also includes low interest financing and bank support to communities. Soon some pilot Projects would be identified and tested in Southern California.⁵⁶ The City of Monrovia's Environmental Justice Element also includes the following policy and programs with respect to climate change:

- *Policy 4.2:* Improve air quality conditions and minimize air quality impacts on sensitive population groups, by reducing point source emissions (ozone, small particulate matter, diesel particulates),

⁵⁶ City of Monrovia. *Energy Action Plan*.
<https://www.cityofmonrovia.org/home/showpublisheddocument/774/636210502321300000> June 2008.

particularly in the environmental justice community.

- *Program 4.2.1:* Collaborate with industrial businesses to improve outdoor air quality through enhanced operations and other pollution reduction measures where possible.
- *Program 4.2.2:* Encourage smoke-free workplaces, multi-family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke and coordinate with local advocacy groups to identify more potential smoke-free areas.
- *Program 4.2.3:* Continue to support the efforts of the South Coast Air Quality Management District (SCAQMD) to identify, monitor, and reduce air pollutants.
- *Program 4.2.4:* Require new sensitive land uses to include feasible measures such as setbacks, landscaping, ventilation systems, and other effective measures to minimize potential impacts from air pollution.
- *Program 4.2.5:* Maintain designated truck routes to avoid residential areas and other sensitive areas, especially in the environmental justice community.
- *Program 4.2.6:* Preserve and enhance natural landscapes and tree canopies in and around the environmental justice community to minimize air pollution impacts and heat exposure. Promote the use of drought tolerant and native species in landscaped areas.
- *Program 4.2.7:* Support programs promoting the installation of electric vehicle charging stations within public parking lots and continue to explore removing barriers for private entity installations.
- *Policy 4.3:* Protect sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure, particularly in the environmental justice community.
- *Program 4.3.1:* Limit the siting and construction of new large-scale hazardous waste producers and facilities on or near sensitive land uses in and around the environmental justice community.
- *Program 4.3.2:* Continue to ensure compatibility between sensitive land uses and heavy industrial uses and other potentially harmful facilities.

The proposed Project's implementation would not adversely impact the above environmental justice policies and programs. As indicated in Table 3-6, the CO₂e operational emissions with amortized total for the proposed Project is 182.99 MTCO₂e per year. Of this total figure, 76.8 MTCO₂e per year would come from mobile emissions. Three truck loading docks would be provided. For purposes of this analysis, the CalEEMod computer analysis assumed an average trip length of 10.52 miles per trip. As indicated previously, the construction and operation of the proposed Project would result in the generation of a limited number of emissions that would be below the SCAQMD's thresholds (refer to Table 3-4). As indicated in Section 3.6, Energy, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed Project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			×	
B. Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			×	
C. Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				×
D. Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			×	
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. Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			×	
G. Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				×

METHODOLOGY

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot. Limited amounts of some hazardous materials, primarily fuels lubricants, and architectural coatings, would be used in the short-term construction phases of the site's

development. The use and the transport of these chemicals and other hazardous materials would be required to adhere to Federal, State, and local standards and regulations for handling, storage, and disposal of hazardous substances. With compliance with the existing Federal, State and local procedures that are intended to minimize potential health risks associated with their use, impacts associated with the handling, storage, and transport of these hazardous materials during construction would be less than significant.

While the specific occupant is not known at this time, if any of the proposed Project's future warehouse tenants are involved in the transport, use, storage, and disposal of hazardous materials, the tenant would need to comply with Federal, State, and local regulations regarding hazardous materials. The future tenants would need to comply with the EPA's Hazardous Materials Transportation Act, Title 42, Section 11022 of the United States Code and Chapter 6.95 of the California Health and Safety Code which requires the reporting of hazardous materials when used or stored in certain quantities. Additionally, the future tenant would need to file a Hazardous Materials Disclosure Plan and a Business Emergency Plan to ensure the safety of the employees and citizens of Monrovia. *As a result, with compliance with local, State and Federal regulations, any short-term construction impacts or long-term impacts due to the handling of hazardous materials would be less than significant.*

B. Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact.

The Project's construction would require the use of diesel fuel, solvents, architectural coatings, and equipment lubricants. The Project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List) or the California Department of Toxic Substances Control's Envirostor database. Additionally, the site is not listed on the Leaking Underground Storage Tank database (LUST), or the U.S. EPA's multi-system search. Therefore, the proposed Project's implementation would not create significant hazards involving the transport and removal of residual contamination.

The City of Monrovia Fire Department (MFD) regulates and enforces the provisions of the Uniform Fire Code relating to hazardous materials, including the use and storage of hazardous materials that are ignitable, reactive, corrosive, or toxic. Businesses using such materials are subject to permitting and inspection. The City currently requires any new business that intends to handle hazardous materials to inventory their hazardous materials and requires them to allow SBCFD to review their hazardous materials processes and procedures, prior to the execution of various required business permits. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the local authorities and the State Office of Emergency Services regarding any release or threatened release of a hazardous materials. While the Project's specific occupant is not known at this time, should the Project's operation require the use of hazardous materials beyond what is typically used in a warehouse setting for routine cleaning and maintenance, the tenant would need to comply with local, State and Federal regulations once the proposed Project is occupied. In addition, the new building would include sprinklers that would adhere to the City of Monrovia Fire Department standards. *As a result, with compliance with local, State and Federal regulations, impacts due to the use of hazardous materials would be less than significant.*

C. Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • No Impact.

No schools are located within one-quarter mile (1,320 feet) of the proposed Project site. The Plymouth Elementary School (1300 Boley Street) is located 1,600 feet southwest of the Project site. *As a result, no impacts would occur.*

D. Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? • Less than Significant Impact.

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the California Department of Toxic Substances Control. Twelve Cortese sites are located in the City of Monrovia, with Mercury Recovery Services being the closest to the Project site at 0.9 miles away.⁵⁷

The San Gabriel Groundwater Basin has been under environmental investigation since 1979 when groundwater contaminated with volatile organic compounds (VOCs) was first identified. The groundwater contamination resulted from the historic use and improper handling and disposal of chlorinated solvents [such as tetrachloroethene (PCE) and trichloroethene (TCE)] and other chemicals (other VOCs, 1,4-dioxane, perchlorate, NDMA). The United States Environmental Protection Agency (USEPA) believes that the contamination initially stemmed from an increase in industrial activity during and after World War II. In May 1984, the USEPA listed four broad areas of regional-scale groundwater contamination within the Basin on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Since listing the San Gabriel Valley Superfund Sites, USEPA has been working to address the groundwater contamination on a regional scale through installation and operation of groundwater extraction systems that control the contaminant migration. Extracted groundwater is treated to safe levels and, if feasible, is reused for drinking water supply. Although the groundwater cleanup activities started in the 1990's, and progress has been made, the groundwater contamination in the San Gabriel Valley is extensive and would require multiple decades to remediate. Therefore, no site-specific impacts would occur upon the implementation of the proposed Project because the contamination is regional and under remediation. *As a result, the impacts would be less than significant.*

E. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area? • No Impact.

The Project site is not located within two miles of a public airport. The closest airport to the Project site is the San Gabriel Valley Airport, located 2.45 miles to the southwest in the City of El Monte. The proposed Project would not introduce any new building or structure that would interfere with the approach and take-off of aircraft utilizing the airport. *As a result, no impacts would occur.*

⁵⁷ California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). <https://dtsc.ca.gov/dtscs-cortese-list/>

F. Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? • Less than Significant Impact.

At no time during Project construction, would any adjacent public street (California Avenue) be completely closed to traffic. The construction plans must identify specific provisions for the regulation of construction vehicle access to the Project site during as a means to provide continued through-access and prevent street blockage or queuing. *As a result, the impacts would be less than significant.*

G. Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? • No Impact.

There are no areas of native vegetation found within the Project site or in the adjacent properties. *As a result, no impacts would occur.*

MITIGATION MEASURES

The environmental analysis indicated that the proposed Project would not result in any potentially significant impacts requiring mitigation. If any of the proposed Project's future tenants are involved in the transport, use, storage, and disposal of hazardous materials, the tenant would need to comply with Federal and State regulations regarding hazardous materials. The future tenants would need to comply with the EPA's Hazardous Materials Transportation Act, Title 42, Section 11022 of the United States Code and Chapter 6.95 of the California Health and Safety Code which requires the reporting of hazardous materials when used or stored in certain quantities. Additionally, the future tenants would need to file a Hazardous Materials Disclosure Plan and a Business Emergency Plan to ensure the safety of the employees and citizens of Monrovia. *As a result, no mitigation is required.*

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✗	
B. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?			✗	
C. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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, impede or redirect flood flows?				✗
D. In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?				✗
E. Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✗

METHODOLOGY

The Clean Water Act (CWA) is the principal Federal law that addresses water quality. The act's primary objectives are to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The implementation plan for these objectives includes the regulation of pollutant discharges to surface water, financial assistance for public wastewater treatment systems, technology development, and non-point source pollution prevention programs. The Clean Water Act also establishes that states adopt water quality standards to protect public health or welfare and to enhance the quality of water. The use and value of State waters for public water supplies, propagation of fish and wildlife, recreation, agriculture, industrial purposes, and navigation must also be considered by the states.

The *National Pollutant Elimination Discharge System (NPDES)* applies to Statewide construction activities including clearing, grading, or excavation that results in the disturbance of at least one acre of total land area, or activity which is part of a larger common plan of development of one acre or greater. In most cases, the NPDES permit program is administered by authorized states. In California, these programs are administered by the nine Regional Water Quality Control Boards (RWQCBs) that issue NPDES permits and enforce regulations in their respective regions. A requirement of the State General Construction Activity NPDES permit is the preparation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify and implement best management practices (BMPs) to reduce impacts to surface water from contaminated stormwater discharges during the construction of the proposed action. Required elements of an SWPPP include the following: site description addressing the elements and characteristics specific to the site; descriptions of BMPs for erosion and sediment controls; BMPs for waste handling and disposal;

implementation of approved local plans; proposed post-construction control requirements; and non-stormwater management.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? • Less than Significant Impact.*

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square-foot (1.41 gross acres) lot. A total of 33 parking stalls and three truck loading docks would also be provided. The property is zoned *PD-19 (Planned Development – Area 19)* and is designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan. The new building would be used for warehouse purposes.⁵⁸

A review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper confirmed that the nearest body of water is the concrete-lined Sawpit Wash, which is located approximately 400 feet southeast of the Project site and is fully channelized and used as a flood control channel.⁵⁹ According to the soil maps prepared for Los Angeles County by the United States Department of Agriculture, the Project site is underlain by soils comprised primarily of Urban Land, Palmview, Tujunga, San Emigdio, and Typic Xerothents soil associations. These soils are well drained with the exception of Typic Xerothents but current development and the placement of landscaping have reduced the soil's drainage risk.⁶⁰ In addition, limited excavation would be required for the clearance of the site, shallow excavation, and the installation of the new building footings and utility connections. The proposed Project would not present a new runoff or erosion risk because the Project site is currently undeveloped with broken hardscape surfaces and the new buildings would not introduce new significant impermeable land cover to the Project site.⁶¹ Overall, the proposed Project would not involve any physical features or activities that would lead to erosion or the contamination of stormwater runoff.

The Project Applicant would be required to implement stormwater pollution control measures pursuant to the National Pollutant Discharge Elimination System (NPDES) requirements. The Clean Water Act delineates a national permitting system for point discharges known as the NPDES. NPDES permits typically incorporate specific discharge limitations for point source discharges to ensure that dischargers meet permit conditions and protect State-defined water quality standards. The NPDES framework also regulates stormwater runoff originating from municipal and industrial sources. The Applicant would also be required to utilize Best Management Practices (BMPs) to control or reduce the discharge of pollutants to the maximum extent practicable over the life of the Project. As part of the permitting process, the paving contractors would be required to adhere to all pertinent Clean Water Act regulations.

Construction is regulated by the California Building Standards Code and the Building Regulations within Title 15 (Buildings and Construction) of the Monrovia Municipal Code.⁶² These building codes provide requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. In addition, Chapter 15.28 (Grading and Erosion Control)

⁵⁸ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

⁵⁹ U.S. Fish and Wildlife Service. National Wetlands Inventory – V2. <https://www.fws.gov/Wetlands/data/Mapper.html>.

⁶⁰ United States Department of Agriculture Soil Conservation Service. *Report and General Soils Map Los Angeles County, California*. Revised 1969.

⁶¹ United States Department of Agriculture. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

⁶² Monrovia, City of. *Municipal Code*. Title 15, Buildings and Construction.

of the Monrovia Municipal Code ensures compliance with grading and erosion control regulations.⁶³ Prior to issuance of any grading permit for the Project that would result in soil disturbance of one or more acres of land, the Applicant would be required to demonstrate that coverage has been obtained under California's General Permit for Storm Water Discharges Associated with Construction Activity by providing a copy of the Notice of Intent (NOI) submitted to the State Water Resources Control Board, and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number or other proof of filing shall be provided to the Chief Building Official and the City Engineer. In addition, the Applicant would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would be submitted to the Chief Building Official and City Engineer prior to the issuance of a grading permit. *As a result, the impacts would be less than significant.*

B. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building. No direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur. The proposed Project site would continue to be connected to the City's water lines and would not result in a direct decrease in underlying groundwater supplies. Furthermore, the construction and post-construction BMPs would filter out contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. *As a result, the impacts would be less than significant.*

C. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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, impede or redirect flood flows? • No Impact.

As previously mentioned, the proposed Project would require limited excavation for construction. No natural drainage or riparian areas exist within the Project site or the surrounding areas. The nearest body of water is the concrete-lined Sawpit Wash, which extends approximately 400 feet southeast of the Project site. The proposed Project would be restricted to the Project site and would not alter the course of the Sawpit Wash. As previously mentioned, the Project site is currently undeveloped with broken hardscape surfaces and the new building would not introduce new significant impermeable land cover to the Project site. Therefore, the proposed Project would not cause a significant increase in impermeable surfaces so as to significantly alter the existing drainage pattern, increase the risk of erosion or siltation, or increase the rate or amount of runoff within of any area within the City.

The Project Applicant would be required to utilize BMPs that would filter contaminated runoff. These BMPs may facilitate percolation of runoff into the ground, result in the slow and controlled discharge of runoff into the City's storm drains or permit the retention of stormwater below ground. No excess runoff would be discharged off-site. As a result, the proposed Project would not result in off-site erosion or flooding. In addition, the Project would not create polluted runoff or runoff that would exceed the capacity of existing storm drains with implementation of the BMPs. *As a result, no impacts would occur.*

⁶³ Monrovia, City of. *Municipal Code*. Title 15, Buildings and Construction, Chapter 15.28, Grading and Erosion Control.

D. In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation? • No Impact.

According to the Los Angeles County Department of Public Works, the City of Monrovia is not located within a designated 100-year flood hazard area, as defined by the Federal Emergency Management Agency (FEMA).⁶⁴ According to the FEMA flood insurance map obtained from the Los Angeles County Department of Public Works, the Project site is located in Zone X. This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain. Thus, sites located in Zone X are not located within a 100-year flood plain.

