

# GRISWOLD RESIDENTIAL PROJECT

SCH NO. 2022020004

prepared for  
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Los Angeles, CA 90012

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## Draft Environmental Impact Report

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**DRAFT**  
**ENVIRONMENTAL IMPACT REPORT**  
**MERITAGE GRISWOLD RESIDENTIAL PROJECT**  
**LOS ANGELES COUNTY, CALIFORNIA**  
**STATE CLEARINGHOUSE NO. 2022020004**

Project No. 2020-001386  
Vesting Tentative Tract Map No. 83183 (RPPL 2020004447),  
Conditional Use Permit No. RPPL 2021005384,  
Environmental Assessment No. RPPL 2020004450

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## ACRONYMS AND ABBREVIATIONS

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°C	degrees celsius
µg/m <sup>3</sup>	micrograms per cubic meter
AB 52	California Assembly Bill 52
ACM	asbestos-containing material
AF	acre-feet
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
AQIA	Air Quality Impact Analyses
AQMP	Air Quality Management Plan
APN	Assessor's Parcel Number
ATCM	airborne toxic control measure
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measure
BACT	best available control technology
Basin	South Coast Air Quality Basin
BAU	business as usual
BFE	base flood elevation
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act of 1970
CAAA	CAA Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CAP	Climate Action Plan of 2013
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act of 1988
CDFW	California Department of Fish and Wildlife
CC&Rs	Covenants, Conditions, and Restrictions
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGEU	California Gas and Electric Utilities 2016 California Gas Report
CGS	California Geological Survey
CH <sub>4</sub>	methane
CHAPIS	Community Health Air Pollution Information System (CARB)
CHRIS	California Historical Resources Inventory System
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CTP	Clean Truck Program
CUP	Conditional Use Permit

dB	decibel
dBA	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Emergency Medical Services
ESA	Environmental Site Assessment
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act of 1973
FMMP	Farmland Mapping and Monitoring Program
gal/day	gallons per day
GHG	greenhouse gas
GWP	global warming potential
Handbook	Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005)
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HDT	Heavy Duty Trucks
HFCs	hydroflourocarbons
Hot Spots Act	Air Toxics Hot Spots Information and Assessment Act of 1987
HP	horsepower
HPLV	High Pressure Low Volume
HVAC	heating, ventilating, and air conditioning
ICU	intersection capacity utilization
I	Interstate
I-5	Santa Ana Freeway
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
LEV	Low Emission Vehicle
LID	low impact development
LOS	level of service
LSTs	localized significance thresholds
MACT	maximum available control technology
MBTA	Migratory Bird Treaty Act of 1918
MCC	Material Culture Consulting
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric tons
MT CO <sub>2e</sub>	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
N <sub>2</sub> O	nitrous oxide
NAHC	Native American Heritage Commission
NALs	numeric action levels
NCCP	Natural Community Conservation Plan
NESHAP	national emissions standards for HAPs
NH <sub>3</sub>	ammonia
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration

NMC	New Model Colony
NOP	Notice of Preparation
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxide
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	U.A. Department of Agriculture Natural Resources Conservation Service
O <sub>3</sub>	ozone
ODC	Ontario Development Code
ONT	Ontario International Airport
PA	Planning Area
Pb	lead
PDF	project design feature
PFCs	perfluorocarbons
PM <sub>2.5</sub>	particulate matter less than 2.5 micrometers in aerodynamic diameter
PM <sub>10</sub>	particulate matter less than 10 micrometers in aerodynamic diameter
ppb	parts per billion
PPP	Plans, Programs, and Policies
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Plan
PWS	public water supplier
REC	recognized environmental conditions
ROG	reactive organic gas
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 18	California Senate Bill 18, Ch. 905 (2004)
SC	Standard Condition
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SCS	Sustainable Communities Strategy
SF	square feet
SF <sub>6</sub>	sulfur hexafluoride
SIP	state implementation plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>3</sub>	sulfur trioxide
SO <sub>4</sub>	sulfates
SoCalGas	Southern California Gas Company
SO <sub>x</sub>	sulfur oxides
SP	Specific Plan
SR	State Route
SR-60	Pomona Freeway
SR-83	Euclid Avenue
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	Storm Water Resources Control Board
TACs	toxic air contaminants
TIA	Traffic Impact Analysis
tpy	tons per year

TTCP	traditional tribal cultural places
TUA	traditional use area
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UTRs	utility tractors
UWMP	Urban Water Management Plan
VdB	velocity levels expressed in decibel notation
VMT	vehicle miles travelled
VOC	volatile organic compounds
WDR	Waste Discharge Requirements
WFA	Water Facilities Authority
Williamson Act	California Land Conservation Act of 1965
WQC	Water Quality Certification



# 1. Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Griswold Residential Project ("Project"). This EIR has been prepared in conformance with State and County of Los Angeles environmental policy guidelines for implementation of the California Environmental Quality Act (CEQA).

The EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review at the County's website (<https://planning.lacounty.gov/case/view/tr83183>) or physically at the following location:

County of Los Angeles  
Department of Regional Planning ("LA County Planning")  
Subdivisions Section  
320 West Temple Street  
Los Angeles, CA 90012

As our offices are currently closed for remodeling, to view the documents in person please make arrangements with the project planner, Ms. Erica G. Aguirre. Written comments related to environmental issues in the Draft EIR should also be addressed to Ms. Aguirre as follows:

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A Notice of Availability of the Draft EIR was published concurrently with distribution of this document.

## 1.1 PROJECT LOCATION

The Project site is 9.61 gross acres and is located at 16209 East San Bernardino Road, Covina, CA (APN: 8435-006-900) within the unincorporated Los Angeles County community of East Irwindale. The Project site is directly north of the intersection of San Bernardino Road and North Woodgrove Avenue.

The Project area is surrounded by Covina to the east; Baldwin Park to the west; Irwindale to the north; and West Covina to the south. Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately one mile to the east. Local access is provided by East San Bernardino Road.

## 1.2 PROJECT DESCRIPTION SUMMARY

The proposed Project includes Project Number PRJ2020-001386, Vesting Tentative Tract Map Number 83183 (RPPL2020004447), Conditional Use Permit Number RPPL2021005384, and Environmental Assessment Number RPPL2020004450. The Project applicant would demolish the existing vacant buildings on the site (the Griswold School)<sup>1</sup> and associated accessory structures and develop the site with approximately 68 detached residential condominium units. The proposed Project would have a density of approximately 7.15 dwelling units per net acre. The proposed residential development would include single-family residences with their private driveways and outdoor areas on one common lot. All homes would have front and back lawns, and driveways accessed from the Project's proposed internal, shared private drives and fire lanes. In addition, designated areas would be provided adjacent to East San Bernardino Road that would be developed with an underground biofiltration basin and landscaping. A total of approximately 179 parking spaces, including 68 two-car garages and 43 onsite guest parking spaces would be provided as part of the Project. Each home also includes a full driveway that can accommodate two additional vehicles.

*Architecture.* The two-story residences would range in size from approximately 1,677 square feet to 2,300 square feet for the design footprints. The two-story design would consist of three different floor plans, not to exceed a maximum height of 25 feet.

*Landscaping.* The Project would provide two common space areas totaling 35,780 square feet with landscaping at the northern and southern portions of the site for passive recreation. The main common open space at the southern portion of the property would include a community open space area, a playground, a lawn area with bench seating, and a short-term bike rack. A secondary open space area would be located along the north end of the property and would include a dog station, picnic tables, and lawn games for passive recreation.

*Site Access.* Vehicular access to the Project would be provided by a driveway from San Bernardino Road, located at the southwest corner of the Project site. Seven new shared private drives and fire lanes would be constructed to provide internal circulation. These shared private drives would feature parallel parking spaces for guests. The Project would provide internal sidewalks and construct a new sidewalk along the East San Bernardino Road frontage. The Project would also provide public transportation access via a bus stop along San Bernardino Road, served by Foothill Transit, which would be relocated from its current location, east of the proposed driveway on San Bernardino Road.

*Infrastructure.* The proposed development would construct new private shared driveways, curb, gutter, sidewalk, and storm drain improvements, wet and dry utilities, and related infrastructure improvements. The new development would connect to the existing water, sewer, and drainage infrastructure in the San Bernardino Road right-of-way.

## 1.3 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

- Provide for additional market-rate housing opportunities consistent with the County's Housing Element and State housing goals.

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<sup>1</sup> Since the publication of the Notice of Preparation (NOP), the school buildings were damaged in a fire. As a result, the school buildings were demolished to eliminate public health and safety hazards related to the unsafe condition of the school buildings. Pursuant to State CEQA Guidelines Section 15125, the environmental baseline for the Draft EIR is February 1, 2022, the date the NOP was published. As of this date, the school buildings were vacant but intact.

- Develop a Project that constructs new single-family residential units, which would help meet the region's demand for housing.
- Redevelop existing land uses that would utilize existing infrastructure, including water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.
- Redevelop an infill site to minimize environmental impacts.
- Ensure new residential development includes adequate open space and high-quality recreational amenities for future residents.
- Eliminate potential nuisances by redeveloping a vacant site.
- Provide a new single-family residential neighborhood that is scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.

## 1.4 SUMMARY OF ALTERNATIVES

Section 7.0, *Alternatives*, of this EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 6.0 are summarized below.

**Alternative 1: No Project/No Build Alternative.** Under this alternative, the proposed Project would not be developed, and no development would occur. The existing school buildings would remain. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the proposed Project in contrast to the result from not approving, or denying, the proposed Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

**Alternative 2: Reduced Project Alternative.** Under this alternative, a reduction in the number of residential units would be built, which would result in increased setbacks, larger lots, and additional open space. The Project site has a General Plan land use designation of Public and Semi-Public (P) and a zoning designation of Light Agricultural (A-1-6,000). This allows for development of single-family residences on lots that have a minimum of 6,000 square feet. This alternative would consist of developing 11 single-family residences, which would be developed on individual lots. The buildout of the site at a decreased density would result in 57 fewer residential units than the proposed Project.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval and would likely require a Conditional Use Permit for grading in excess of 100,000 cubic yards.

**Alternative 3: Buildout of Existing Land Use and Zoning Alternative.** Under this alternative, the Project site would be developed to the maximum allowable density pursuant to the Los Angeles County General Plan and would result in a density of 8.9 dwelling units per acre. An increase in the number of residential units would be built, which would result in decreased setbacks, smaller lots, and less open space. This alternative would consist of developing 85 multi-family residential units. The buildout of the site at an increased density would result in 17 more residential units than the proposed Project.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval and would likely require a Conditional Use Permit for grading in excess of 100,000 cubic yards.

## 1.5 SUMMARY OF IMPACTS

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft EIR and the conclusions of the environmental analysis contained in the Initial Study, included as Appendix A, and summarized in Chapter 6.0, *Other CEQA Considerations*. The level of significance of impacts after the proposed mitigation measures are applied are identified as significant and unavoidable, less than significant, and no impact. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts.

**Table 1-1: Summary of Impacts, Mitigation Measures, and Level of Significance from the EIR**

<b>Impact</b>	<b>Applicable Standard Conditions, Project Design Features, Plan, Program, Policy</b>	<b>Level of Significance before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
<b>5.1 Transportation</b>				
<b>Impact TR-1:</b> The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	None.	Less than Significant.	None.	Less than Significant.
<b>Impact TR-2:</b> The Project would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	<p><b>PDF TR-1: Provide Pedestrian Network Improvements (CAPCOA SDT-1).</b> Sidewalks currently exist along the Project's frontage of San Bernardino Road and connections extend both east and west from the site to surrounding land uses. The Project includes construction of onsite, internal five-foot-wide sidewalks that will connect to the existing sidewalks along San Bernardino Road. Improvement plans for the proposed sidewalks shall be submitted to Public Works for review and approval prior to final map recordation.</p> <p><b>PDF TR-2: Onsite Bicycle Parking.</b> As part of the Project design, the Project will provide bicycle parking in common areas in addition to private garages. Improvement plans shall be submitted to Public Works for review and approval prior to final map recordation. A note shall be shown on the Exhibit A map showing bicycle parking.</p> <p><b>PDF TR-3: Onsite Parks (inspired by CAPCOA LUT-3).</b> The Project will construct two onsite park/open</p>	Potentially Significant.	<p><b>MM TR-1: Provide Ride Share Program (CAPCOA TRT-3).</b> The Project applicant/developer shall create a website in multiple languages describing and coordinating the following carpooling/ridesharing programs for the Project site that shall be made available to the greater community. The website shall function as a resource for encouraging and implementing VMT reduction measures by providing one consolidated location for people to connect with others within the community. The website shall be managed and maintained by the property management company for the Project. The website shall encourage and facilitate ridesharing by providing a means for community members to be matched with other members of the community and shall include matches for midday trips for shopping and medical appointments. The Project shall also provide carpool/vanpool loading/unloading area and parking spaces near the main open space area to discourage the use of single occupancy automobiles. The Project Applicant shall submit a memorandum to Public Works for review and approval detailing the metrics that will be used to measure program participation and the expected frequency of the reporting prior to</p>	Significant and Unavoidable.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	space areas that shall be made available for resident and public use. Improvement plans for the onsite open space shall be submitted to Public Works for review and approval prior to final map recordation. The signage shall include "Open to the Public" and the Street Improvement Plans shall demonstrate sidewalk accessibility. Upon completion of the Project, the open space will be conveyed to the homeowners' association formed to manage the Project ("HOA"). Any recorded instrument that references the public's use of the open space shall provide that the public's use of the open space is subject to any rules and regulations promulgated by the HOA related to the public's use of such open space and all HOA members and the general public shall comply with the rules and regulations promulgated by the HOA.		final map recordation. The Project shall implement the websites and programs prior to certificate of occupancy. A bond shall be required prior to final map recordation to guarantee these items are completed.	
<b>Cumulative</b>	PDF TR-1 through TR-3, listed above.	Less than Significant.	Mitigation Measure TR-1, listed above.	Less than Significant.
Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>6.0 Other CEQA Considerations</b>				
<b>Aesthetics</b>				
<b>Impact AES-1:</b> The Project would not have a substantial adverse effect on a scenic vista.	None.	Less than Significant.	None.	Less than Significant.

<b>Impact</b>	<b>Applicable Standard Conditions, Project Design Features, Plan, Program, Policy</b>	<b>Level of Significance before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
<b>Impact AES-2:</b> The Project would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail.	None.	No Impact.	None.	No Impact.
<b>Impact AES-3:</b> The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	None.	No Impact.	None.	No Impact.
<b>Impact AES-4:</b> The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality (Public views are those that are experienced from publicly accessible vantage point).	None.	Less than Significant.	None.	Less than Significant.
<b>Impact AES-5:</b> The Project would not create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.	None.	Less than Significant.	None.	Less than Significant.
<b>Cumulative</b>	None.	Less than Significant.	None.	Less than Significant.
<b>Agricultural and Forestry Resources</b>				
<b>Impact AG-1:</b> The Project would not 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.	None.	No Impact.	None.	No Impact.

<b>Impact</b>	<b>Applicable Standard Conditions, Project Design Features, Plan, Program, Policy</b>	<b>Level of Significance before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
<b>Impact AG-2:</b> The Project would not conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.	None.	Less than Significant.	None.	Less than Significant.
<b>Impact AG-3:</b> The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g)).	None.	No Impact.	None.	No Impact.
<b>Impact AG-4:</b> The Project would not result in the loss of forest land or conversion of forest land to non-forest use.	None.	No Impact.	None.	No Impact.
<b>Impact AG-5:</b> The Project would not 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.	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	None.	Less than Significant.	None.	Less than Significant.
<b>Air Quality</b>				
<b>Impact AQ-1:</b> The Project would not conflict with or obstruct implementation of applicable air quality plans of the South Coast AQMD (SCAQMD).	None.	Less than Significant.	None.	Less than Significant.
<b>Impact AQ-2:</b> The Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-	<b>PPP AQ-1: SCAQMD Rule 403.</b> The following measures shall be incorporated into construction plans and specifications as	Less than Significant.	None.	Less than Significant.



Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
attainment under an applicable federal or state ambient air quality standard.	<p>implementation of SCAQMD Rule 403:</p> <ul style="list-style-type: none"> <li>• All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.</li> <li>• The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.</li> <li>• The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.</li> </ul> <p><b>PPP AQ-2: SCAQMD Rule 1113.</b> The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 1113. The project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50</p>			