The Project site is not located in an area that would be subject to seiche or tsunami. A seiche in the Sawpit Wash is not likely to happen due to the current level of channelization and volume of water present. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Project area is not adjacent to the water bodies behind the Sawpit Dam, or Sawpit Debris Basin Dam, therefore there would be no risk of direct impacts from a seiche on these water bodies. The Project area is approximately 2.9 miles southwest of the Sawpit Spreading Basin, which is a shallow basin used for groundwater recharge. This basin is uphill from the Project site and can hold up to 13 acre-feet (equal to 4,236,000 gallons) of water, but the basin is too shallow to be a seiche hazard for the Project site. In addition, the Project site is located inland approximately 28 miles from the Pacific Ocean and the Project area would not be exposed to the effects of a tsunami.⁶⁵

There are two areas, the Sawpit Debris Basin and the Santa Anita Dam, which have the potential for failure caused by seismic activity. The first of these, the Sawpit Debris Basin, located in the foothills in northern portion of the City of Monrovia, has a capacity of 476 acre-feet. If the debris basin failed at capacity, it would require a drainage area of three-square miles. The ensuing flood would last approximately 25 minutes and be confined largely within the area bounded by Santa Anita Wash and the Santa Fe Flood Control Basin. A flood of this type will inundate portions of the cities of Monrovia, Duarte, and Bradbury.⁶⁶

The second, the Santa Anita Dam, which was built in 1927, is located to the northwest of downtown Monrovia. This dam has a capacity of 1,376 acre-feet. Should the Santa Anita Dam fail at capacity, the drainage area required would be 11 square miles. Most of the flooding would occur in Sawpit Canyon between Myrtle Avenue and Santa Anita Wash north of the Foothill Freeway.⁶⁷ As indicated in Figure 3 and Figure 4 of the City's General Plan Conservation Element, the Project site is not located within the dam inundation areas for the Sawpit Debris Basin or the Santa Anita Wash. *As a result, the impacts with regards to flooding, tsunamis, seiches, or dam inundation would be less than significant.*

E. Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? • No Impact.

The proposed Project must comply with Chapter 15.28 - Grading and Erosion Control of the City's Municipal Code, which limits the discharge of sediment during construction activities. In addition, the proposed Project would be required to be in compliance with Chapter 12.36 - Stormwater and Urban Runoff Pollution Control of the City's Municipal Code. The Project Applicant would be required to implement Low Impact Development (LID) measures, also known as Best Management Practices (BMPs) into the Project's

⁶⁴ Los Angeles County Department of Public Works. *Flood Zone Determination Website*. <http://dpw.lacounty.gov/wmd/floodzone/>.

⁶⁵ Google Earth. Website accessed June 20, 2022

⁶⁶ City of Monrovia General Plan. *Safety Element*. Element updated 2022.

⁶⁷ Ibid.

design. These operational BMPs would reduce the volume of water discharged into the local storm drains and would filter out any contaminants present in the stormwater runoff. These BMPs may include the use of stormwater detention chambers, grate inlet filters, and bioswales as well as other mechanisms for reducing runoff and removing potential contaminants. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

As indicated previously, hydrological characteristics within the Project site would not substantially change. As a result, no mitigation is required.

3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project physically divide an established community?				✗
B. Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		✗		

METHODOLOGY

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000–66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law provides cities and counties wide latitude in how a jurisdiction may create a general plan. There are certain requirements that must be met including the inclusion of seven mandatory elements described in the Government Code, including a section on land use. In addition, if a city has one or more “disadvantaged communities,” its general plan must include an Environmental Justice Element, or contain policies incorporated into other elements. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures. The City of Monrovia’s General Plan contains an Environmental Justice Element, which was adopted on November 2022.

The *Southern California Association of Governments (SCAG)* is the regional planning organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The region encompasses a population exceeding 19 million in an area of more than 38,000 square miles. As the designated Council of Governments (COG), the Federal government mandates SCAG to research and develop plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive regional plans to address these concerns. SCAG is responsible for the maintenance of a continuous, comprehensive, and coordinated planning process resulting in a regional transportation plan. SCAG is also responsible for the development of demographic Projections and the integrated land use, housing, employment, transportation programs, measures, and strategies for the Air Quality Management Plan (AQMP).

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project physically divide an established community?* • No Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. The Project site is located within an urbanized area within the City of Monrovia. The Project site is currently undeveloped and covered in ruderal vegetation and broken hardscape. There are no trees located within the Project site’s boundaries. All of the structural improvements that previously occupied the site have been demolished. Existing land uses and development

found in the vicinity of the Project site are summarized below:⁶⁸

- *North of the Project site.* A total of six single-family residential units are located directly adjacent to the Project site (0-foot separation between property lines), and just outside of the City's boundaries in unincorporated Los Angeles County (referred to as the South Monrovia Islands). The addresses of these residential units are 208 Wyland Way, 214 Wyland Way, 220 Wyland Way, 226 Wyland Way, 232 Wyland Way, and 2547 California Avenue. These properties are designated as Residential 9 (H9) in the Los Angeles County General Plan and are zoned for single-family residential development in Los Angeles County's R-1 (Residential) zoning district.
- *South of the Project site.* To the south of the site at 2640 – 2670 South Myrtle Avenue is a commercial and manufacturing use, Dootson Industrial Park. This property is designated as *Manufacturing* in the Monrovia General Plan and zoned as *M (Manufacturing)*. Approximately 300 feet south of the Project site in unincorporated Los Angeles County is the Sawpit Wash, a concrete-lined flood control channel, which extends in a northeast-southwest orientation. The United Plant Quarry is located further southeast of the Project site, south of the aforementioned flood drainage channel.
- *East of the Project site.* To the east of the site is California Avenue and a single-family residential neighborhood within unincorporated Los Angeles County. The properties are within Los Angeles County's A-1 (*Light Agricultural*) zoning district and improved with single-family residences. South of this single-family residential neighborhood at 2600 – 2620 South California Avenue is an industrial use, California Suites. The site is located within the City boundaries and is designated as *Manufacturing* in the Monrovia General Plan and zoned as *M (Manufacturing)*.
- *West of the Project site.* Three single-family residential properties are located directly to the west of the Project site. The addresses of these units are 2568 S. Myrtle Avenue, 203 Novice Lane, and 209 Novice Lane. The two units located on Novice Lane have frontage along a private easement, Novice Lane. These three properties are designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan and are zoned as PD-19 (*Planned Development – Area 19*).

The Project site consists of 1.41-gross acres. The site was formerly occupied by an automotive repair business (Don's Automotive) and two residential units that have since been demolished. The site is currently undeveloped and covered in ruderal vegetation and broken hardscape.

The Project site is surrounded by industrial, manufacturing, and residential uses with the nearest residential uses adjacent to the site to the north and west, and approximately 70 feet east of the Project site as shown in Exhibit 3-5. The proposed Project would not involve the permanent closure of any existing public roadways or otherwise result in the division of an established residential neighborhood. Access granted by existing recorded easements on all properties using Novice Lane to access their properties will be uninterrupted as a result of the Project. The single-family homes located at 203 Novice Lane and 209 Novice Lane will continue to access their properties from the shared easement portion of Novice Lane from Myrtle Avenue. Two wrought-iron sliding gates will be installed to separate the private easement portion of Novice Lane in front of the Project site from the shared easement portion to the west, effectively preventing through traffic between Myrtle Avenue and the site. One gate will be installed across Novice Lane at the west property line and another across the driveway on the Project site on the east. A "Knox-box" would be

⁶⁸ Blodgett Baylosis Environmental Planning. *Site Survey*. Survey was conducted on June 13, 2022 and September 15, 2023. Survey updated periodically in 2024, 2025, and 2026.

provided at the gates to allow the Fire Department and other emergency services to access the site from Myrtle Avenue across Novice Lane. Therefore, the proposed Project would not lead to any division of an existing established neighborhood. *As a result, no impacts would occur.*

B. *Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* • *Less than Significant Impact with Mitigation.*

The property is designated as *Planned Development – Area 19 (Novice Lane Area)* General Plan designation and is zoned *PD-19 (Planned Development – Area 19)*. This designation applies to the properties located along the north side of Novice Lane between California/Myrtle Avenues. City of Monrovia's Land Use Element has the following development guidelines that are applicable to Area PD-19 land use designation:⁶⁹

1. The existing single family residential homes shall be treated as permitted uses and be allowed to expand and be upgraded as typically permitted. Conversion of existing residences to industrial uses shall not be permitted.
2. Industrial uses shall be allowed but designed so the residential lots will not be adversely impacted.
3. Any new development will trigger a review of access and possible improvement of Novice Lane.

According to the Project Applicant, the proposed new building would house a warehouse use. Properties located in the PD zones are subject to the provisions outlined in the City of Monrovia Land Use Element of the General Plan. A use not specifically listed in the General Plan as permitted in a PD zone may be approved by the Development Review Committee; provided that the use is not expressly prohibited by the General Plan. The Development Review Committee may also determine that such a use will require approval of either a minor conditional use permit or major conditional use permit. MMC Section 17.08.030 indicates the land uses that are permitted in the PD zone and the proposed warehouse use is permitted in Section 17.08.010 which states the following:

“Warehousing/Wholesaling. Places of business primarily engaged in warehousing, wholesaling, storage, distribution and handling of materials and equipment other than live animals and plants.”

The specific tenant has not yet been identified and the future occupant is unknown at this time. It has been assumed that the future occupant would adhere to the zoning definition of “warehouse” outlined in Section 17.08.010 of the Zoning Ordinance.

This is a mixed use area containing industrial uses on the California Avenue side and single family residential uses located east of Myrtle Avenue. Table 3-7 evaluates the Project's consistency with the General Plan, including the Land Use, Housing, Circulation, Noise, Safety, Open Space, Conservation and Environmental Justice Elements. The table lists the goals and policies relevant to the proposed warehouse use and a summary of how the proposed Project's is consistent with the policies.

⁶⁹ City of Monrovia. *Land Use Element*. Updated March 2021.

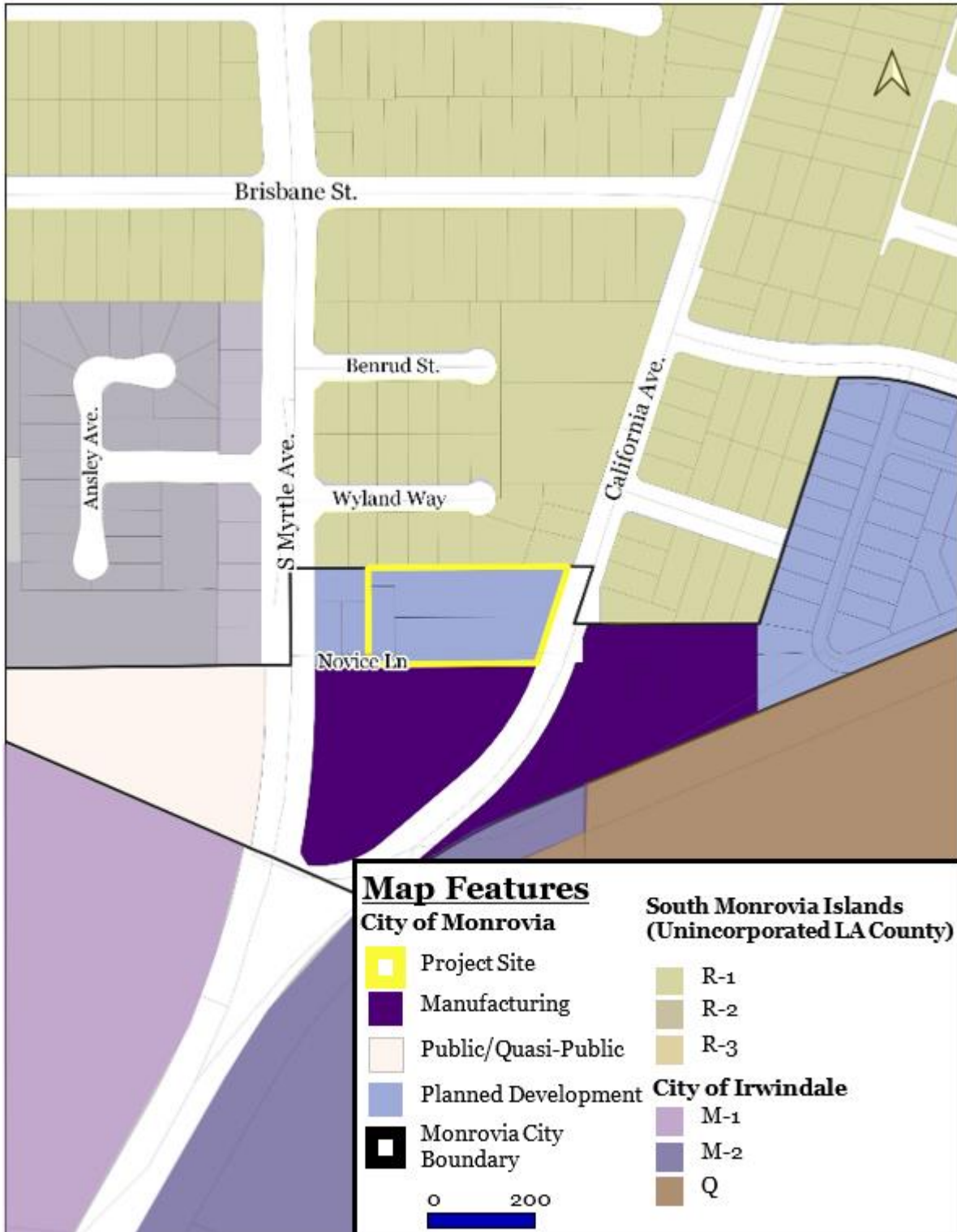


EXHIBIT 3-4 ZONING MAP

Source: City of Monrovia and QGIS; City of Irwindale; Los Angeles County

TABLE 3-7 PROJECT'S CONFORMITY WITH GENERAL PLAN

General Plan Policy	Conformity Analysis
Land Use Element Policy 4.1: Require new developments in established neighborhoods to consider the established architectural styles, development patterns, building materials, and scale of buildings within the vicinity of the proposed Project.	The City worked closely with the Project architect to reduce the size and scale of the new building to facilitate its compatibility with the neighboring residential uses. The applicant reduced the number of loading docks and oriented them away from the adjacent residential uses. The building height was reduced from 38 feet to 33 feet to better match the scale of the other nonresidential buildings within the vicinity of the proposed Project.
Land Use Element Policy 4.2: Require all new development to consider existing uses in terms of neighborhood disruption, buffering, architectural styles, building materials, development patterns, and scale of buildings within the vicinity of the proposed Project.	The City worked closely with the Project architect to reduce the size and scale of the new building to facilitate its compatibility with the neighboring residential uses. The City sponsored community workshops and CEQA scoping meetings. The major community concern was related to truck traffic on Novice Lane and the building's height. The building's height was reduced to 33-feet and loading areas would be located in a recess of the building on the south elevation. In addition, due to the proposed gate along the western property line, truck traffic is unable to use the Novice Lane easement in front of the adjacent residential properties.
Land Use Element Policy 6.4: Evaluate the location of new industrial uses on residential uses. Require noise reduction strategies for industrial uses such as block walls, restricting hours of operation, and other measures as appropriate.	The proposed Project would include an eight-foot high decorative block wall along the north and west sides. Shrubs including Texas Privet would be installed along the west and north side of the Project site to reduce noise. In addition, two loading docks would be recessed into the building's south elevation to reduce noise emissions. The wrought-iron sliding gate located the western property line prevents through traffic on Novice Lane in front of the adjacent residential properties. Finally, the facility's hours of operation and permitted hours for deliveries would be determined through a discretionary process. At a minimum, no activity can occur between 12:00 am and 6:00 am.
Land Use Element Policy 7.6: Encourage the location of clean industrial uses in the City and more aesthetic design solutions to traditional industrial uses.	The new warehouse building replaces an older dilapidated commercial use and two single-family residences that have been demolished. While the General Plan Land Use designation calls for industrial uses at the site, more intensive industrial uses are not appropriate given the sensitive receptors. To reduce potential impacts on the adjacent residents, the Project is therefore limited to warehouse use only. Industrial uses would not be allowed by Mitigation Measure LU-1. Other Project elements on the site would also serve as a buffer (walls and gate). The future use would also be required to conform to the most current environmental and design requirements.
Land Use Element Policy 7.7: Encourage the development of light industrial, offices, and warehouses on Myrtle Avenue between Duarte Road and the southern city limits. Homes on Novice Lane should transition to Light Industrial land uses, but new development shall provide adequate landscaping, setbacks, and walls to buffer negative impacts on the existing residential uses.	While the General Plan Land Use designation calls for industrial uses at the site, more intensive industrial uses are not appropriate given the sensitive receptors. To reduce potential impacts on the adjacent residents, the Project is limited to warehouse use only. Industrial uses would not be allowed by Mitigation Measure LU-1. Additionally, the Project would be buffered with adequate landscaping, setbacks, and walls to reduce negative impacts on the existing residential uses. The existing homes on Novice Lane would be maintained. The new development reflects the City's land use policy for the Project site.
Land Use Element Policy 8.5: Provide a mix of housing, commercial, and industrial uses to encourage jobs/housing balance.	The proposed Project would provide 20 new jobs in the City. The proposed Project conforms to the existing General Plan and Zoning designations that are applicable to the site.