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	gram/liter of VOC) consistent with SCAQMD Rule 1113.  <b>PPP AQ-3: SCAQMD Rule 445.</b> The following measure shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.			
<b>Impact AQ-3:</b> The Project would not expose sensitive receptors to substantial pollutant concentrations.	PPP AQ-1 through PPP AQ-3, listed above.	Less than Significant.	None.	Less than Significant.
<b>Impact AQ-4:</b> The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	None.	Less than Significant.	None.	Less than Significant.
<b>Cumulative</b>	PPP AQ-1 through PPP AQ-3, as listed above.	Less than Significant.	None.	Less than Significant.
<b>Biological Resources</b>				
<b>Impact BIO-1:</b> The Project would potentially 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS).	None.	Potentially Significant.	<b>Mitigation Measure BIO-1: Special-Status Roosting Bats.</b> To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in tree cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:  a) To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.	Less than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>b) If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified bat specialist shall conduct a pre-construction survey to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.</p> <p>c) Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified bat specialist no greater than seven (7) days prior to tree disturbance or structure removal to more precisely determine the presence or absence of roosting bats.</p> <p>d) If bats are not detected, but the qualified bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees or structures in a controlled manner using heavy machinery. In order to ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a bat specialist. Felled trees shall remain in place</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawn up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.</p> <p>e) Maternity season lasts from March 1 to September 30. Trees or structures determined to be maternity roosts shall be left in place until the end of the maternity season or until the roost has fully fledged. A structure containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.</p> <p>f) The bat specialist shall document all demolition monitoring activities and prepare a summary report to the County upon completion of tree disturbance or building demolition activities. If Townsend's big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p><b>Mitigation Measure BIO-2: Bat Relocation.</b> If confirmed occupied bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality shall be constructed and maintained at a suitable undisturbed area. The design and location of the artificial bat roosts shall be determined by the bat specialist in consultation with CDFW.</p> <ul style="list-style-type: none"> <li>a) In exceptional circumstances, such as when roosts cannot be avoided and bats cannot be evicted by non-invasive means, it may be necessary to capture and transfer the bats to appropriate natural or artificial bat roosting habitat in the surrounding area. Bats raising young or hibernating shall not be captured and relocated. Capture and relocation shall be performed by the bat specialist in coordination with CDFW, and shall require a Scientific Collection Permit and be subject to approval by Los Angeles County Department of Regional Planning (DRP) and CDFW.</li> <li>b) A monitoring plan shall be prepared for the replacement roosts, which shall include performance standards for the use of the replacement roosts by the displaced species, as well as provisions to prevent harassment, predation, and disease of relocated bats.</li> <li>c) Annual reports detailing the success of roost replacement and bat relocation shall be prepared and submitted to Los Angeles County Department of Regional</li> </ul>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>Planning and CDFW for five (5) years following relocation or until performance standards are met, whichever period is longer.</p> <p><b>Mitigation Measure BIO-3: Nesting Birds.</b>  Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, which generally runs from February 1 – August 31 (as early as January 1 for some raptors), to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <p>If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent shall provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <p>If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.</p> <p>The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.</p>	
<b>Impact BIO-2:</b> The Project would potentially have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.	None.	Potentially Significant.	<p><b>Mitigation Measure BIO-1: Special-Status Roosting Bats:</b> see Impact BIO-1</p> <p><b>Mitigation Measure BIO-2: Bat Relocation:</b> see Impact BIO-1</p> <p><b>Mitigation Measure BIO-3: Nesting Birds:</b> See Impact BIO-1</p>	Less than Significant.
<b>Impact BIO-3:</b> The Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.	None.	No Impact.	None.	No Impact.



Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact BIO-4:</b> The Project would potentially 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.	None.	Potentially Significant.	<b>Mitigation Measure BIO-1: Special-Status Roosting Bats:</b> see Impact BIO-1 <b>Mitigation Measure BIO-2: Bat Relocation:</b> see Impact BIO-1 <b>Mitigation Measure BIO-3: Nesting Birds:</b> See Impact BIO-1	Less than Significant.
<b>Impact BIO-5:</b> The Project would not convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).	None.	No Impact.	None.	No Impact.
<b>Impact BIO-6:</b> The Project would not conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)	None.	No Impact.	None.	No Impact.
<b>Impact BIO-7:</b> The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan.	None.	No Impact.	None.	No Impact.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Cumulative</b>	None.	Potentially Significant.	<b>Mitigation Measure BIO-1: Special-Status Roosting Bats:</b> see Impact BIO-1 <b>Mitigation Measure BIO-2: Bat Relocation:</b> see Impact BIO-1 <b>Mitigation Measure BIO-3: Nesting Birds:</b> See Impact BIO-1	Less than Significant.
<b>CULTURAL RESOURCES</b>				
<b>Impact CUL-1:</b> The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact CUL-2:</b> The Project would potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5.	None.	Potentially Significant.	<b>Mitigation Measure CUL-1: Archaeological Monitoring.</b> Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified archaeologist has been retained, from a qualified professional archaeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A stating that the archaeologists have been retained and shall be present at pre-grade meetings and for all initial ground disturbing activities. The archaeologist shall provide spot check monitoring as determined necessary by the retained archaeologist.  In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist shall be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find would need to occur.</p> <p>In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the County shall be immediately notified. The archaeologist shall be contacted to flag the area in the field and shall determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)).</p> <p>If the find is considered a “resource” the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the developer/applicant’s expense.</p>	
<b>Impact CUL-3:</b> The Project would potentially directly or indirectly destroy	None.	Potentially Significant.	<b>Mitigation Measure CUL-2: Paleontological Incidental Discoveries.</b> Prior to	Less than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
a unique paleontological resource or site or unique geologic feature.			<p>commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified paleontologist has been retained and either the paleontologist, or a representative, shall be onsite if excavations penetrate the bedrock formations.</p> <p>In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The project applicant shall then inform the Los Angeles County Natural History Museum of the find and retain a qualified paleontologist. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.</p> <p>Criteria for discard of specific fossil specimens shall be made explicit by the qualified paleontologist. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery shall be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.	
<b>Impact CUL-4:</b> The Project would potentially disturb any human remains, including those interred outside of dedicated cemeteries.	None.	Potentially Significant.	<b>Mitigation Measure CUL-3: Human Remains.</b> If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code §5097.98). The Coroner shall determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he shall contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98).	Less Than Significant.
<b>Cumulative</b>	None.	Potentially Significant	<b>Mitigation Measures CUL-1 through CUL-3,</b> as included above.	Less than Significant.
<b>ENERGY</b>				
<b>Impact E-1:</b> The Project would not result in potentially significant environmental	None.	Less than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.				
<b>Impact E-2:</b> The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>GEOLOGY</b>				
<b>Impact GEO-1:</b> The Project would not 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 active fault trace.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-2:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	<b>PPP GEO-1: CBC Compliance.</b> The project is required to comply with the California Building Standards Code (CBC) as included in the County Code as Title 26, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for the proposed project shall be incorporated into grading plans and building specifications as a condition of construction permit approval.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-3:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including	<b>PPP GEO-1,</b> as listed above.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
the risk of loss, injury, or death involving liquefaction and lateral spreading.				
<b>Impact GEO-4:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including landslides.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-5:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the substantial soil erosion or the loss of topsoil.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-6:</b> The Project would not 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.	PPP GEO-1, as listed above.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-7:</b> The Project would not 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.	PPP GEO-1, as listed above.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GEO-8:</b> The Project would not have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater.	None.	No Impact.	None.	No Impact.
<b>Impact GEO-8:</b> The Project would not conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104).	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	PPP GEO-1, as listed above.	Less Than Significant.	None.	Less Than Significant.
<b>GREENHOUSE GAS EMISSIONS</b>				

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact GHG-1:</b> The Project would not generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact GHG-2:</b> The Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>HAZARDS AND HAZARDOUS MATERIALS</b>				
<b>Impact HAZ-1:</b> The Project would potentially create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.	<b>PPP HAZ-1: SCAQMD Rule 1403.</b> Prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District (SCAQMD) Rule 1403. Prior to issuance of demolition permits the applicant shall provide verification that the following SCAQMD Rule 1403 regulations have been taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	Potentially Significant.	<b>Mitigation Measure HAZ-1: Soils Testing Plan.</b> Prior to issuance of a grading permit, a soils testing plan for arsenic shall be prepared by a qualified hazardous materials consultant and shall detail procedures and protocols for testing any soils that require offsite disposal. Based on testing results soils shall be transported and disposed of per California Hazardous Waste Regulations to an appropriately permitted landfill. Any soil contaminated with concentrations of arsenic exceeding 12 ppm shall be removed and transported to an appropriately permitted disposal facility prior to site grading and development activities. Should the volume of arsenic impacted soil exceed 50 cubic yards, a SCAQMD Rule 1466 permit would be required and shall be implemented during soil excavation and removal activities. Soils testing and disposal requirements shall be included within all grading permits and specifications.	Less Than Significant.



Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p><b>PPP HAZ-2: Lead.</b> Prior to issuance of demolition permits, the project applicant shall submit verification to the County Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, County demolition permits shall ensure that all procedural requirements and regulations are followed for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.</p>		<p><b>Mitigation Measure HAZ-2: Health and Safety Plan.</b> Due to the potential for onsite soils to contain elevated levels of arsenic, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719). The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of arsenic are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase I and Phase II ESAs. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.</p> <p><b>Mitigation Measure HAZ-3: Hazardous Waste Education.</b> As part of the Home Buyer's package, the project Applicant/Owner shall provide new homeowners education materials on the proper management and disposal of household hazardous waste. The educational materials shall provide new homeowners with links to the County Department of Public Works' website regarding the Los Angeles County Household Hazardous Waste Collection Program and provide the</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			addresses of permanent household hazardous waste collection centers.	
<b>Impact HAZ-2:</b> The Project would potentially create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.	<b>PPP HAZ-1</b> and <b>PPP HAZ-2</b> , as listed above. <b>PPP AQ-1:</b> See Impact AQ-1. <b>PPP WQ-1:</b> See Impact WQ-1. <b>PPP WQ-2:</b> See Impact WQ-2.	Potentially Significant.	<b>MM HAZ-1:</b> See Impact Haz-1. <b>MM HAZ-2:</b> See Impact Haz-1. <b>MM HAZ-3:</b> See Impact Haz-1.	Less Than Significant.
<b>Impact HAZ-3:</b> The Project would potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses.	<b>PPP HAZ-1, PPP HAZ-2, and PPP AQ-1</b> , as listed above.	Potentially Significant.	<b>MM HAZ-1:</b> See Impact Haz-1. <b>MM HAZ-2:</b> See Impact Haz-1.	Less Than Significant.
<b>Impact HAZ-4:</b> The Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	None.	No impact.	None.	No Impact.
<b>Impact HAZ-5:</b> The Project would not be located within an airport land use plan, or be within two miles of a public airport or public use airport, and the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area.	None.	No Impact.	None.	No Impact.
<b>Impact HAZ-6:</b> The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact HAZ-7:</b> The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within a	None.	No Impact.	None.	No Impact.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
high fire hazard area with inadequate access.				
<b>Impact HAZ-7:</b> The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within an area with inadequate water and pressure to meet fire flow standards.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact HAZ-7:</b> The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within proximity to land uses that have the potential for dangerous fire hazard.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact HAZ-7:</b> The Project would not involve a proposed use constituting of a potentially dangerous fire hazard.	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	<b>PPP HAZ-1</b> and <b>PPP HAZ-2</b> , as listed above. <b>PPP AQ-1:</b> See Impact AQ-1. <b>PPP WQ-1:</b> See Impact WQ-1. <b>PPP WQ-2:</b> See Impact WQ-2.	Potentially Significant.	<b>MM HAZ-1:</b> See Impact Haz-1. <b>MM HAZ-2:</b> See Impact Haz-1. <b>MM HAZ-3:</b> See Impact Haz-1.	Less Than Significant.
<b>10 HYDROLOGY AND WATER QUALITY</b>				
<b>Impact WQ-1:</b> The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	<b>PPP WQ-1: NPDES/SWPPP.</b> Prior to issuance of any grading or demolition permits, the applicant shall provide the County Department of Public Works evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p>Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.</p> <p><b>PPP WQ-2: LID.</b> Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Low Impact Development Plan (LID) shall be submitted to and approved by the County Department of Public Works. The LID shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.</p>			
<b>Impact WQ-2:</b> The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	<b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>Impact WQ-3:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or	<b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site				
<b>Impact WQ-4:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would not substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite.	<b>PPP WQ-1:</b> See impact WQ-1. <b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>Impact WQ-5:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	<b>PPP WQ-1:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>Impact WQ-6:</b> The Project would substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would not impede or redirect flood flows which	None.	No Impact.	None.	No Impact.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.				
<b>Impact WQ-7:</b> The Project would not otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.	None.	No Impact.	None.	No Impact.
<b>Impact WQ-8:</b> The Project would not conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84).	<b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>Impact WQ-9:</b> The Project would not use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).	None.	No Impact.	None.	No Impact.
<b>Impact WQ -10:</b> The Project would not risk the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.	None.	No Impact.	None.	No Impact.
<b>Impact WQ-11:</b> The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	<b>PPP WQ-1:</b> See impact WQ-1 <b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>Cumulative</b>	<b>PPP WQ-1:</b> See impact WQ-1 <b>PPP WQ-2:</b> See impact WQ-1.	Less Than Significant.	None.	Less Than Significant.
<b>LAND USE AND PLANNING</b>				

<b>Impact</b>	<b>Applicable Standard Conditions, Project Design Features, Plan, Program, Policy</b>	<b>Level of Significance before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
<b>Impact LU-1:</b> The Project would not physically divide an established community.	None.	No Impact.	None.	No Impact.
<b>Impact LU-2:</b> The Project would not cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact LU-3:</b> The Project would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas.	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>MINERAL RESOURCES</b>				
<b>Impact MIN-1:</b> The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact MIN-2:</b> The Project would not 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.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>NOISE</b>				

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact NOI-1:</b> The Project would potentially 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 County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies.	None.	Potentially Significant.	<b>MM NOI-1: Temporary Sound Barriers and Permanent Walls.</b> Construction plans and specifications shall require that a minimum eight-foot-high temporary sound barrier (e.g., fiberglass core sound blanket or a 0.5-inch-thick wooden panel sound wall) shall be placed on the eastern and western property lines prior to commencement of Project grading. Temporary sound blankets or sound walls shall be maintained until the permanent six-foot-high concrete masonry unit (CMU) wall that are depicted in the Wall Plan for the Project are constructed along the east and west property lines. Construction plans and specifications shall also state that stationary construction equipment shall be located a minimum of 100 feet from the property line of any offsite residence. Noise control requirements shall be noted and depicted on Project construction drawings/plans.	Less Than Significant.
<b>Impact NOI-2:</b> The Project would potentially result in generation of excessive groundborne vibration or groundborne noise levels.	None.	Potentially Significant.	<b>MM NOI-2: Vibration Control.</b> The Project construction plans and specifications shall state that operation of off-road construction equipment that is 150 horsepower or greater shall not occur within 10 feet of either the east or west property lines in order to limit construction-related vibration levels at the nearby residences. Typical construction equipment that is less than 150 horsepower include backhoes, skid steers, skip loaders, and tractors, that are capable of performing all grading and excavation activities within the 10-foot-wide areas adjacent to the east and west property lines. Noise control requirements shall be noted and depicted on Project construction drawings/plans.	Less Than Significant.



Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact NOI-3:</b> The Project would not expose people residing or working in the project area to excessive noise levels 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.	None.	No impact.	None.	No impact.
<b>Cumulative</b>	None.	Potentially Significant.	<b>MM NOI-1:</b> See Impact NOI-1. <b>MM NOI-2:</b> See Impact NOI-2.	Less Than Significant.
<b>POPULATION AND HOUSING</b>				
<b>Impact POP-1:</b> The Project would not 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).	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact POP-2:</b> The Project would not displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere.	None.	No impact.	None.	No impact.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>PUBLIC SERVICES</b>				
<b>Impact PS-1:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in	None.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
order to maintain acceptable service ratios, response times or other performance objectives for fire protection.				
<b>Impact PS-2:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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 sheriff protection.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact PS-3:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact PS-4:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.	None.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact PS-5:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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 libraries.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact PS-6:</b> The Project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>RECREATION</b>				
<b>Impact REC-1:</b> The Project would not 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.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact REC-2:</b> The Project would not include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an	None.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
adverse physical effect on the environment.				
<b>Impact REC-3:</b> The Project would not interfere with regional trail connectivity.	None.	No impact.	None.	No impact.
<b>Cumulative</b>	None.	Less Than Significant.	None.	Less Than Significant.
<b>TRANSPORTATION</b>				
<b>Impact TRAN-3:</b> The Project would not substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment).	<b>PDF TR-4: Construction Traffic Control Plan.</b> Prior to issuance of construction permits, a traffic control plan shall be submitted by the applicant and approved by the County. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	synchronization to improve traffic flow.			
<b>Impact TRAN-4:</b> The Project would not result in inadequate emergency access.	None.	No impact.	None.	No impact.
<b>TRIBAL CULTURAL RESOURCES</b>				
<b>Impact TCR-1:</b> The Project would potentially cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k).	None.	Potentially Significant.	<p><b>MM TCR-1: Native American Monitoring.</b> Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the</p>	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.</p> <p>E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>educational, cultural and/or historic purposes.</p> <p><b>MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.</b></p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).</p> <p>D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)</p> <p>E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.</p> <p>F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p> <p><b>MM TCR-3: Procedures for Burials and Funerary Remains.</b></p> <p>A. As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.</p> <p>B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.</p>	



Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.</p> <p>D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed, as described in item E.</p> <p>E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.</p> <p>F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains,</p>	

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.</p> <p>G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.</p>	
<p><b>Impact TCR-2:</b> The Project would potentially cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to</p>	None.	Potentially Significant.	<p><b>MM TCR-1:</b> See Impact TCR-1.  <b>MM TCR-2:</b> See Impact TCR-1.  <b>MM TCR-3:</b> See Impact TCR-1.</p>	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				
<b>Cumulative</b>	None.	Less Than Significant.	<b>MM TCR-1:</b> See Impact TCR-1. <b>MM TCR-2:</b> See Impact TCR-1. <b>MM TCR-3:</b> See Impact TCR-1.	Less Than Significant.
<b>UTILITIES AND SERVICE SYSTEMS</b>				
<b>Impact UT-1:</b> The Project would potentially require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.	None.	Potentially Significant.	<b>MM UT-1: Sewer Fees.</b> Prior to the issuance of building permits, per the will serve letter dated December 3, 2020, the project applicant shall pay all applicable in-lieu sewer upgrade fees to the City of West Covina.	Less Than Significant.
<b>Impact UT-2:</b> The Project would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact UT-3:</b> The Project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	None.	Less Than Significant.	None.	Less Than Significant.
<b>Impact UT-4:</b> The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	None.	Less Than Significant.	None.	Less Than Significant.