TABLE 3-7 PROJECT'S CONFORMITY WITH GENERAL PLAN

General Plan Policy	Conformity Analysis
Land Use Element Policy 10.9: Require water efficient landscaping in regard to plant selection and irrigation.	The proposed Project would implement the City's water conservation requirements. The Project site would consist of robust landscape with native trees and shrubs including but not limited to: Crape Myrtle (<i>Lagerstroemia</i> i. 'Tuscarora'), Brisbane Box (<i>Lophostemon confertus</i>), Australian Willow (<i>Geijera parvifolia</i>), Forest Pansy (<i>Cercis</i> c. 'Forest Pansy'), Foxtail Agave (<i>agave attenuate</i>), Texas Privet (<i>Ligustrum</i> j. 'Texanum'), Raspberry Ice Bougainvillea (<i>Bougainvillea</i> 'Raspberry Ice'), Basket-Of-Gold, (<i>Aurinia saxatilis</i>), Little Rev Flax Lily (<i>Dianella</i> 'Little Rev'), Moor Grass (<i>Sesleria autumnalis</i>), Emerald Blanket (<i>Carissa</i> m. 'Emerald Blanket'), Dwarf Coyote Bush (<i>Baccharis</i> p. 'Coyote Bush'), and Irene Trailing Rosemary " <i>Rosmarinus officinalis</i> "Irene"). The proposed Project would also conform to the most recent Model Water Efficient Landscape Ordinance (MWELO).
Land Use Element Policy 11.7: Comply with the National Pollutant Discharge Elimination System regarding stormwater management to reduce impacts from storm water run- off.	The proposed Project would conform to all pertinent NPDES storm water runoff requirements.
Land Use Element Policy 13.1: Continue design review for all commercial and industrial areas. These guidelines should address architecture, access, setbacks, building articulation, materials, landscaping, pedestrian amenities, and linkages with nearby activity centers.	City staff conducted a preliminary design review and the building's overall site plan and architectural design reflects this informal process. Additionally, the Conditional Use Permit for a new building with over 10,000 square feet of floor area requires approval by the Planning Commission. The design requirements for the new construction will then be evaluated.
Land Use Element Policy 13.3: In commercial and industrial areas designated Planned Development, develop architectural, site design, and landscape guidelines.	The Project architect worked with the City to develop a Project that follows the City's commercial and industrial architectural, site design and landscape guidelines. The City sponsored community workshops and CEQA scoping meetings. The major community concern was related to truck traffic on Novice Lane and the building's massing. The building's height was reduced from 38 feet to 33 feet, the floor area was reduced and the setbacks from the residential uses were increased. Furthermore, the number of loading areas was reduced and the location of the loading areas was moved to a recess in the building on the south elevation. Lastly, a proposed gate along the western property line prevents truck traffic from using the Novice Lane easement in front of the adjacent residential properties. As a result, the City's design review comments are reflected in the Project's architectural design and site plan.
Land Use Element Policy 13.7: In specified zones permitting outside storage, an aesthetic combination of decorative block wall and landscaping should be required.	No outside storage would occur with the proposed Project. However, a new eight-foot high decorative block wall would be constructed along the site's north and west sides to buffer the adjacent single-family residences. The proposed Project would also provide a row of Texas Privet hedges along the property lines and several evergreen trees. The proposed Project would also conform to the most recent Model Water Efficient Landscape Ordinance (MWELO).
Circulation Element Policy 1:3: Locate new industrial and commercial developments and their access points in such a way that traffic does not impact local residential streets and alleys for access to the development and its parking.	A barrier on the west property line would be provided as a means to restrict truck traffic access on Novice Lane in front of the adjacent residents west of the site. The Fire Department has indicated that the barrier used cannot be permanent in case emergency access is needed. For this reason, a gate with a Knox box is proposed to prevent through traffic from the site to Myrtle Avenue.
Circulation Element Policy 2:6: Discourage through traffic from using local collector and residential streets.	A gate would be provided as a means to restrict access on Novice Lane to Myrtle Avenue. Vehicles (including trucks) would access the site from California Avenue.
Circulation Element Policy 5:1: Limit designated truck routes for commercial trucks to minimize their impact on local traffic and neighborhoods. Coordinate with adjacent jurisdictions where possible to reduce the volume of truck traffic traveling through the City. Revise the existing network of designated truck routes in the City, as appropriate, with consideration of the effect any changes may have on alternate routes.	A gate would be provided as a means to restrict access on Novice Lane to Myrtle Avenue. Vehicles (including trucks) would access the site from California Avenue. All Project-related truck traffic would adhere to the City's designated truck route requirements. The future tenants would be provided truck route maps that must be adhered to by the drivers.

TABLE 3-7 PROJECT’S CONFORMITY WITH GENERAL PLAN

General Plan Policy	Conformity Analysis
Circulation Element Policy 5:4: As appropriate, require new development to provide adequately sized on-site truck loading areas to minimize interference with nearby traffic circulation	The three truck loading and parking docks would be located on-site in a recess in the building on the south central part of the building.
Circulation Element Policy 6:5: Encourage the provision of an accessible and secure area for bicycle storage at all new and existing developments.	The proposed Project would provide a total of 4 bike spaces. 2 long-term bike spaces located inside the warehouse, east of the truck docking areas and 2 short-term bike spaces are located outside the warehouse south of the office.
Circulation Element Policy 8:2: Require all new developments to provide off-street parking in compliance with the City’s Zoning Code and the requirements of the ADA.	The proposed Project would provide 33 off-street parking spaces for the 20 employees. The Project site provides two ADA compliant van parking spaces with 8 foot ramps to access the building’s entrance.
Circulation Element Policy 8:4: Consider the development of parking facilities through such methods as alley vacation and lot consolidation.	The proposed Project would involve the consolidation of three lots into a single lot and provide all required parking on-site.
Safety Element Policy 1.3.1: Continue to adopt and implement the most recent uniform building code (with special attention to Chapter 23 and Chapter 70), and all supplements which include the latest most stringent earthquake regulations for new construction.	The new building’s implementation would adhere to all current California Building Code (CBC) requirements.
Safety Element Policy 3.1.4: Ensure the roadway system provides adequate capacity to provide for emergency service provision and emergency evacuations.	The residents located directly to the west of the Project site on Novice Lane requested that the portion of Novice Lane in front of their properties be closed to through traffic from the subject site and that vehicles (including trucks) use California Avenue to access the site. The Fire Department has indicated that the barrier used cannot be permanent in case emergency access is needed. For this reason, a gate with a “Knox box” is proposed to allow for emergency services and to prevent truck through traffic from the site.
Environmental Justice Element Policy 4.2: Improve air quality conditions and minimize air quality impacts on sensitive population groups, by reducing point source emissions (ozone, small particulate matter, diesel particulates), particularly in the environmental justice community.	According to SCAQMD Rule 403, Fugitive Dust, all unpaved demolition and construction areas shall be regularly watered down to three times per day during excavation, grading, and construction as required (depending on temperature, soil moisture, wind, etc.). Watering could reduce fugitive dust by as much as 55 percent. Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing equipment idling and emissions controls. The SCAQMD regulations are standard conditions required for every construction Project undertaken in the City as well as in the cities and counties governed by the SCAQMD. The proposed Project would be required to adhere to standards conditions (SCAQMD Rules and Regulations) that would reduce operational air quality impacts. These rules would include, but not be limited to SCAQMD Rule 1401 (Toxic Air Contaminant) and 402 (Contaminants).
Environmental Justice Element Policy 4.3: Protect sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure, particularly in the environmental justice community.	While the proposed Project’s tenant and operations is not known at this time, the Project applicant is limiting the use of the property and future improvements to warehouse uses only; no industrial uses, light or heavy, would be permitted. Additionally, Mitigation Measure AIR-1 and Standard Condition AIR-1 through 3 would prevent any land uses that cause odors as well as minimize the pollution exposure during construction and operations.

TABLE 3-7 PROJECT'S CONFORMITY WITH GENERAL PLAN

General Plan Policy	Conformity Analysis
Noise Element Program No. 6: Future Projects within the City will reflect a consciousness on the part of the City regarding the reduction of unnecessary noise near noise-sensitive areas such as residences, schools, parks, hospitals, libraries, and convalescent homes. Actions that can be taken to implement this program can include: 1. Maintain liaison with transportation agencies such as Caltrans and the FHWA regarding the reduction of noise from existing facilities. The design and location of new facilities will also be considered. 2. Consideration should be given to buffering noise-sensitive areas from noise-generating land uses. 3. Noise monitoring within the City will be an ongoing process conducted by the appropriate departments. 4. Ensure that the segment of the Pasadena Blue Line Extension Project that would go through the City of Monrovia will be designed to meet FTA and other relevant noise criteria; close attention shall be paid to the potential adverse noise effects on residences and other noise sensitive receptors located in the vicinity of the proposed Blue Line station near the Myrtle Avenue / Duarte Road intersection, as well as along the transit route. 5. Close attention shall be paid to the noise evaluation in environmental assessments, environmental impact reports and environmental impact statements.	As indicated in Section 3.17, Transportation, there will not be a significant change in the traffic distribution over that which presently exists. Therefore, the Projected traffic generation will not result in a doubling of traffic volumes. Additionally, Noise Mitigation Measures 1 through 8 would minimize unnecessary noise during the Project's construction and operational phase.

Source: Monrovia General Plan

The industrial uses are permitted to expand from east to west but consideration of the single family homes on the west shall be given. The following development discretionary approvals would be required:

- *Conditional Use Permit* for the new construction of over 10,000 square feet in area and/or with an occupant load of 30 persons or more;
- *Conditional Use Permit* to utilize a reduced parking ratio of 1 (space) per 1,000 square feet for a warehouse land use in-lieu of the otherwise required parking ratio of 1 (space) per 500 square feet for manufacturing, industrial, warehouse, and storage uses;
- *Tentative Parcel Map* to allow for the consolidation of three parcels into one; and,
- *Minor Exception* to allow for a wall on the northern property line to exceed six feet in height.
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

Although the proposed Project would seek the above discretionary actions, the proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Mitigation Measure LU-1 would require that the Project include warehouse uses only. In addition, no commercial or retail activities would be permitted, which would necessitate customer parking. This would limit parking only for the employees and thus, would have excess parking spaces on-site. *As a result, the impacts would be less than significant with mitigation regarding the Project limited to warehouse use only.*

MITIGATION MEASURES

The Project would be required to adhere to the mitigation measure below.

Mitigation Measure LU-1. The Project shall be limited to warehouse use only and no commercial or retail activities shall be permitted that necessitate the need for customer parking.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✗
B. Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✗

METHODOLOGY

The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1)*: This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2)*: This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3)*: This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgrade it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4)*: This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? • No Impact.

The proposed Project involves the construction of a 27,078 square foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. The Project site is not located in a Surface Mining and Reclamation Act (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the Project site. In addition, according to SMARA, study area maps prepared by the California

Geological Survey identified that the City of Monrovia is located within the larger San Gabriel Valley and classified this location as the Portland cement concrete-grade aggregate. However, as indicated in the San Gabriel Valley P-C region MRZ-2 map, the Project site is not located in an area where there are significant aggregate resources present. A gravel mining pit (Holliday Rock located at 257 Longden Ave, Irwindale, CA 91706) is located approximately 850 feet south of the site. The proposed Project would not impact these activities. *As a result, no impacts would occur.*

B. *Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? • No Impact.*

As mentioned in the previous section, no existing or former wells are located within the Project site and the site does not involve active mineral extraction activities. Additionally, the resources and materials that would be utilized for the construction of the proposed Project would not include any materials that are considered rare or unique. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the proposed Project. As a result, no mitigation measures are required.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✗		
B. Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?		✗		
C. For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?				✗

METHODOLOGY

Noise levels may be described using a number of methods designed to evaluate the “loudness” of a particular noise. The most commonly metric used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. The human ear can detect changes in sound levels greater than 3.0 dBA under normal ambient conditions. Changes of less than 3.0 dB are noticeable to some people under quiet conditions while changes of less than 1.0 dB are only discernible by few people under controlled, extremely quiet conditions. Noise levels associated with common activities are illustrated in Exhibit 3-5. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Because the area of the sound wave increases as the sound gets further and further from the source, less energy strikes any given point over the surface area of the wave. This phenomenon is known as “spreading loss.” Due to spreading loss, noise attenuates (decreases) with distance. Stationary, or point, noise subject to spreading loss experiences a 6.0 dBA reduction for every doubling of the distance over hard surfaces, beginning with the initial 50-foot distance.⁷⁰

Environmental noise descriptors are typically based on average noise levels over time, rather than instantaneous measurements. The most commonly used metric is the equivalent continuous sound level (L_{eq}). Rather than being measured directly, L_{eq} is calculated from A-weighted sound pressure levels (dBA) recorded over a specified time period. The L_{eq} represents the constant sound level that, over a given time, would contain the same acoustic energy as the actual fluctuating sound levels. As such, it is widely used to describe average environmental noise exposure. Importantly, while sound pressure levels (e.g., L_{eq}) are used to characterize the intensity of sound at a specific location, these noise levels are affected by distance and environmental conditions (surfaces, humidity, topography, etc.).

⁷⁰ United States Department of Transportation – Federal Highway Administration. *Transit Noise and Vibration Impact Assessment Manual*. Report dated September 2018.

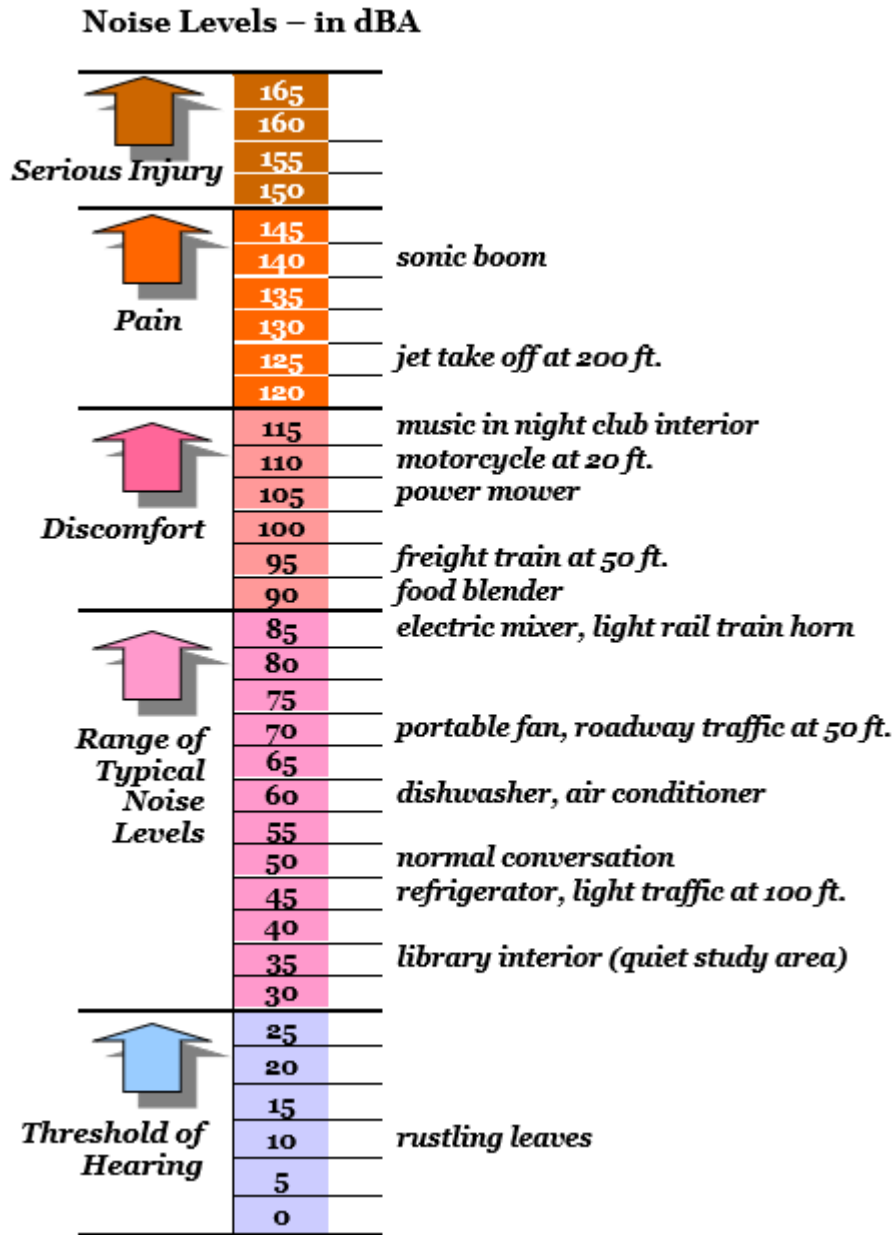


EXHIBIT 3-5 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

To describe the time-varying character of environmental noise, the statistical or percentile noise descriptors L_{99} , L_{90} , L_{75} , L_{50} , L_{25} , L_8 and L_2 are commonly used. The percentile noise descriptors are the noise levels equaled or exceeded during 99 percent, 90 percent, 75 percent, and 50 percent of a stated time. Sound levels associated with less than the L_{50} typically describe transient or short-term events, while levels associated with the L_{50} describe the steady state (or median) noise conditions. While the L_{50} describes the median noise levels occurring 50 percent of the time, the L_{eq} accounts for the total energy (average) observed for the entire hour. Therefore, the L_{eq} noise descriptor is generally 1-2 dBA higher than the L_{50} noise level. While useful, peak-hour or average noise levels do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level, is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise-sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City of Monrovia relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact with Mitigation.*

As indicated herein in Section 3.11, Land Use & Planning, the proposed Project site is located on an industrial zoned site and the proposed use would be compatible to its respective Zoning and General Plan land use designations. The ambient noise environments within the Project site and surrounding areas are dominated by high ambient vehicle noise emanating from California Avenue, and noise typically associated with the adjacent uses, which includes industrial and manufacturing located to the south.

To characterize the ambient noise environment, noise measurements were taken at the Project site. The closest noise-sensitive receptors are single-family residential properties located adjacent to the site along the north and west property lines and there is a 0-foot separation between property lines. Additionally, residences are located across California Avenue, which is approximately 70 feet to the east. While there are sensitive receptors directly adjacent to the site (with a 0-foot separation at the property lines), there is about 60 feet separation between the proposed building and the west property line, and a 20-foot separation between the proposed building and the north property line.

Four sets of 100 noise measurements were taken: two along the project site's eastern property line adjacent to California Avenue, a third inside the site's interior along the west property line, and one inside the southwest corner of the site (refer to Exhibit 3-6). A Sper Scientific Digital Sound Meter was used to conduct the noise measurements. The measurements were captured five feet above the ground surface at a location free from any obstructions. The noise meter setting was adjusted for "slow" on an "A weighted" measurement. Two measurements were taken on October 27, 2025, Monday morning at 9:30 am and ending at 11:30 pm. The third and fourth measurements were taken in the site's interior on Friday, March 13, 2026 at 9:25 AM and ending at 11:30 pm. The ambient noise environment was dominated by vehicular traffic on California Avenue. These noise measurements were taken after the previous onsite improvements had been demolished and cleared of structures. Exhibit 3-6 shows the location of where the ambient noise

measurements were taken. Table 3- 8 indicates the variation in ambient noise levels over time during the measurement period.

TABLE 3-8 AMBIENT NOISE MEASUREMENT RESULTS

Noise Metric	Noise Level (dBA)			
	Location #1 (Northeast)	Location #2 (Southeast)	Location #3 (West)	Location #4 (Southwest)
L _{max} (Maximum Noise Level)	70.1	69.8	63.5	66.3
L ₉₉ (Noise levels <99% of time)	66.4	67.4	61.5	65.8
L ₉₀ (Noise levels <90% of time)	62.9	64.4	54.1	62.3
L ₇₅ (Noise levels <75% of time)	57.2	59.0	52.3	59.4
L ₅₀ (Noise levels <50% of time)	50.5	54.5	50.4	57.8
L _{min} (Minimum Noise Level)	46.9	50.0	44.4	48.8
Average Noise Level	52.8	55.8	51.1	57.6

Source: Blodgett Baylosis Environmental Planning.

The existing ambient noise measurements are included in Attachment A – Noise Measurements. The ambient median noise levels for the first three locations are below the ambient median threshold for the City of Monrovia (55 dBA); however, the fourth location exceeds the threshold by 2.8 dBA. The average noise measurements ranged from 51.1 dBA to 57.6 dBA during the measurement period. The ambient median noise levels at all four locations exceed the County of Los Angeles ambient threshold of 50 dBA. Accordingly, the analysis evaluates whether construction and operational noise would result in a substantial increase over existing ambient conditions at each representative location.

Construction Noise

Construction (short-term) noise impacts will primarily occur during grading and site preparation phases where the highest noise levels arise due to the operation of earthmoving machinery like excavators and bulldozers. Typical operating patterns for this equipment often consist of brief bursts of high power (1 to 2 minutes) followed by longer periods at reduced power (3 to 4 minutes). Construction activities would likely cause a temporary increase in ambient noise levels around the Project site. The maximum noise at any nearby receptor would be short-term and would generally intermittently occur, depending on the construction phase and the distance from the noise source and the location of active equipment. The duration of these noise impacts may span from a day to several days, depending on the construction phase, and would fluctuate as equipment moves around the site over the approximately nine-month construction timeline. The construction noise levels would only be temporary and would not carry over to the Project's operational noise levels.

During the earlier construction phases, relatively high ground-borne noise levels would be generated by the operation of heavy-duty trucks, backhoes, bulldozers, excavators, front-end loaders, scrapers, and other heavy duty construction equipment (refer to Table 3-9). Table 3-9 (Maximum Noise Levels Generated by Construction Equipment) identifies actual measured maximum noise levels for individual equipment types and illustrates potential short-term noise levels near the site boundary under conservative, worst-case conditions. To evaluate these conditions, actual measured equipment noise levels were used to estimate maximum noise levels at distances of 25, 50, and 100 feet, as shown in Table 3-9. Noise levels presented in Table 3-9 represent single-equipment L_{max} events, and do not reflect cumulative construction noise, and are not used to determine overall CEQA significance.

Noise emissions from point sources (construction equipment) are typically attenuated by a factor of 6 dBA per a doubling of distance away from the noise source (e.g. 25 feet, 50 feet, and 100 feet away from the source). The Monrovia Municipal Code allows construction activities during designated hours and does not

provide specific criteria for evaluating construction noise impacts. To assess the significance of noise increases experienced by sensitive receptors surrounding the Project, this analysis uses the guidelines from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment (FTA 2006) for identifying construction noise impacts. According to the construction noise thresholds derived from the FTA Transit Noise and Vibration Impact Assessment, a significant construction noise threshold impact would occur if construction noise exceeds 80 dBA at a sensitive receptor.

As shown in Table 3-9, unmitigated short-term maximum noise levels at distances of 25 or 50 feet could exceed FTA guidance levels and Los Angeles County L_{max} thresholds for individual pieces of equipment. However, the Project would implement Mitigation Measure NOI-1, which requires installation of temporary acoustic barriers or noise blankets, achieving a minimum 5 dBA reduction, thereby reducing these short-term noise levels.



EXHIBIT 3-6 LOCATION OF AMBIENT NOISE MEASUREMENT

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

TABLE 3-9 MAXIMUM NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT⁷¹

Construction Equipment	Actual L _{max} @25 ft.	Actual L _{max} @50 ft.**	Actual L _{max} @100 ft.	Noise Levels with MM NOI-1 @Sens Rec. (25 ft.)	Noise Levels with MM NOI- 1 @ Sens Rec. (50 ft.)
Air Compressor	84 dBA	78 dBA	72 dBA	79 dBA	73 dBA
Backhoe	84 dBA	78 dBA	72 dBA	79 dBA	73 dBA
Bulldozer	88 dBA	82 dBA	76 dBA	83 dBA	77 dBA
Compactor	89 dBA	83 dBA	77 dBA	84 dBA	78 dBA
Concrete Mixer	85 dBA	79 dBA	73 dBA	80 dBA	74 dBA
Concrete Pump	87 dBA	81 dBA	75 dBA	82 dBA	76 dBA
Crane, Mobile	87 dBA	81 dBA	75 dBA	82 dBA	76 dBA
Dump Truck	82 dBA	76 dBA	70 dBA	77 dBA	71 dBA
Excavator	87 dBA	81 dBA	75 dBA	82 dBA	76 dBA
Generator	87 dBA	81 dBA	75 dBA	82 dBA	76 dBA
Grader*	91 dBA	85 dBA*	79 dBA	86 dBA	80 dBA
Loader, Front End (Forklift)	85 dBA	79 dBA	73 dBA	80 dBA	74 dBA
Paver	83 dBA	77 dBA	71 dBA	78 dBA	72 dBA
Roller	86 dBA	80 dBA	74 dBA	81 dBA	75 dBA
Tractor*	90 dBA	84 dBA*	78 dBA	85 dBA	79 dBA
Truck, Flatbed	80 dBA	74 dBA	68 dBA	75 dBA	69 dBA
Welder	80 dBA	74 dBA	68 dBA	75 dBA	69 dBA

* FHWA model does not have a reference value for “actual measured” for “Grader” or “Tractor” equipment and the “Typical Spec 721.560” value is used instead.

** FHWA reference noise levels (L_{max} @ 50 ft) are derived from empirical measurements incorporated into the FHWA Roadway Construction Noise Model (FHWA, 2006), which is based on original EPA construction equipment noise studies. These data represent point-source emissions measured under free-field, hard-ground conditions, and the conventional 6 dBA per doubling attenuation rate is applied when extrapolating to other distances. Under soft-ground conditions, actual attenuation may be 1–1.5 dBA greater per doubling, though the conservative hard-ground assumption is typically retained to avoid under predicting noise.

Source: Federal Highway Administration. *Road Construction Noise Model*. 2006.

Compliance with Mitigation Measure NOI-1 would require the installation of temporary acoustic barriers or noise blankets around stationary construction noise sources and along property lines for mobile construction equipment. These barriers must feature weather-protected, sound-absorptive material on the construction-activity side, fully block the line-of-sight between the construction noise source and sensitive receptors, and include a solid face from top to bottom, without any gaps, holes or weaknesses. Barriers may consist of masonry block, ¼ inch glass, earthen berms or a combination of these materials. Existing and proposed landscaping, including mature trees along the north and west property lines, would further buffer adjacent residences. While landscaping does not substantially reduce noise levels, it provides a documented psychological benefit that can reduce perceived noise impacts and community annoyance⁷². As shown in Table 3-9, implementation of NOI-1 would reduce short-term construction equipment noise levels by a minimum of 5 dBA.

The Project would also implement additional construction-period noise controls. Mitigation Measure NOI-2 requires the use of Tier IV rated construction equipment during demolition, site preparation, grading, and construction activities. Mitigation Measure NOI-3 requires all construction equipment to be equipped with mufflers and other suitable noise attenuation devices, requires quieter equipment where feasible,

⁷¹ U.S. Department of Transportation, Federal Highway Administration (FHWA). *Road Construction Noise Model (RCNM)*. 2006.

⁷² City of Monrovia (2002), *Noise Element*.

requires construction activity notification for nearby residents, and establishes a noise disturbance coordinator to respond to construction noise complaints. Mitigation Measure NOI-4 requires stationary construction equipment, such as pumps, generators, or compressors, to be placed as far from noise-sensitive uses as physically possible, requires the use of electric equipment where available, and limits idling of construction-related equipment. Mitigation Measure NOI-5 limits construction hours to comply with the most restrictive applicable requirements of the City of Monrovia and Los Angeles County. Mitigation Measure NOI-8 further requires stationary noise sources to be located, oriented, screened, or enclosed to block line-of-sight between the noise source and nearby sensitive receptors.

Construction noise would be temporary, intermittent, and would vary by construction phase, receptor distance, and the location of active equipment. Construction equipment would move throughout the site over the approximately nine-month construction period and would generally operate more than 50 feet from adjacent property lines due to site layout and setbacks. Noise levels would attenuate with distance and fluctuate as construction activities shift across the site. Overall, noise impacts at any nearby receptor would be temporary and would cease upon completion of construction.

The combined noise levels associated with typical construction activities during each phase were evaluated using the FHWA Roadway Construction Noise Model. The resulting cumulative construction noise levels, expressed as L_{eq} , at the nearest sensitive receptors are summarized in Table 3-10 (Cumulative Construction Noise Levels at the Nearest Sensitive Receptors).

TABLE 3-10 CUMULATIVE CONSTRUCTION NOISE LEVELS AT THE NEAREST SENSITIVE RECEPTORS

Construction Phase	Sensitive Receptors to the North and West of the Site	Sensitive Receptors to the North and West of the Site with Barrier (NOI-1)
Site Preparation/Grading	91.3 dBA	86.3 dBA
Building Construction	90.3 dBA	85.3 dBA
Paving	88.2 dBA	83.2 dBA
Architectural Coating	82.1 dBA	77.1 dBA

Source: FHWA (2006), RCNM.

As shown in Table 3-10, implementation of Mitigation Measure NOI-1 would reduce modeled cumulative construction noise levels by approximately 5 dBA through installation of temporary noise barriers. The barrier reduction alone would not reduce all construction phases below the FTA daytime exterior guideline of 80 dBA L_{eq} . However, the project would also implement additional construction noise controls required by Mitigation Measures NOI-2 through NOI-5 and NOI-8, including Tier IV rated equipment, mufflers and other suitable noise attenuation devices, quieter equipment where feasible, placement of stationary equipment as far from sensitive receptors as practicable, idling restrictions, construction-hour limits, construction notification, a noise disturbance coordinator, and blockage of line-of-sight between noise sources and sensitive receptors. Together, these measures would reduce the intensity, duration, and exposure of nearby sensitive receptors to construction noise. Therefore, construction noise impacts would be reduced to less than significant with mitigation incorporated.