Impact	Applicable Standard Conditions, Project Design Features, Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact UT-5:</b> The Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	None.	No Impact.	None.	No Impact.
<b>Cumulative</b>	None.	Potentially Significant.	<b>MM UT-1:</b> See Impact UT-1.	Less Than Significant.
<b>WILDFIRE</b>				
<b>Impact WF-1:</b> The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	None.	No Impact.	None.	No Impact.
<b>Impact WF-2:</b> The Project would not, 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.	None.	No Impact.	None.	No Impact.
<b>Impact WF-3:</b> The Project would not 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.	None.	No Impact.	None.	No Impact.
<b>Impact WF-4:</b> The Project would not 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.	None.	No Impact.	None.	No Impact.
<b>Impact WF-5:</b> The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	None.	No Impact.	None.	No Impact.

<b>Impact</b>	<b>Applicable Standard Conditions, Project Design Features, Plan, Program, Policy</b>	<b>Level of Significance before Mitigation</b>	<b>Mitigation Measures</b>	<b>Significance after Mitigation</b>
<b>Cumulative</b>	None.	No Impact.	None.	No Impact.

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## 2. Introduction

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Griswold Residential Project (“Project”). This Draft EIR has been prepared by the County of Los Angeles in its capacity as Lead Agency, as that term is defined in Section 15367 of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) and in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). This Draft EIR has been prepared to identify, analyze, and mitigate the significant environmental effects of the proposed Project.

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze Project impacts, analyses and conclusions regarding the level of significance of impacts both before and after mitigation, the identification and application of mitigation measures to avoid or reduce Project-related impacts, and the consideration of alternatives to the proposed Project. In preparing this Draft EIR, the County of Los Angeles has employed CEQA and environmental technical specialists; however, the analyses and conclusions set forth in this EIR reflect the independent judgment of the County as Lead Agency.

### 2.1 PURPOSE OF AN EIR

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. Pursuant to the provisions of CEQA Guidelines Section 15121(a), this EIR is intended as an informational document to inform public agency decision makers and the general public of the significant environmental effects of the proposed Project, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the Project that might avoid or lessen significant environmental effects. Thus, this EIR is intended to aid the review and decision-making process.

The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency’s decision-making process.

## 2.2 EIR SCOPE AND CONTENT

**Impacts Found to Be Potentially Significant.** The County determined that an EIR should be prepared for the Meritage Griswold Residential Project. As a result, an Initial Study/Notice of Preparation (IS/NOP) was prepared and circulated between February 1, 2022 and March 3, 2022 for the required 30-day review period. The purpose of the IS/NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR. The IS/NOP and written responses to the IS/NOP are contained in Appendix A of this Draft EIR. The County of Los Angeles also held a scoping meeting for the Project to solicit oral and written comments from the public and public agencies. The public scoping meeting was held on February 10, 2022. Comments received at the meeting are contained in Appendix A of this Draft EIR. Topics requiring a detailed level of analysis evaluated in this Draft EIR have been identified based upon the responses to both the NOP and a review of the Project by the County of Los Angeles. The County determined through the initial review process that impacts related to the following topic are potentially significant and required a detailed level of analysis in this Draft EIR:

- Transportation

**Impacts Found to Be Less Than Significant or Less Than Significant With Mitigation Incorporated.** CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment”. Topics that have been determined not to be significant, or not to be significant with mitigation incorporated, are therefore not discussed in detail in the Draft EIR. These topics were identified based upon the Initial Study, responses to the NOP, and a review of the Project by the County of Los Angeles. The County determined through the initial review process that impacts related to the following topics are less than significant or less than significant with mitigation incorporated and are not required to be analyzed in detail in this Draft EIR:

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

## 2.3 EIR PROCESS

### Notice of Preparation/Initial Study

Pursuant to the requirements of CEQA, the County of Los Angeles, as Lead Agency, prepared an Initial Study/Notice of Preparation (IS/NOP) for the proposed Project, which was distributed February 1, 2022 a 30-day public review and comment period that ended on March 3, 2022. The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and summarized in Table 2-1, which also includes a reference to the Draft EIR section(s) in which issues raised in the comment letters are addressed or the Initial Study section(s) in which issues raised were already addressed.



**Table 2-1: Summary of NOP/Initial Study Comment Letters**

<b>Comment Letter and Comment</b>	<b>Relevant IS or EIR Section</b>
<b>State Agencies</b>	
<b>Native American Heritage Association, February 8, 2022</b>	
<p>This letter provides details regarding the mission of the Native American Heritage Commission (NAHC), a background of AB 52 and SB 18, and the NAHC interest in the Project's cultural and historical impacts. The letter also details the requirements for CEQA compliance with AB 52 and SB 18, as well as the NAHC Recommendations for Cultural Resources Assessments.</p> <p><b>Response to IS Comments:</b> As discussed within the Initial Study, tribal consultation was conducted pursuant to AB 52 with the Kizh Nation and the Project will incorporate Mitigation Measures TCR-1 through TCR-3. With incorporation of these mitigation measures, impacts to tribal cultural resources would be less than significant.</p>	IS Tribal Cultural Resources; EIR, Section 6.4, <i>Effects Found Not to be Significant</i> , Tribal Cultural Resources
<b>State Department of Transportation/Caltrans, February 23, 2022</b>	
<p>The comment provides a summary of the proposed Project and Caltrans' mission. The comment further states that vehicle miles traveled (VMT) is the standard metric used to analyze CEQA impacts related to transportation. The comment states that Caltrans is aware of congestion issues in the Los Angeles County region and suggests the development should incorporate multi-modal and complete streets to promote alternatives to car use. The comment states the EIR should ensure that all modes of transportation are served well by development planning and encourages the County of Los Angeles to evaluate potential Transportation Demand Strategies (TDM) and Intelligent Transportation System (ITS) applications.</p> <p>The comment provides a summary of the analysis included in the Initial Study and encourages the Lead Agency to prepare traffic safety impact analyses as part of the CEQA process, using Caltrans guidelines for State-owned facilities.</p> <p><b>Response to IS Comments:</b> Impacts related to VMT and strategies to reduce VMT, including TDM applications, are analyzed in Section 5.1 of this Draft EIR.</p>	EIR Section 3.0, <i>Project Description</i> , EIR Section 5.1, <i>Transportation</i>
<b>California Department of Fish and Wildlife, March 2, 2022</b>	
<p>This comment provides a summary of California Department of Fish and Wildlife's (CDFW) role as a trustee agency for fish and wildlife resources and that CDFW is submitting comments as a Responsible Agency under CEQA. The comment provides a summary of the proposed Project and the Project site. The letter provides comments and recommendations to assist the County of Los Angeles. The comment states that the Department of Regional Planning or biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality.</p> <p>The comment states that CDFW recommends the Draft EIR provide the Project's landscape palette and recommends using native, locally appropriate plant species and avoiding invasive plants. The comment states that CDFW recommends that the Draft EIR include an infectious tree disease management plan or a list of preventative measures to reduce the spread of tree insect pests and diseases.</p> <p>The comment states that the Draft EIR should provide adequate, complete, and detailed disclosure and feasible and enforceable mitigation measures. The comment further states that a complete assessment and impact analysis of flora and fauna within and adjacent to the Project site should be conducted. This analysis should include analysis of impacts to sensitive natural</p>	IS Biological Resources, EIR Section 3.0, <i>Project Description</i> , EIR Section 6.4, <i>Effects Found Not to be Significant</i> , Biological Resources, EIR Section 7.0, <i>Alternatives</i>

Comment Letter and Comment	Relevant IS or EIR Section
<p>communities; sensitive habitats; rare, threatened, and endangered or otherwise sensitive species; a recent wildlife and rare plant survey. The comment further states that the Draft EIR should include a thorough project description and range of feasible alternatives and a discussion of potential direct, indirect, and cumulative impacts related to biological resources. The comment further states that if an Incidental Take Permit is needed, CDFW might be required to issue a separate CEQA document unless the Draft EIR addresses all issues related to California Endangered Species Act species. The comment provides a summary of why mitigation measures should emphasize avoidance and reduction of impacts over offsite mitigation. The comment further states that a qualified biologist should be onsite during ground and habitat disturbing activities to move species out of harms way.</p> <p><b>Response to IS Comments:</b> As discussed in the Initial Study and Appendix C to this Draft EIR, a literature review and field survey were conducted on the project site and surrounding area. The literature review and field survey found that no native vegetation exists on the project site, and no candidate, sensitive, or special status wildlife species have the potential to occur onsite. However, Mitigation Measures BIO-1 through BIO-3 are incorporated in order to ensure that no impacts to roosting bats or nesting birds would occur from implementation of the Project. With implementation of these mitigation measures, impacts to biological resources was determined to be less than significant. Further, the Homeowners Association would be responsible for landscape maintenance, which would include the monitoring of tree health and the removal of diseased trees, if necessary.</p>	
Regional Agencies	
South Coast Air Quality Management District, March 1, 2022	
<p>This comment provides recommendations on the analysis of potential air quality impacts from the proposed Project and requests that the Draft EIR, all appendices, and technical documents be provided to SCAQMD upon completion. The comment recommends that the County of Los Angeles use SCAQMD's CEQA Air Quality Handbook and CalEEMod while preparing air quality and greenhouse gas emissions analysis for the Project. The comment states that the analysis should compare emissions from the Project to SCAQMD's regional and localized significance thresholds and that all potential air quality emissions should be calculated. The comment states that if the Project generates diesel emissions, it is recommended that the County prepare a Health Risk Assessment. Furthermore, the comment states that if the Project requires SCAQMD permits, SCAQMD should be identified as a responsible agency.</p> <p>The comment states that if the proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. The comment further provides resources for identifying potential mitigation measures for the Project.</p> <p><b>Response to IS Comments:</b> Impacts related to air quality and greenhouse gas emissions were analyzed in the IS based on the Air Quality, Greenhouse Gas, and Energy Impact Analysis presented in Appendix B. Air quality impacts were found to be less than significant as they are below SCAQMD regional and localized thresholds, and no mitigation is needed. Greenhouse gas emission impacts were found to be less than significant based on the quantitative analysis performed and the consistency of the proposed Project with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.</p>	<p>IS Air Quality, IS Greenhouse Gas Emissions, EIR Section 6.4, <i>Effects Found Not to be Significant</i>, Air Quality, Greenhouse Gas Emissions</p>