Operational Noise

Stationary noise sources associated with the Project could include heating, ventilation, and air conditioning (HVAC) mechanical equipment, truck delivery loading/unloading activities, and typical motor vehicle/parking area activities. In order to assess permanent noise levels from on-going activities on-site, a reference noise level measurement for loading dock activities was collected to represent the truck idling/reefer activity at a neighboring receiving dock next to the offices of Blodgett Baylosis Environmental

Planning. This was chosen due to similar type of activity, i.e. truck idling, truck backing, etc. The truck observed during the measurement period is a single 5-axle semi-truck, which would be similar or the same type of vehicle used to deliver to the site. The truck idling activity reference noise level measurement was taken adjacent to the parking position with a direct line of sight. During the measurement period, the recorded noise levels were 65.2 dBA at a uniform distance of 50 feet. This represents a worst case since the line of sight between the proposed Project's loading docks and the homes would be obstructed by the new building. The distance between the receiving area and the homes would be at least 127 feet with no direct line of sight. The new building will be located between the new receiving areas (loading docks and truck maneuvering area) and the existing homes. As a result, the new building will attenuate the loading dock noise impacts on the existing homes. Additionally, the two primary truck receiving areas are located within a recessed loading area located along the building's south elevation, separated from the homes to the north of the site by the proposed 33-foot-high building. Moreover, the new Project's hours of operation will be limited so that after hours operations do not affect the noise sensitive receptors in the area (see Mitigation Measures NOI-6 and 7).

There is also a trash enclosure on site, which includes loading and unloading associated with waste disposal. However, such activities would take place over 225 feet from the closest sensitive receptor to the west. While this noise exposure could exceed ambient noise levels, the handling of boxes, crates, garbage bins or other similar objects is exempt from the provisions of the City's Municipal Code during the hours of 7:00 a.m. and 7:00 p.m. (Section 9.44.080, Exemptions, of the City's Municipal Code). Additionally peak noise levels from loading and unloading are expected to be intermittent, and averaged over a 1-hour period, would be much lower than peak levels. Implementation of Mitigation Measures NOI-6 through 8 would restrict operations for delivery, truck idling and waste disposal, thereby reducing impacts to a less than significant level. Furthermore, the Project would be required to adhere to the provisions established in Mitigation Measure NOI-8, which itself requires that the line-of-site between stationary noise sources (e.g., HVAC equipment and loading docks) and noise-sensitive uses be blocked through the implementation of noise barriers (i.e., a concrete block wall or enclosing the noise source). Adherence with Mitigation Measure NOI-8 would further ensure that the proposed Project would not substantially increase noise levels over existing conditions and impacts to adjacent sensitive receptors would be less than significant with mitigation incorporated.

Onsite Equipment Noise Impacts

Another operational noise source would be exterior mechanical equipment on the roof which would be screened by a four foot tall parapet. Precise details of any HVAC equipment, including future location and sizing, are unknown at this time. However, the reference noise level from a Lennox SCA120 series 10-ton model packaged air conditioning unit on a roof is appropriate as it is one of the most common units currently in use for a comparable uses. At 5 feet from the air conditioning unit, the exterior noise levels were measured at 77.2 dBA. At the uniform reference distance of 50 feet, the reference noise levels are 57.2 dBA. Based on the typical operating conditions observed over a four-day measurement period, the rooftop air conditioning units are estimated to operate for an average 39 minutes per hour during the daytime hours, and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit (°F) with average daytime temperatures of 82°F. Therefore, HVAC would not create noise levels that exceed the median ambient noise levels on the Project site.

Forklift noise can be generated three primary sources: 1. engine noise from the forklift, 2. noise from the hydraulic lift motors, and 3. noise from the back-up alarms. Gas forklifts generally produce noise levels that can vary depending on several factors, including the specific model, engine design, age, maintenance, and operating conditions. When a gas forklift is idling, the noise level typically ranges from 60 to 70 dB at 50

feet from the source. During normal operation, the noise level of a gas forklift can range from 80 to 90 dB. Backup alarms generally range from 87 to 112 dBA and can be approximately 80.2 dBA to 55.2 dBA at 50 feet from the source. Given the relatively small size of the warehouse floor area, a limited number of forklifts would be used. Instead, pallet jacks would be employed to eliminate the need for forklift equipment. Finally, the use of forklifts would be used during normal business hours and inside the building.

Traffic Noise Impacts

Changes in traffic noise levels are generally considered perceptible to the human ear when they range between 3.0 dBA and 5.0 dBA, which typically corresponds to a doubling of traffic volumes on a given roadway. The proposed warehouse use, based on Institute of Transportation Engineers (ITE) Land Use Code 150 – Warehousing, is anticipated to generate approximately 45 daily trips using the average trip rate, including 8 trips during the AM peak hour, and 9 trips during the PM peak hour. According to the ITE, approximately 20% of these trips (about 9 daily trips) would consist of heavy trucks.

Project access would occur from California Avenue via Novice Lane, with project traffic expected to use California Avenue and Myrtle Avenue to reach regional destinations.⁷³ According to the City of Monrovia Noise Element, average daily traffic (ADT) volumes are approximately 7,242 vehicles on California Avenue between Duarte Road and the Southern City limit and 23,449 vehicles on Myrtle Ave between Duarte Road and the Southern City limit. The addition of 45 daily trips represents less than one percent (1%) of existing traffic volumes on either roadway—well below the threshold required to produce a perceptible (3 – 5 dBA) change in traffic noise levels. Therefore, project-generating vehicle traffic would not result in a measurable or perceptible increase in roadway noise along California Avenue or Myrtle Avenue.

Truck activity would be intermittent and limited to approximately nine trips per day. In accordance with Mitigation Measures NOI-7 and NOI-10, truck access would be restricted to California Avenue and trucks would be prohibited from using Myrtle Avenue to access the Project site. Given the limited number of truck trips, the intermittent nature of truck activity, and required truck access controls, project-related truck traffic would not contribute a sustained increase in ambient roadway noise.

According to the City's Noise Element, the existing 60 dBA CNEL contour along California Avenue, between Duarte Road to the Southern City limit, extends approximately 129 feet from the roadway centerline, and the 55 dBA CNEL contour extends 383 feet. Along Myrtle Avenue the 70 dBA CNEL 65 dBA, 60 dBA, and 55 dBA CNEL contours extend 65 feet, 170 feet, 490 feet, and 1,291 feet, respectively, based on existing ADT volumes. The Project site would fall within the 60 dBA noise contour on these roadways. The area within this contour represents areas of equal noise exposure and represents an existing noise level to compare to. Given the minimal traffic contribution from project operations, the proposed development would not cause a measurable increase in existing traffic noise levels and would therefore result in a less than significant impact.

As a result, with compliance with Mitigation Measures NOI-1 through 8, the impacts would be less than significant.

B. Would the Project result in generation of excessive groundborne vibration or groundborne noise levels? • Less than Significant Impact with Mitigation.

Construction Vibration Impacts

The construction of the proposed Project would result in the generation of ground-borne vibration. Construction activity can result in varying degrees of vibration depending on the equipment and methods used, distance to affected structures, soil type, and the age and construction type of nearby buildings.

⁷³ Institute of Transportation Engineers (ITE). *Trip Generation Manual*, 11th Edition. September 2021.

Construction vibration is generally associated with pile driving, rock blasting, vibratory compaction, and heavy earthmoving equipment. The nearest structures to the Project site are single-family residences located adjacent to the north and west property lines.

The Project would not require deep foundations, pile drivers, or auger-type equipment. The warehouse building would be constructed over a shallow foundation, generally extending no more than three to four feet below ground surface. However, other vibration-generating equipment may be used on-site during construction, including excavators, loaders, bulldozers, haul trucks, and vibratory rollers.

The operation of construction equipment generates ground-borne vibration that propagates outward and generally diminishes in amplitude with distance from the source. Ground-borne vibration may be evaluated both in terms of potential human response and potential building damage. With respect to human response, FTA guidance identifies residential impact criteria of 72 VdB for frequent events, 75 VdB for occasional events, and 80 VdB for infrequent events⁷⁴. These human-response criteria address potential perception, annoyance, or disturbance from vibration and are separate from the structural damage criteria used to evaluate whether vibration could result in cosmetic or structural building damage.

For purposes of evaluating potential building damage, this analysis relies on the FTA construction vibration damage criteria shown in Table 3-11. Nearby residential structures are conservatively evaluated under the FTA criterion for non-engineered timber and masonry buildings, which identifies a structural damage screening threshold of 0.2 in/sec PPV, or approximately 94 VdB.

TABLE 3-11 CONSTRUCTION VIBRATION DAMAGE CRITERIA (FTA)

Building/Structural Category	PPV, in/sec	Approximate L _v *
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

Source: U.S. Department of Transportation, Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September 2018.

*RMS velocity in decibels, VdB re 1 micro-in/sec

The nearest structure to the Project site is a single-family residence located approximately five feet from the western property line. The anticipated vibration source levels for construction equipment are summarized in Table 3-12.

TABLE 3-12 CONSTRUCTION EQUIPMENT VIBRATION SOURCE LEVELS

Construction Equipment	PPV @25 ft. (inches/sec.)	Vibration L _v (VdB) @ 25 ft.
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Small Bulldozer	0.003	58

Source: FTA (2018)

⁷⁴ U.S. Department of Transportation, Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September 2018.

As shown in Table 3-12, most construction equipment would generate vibration levels below the 0.2 in/sec PPV / 94 VdB structural damage screening threshold at 25 feet. The highest vibration source would be a vibratory roller, which could generate up to approximately 0.21 in/sec PPV / 94 VdB at 25 feet before mitigation. These levels could also exceed FTA human-response criteria for residences depending on the frequency, duration, and location of construction activity. Because nearby residential structures are located adjacent to the Project site, construction vibration impacts could be potentially significant without mitigation.

Mitigation Measures NOI-9 and NOI-10 would reduce construction vibration exposure at nearby residences by requiring equipment setbacks where feasible, use of alternative equipment or reduced vibration settings where necessary, and implementation of vibration-reduction measures near sensitive receptors. These measures would reduce both the potential for structural damage and human annoyance or disturbance from construction vibration. *With implementation of Mitigation Measures NOI-9 and NOI-10, construction vibration impacts would be reduced to levels that are less than significant.*

Operational Vibration Impacts

Future proposed land uses within the Project would not be anticipated to generate significant levels of vibration since the proposed Project involves development of a warehouse. The primary source of operational ground-borne vibration would be vehicle traffic on the internal drive aisle and adjacent streets. As shown in Table 3-12, a fully loaded truck traveling on the drive aisle would generate approximately 0.076 PPV at 25 feet, which is below the 0.2 PPV structural screening threshold for non-engineered timber and masonry residential structures. Truck travel would also be intermittent, with approximately nine truck trips expected per day. As previously discussed, Project traffic would not be significant enough to result in a doubling of traffic volumes along local streets and would not result in a measurable increase in vibration levels. *Therefore, operational vibration impacts would be less than significant, and no mitigation is required.*

C. *For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels? • No Impact.*

The Project site is not located within an airport land use plan. The Project site is located approximately 2.45 miles northeast of the San Gabriel Valley Airport and the nearest major airport is the Burbank Airport located roughly 16 miles west of the Project site. The majority of aircraft that utilize the San Gabriel Valley Airport are small civilian single engine airplanes, which are not a significant source of noise as compared to larger aircraft, such as turbo prop and turbo jet planes, which make up a very small percentage of airport's-based aircraft.⁷⁵ Thus, the Project would not be exposed to excessive noise levels from airport operations, and therefore, *no impacts would occur.*

MITIGATION MEASURES

The following mitigation measures focus on ways to further reduce construction noise levels at the nearest sensitive receptors so that the impacts would be less than significant:

Mitigation Measure NOI-1 Installation of a temporary sound barrier at the property lines of the proposed Project site to mitigate noise impacts on all surrounding properties. Temporary noise barriers shall achieve a minimum of 5 dBA reduction in construction noise. The noise barrier shall include the

⁷⁵ Los Angeles County Department of Public Works, Los Angeles County Airports. *Operational Data.*
<https://dpw.lacounty.gov/avi/airports/BrackettFieldOperational.aspx>.

following:

- The noise control barriers must present a solid face from top to bottom.
- The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.

The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between shielded areas and the noise source:

- Masonry block;
- Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot;
- Earthen berm;
- Any combination of these construction materials.

In addition, the contractor shall install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors. The contractor shall maintain all barriers in compliant condition throughout construction. To promote effective practices, the contractor shall position construction equipment staging areas and stationary noise sources as far from those nearby receptors as possible (e.g. in the southeastern portion of the Project site on Novice Lane). Additionally, the contractor will prohibit idling of equipment, and will notify adjacent residences in advance of construction work.

Mitigation Measure NOI-2. The use of Tier IV rated construction equipment must be used during grading, site preparation, construction and paving activities. Prior to issuance of the first building permit, the applicant shall submit manufacturer data sheets demonstrating compliance with Tier IV Final or equivalent noise performance.

Mitigation Measure NOI-3. To reduce temporary construction noise impacts on adjacent residential uses, the applicant or the applicant's construction contractor shall implement the following construction-period noise abatement measures, as outlined in Mitigation Measures NOI-C through F of the *City of Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report* (2008).

- All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
- Construction Activity Notification: All residential units located within 500 feet of the construction site shall be sent a notice at least two weeks in advance of construction activity regarding construction times. A sign shall provide local contact information and be placed at the construction site so that it is legible at a distance of 50 feet and in prominent locations along the Novice Lane and California Avenue frontages along the Project site's boundaries. All notices and signs shall indicate the dates and duration of construction activities, and shall include the name and phone number of the contact person at both the construction site and at the City's

Code Enforcement office where residents may call to register a complaint about noise.

- **Noise Disturbance Coordinator:** A “noise disturbance coordinator” shall be established by the applicant. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. Upon receipt of a complaint, the contractors must stop work to inspect their equipment to ensure that it is properly tuned and muffled. Construction activities may not resume until the equipment is replaced and/or repaired with newer and quieter Tier IV equipment. In addition, copies of all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City’s Community Development Director.
- **Construction Traffic:** Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.

Mitigation Measure NOI-4. The Project developer shall require that the following construction measures be implemented by contractors to reduce construction noise levels below the established thresholds:

- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses whenever physically possible during all phases of Project construction.
- Use electric air compressors and similar power tools rather than diesel equipment shall be used, whenever such equipment is available.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.

Mitigation Measure NOI-5. In consideration of requirements from the City of Monrovia and the County of Los Angeles, construction shall be prohibited from taking place from 7:00 PM to 7:00 AM, Monday through Friday, from 6:00 PM to 9:00 AM on Saturdays, and at any time on Sundays or holidays.

Mitigation Measure NOI-6. The loading and receiving area shall be closed after business hours to restrict noise impacts related to these activities (back-up alarms, roll-up doors, fork-lifts, etc.) on the adjacent homes. The hours for truck deliveries shall only be permitted during the business’s normal hours of operations as established by the CUP or by the Development Review Committee upon selection of a specific tenant. The City Code prohibits operations occurring between 12:00 AM and 6:00 AM.

Mitigation Measure NOI-7. Truck deliveries would be limited to accessing the site to and from California Avenue. Only emergency vehicles are allowed access to the gate from Novice Lane to Myrtle Avenue.