Comment Letter and Comment	Relevant IS or EIR Section
<b>Southern California Regional Rail Authority, February 10, 2022</b>	
The comment states that the Southern California Regional Rail Authority (SCRRA) operates the regional rail system of Metrolink. The railroad right-of-way (ROW) adjacent to the project site is heavily trafficked and operated and maintained by SCRRA. In addition to several freight trains operating daily on the line, 40 Metrolink trains operate each weekday. Rail traffic along the corridor occurs 24 hours a day, 7 days a week and is expected to increase in the future to address growing demand. The comment states that all drainage should drain away from the railroad corridor, trees should be set back from the ROW so that they do not hang over the ROW line. The comment states that the developer should conduct a noise and vibration analysis and measures are proposed in the building design to limit impacts to proposed homes. Additionally, the comment states that construction plans and site development plans should be provided to SCRRA for review.	IS Hydrology and Water Quality, EIR Section 3.0, <i>Project Description</i> , EIR Section 5.1 <i>Transportation</i> , EIR Section 6.4, <i>Effects Found Not to be Significant</i> , Hydrology and Water Quality
<b>Response to IS Comments:</b> The proposed post-development drainage pattern is discussed in the Initial Study in the Hydrology and Water Quality discussion. As shown, drainage would flow generally to the south, away from the railroad ROW. Impacts to disruption of rail service are discussed in this Draft EIR in Section 5.1, <i>Transportation</i> .	
<b>County and City Agencies</b>	
<b>Los Angeles County Sanitation Districts, February 16, 2022</b>	
This comment states that the proposed Project is located within the jurisdictional boundaries of District No. 22. The comment states that the will-serve letter dated August 14, 2020 is still applicable with the following updates: <ul style="list-style-type: none"><li>• The wastewater generated by the Project will be treated at the San Jose Creek Water Reclamation Plant (WRP), which currently processes an average flow of 61.2 million gallons per day</li><li>• As mentioned in the Initial Study, the expected average wastewater flow from the Project site is 17,680 gallons per day</li></ul> The comment further states that all other information contained in the Initial Study is current.	IS Utilities and Service Systems, EIR Section 6.4, <i>Effects Found Not to be Significant</i> , Utilities and Service Systems
<b>Response to IS Comment:</b> The increased average flow at the San Jose Creek WRP is noted. The increase flow would not result in increase impacts to wastewater services or result in a change to the determination of less than significant impacts presented in the IS.	
<b>Los Angeles County Sheriff's Department, March 3, 2022</b>	
This comment provides a summary of the Project description and states that the Project should incorporate the principles of Crime Prevention through Environmental Design (CPTED) in design plans in order to reduce opportunities for criminal activities. The Station also recommends installation of security cameras to reduce opportunities for criminal activities. The comment states that the Station's average response times in 2022 are 5.1 minutes for emergent, 8.6 minutes for priority, and 28.1 minutes for routine. Furthermore, the Sheriff Station reviewed the site plans, building elevations, wall and fence plans, and landscape drawings and provided comments on how the Project can incorporate various CPTED features.	IS Public Services, EIR Section 3.0, <i>Project Description</i> , EIR Section 6.4, <i>Effects Found Not to be Significant</i> , Public Services
The comment states that the Project should implement a Construction Traffic Management Plan to address construction-related traffic congestion and emergency access issues. The comment states that the Project would benefit from a landscaping maintenance program to minimize opportunities for individuals to hide. The comment states that the Project should incorporate	

Comment Letter and Comment	Relevant IS or EIR Section
security lighting and street lighting with shielding devices to limit light spillover. The Project should also incorporate a video monitoring system.	
<b>Response to IS Comment:</b> The reduced response times from the San Dimas Station to the Project site are noted. The reduced response times would not result in significant impacts related to sheriff services or result in a change to the determination of less than significant impacts presented in the IS. The comments related to Project design will be considered by the County Department of Regional Planning.	
<b>Los Angeles County Metropolitan Transportation Authority, March 3, 2022</b>	
This comment states that Los Angeles County Metropolitan Transportation Authority (Metro) is committed to working with municipalities and developers to support transit-supportive developments. The comment letter outlines potential impacts from the Project on the Metro-owned right-of-way north of the Project site that is maintained by the Southern California Regional Rail Authority for the Metrolink. The comment states that operations on the rail line may operate 25 hours a day, seven days a week. The comment states that the Draft EIR must analyze potential effects on rail operations and identify mitigation measures as appropriate. The comment states that impacts of Project construction and operation on track integrity or disruption to rail service should be analyzed. The comment states that the Applicant will generally not be permitted to access Metrolink ROW to maintain private development. The comment states that the Applicant should submit engineering drawing and calculations as well as construction plans to evaluate potential impacts to infrastructure. The comment states that structures should be setback from the rail line a minimum of five feet from the property line. The comment states that the Applicant shall obtain specific Right-of-Entry temporary access permits for any work requiring access to the ROW. The comment states that the Applicant should permit staff to monitor construction activity to make sure the Project does not impact the ROW and the Applicant should construct a protection barrier to prevent objects, material, or debris from falling into the ROW. Construction work in proximity to the ROW may be subject to additional OSHA requirements. Furthermore, Metro charges for review of construction drawings or construction monitoring and the Applicant would be responsible for costs incurred related to Project construction.	EIR Section 3.0, <i>Project Description</i> , EIR Section 5.1, <i>Transportation</i>
<b>Response to IS Comments:</b> Impacts related to the Metro rail line are analyzed in Section 5.1 of this Draft EIR.	

### Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the County of Los Angeles hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the EIR for the proposed Project. The scoping meeting was held on February 10, 2022 at 6 p.m. via videoconference. Comments received during the scoping meeting are summarized in Table 2-2, which also includes a reference to the EIR section(s) in which issues raised in the comment letters are addressed or the Initial Study section(s) in which issues raised were already addressed.

**Table 2-2: Summary of Public Scoping Meeting Comments**

<b>Commenter and Comment</b>	<b>Relevant IS or EIR Section</b>
<b>Diana Rey, Neighbor</b>	
The commenter states that they live in one of the houses on Hartley Avenue and are puzzled as to how 68 units will fit on the Project site. Furthermore, the commenter stated that they read an article about the area, which stated the site was used as a strawberry field and there was a fungus in the soil that made farmworkers sick. The commenter asked if there is a way to test for the fungus and wants to make sure workers and neighbors will be okay when grading occurs.	IS Air Quality, IS Hazards and Hazardous Materials, EIR Section 3.0, <i>Project Description</i> , EIR Section 6.4, <i>Effects Found Not to be Significant</i> , Air Quality, Hazards and Hazardous Materials
<b>Response to Comments:</b> Impacts related to hazards from exposure to onsite soils are discussed in Section 6.4, <i>Effects Found Not to be Significant</i> . As discussed, standard dust mitigation measures would be implemented during soil handling activities, which would limit any exposure to onsite soils, including those potentially containing fungus.	

### Public Review of the Draft EIR

The County of Los Angeles filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this EIR has been completed and is available for review. A Notice of Availability of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR is available for public review digitally on the County's website (<https://planning.lacounty.gov/case/view/tr83183>) or physically at the following location:

County of Los Angeles  
 Department of Regional Planning ("LA County Planning")  
 Subdivisions Section  
 320 West Temple Street, 13<sup>th</sup> Floor  
 Los Angeles, CA 90012

Written comments related to environmental issues in the Draft EIR should be addressed to:

Erica G. Aguirre, AICP, Principal Regional Planner  
 County of Los Angeles  
 Department of Regional Planning  
 Subdivisions Section  
 320 West Temple Street, G10  
 Los Angeles, CA 90012  
 E-mail: [eaguirre@planning.lacounty.gov](mailto:eaguirre@planning.lacounty.gov)

### Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by the County. The Final EIR may also contain corrections and additions to the Draft EIR, and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the County. Notice of the availability of the Final EIR will be sent to all who commented on the Draft EIR.