Mitigation Measure NOI-8. Stationary Noise Sources. During construction activities and operational activities, the Project shall comply with Mitigation Measure NOI-A of the City of Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (2008) to further reduce noise emitted from stationary noise sources on the Project site. As required by Mitigation

Measure NOI-A, stationary noise sources associated with the operation of future non-residential uses (e.g., mechanical equipment and loading docks) within the Project areas shall not have a direct line-of-sight to noise sensitive uses. The line-of-sight between the noise source and noise sensitive receptor shall be blocked through the orientation of the non-residential land use and/or by using noise barriers, such as a concrete block wall or enclosing the noise source. The Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that noise-reducing measures have been implemented in the Project Design.

Mitigation Measure NOI-9: Prior to the start of grading, compaction, or other vibration-generating construction activities, the Project contractor shall submit a Construction Vibration Control Plan to the City Community Development Department for review and approval. The plan shall identify the vibration-generating equipment to be used, anticipated work areas, approximate distances to nearby residential structures, proposed equipment setbacks, and alternative vibration-reduction measures to be implemented where the setback distances identified below cannot be achieved.

During construction activities involving vibration-generating equipment, the contractor shall minimize vibration exposure at nearby residential structures through implementation of the Construction Vibration Control Plan and the following measures, as applicable: (1) equipment operating within 10 feet of the nearest residence shall be limited to a small bulldozer or similar equipment with vibration levels less than 72 VdB; (2) vibratory rollers shall, to the maximum extent feasible, maintain a setback distance of 140 feet from nearby residences; (3) large bulldozers and loaded haul trucks shall, to the maximum extent feasible, maintain a setback distance of 80 feet from nearby residences; and (4) where these setback distances cannot be achieved due to site constraints or required construction activities, the contractor shall utilize alternative vibration-reduction measures, including reduced vibratory settings, smaller or static compaction equipment, phased operations, or limiting simultaneous operation of vibration-generating equipment near sensitive receptors. The contractor shall document the vibration-reduction measures implemented during grading and compaction activities and shall make such documentation available to the City upon request.

Mitigation Measure NOI-10. Loaded and unloaded haul trucks over 7 tons are prohibited from travelling north on California Avenue from the site. All trucks must follow adopted truck routes. No construction vehicles are permitted to use Novice Lane to exit or enter from Myrtle Avenue.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. 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)?			✗	
B. Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✗

METHODOLOGY

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000–66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law provides cities and counties wide latitude in how a jurisdiction may create a general plan. There are certain requirements that must be met including the inclusion of seven mandatory elements described in the Government Code, including a section on land use and housing. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

The *Southern California Association of Governments (SCAG)* is the regional planning organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The region encompasses a population exceeding 19 million in an area of more than 38,000 square miles. As the designated Council of Governments (COG), the Federal government mandates SCAG to research and develop plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive regional plans to address these concerns. SCAG is responsible for the maintenance of a continuous, comprehensive, and coordinated planning process resulting in a regional transportation plan. SCAG is also responsible for the development of demographic Projections and the integrated land use, housing, employment, transportation programs, measures, and strategies for the Air Quality Management Plan (AQMP).

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot.⁷⁶ Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

⁷⁶ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

- New development in an area presently undeveloped and economic factors which may influence development;
- Extension of roadways and other transportation facilities;
- Extension of infrastructure and other improvements;
- Major off-site public Projects (treatment plants, etc.);
- The removal of housing requiring replacement housing elsewhere in the City;
- Additional population growth leading to increased demand for goods and services; and,
- Short-term growth-inducing impacts related to the Project's construction.

The Project site is zoned PD-19 (*Planned Development Area – 19*). The nearest residential uses are located in between 30 and 70 feet to the north, east and west of the Project site. The proposed Project would involve warehouse uses and would not result in any direct population growth for the Project area since the proposed Project would not create housing. However, the proposed Project may result in indirect population growth due to employment opportunities (20 new jobs). Furthermore, the proposed Project would not involve an extension of infrastructure which could induce population growth. *As a result, the impacts would be less than significant.*

B. Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.

Two vacant dilapidated single family residential unit were demolished to accommodate the new building. Following a Historic Resource Analysis report, prepared by Urbana Preservation & Planning LLC., the report concluded the vacant residential buildings to be culturally insignificant. These two units have been demolished. The Project site now has been graded and does not contain any structures or buildings. No housing will need to be replaced for this Project. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed Project's approval and subsequent implementation.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities?			×	

METHODOLOGY

The California Code of Regulations Title 24 refers to the California Building Standards Code (CBSC), which contains complete regulations and general construction building standards of State agencies, including administrative, fire and life safety and field inspection provisions. Part 2, the California Building Code (CBC), was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. In particular, CBC Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, addresses fire safety standards for new construction. CBC Chapter 33, Safeguards During Construction, includes emergency access requirements for new construction. CBSC Part 9 refers to the California Fire Code, which contains other fire safety-related building standards.

The California Fire Code exists within Part 9 of the California Building Code, and includes measures for emergency planning preparation and safety. Examples of fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

Senate Bill 50 (the Leroy F. Greene School Facilities Act of 1998), adopted in 1998, defined the school impact fee needs analysis process in Government Code Sections 65995.5– 65998. Pursuant to its provisions, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. By statute, payment of a statutory fee by developers serves as the total mitigation of the potential impact of a development on school facilities pursuant to the California Environmental Quality Act (CEQA).

ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities?*
- *Less than Significant Impact.*

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a

61,508 square foot (1.41 gross acres) lot. A total of 33 parking stalls and three truck loading docks would also be provided. The property is in the *PD-19 (Planned Development – Area 19)* zoning district and designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan. The new building would be used for warehouse and distribution purposes. The site's Assessor Parcel Numbers are (APNs) 8534-016-045, 8534-016-046, and 8534-016-047. The site's address is 2601 California Avenue, Monrovia, California 91016. Other addresses associated with the site include 213 and 217 Novice Lane.⁷⁷

Fire Protection

The Monrovia Department of Fire and Rescue provides fire protection and emergency services throughout the City. The proposed Project would be subject to review and approval by the Monrovia Department of Fire and Rescue to ensure that safety and fire prevention measures are incorporated into the proposed Project. As part of the Project review process, the Monrovia Department of Fire and Rescue would review the proposed Project and make recommendations for fire protection services and fire flow rates. The Project Applicant would be required to comply with the most recent Building and Fire Code, which would require the developer to install sprinklers, emergency signage, alarms, and smoke obstructing fillers/materials.

The Department engages in functions such as fire prevention, fire suppression, pre-hospital emergency care, pre-fire planning, training, apparatus maintenance and communications support. The closest fire station, Monrovia Fire Department Station 102, is located approximately 3,500 feet northwest of the Project site. Depending on the outcome of the review, any required improvements to the water system (e.g., additional hydrants) would be provided at the expense of the Applicant. In addition, the proposed Project would comply with all applicable State and local codes and ordinances related to fire protection. The proposed Project would not negatively impact fire protection services because the proposed Project would be constructed in accordance with the most recent fire and building codes. In addition, the implementation of the proposed Project would not impact Department response times or performance. The Project is located near existing buildings and homes and would allow for adequate fire truck turnaround from the 35 feet ingress-egress easement on Novice Lane.

The proposed Project description includes an installation of a gate across Novice Lane along the site's western property line. The residents located to the west of the site requested a block wall or a permanent barrier be constructed across this roadway to prevent trucks from using Novice Lane to "cut-through" to Myrtle Avenue. The Fire Department indicated that a gate with a "Knox Box" would be required instead of a permanent block wall or fence. As such, the gate on the western property line will be equipped with a Knox Box. The new building would include sprinklers. *As a result, the impacts would be less than significant.*

Police Protection

Law enforcement services are provided by the City of Monrovia Police Department. The proposed Project would place an incremental demand on police protection services since the proposed Project is not anticipated to be an attractor for crime due to the lack of unsecure vacant space. The Monrovia Police Department is located 2.1 miles north of the Project site. To ensure the proposed Project elements adhere to the City's security requirements, the City of Monrovia Police Department would review the site plan for the proposed Project to ensure that the development adheres to the Department requirements. The proposed Project description also calls for the installation of a gate across Novice Lane along the site's western property line. The residents located to the west of the site requested a block wall or a permanent

⁷⁷ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

barrier be constructed across this roadway to prevent trucks from using Novice Lane to “cut-through” to Myrtle Avenue. The Fire Department indicated that a gate with a “Knox Box” would be required instead of a permanent block wall or fence. The Knox Box would be accessible by the Police Department. Adherence to the above-mentioned requirement would reduce potential impacts to levels that are less than significant. *As a result, the impacts would be less than significant.*

Schools

Due to the nature of the proposed Project, no direct enrollment impacts regarding school services would occur. The proposed Project would not directly increase demand for school services. However, the proposed Project may result in indirect population growth due to employment opportunities. Pursuant to SB-50, payment of fees to the applicable school district is considered full mitigation for Project-related impacts. The current development fees for the MUSD is 0.78 per square foot. School fees would be paid by the developer. *As a result, the impacts would be less than significant.*

Parks or Other Public Facilities

Due to the nature of the proposed Project, no significant increase in the usage of City parks and recreational facilities is anticipated to occur. The proposed warehouse development would be constructed within the confines of the Project site and the proposed Project would not physically impact any nearby parks. No new public facilities would be needed since the proposed industrial development would not result in a direct increase in population and therefore would not create a significant need for increased public services. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated and no mitigation is required with the implementation of the proposed Project.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			×	
B. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				×

METHODOLOGY

The analysis must first determine if the Project would 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. The analysis must then determine whether the proposed Project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? • Less than Significant Impact.*

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. The proposed Project would involve warehouse uses and would not result in direct population growth. However, the proposed Project may result in indirect population growth due to employment opportunities. The proposed Project would result in an estimated 20 new employees. Due to the nature of the proposed Project, no significant increase in the usage of City parks and recreational facilities is anticipated to occur. The proposed Project would be constructed within the confines of the Project site and the proposed Project would not physically impact any nearby parks. The nearest park is Pamela Park, located approximately 0.47 miles to the northeast of the site. The potential future employees may patronize local parks from time to time though this impact would be limited given the relatively low numbers of employees. *As a result, the impacts would be less than significant.*

B. *Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? • No Impact.*

The proposed Project would not involve the construction of new recreational facilities nor would the Project result in a direct demand for park facilities. As a result, no changes in the demand for local parks and recreation facilities are anticipated. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed Project's approval and subsequent implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✗	
B. Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			✗	
C. 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)?			✗	
D. Would the Project result in inadequate emergency access?				✗

METHODOLOGY

Senate Bill 743 (Steinberg) (SB 743) requires the California Governor’s Office of Planning and Research to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to LOS as the metric for evaluating transportation impacts under CEQA. SB 743 requires the alternative criteria to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and diversity of land uses. The alternative metric for transportation impacts detailed in the CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020 to adopt and begin implementing Vehicle Miles Travelled (VMT) thresholds for traffic analysis. Prior to July 1, 2020, jurisdictions had the option to continue using LOS analysis or converting to VMT analysis once such thresholds were adopted. The Governor’s Office of Planning and Research (OPR) released the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) in December 2018. The Technical Advisory aids in the transition from LOS to VMT methodology for transportation impact analysis under CEQA. The advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the Federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2020-2045 Connect SoCal 2050. The Plan integrates transportation planning with economic development and sustainability planning and aims to comply with State greenhouse gas emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates, in the RTP/SCS, that the six-county region will have to accommodate 20.9 million residents, an increase of nearly 2.1 million people by 2050, while also meeting the greenhouse gas emissions reduction targets set by the California Air Resources Board.⁷⁸

SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region’s counties and cities. In

⁷⁸ SCAG Connect SOCAL 2024. Southern California’s Regional Plan. 2024.

addition, SCAG has taken on the role of planning for regional growth management.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? • Less than Significant Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. A total of 33 parking stalls and three truck loading docks would also be provided. The property is in the *PD-19 (Planned Development-Area 19)* zone with a General Plan Designation of *Planned Development – Area 19 (Novice Lane Area)*. The new building would be used for warehouse and distribution purposes. The site's Assessor Parcel Numbers are (APNs) 8534-016-045, 8534-016-046, and 8534-016-047. The site's address is 2601 California Avenue, Monrovia, California 91016. Other addresses associated with the site include 213 and 217 Novice Lane.⁷⁹

Regional access to the Project site is provided by two area freeways: the Foothill Freeway (I-210), which traverses the center portion of the City in an east-west orientation; and, the San Gabriel River Freeway (I-605), which is a north-south freeway approximately 1.3 miles east of Monrovia's eastern boundary.⁸⁰ Roadways in the area include Novice Lane, a private street on the southern portion of the Project site that would provide vehicular access to the Project in an east/west orientation; California Avenue, which abuts the Project site to the east and extends in a northeast-southwest orientation; and South Myrtle Avenue, which is located west of the Project site and extends in a north-south orientation.

Trip generation estimates for the proposed Project were developed using the trip rates contained in the Institute of Transportation Engineers' (ITE) Trip Generation, 11th Edition based on the Warehouse land use category (ITE Code 150). This ITE information was used to estimate future traffic generated and this information is summarized in Table 3-13. As indicated in Table 3-13, the proposed warehouse use (ITE Code 150) is anticipated to generate approximately 45 daily trips, with approximately 8 trips occurring during the AM peak hour, and 9 trips occurring during the PM peak hour. The addition of 8 AM peak hour trips and 9 PM peak hour trips would not add a significant number of vehicles to the road nor alter the Level of Service (LOS) of any of the nearby roadway intersections due to the overall total daily trips to be less than 110 daily trips.

TABLE 3-13 TRIP GENERATION BY PROPOSED PROJECT

ITE Code	Size	Trip Generation Rate			Average Traffic Volume		
		Daily Total	AM Peak Hour	PM Peak Hour	Daily Total	AM Peak Hour	PM Peak Hour
150	27,078 SF	1.65	0.17	0.19	45	8	9

Source: Institute of Transportation Engineers' (ITE) Trip Generation, 11th Edition

Vehicle access to the Project site would be provided from California Avenue through a new, single, 29-foot-wide, two-way driveway utilizing the existing ingress/egress easement (Novice Lane) along the southern portion of the Project site. In addition, the driveway utilizing Novice Lane would serve as a fire lane, truck

⁷⁹ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

⁸⁰ Google Earth. Website accessed June 14, 2022.

access, and vehicular access to the parking areas. A 35-foot fire turnaround extension of this fire lane would be located on the shared ingress/egress easement on the abutting property (APN 8534-016-048) to the west, known as “Parcel 3a” in the Title Report for the site.⁸¹ All warehouse use related truck maneuvering would occur on-site in an area located to the south of the loading docks. The main pedestrian access to the building would be provided on the eastern side of the building through the office space. Additional pedestrian access doors are provided on the north, south, and west sides of the building.

A wrought-iron sliding gate would extend across Novice Lane on the west side of the site to prevent through traffic from the site to Myrtle Avenue and a “Knox-box” would be provided to permit the Fire Department and other emergency services access. From the Title Report for the Project site, Parcel 3a is an easement for ingress and egress in common with others, over the South 20.00 feet of the North 142.22 feet of that portion of Lot 5 of I. H. Polk Tract, in the City of Monrovia, County of Los Angeles, State of California, as per map recorded in Book 15 Page 17 of Maps, lying Easterly of the Easterly line of Myrtle Avenue, 100 feet wide, as described in the Deed to the City of Los Angeles, recorded October 4, 1949 in Book 31153 Page 278, Official Records. EXCEPT the East 403.25 feet of said land. The easement will remain as is and would not be modified from its current state. The Project would not be in conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. *As a result, the impacts would be less than significant.*

B. *Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? • Less than Significant Impact.*

The State of California Governor’s Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance was finalized in December 2018 (OPR Technical Advisory) that amends 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 would result in a substantial increase in Vehicles Miles Traveled (VMT).