## 2.4 ORGANIZATION OF THIS DRAFT EIR

The Draft EIR is organized into the following Sections. To help the reader locate information of interest, a brief summary of the contents of each chapter of this Draft EIR is provided.

- **Section 1 Executive Summary:** This section provides a brief summary of the Project area, the proposed Project, and alternatives. The section also provides a summary of environmental impacts and mitigation measures that lists each identified environmental impact, applicable Project design features, standard conditions, proposed mitigation measure(s) (if any), and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either less than significant or significant and unavoidable.
- **Section 2 Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this EIR, a summary of the legal authority for the EIR, a summary of the environmental review process, and the general format of the document.
- **Section 3 Project Description:** This section provides a detailed description of the proposed Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4 Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5 Environmental Impact Analysis for Transportation:** This section includes a summary of the existing statutes, ordinances and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the proposed Project; any applicable Project design features; standard conditions and plans, policies, and programs that could reduce potential impacts; and the feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to less than significant are identified as significant and unavoidable.

This section also summarizes the significant and unavoidable impacts that would occur from implementation of the proposed Project and provides a summary of the environmental effects of the implementation of the proposed Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the proposed Project.

- **Section 6 Other CEQA Considerations:** This section describes significant and unavoidable impacts from the Project, impacts related to growth inducement, and significant irreversible effects. The section also summarizes effects found not to be significant, including Aesthetics, Agriculture and Forest Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use/Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.
- **Section 7 Alternatives:** This section describes and analyzes a reasonable range of alternatives to the proposed Project. The CEQA-mandated No Project Alternative is included along with alternatives that would reduce one or more potentially significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.

- **Section 8 Report Preparation and Persons Contacted:** This section lists authors of the Draft EIR and County staff that assisted with the preparation and review of this document. This section also lists other people that were contacted for information that is included in this EIR document.

## 2.5 INCORPORATION BY REFERENCE

In accordance with Section 15150 of the CEQA Guidelines and to reduce the size of the report, the following documents are hereby incorporated by reference into this EIR and are available for public review at the County of Los Angeles Department of Regional Planning, 320 West Temple Street, Los Angeles, CA 90012. A brief summary of the scope and content of these documents is provided below.

**Los Angeles County Code:** The Los Angeles County Code consists of regulatory, penal, and administrative ordinances of the County of Los Angeles. The County Code guides the County's control of land uses, in concert with General Plan goals, objectives, and policies. The County's Zoning Code (Title 22) identifies land uses permitted and prohibited according to the zoning category of particular parcels. The County Code and Zoning Code are utilized throughout this document as a regulatory document governing development and land use activities within the County. Regulatory information from the County Code and Zoning Code is cited in various sections of this Draft EIR.

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## 3. Project Description

### 3.1 PROJECT LOCATION

The Project is located at 16209 East San Bernardino Road (APN: 8435-006-900) within the unincorporated community of East Irwindale in Los Angeles County. The Project site is directly north of the intersection of San Bernardino Road and North Woodgrove Avenue.

The Project area is surrounded by Covina to the east; Baldwin Park to the west; Irwindale to the north; and West Covina to the south. As shown on Figure 3-1, *Regional Location*, Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately one mile to the east. Local access is provided by East San Bernardino Road, as shown in Figure 3-2, *Local Vicinity*.

### 3.2 PROJECT SITE CHARACTERISTICS

The Project site consists of one 9.61-gross acre parcel. As shown on Figure 3-3, *Aerial*, the Project site is comprised of the former Griswold School, and is currently improved with six permanent structures, as well as associated improvements, such as paved recreational areas, parking lots, and patio areas. The existing buildings were constructed in 1953 for use as the Griswold School through 1974. The school was reopened in 1978 for use by Tri-Community Adult Education. Since the time of the publication of the Notice of Preparation (NOP) for the Draft EIR on February 1, 2022, the school buildings were damaged in a fire. As a result, the school buildings were demolished to eliminate public health and safety hazards related to the unsafe condition of the school buildings. Pursuant to State CEQA Guidelines Section 15125(a)(1), the environmental baseline for the Draft EIR is February 1, 2022, the date the NOP was published. As of this date, the school buildings were vacant but intact. As such, the Draft EIR environmental baseline condition assumes the school buildings as vacant but intact.

The site is landscaped and includes grass/turf field areas, as well as shrubs, and mature trees. Vehicular access to the site is provided by existing driveways on East San Bernardino Road. The Project site is bounded by the Metrolink railroad to the north, single-family residences to the east and west, and East San Bernardino Road to the south.

### 3.3 DESCRIPTION OF ADJACENT AREAS

The Project site is located within a developed, residential area within unincorporated Los Angeles County as described below:

**North:** Directly adjacent to the north of the Project site is the Metrolink Railroad. Across the Metrolink Railroad to the north of the Project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6,000).

**West:** Directly adjacent to the west of the Project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6,000).

**South:** Across San Bernardino Road to the south of the Project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6,000).

**East:** Directly adjacent to the east of the Project site are single-family residential uses, designated as Residential 9 (H9) in the General Plan and zoned Light Agricultural (A-1-6,000).

### 3.4 EXISTING COUNTY OF LOS ANGELES LAND USE DESIGNATIONS

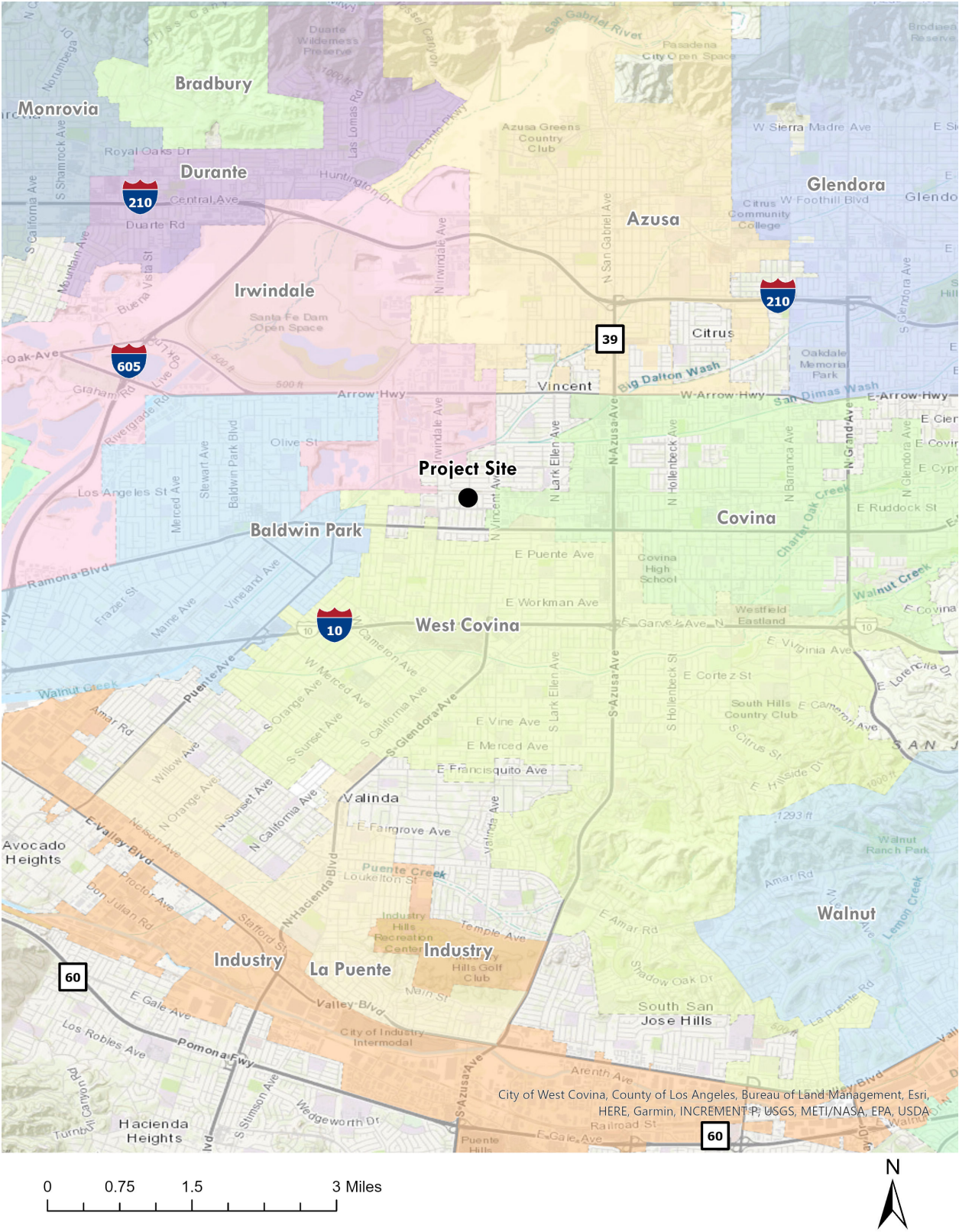
#### **General Plan Designations**

As depicted on Figure 3-4, *Existing General Plan Designations*, the Project site has a General Plan designation of Public and Semi-Public (P). The intent of the Public and Semi-Public (P) designation is to provide for areas of public and semi-public facilities and community-serving uses including public buildings and campuses, schools, hospitals, cemeteries, and fairgrounds, and airports and other major transportation facilities. The General Plan states that in the event that the Public or Semi-Public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community character, are permitted. The Public and Semi-Public (P) designation allows varying densities and a maximum floor area ratio (FAR) of 3.0.