Traditionally, public agencies have set certain thresholds to determine whether a Project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. The City has adopted three screening criteria which may be applied to screen Projects out of a detailed VMT analysis. 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 provides the Project analysis for each of the three screening criteria. Pursuant to the City’s guidelines⁸² there are three types of screening criteria that may be used to determine a full VMT analysis applicability:

- *Project Screening Type 1: Transit Priority Area (TPA) Screening.* If a Project is located within a Transit Priority Area (TPA), it may be presumed that it would have a less than significant impact absent of any substantial evidence to the contrary.
- *Project Screening Type 2: Low VMT Screening Area.* If the Project has land uses consistent with the Project TAZ and located within a low VMT generating area, the Project may be presumed to have a less than significant impact.

⁸¹ Seaboard Engineering Co. A.L.T.A./N.S.P.S. Land Title Survey, 2601 S. California Avenue & 213-217 Novice Lane, Monrovia, CA 91016.

⁸² City of Monrovia Transportation Study Guidelines. November 2024.

- *Project Screening Type 3: Project Type Screening.* Some Project types have been identified as having the presumption of a less than significant impact. The following uses can be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are local serving in nature: Local-serving retail uses less than 50,000 square feet, including: Gas stations, Banks, Restaurants, Shopping Center; warehousing uses less than 63,000 square feet; Other local serving uses as approved by the City Staff; or Projects generating less than 110 daily vehicle trips.

For the proposed Project, the *Step 3: Project Type Screening*, was used in the screening analysis. Based on the screening criteria using this methodology, the proposed Project was presumed to generate under 110 new daily trips. As indicated in Table 3-17, the proposed warehouse use (ITE Code 150) is anticipated to generate approximately 45 daily trips, with approximately 8 trips occurring during the AM peak hour, and 9 trips occurring during the PM peak hour. Since the proposed warehouse use would only generate 45 daily trips and it is less than the 110 daily vehicle trip threshold, the Project is screened out from a full VMT analysis. *As a result, the impacts would be less than significant.*

C. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? • Less than Significant Impact.

Roadways in the area include Novice Lane, a private street on the south side of the Project site that would allow vehicular access to the site; California Avenue, which abuts the Project site to the east and extends in a northeast-southwest orientation; and South Myrtle Avenue, which is located west of the Project site and extends in a north-south orientation. According to Table 3-17, the Trip Generation table shows a maximum of 8 vehicles would enter and exit the site during the AM peak hour and a maximum of 9 vehicles would enter and exit the site during the PM peak hour. This low volume of traffic is not expected to cause any on-street delays or queuing. The proposed Project would not require the construction of new roadways, thus eliminating the impacts related to sharp curves or dangerous intersections. The Project would also not require incompatible uses such as farm equipment. *As a result, no impacts would occur.*

D. Would the Project result in inadequate emergency access? • Less than Significant Impact.

The proposed Project would not impede emergency access to any neighboring properties during construction or operation. At no time would the surrounding roadways be closed to traffic during the Project's construction. The proposed Project description calls for the installation of a gate across Novice Lane along the site's western property line. The residents located to the west of the site requested a block wall or a permanent barrier be constructed across this roadway to prevent trucks from using Novice Lane to "cut-through" to Myrtle Avenue. The Fire Department indicated that a gate with a "Knox Box" would be required instead of a permanent block wall or fence. A wrought-iron sliding gate would extend across Novice Lane on the west side of the site to prevent through traffic from the site to Myrtle Avenue and a "Knox-box" would be provided to permit the Fire Department and other emergency services access to and from Myrtle Avenue. Additionally, a 35-foot extension to accommodate the fire turnaround would be located on the abutting parcel (APN 8534-01-6048) within a shared ingress egress easement, "Parcel 3a". From the Title Report, an easement for ingress and egress in common with others, over the South 20.00 feet of the North 142.22 feet of that portion of Lot 5 of I. H. Polk Tract, in the City of Monrovia, County of Los Angeles, State of California, as per map recorded in Book 15 Page 17 of Maps, lying Easterly of the Easterly line of Myrtle Avenue, 100 feet wide, as described in the Deed to the City of Los Angeles, recorded October 4, 1949 in Book 31153 Page 278, Official Records. EXCEPT the East 403.25 feet of said land. The easement will remain as is and would not be modified from its current state. *As a result, less than significant impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to traffic and circulation indicated that no significant adverse impacts would result from the proposed Project. As a result, no mitigation measures are required.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?		×		
B. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		×		

METHODOLOGY

The California State Government passed AB 4239, creating the Native American Heritage Commission (NAHC). The NAHC is responsible for identifying and categorizing Native American cultural resources as well as preventing damages to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside of any place other than a designated cemetery. An MLD has the authority to make recommendations in regard to the treatment and disposition of the discovered remains.

The *Native American Historic Resource Protection Act* or Assembly Bill (AB 52), defines guidelines for reducing conflicts between Native Americans and development Projects and activities. Projects are subject to AB 52 if a notice of preparation for an EIR is filed or a notice of intent to adopt a Negative or Mitigated Negative Declaration is filed on or after July 1, 2016. “Tribal Cultural Resources” (TCR) are protected under CEQA and are defined as a site, feature, place, cultural landscape (must include the size and scope of landscape), sacred place, and object with a cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources. At the lead agency’s discretion, a resource can be treated as a TCR if a Native American Tribe provides substantial evidence. Additionally, AB 52 allows tribes to engage in consultation with lead agencies and sets guidelines for such consultation. A request for Native American consultation was requested by the City from the following Native American Tribes:

- Soboba Band of Luiseno Indians;

- Santa Rosa Band of Cahuilla Indians;
- Kizh Nation – Gabrielino- Band of Mission Indians; and,
- Gabrielino-Tongva Indians.

Input was provided by the Gabrielino Band of Mission Indians – Kizh Nation in accordance with AB-52 and it was determined that the Project site is located in an area of high archaeological significance according to Mr. Andrew Salas, the Tribal Chairman.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

The proposed Project would be located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts would be encountered. The grading and excavation would involve the clearance of the site, shallow excavation, and the installation of the new building footings and utility connections. In addition, the Project site is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials. However, the entire City of Monrovia is located within the cultural area that was formerly occupied by the Gabrieleño tribe. A request for Native American consultation was provided by the Gabrielino Band of Mission Indians – Kizh Nation in accordance with AB-52 and it was determined that the Project site is located in an area of high archaeological significance. As a result, the applicant would be required to follow mitigation measure TCR-

1, which relates to obtaining the services of a qualified Native American Monitor.

Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. *As a result, the impacts would be less than significant with Mitigation Measure TCR-1 incorporated.*

B. *Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. • Less than Significant Impact with Mitigation.*

The Native American Heritage Commission (NAHC) provided the City a list of councils and corresponding Native American representatives on November 17, 2023. This includes the following Tribal representatives:

- Gabrielino/Tongva Nation, Sandonne Goad, Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Robert Dorame, Chairperson
- Gabrielino Tongva Tribe, Charles Alvarez, Chairperson and Sam Dunlap, Cultural Resource Director
- Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairperson and Christina Swindall Martinez, Secretary
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, Anthony Morales, Chairperson
- Gabrielino Tongva Indians of California Tribal Council, Christina Conley, Cultural Resource Administrator
- Santa Rosa Band of Cahuilla Indians, Lovina Redner, Tribal Chair
- Soboba Band of Luiseno Indians, Jessica Valdez, Cultural Resource Specialist and Joseph Ontiveros, Tribal Historic Preservation Officer

In compliance with AB 52 and SB 18, the City distributed letters notifying each representative that requested to be on the City's list for the purposes of AB 52 and SB 18 of the opportunity to consult with the City regarding the Project. The letters were distributed by certified mail on November 20, 2023. The tribes had 30 days to respond to the City's request for consultation. The Gabrieleno Band of Mission Indians – Kizh Nation responded on December 1, 2023 stating that the Project is within the tribe's ancestral tribal territory and requested consultation. The City attempted to follow up with Mr. Salas with an email on December 6, 2023; however, no response was received. No other tribes responded within the 30 days. As noted above, Mr. Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation, stated that the Project site lies within the ancestral territories of the Kizh Gabrieleno. The Project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts would be encountered. The grading and excavation would involve the installation of the new building footings and utility connections. In addition, the Project site is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials.

Nevertheless, in order to reduce potential impacts to less than significant, Mitigation Measure TCR-1 shall be implemented to provide Native American monitoring during ground-disturbing activities in native soils to address potential impacts associated with buried or undiscovered tribal cultural resources that may exist in previously undisturbed native soil. *As a result, the impacts would be less than significant with mitigation incorporated.*

MITIGATION MEASURES

Although the Project site has been subject to disturbance to accommodate the on-site development and the surrounding buildings, the Project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

Mitigation Measure TCR-1. The Project Applicant would be required to obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, potholing or auguring, boring, grading, excavation, and trenching, within the Project site. The monitor(s) must be approved by the tribal representatives and would be present on-site during the construction phases that involve any ground-disturbing activities.

3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
A. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				×
B. Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?			×	
C. Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?			×	
D. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			×	
E. Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				×

METHODOLOGY

The analysis must first determine if the Project would require 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 analysis must then determine if 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. The analysis must then determine if the Project would result in a determination by the wastewater treatment provider which serves or may serve the proposed Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The analysis must then determine if the proposed Project would 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 or if a proposed Project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • No Impact.

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot. A total of 33 parking stalls and three truck loading docks would

also be provided. The property is in the *PD-19 (Planned Development – Area 19)* zoning district and designated as *Planned Development – Area 19 (Novice Lane Area)* in the Monrovia General Plan. The new building would be used for warehouse and distribution purposes. The site's Assessor Parcel Numbers are (APNs) 8534-016-045, 8534-016-046, and 8534-016-047. The site's address is 2601 California Avenue, Monrovia, California 91016. Other addresses associated with the site include 213 and 217 Novice Lane.⁸³

There are no existing water plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the proposed Project's implementation would not require the relocation of any of the aforementioned facilities. In addition, any increase in demand for waste disposal, water, and wastewater treatment services can be adequately handled and no expansion of these services is required (refer to the following subsections). *As a result, no impacts would occur.*

B. Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years? • Less than Significant Impact.

Water agencies, districts, and suppliers in the San Gabriel Basin generally obtain their water from groundwater extraction. Some agencies and jurisdictions replenish this water supply by groundwater recharge through spreading grounds located along the San Gabriel and Rio Hondo rivers. Imported water purchased from the Metropolitan Water District of Southern California (MWD) and recycled water from Whittier, Pomona, and San Jose water reclamation plants are also used for recharge. The Main San Gabriel Basin Watermaster is responsible for administering water rights allocations, including water spreading activities, within the Main San Gabriel Basin.

Water service in Monrovia is provided by the City of Monrovia's Public Works Department. According to the City's 2020 Urban Water Management Plan, the City will have an adequate supply of water to meet the Projected demand under a normal year scenario, a single dry-year scenario, and a multiple dry year scenario. The water supply source available to the City of Monrovia is 6,976 acre-foot.⁸⁴

The age and size of the existing water main would be sufficient in accommodating the Projected flows according to the Project architect. According to the City's 2021-2029 Housing Element, the City of Monrovia has an adequate supply of water in acre-feet through the year 2040.⁸⁵ In addition, the Applicant would be required to comply with the Water Efficiency Model Water Efficient Landscape Ordinance (MWELO) and Chapter 17.20 (Landscaping/Tree Preservation) of the City's Municipal Code.⁸⁶ As indicated in Table 3-18, the proposed Project is Projected to consume approximately 1,890.4 gallons of water on a daily basis. The existing water supply facilities and infrastructure would be able accommodate this additional demand. In addition, the tilt-up concrete building would be equipped with water efficient fixtures and drought tolerant plants would be planted throughout the property. *As a result, impacts would be less than significant.*

⁸³ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

⁸⁴ City of Monrovia. *2020 Urban Water Management Plan*. July 2021.

⁸⁵ City of Monrovia. *2021-2029 Housing Element Revised HCD*. Draft. February 18, 2022.

⁸⁶ City of Monrovia. *Model Water Efficient Landscape Ordinance (MWELO)*. <https://www.monroviaca.gov/your-government/community-development/planning/landscape-regulations>. Secondary Source: City of Monrovia Municipal Code. Title 17 Zoning, Chapter 17.20 Landscaping/Tree Preservation.

TABLE 3-14 WATER CONSUMPTION (GALS/DAY)

Use	Unit	Factor	Consumption
Warehouse	24,932 sq. ft.	0.05 gals/day/sq. ft.	1,246.6 gals/day
Office	2,146 sq. ft.	0.30 gals/day/sq. ft.	643.8 gals/day
Total Consumption			1,890.4 gals/day

Source: Los Angeles County Sanitation District Rates (150% of effluent generation)

C. Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments? • Less than Significant Impact.

The City of Monrovia is located within District 15 of the Los Angeles County Sanitation District (LACSD). The Sanitation Districts own, operate, and maintain approximately 1,400 miles of sewers, ranging from 8 to 144 inches in diameter, that convey approximately 500 million gallons per day of wastewater to 11 wastewater treatment plants. Wastewater will typically be conveyed to either the San Jose Creek Water Reclamation Plant (WRP) or the Whittier Narrows WRP, though wastewater collected within the Los Angeles County Sanitation District may be conveyed and treated at any of the County treatment plants. The San Jose Creek WRP provides primary, secondary, and tertiary treatment for 100 million gallons of wastewater per day. The plant serves a population of approximately one million residents throughout Los Angeles County. Approximately 42 million gallons per day of reclaimed water is reused at over 130 different reuse sites, while the remainder is discharged into the San Gabriel River. The Whittier Narrows WRP provides primary, secondary, and tertiary treatment for 15 million gallons of wastewater per day. According to Table 3-15, the proposed Project is expected to generate approximately 1,177.16 gallons of wastewater per day, well within the daily average totals for the Whittier Narrows WRP.

TABLE 3-15 WASTEWATER (EFFLUENT) GENERATION (GALS/DAY)

Use	Unit	Factor	Generation
Warehouse	24,932 sq. ft.	0.03 gals/day/sq. ft.	747.96 gals/day
Office	2,146 sq. ft.	0.20 gals/day/sq. ft.	429.2 gals/day
Total Consumption			1,177.16 gals/day

Source: Los Angeles County Sanitation Districts

The future development is Projected to generate 1,177.16 gallons of effluent on a daily basis. The San Jose Creek WRP provides primary, secondary, and tertiary treatment for 100 million gallons of wastewater per day. The Whittier Narrows WRP provides primary, secondary, and tertiary treatment for 15 million gallons of wastewater per day. The proposed Project's wastewater generation would not result in the remaining capacity being exceeded. In addition, the City's sewer system has sufficient capacity to accommodate the proposed Project. *As a result, impacts would be less than significant.*

D. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? • Less than Significant Impact.

Athens Services would provide solid waste collection for the proposed Project. According to a representative of Athens Services, the proposed Project would be supplied with a three-yard dumpster that would be collected three times per week. Three-yard dumpsters typically have a capacity of 500 pounds of waste. As indicated in Table 3-16, the proposed Project is estimated to produce 235.52 pounds of solid waste per day, or approximately 85,965 pounds (42.98 tons) annually. In the event a dumpster is full, the tenant would be required to have additional waste pick-ups.

TABLE 3-16 SOLID WASTE GENERATION (POUNDS/DAY)

Use	Unit	Factor	Generation
Warehouse	24,932 sq. ft.	8.93 lbs./day/1,000 sq. ft.	222.64 lbs./day
Office	2,146 sq. ft.	6.00 lbs./day/1,000 sq. ft.	12.88 lbs./day
Total Generation			235.52 lbs./day

Source: Los Angeles Average Solid Waste Generation Rates

The Districts' Puente Hills Materials Recovery Facility, Downey Area Recycling and Transfer Facility, South Gate Transfer Station, Scholl Canyon Landfill, and Calabasas Landfill are open and accepting solid waste. *As a result, impacts would be less than significant.*

E. Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? • No Impact.

The proposed Project, like all other development in Monrovia, would be required to adhere to City and County ordinances with respect to waste reduction and recycling. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed Project's approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

The proposed Project involves the construction of a 27,078 square-foot warehouse building (2,146 square feet of office and 24,932 square feet of warehousing) with related parking and site improvements on a 61,508 square foot (1.41 gross acres) lot.⁸⁷ As previously mentioned, at no time during construction or operation would adjacent streets be completely closed to traffic. The proposed Project description calls for the installation of a gate across Novice Lane along the site's western property line. The residents located to the west of the site requested a block wall or a permanent barrier be constructed across this roadway to prevent trucks from using Novice Lane to "cut-through" to Myrtle Avenue. The Fire Department indicated that a gate with a "Knox Box" would be required instead of a permanent block wall or fence. Furthermore, the Project site is located within an urbanized area and no areas prone to wildfires are located near the Project site. *As a result, no impacts would occur.*

⁸⁷ C.E.G. Construction. *Site Plan Sheet A100 California Industrial 2601 California, Monrovia, California*. May 2025.

B. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • No Impact.*

There is no risk from wildfire within the Project site or the surrounding area given the distance from any area that may be at risk of a wildfire event. In addition, the proposed Project would not change the nature of the Project site. *As a result, no impacts would occur.*

C. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

The proposed Project would not change the nature of the Project site. There is no risk from wildfire within the Project site or the surrounding area given the distance from any area that may be at risk of a wildfire event. *As a result, no impacts would occur.*

There is no risk from wildfire within the Project site or the surrounding area given the distance from any area that may be at risk of a wildfire event. *As a result, no impacts would occur.*

D. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

MITIGATION MEASURES

The analysis of wildfires impacts indicated that no impacts would result from the proposed Project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? • Less than Significant Impact with Mitigation.*

The proposed Project *would not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As concluded in Section 3.4, *Biological Resources*, the Project site is previously developed and is located within an urbanized area of the City. As such, no sensitive plant or animal species are present on-site and no impacts would occur in this regard. As indicated in Section 3.5, *Cultural Resources*, Section 3.7, *Geology and Soils*, and Section 3.18, *Tribal Cultural Resources*, impacts on cultural, paleontological, or tribal cultural resources are not anticipated due to the level of past disturbance on-site. Nonetheless, due to the proposed excavation, there is a possibility that unknown cultural resources are uncovered during site disturbance activities. As such, in the unlikely event that previously unidentified cultural resources are encountered during ground-disturbing activities, Mitigation Measure CUL-1 and CUL-2 would require all Project construction efforts in the immediate area to halt until an archaeologist evaluate the find and recommends a course of action. Mitigation Measure TCR-1 would require a Tribal Monitor during site disturbance activities and implementation of appropriate actions

should unknown TCRs be discovered during site disturbance. Further, if evidence of subsurface paleontological resources is found during construction, Mitigation Measure GEO-1 would ensure that Project construction activities would cease within 50 feet of the discovery and the City Planning Division be contacted. With direction from the City Planning Division, a qualified paleontologist may be contacted to evaluate the find and recommend a course of action.

As such, the Project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory with implementation of Mitigation Measures CUL-1, TCR-1, and GEO-1. *As a result, the impacts would be less than significant with mitigation incorporated.*

The mitigations are listed below under mitigation measures Aesthetics 1-5, Air Quality 1, Cultural Resources 1-2, Geology & Soils 1, Land Use 1, Noise 1-10, and Tribal Cultural Resources 1.

B. Does the Project have impacts that are individually limited, but cumulatively considerable? (*"Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects*)? • **No Impact.**

The proposed Project would not have impacts that are individually limited, but cumulatively considerable. *The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.*

C. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? • **Less than Significant Impact with Mitigation.**

Previous sections of this Initial Study reviewed the Project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous sections, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework, standard conditions, and mitigation measures. *As a result, the impacts would be less than significant with mitigation incorporated.* The proposed Project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. *As indicated in Sections 3.1 through 3.20, the impacts of the proposed Project would be less than significant with mitigation incorporated.*

The mitigations are listed below under mitigation measures Aesthetics 1-5, Air Quality 1, Cultural Resources 1-2, Geology & Soils 1, Land Use 1, Noise 1-10 and Tribal Cultural Resources 1.

MITIGATION MEASURES

Mitigation Measure AES-1. Prior to issuance of any construction permits, the City of Monrovia (City) Community Development Director, or designee, shall verify that all construction plans include the following note: "During construction, the Construction Contractor shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner. In the event that unauthorized materials or markings are discovered on any temporary construction barrier or temporary pedestrian

walkway, the Construction Contractor shall remove such items within 48 hours.”

Mitigation Measure AES-2. Automatic shut off for exterior lights and light shields must be installed so as to reduce the amount of glare, spillover lighting, and other possible intrusive lighting during periods of darkness.

Mitigation Measure AES-3. Reflective glass, metallic, and other highly reflective and glare producing materials, shall not be used in new building construction as a measure to prevent glare to traffic on California Avenue, Myrtle Avenue, and nearby residential uses.

Mitigation Measure AES-4. Prior to the issuance of a building permit, the applicant shall submit a comprehensive lighting plan for review and approval by the City Community Development Director, or designee. The lighting plan shall be prepared by a qualified engineer (i.e., an engineer who is an active member of the Illuminating Engineering Society of North America [IESNA]) and shall be in compliance with applicable standards of the City’s Municipal Code. The lighting plan shall address all aspects of lighting, including infrastructure, onsite driveways, recreation, safety, signage, and promotional lighting, if any. The lighting plan shall include the following in conjunction with other measures, as determined by the illumination engineer: 1. Exterior onsite lighting shall be shielded and confined within site boundaries; 2. No direct rays or glare are permitted to shine onto public streets or adjacent sites; 3. Lighting fixtures that blink, flash, or emit unusual high intensity or brightness shall not be permitted; and 4. The site shall not be excessively illuminated based on the illumination recommendations of the Illuminating Engineering Society of North America (IESNA).

Mitigation Measure AES-5. No after-hour truck deliveries shall be permitted as a means to eliminate nuisance light and glare after hours. The City Code prohibits operations, including truck deliveries, from occurring between 12:00 AM and 6:00 AM. All proposed uses of the site shall be reviewed by the City of Monrovia’s Development Review Committee. Permitted hours for truck deliveries and normal operations shall be identified as conditions of approval upon determination of specific occupant.

Mitigation Measure AIR-1. All proposed uses of the site shall be reviewed by the City of Monrovia’s Development Review Committee. No land uses that cause odors are allowed.

Mitigation Measure CUL-1. The Project Applicant would be required to obtain the services of a qualified Native American Monitor during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians, Kizh Nation as activities that include, but are not limited to, pavement removal, potholing or auguring, boring, grading, excavation, and trenching, within the Project area. The monitor(s) must be approved by the tribal representatives and would be present on-site during the construction phases that involve any ground disturbing activities. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

Mitigation Measure CUL-2. In the event cultural resources are encountered during construction, the contractor(s) shall comply with California Code of Regulations (CCR) Section 15064.5(b)(4) which states that “A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit

conditions, agreements, or other measures.”

Mitigation Measure GEO-1. Prior to commencement of any grading activity on site, the Applicant shall retain a qualified paleontologist, subject to the review and approval of the City’s Community Development Director, or designee. The qualified paleontologist shall be on-site during grading and other significant ground disturbance activities that impact Pleistocene alluvial deposits, which could occur at depths below six feet. The monitoring shall apply to the areas of the site where excavation shall extend at depths of six feet or more.

Mitigation Measure LU-1. The Project shall be limited to warehouse use only and no commercial or retail activities shall be permitted that necessitate the need for customer parking.

Mitigation Measure NOI-1 Installation of a temporary sound barrier at the property lines of the proposed Project site to mitigate noise impacts on all surrounding properties. Temporary noise barriers shall achieve a minimum of 5 dBA reduction in construction noise. The noise barrier shall include the following:

- The noise control barriers must present a solid face from top to bottom.
- The noise barriers shall be maintained, and any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.

The temporary noise barrier shall be constructed using one of the following materials with no decorative cutouts or line-of-sight openings between shielded areas and the noise source:

- Masonry block;
- Glass (1/4-inch-thick), or other transparent material with sufficient weight per square foot;
- Earthen berm;
- Any combination of these construction materials.

In addition, the contractor shall install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors. The contractor shall maintain all barriers in compliant condition throughout construction. To promote effective practices, the contractor shall position construction equipment staging areas and stationary noise sources as far from those nearby receptors as possible (e.g. in the southeastern portion of the Project site on Novice Lane). Additionally, the contractor will prohibit idling of equipment, and will notify adjacent residences in advance of construction work.

Mitigation Measure NOI-2. The use of Tier IV rated construction equipment must be used during demolition, site preparation, and construction activities. Prior to issuance of the first building permit, the applicant shall submit manufacturer data sheets demonstrating compliance with Tier IV Final or equivalent noise performance.

Mitigation Measure NOI-3. To reduce temporary construction noise impacts on adjacent

residential uses, the applicant or the applicant's construction contractor shall implement the following construction-period noise abatement measures, as outlined in Mitigation Measures NOI- C through F of the *City of Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report* (2008).

- All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
- Construction Activity Notification: All residential units located within 500 feet of the construction site shall be sent a notice at least two weeks in advance of construction activity regarding construction times. A sign shall provide local contact information and be placed at the construction site so that it is legible at a distance of 50 feet and in prominent locations along the Novice Lane and California Avenue frontages along the Project site's boundaries. All notices and signs shall indicate the dates and duration of construction activities, and shall include the name and phone number of the contact person at both the construction site and at the City's Code Enforcement office where residents may call to register a complaint about noise.
- Noise Disturbance Coordinator: A "noise disturbance coordinator" shall be established by the applicant. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. Upon receipt of a complaint, the contractors must stop work to inspect their equipment to ensure that it is properly tuned and muffled. Construction activities may not resume until the equipment is replaced and/or repaired with newer and quieter Tier 4 equipment. In addition, copies of all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City's Community Development Director.
- Construction Traffic: Route all construction traffic to and from the construction site via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.

Mitigation Measure NOI-4. The Project developer shall require that the following construction measures be implemented by contractors to reduce construction noise levels below the established thresholds:

- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses whenever physically possible during all phases of Project construction.
- Use electric air compressors and similar power tools rather than diesel equipment shall be used, whenever such equipment is available.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.

Mitigation Measure NOI-5. In consideration of requirements from the City of Monrovia and the County of Los Angeles, construction shall be prohibited from taking place from 7:00 PM to 7:00 AM, Monday through Friday, from 6:00 PM to 9:00 AM on Saturdays, and at any time on Sundays or holidays.

Mitigation Measure NOI-6. The loading and receiving area shall be closed after business hours to restrict noise impacts related to these activities (back-up alarms, roll-up doors, fork-lifts, etc.) on the adjacent homes. The hours for truck deliveries shall only be permitted during the business's normal hours of operations as established by the CUP or by the Development Review Committee upon selection of a specific tenant. The City Code prohibits operations occurring between 12:00 AM and 6:00 AM.

Mitigation Measure NOI-7. Truck deliveries would be limited to access to and from the site via California Avenue. Only emergency vehicles are allowed access to the gate from Novice Lane to Myrtle Avenue.

Mitigation Measure NOI-8. Stationary Noise Sources. During construction and operational activities, the Project shall comply with Mitigation Measure NOI-A of the City of Monrovia General Plan Proposed Land Use and Circulation Elements Environmental Impact Report (2008) to further reduce noise emitted from stationary noise sources on the Project site. As required by Mitigation Measure NOI-A, stationary noise sources associated with the operation of future non-residential uses (e.g., mechanical equipment and loading docks) within the Project areas shall not have a direct line-of-sight to noise sensitive uses. The line-of-sight between the noise source and noise sensitive receptor shall be blocked through the orientation of the non-residential land use and/or by using noise barriers, such as a concrete block wall or enclosing the noise source. The Project Developer shall submit documentation to the City Community Development Department, or designee, demonstrating that noise-reducing measures have been implemented in the Project Design.

Mitigation Measure NOI-9. Prior to the start of grading, compaction, or other vibration-generating construction activities, the Project contractor shall submit a Construction Vibration Control Plan to the City Community Development Department for review and approval. The plan shall identify the vibration-generating equipment to be used, anticipated work areas, approximate distances to nearby residential structures, proposed equipment setbacks, and alternative vibration-reduction measures to be implemented where the setback distances identified below cannot be achieved.

During construction activities involving vibration-generating equipment, the contractor shall minimize vibration exposure at nearby residential structures through implementation of the Construction Vibration Control Plan and the following measures, as applicable: (1) equipment operating within 10 feet of the nearest residence shall be limited to a small bulldozer or similar equipment with vibration levels less than 72 VdB; (2) vibratory rollers shall, to the maximum extent feasible, maintain a setback distance of 140 feet from nearby residences; (3) large bulldozers and loaded haul trucks shall, to the maximum extent feasible, maintain a setback distance of 80 feet from nearby residences; and (4) where these setback distances cannot be achieved due to site constraints or required construction activities, the contractor shall utilize alternative vibration-reduction measures, including reduced vibratory settings, smaller or static compaction equipment, phased operations, or limiting simultaneous operation of vibration-generating equipment near sensitive receptors. The contractor shall document the vibration-reduction measures implemented during grading and compaction activities and shall make such documentation available to the City upon request.

Mitigation Measure NOI-10. Loaded and unloaded haul trucks over 7 tons are prohibited from travelling north on California Avenue from the site. All trucks must follow adopted truck routes. No construction vehicles are permitted to use Novice Lane to exit or enter from Myrtle Avenue.

Mitigation Measure TCR-1. The Project Applicant would be required to obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians and Kizh Nation as activities that include, but are not limited to, pavement removal, potholing or auguring, boring, grading, excavation, and trenching, within the Project site. The monitor(s) must be approved by the tribal representatives and would be present on-site during the construction phases that involve any ground-disturbing activities.

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SECTION 4 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed Project is not expected to have significant adverse environmental impacts that cannot be mitigated to an insignificant level. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed Project *would not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed Project *would not* have impacts that are individually limited, but cumulatively considerable.
- The proposed Project *would not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.
- A Mitigation Reporting and Monitoring Program *will be* required.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Mitigated Negative Declaration, which relates to the Mitigation Monitoring Program. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Monrovia can make the following additional findings:

- A mitigation monitoring and reporting program will be required; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigation measures adopted as part of the decision-maker's final determination.

Mitigation measures have been recommended as a means to reduce or eliminate potential adverse environmental impacts to insignificant levels. AB-3180 requires that a monitoring and reporting program be adopted for the recommended mitigation measures.

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SECTION 5 REFERENCES

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5.2 REFERENCES

References are noted using footnotes.

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