#### **Zoning Designations**

As depicted on Figure 3-5, *Existing Zoning Designations*, the Project site has a zoning designation of Light Agricultural (A-1-6,000). The minimum lot size of land zoned A-1-6,000 is 6,000 square feet. According to Title 22, Section 22.16.030 of the Los Angeles County Zoning Code and the County of Los Angeles 2021-2029 Housing Element, single-family residences and crops are allowable uses for this zone.

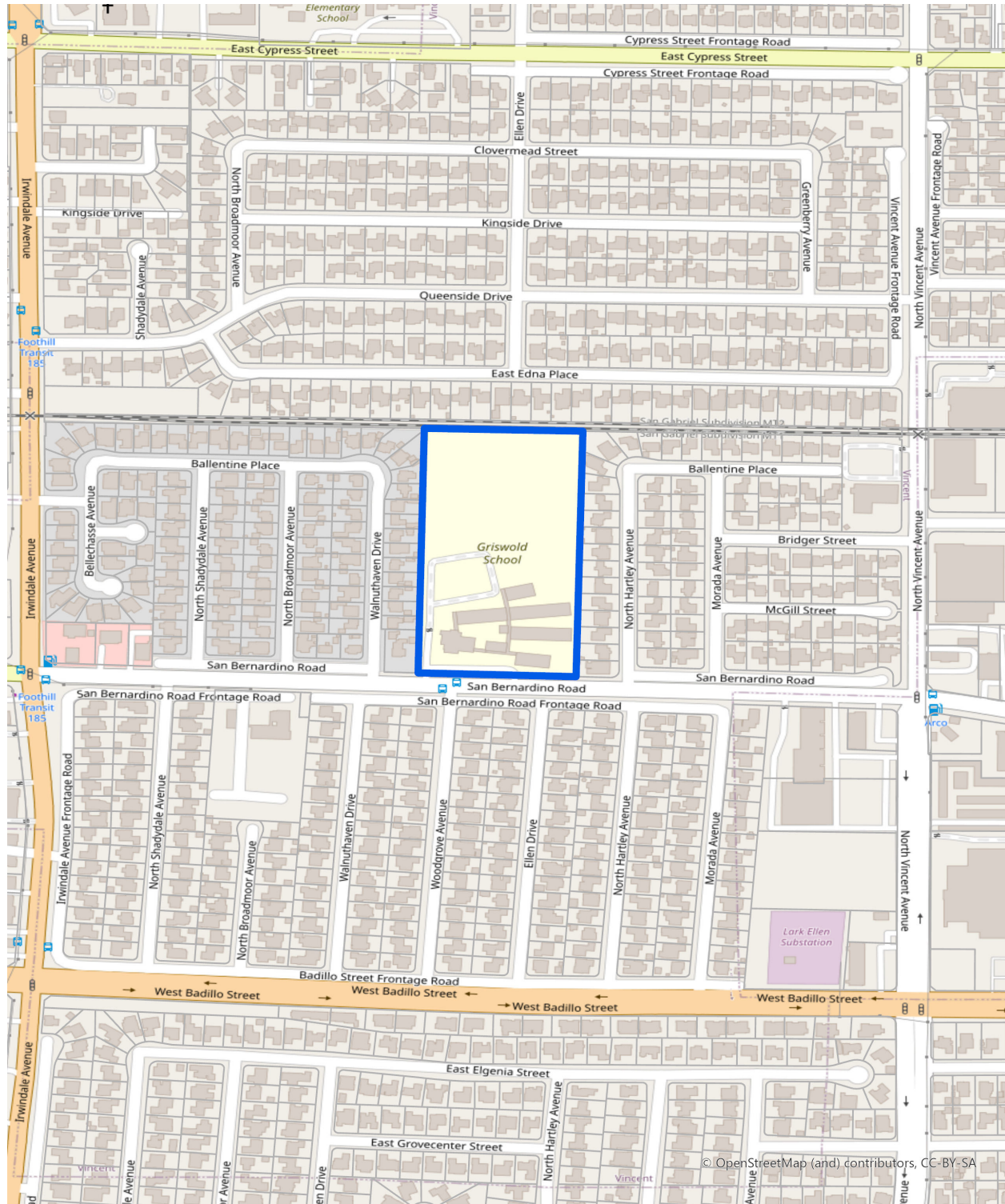
# Reginal Location



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# Local Vicinity



 Project Site



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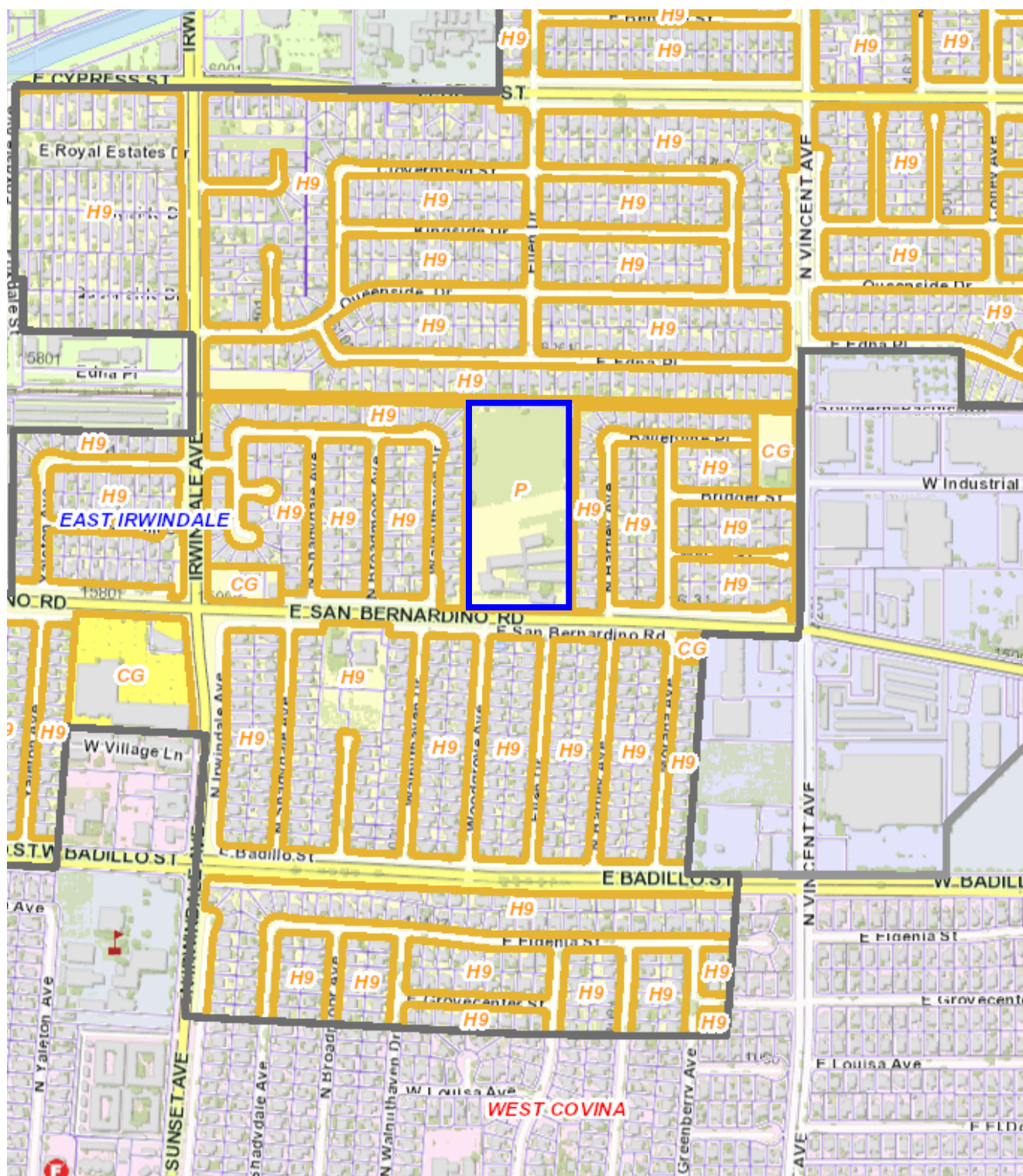




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## Existing General Plan Designations

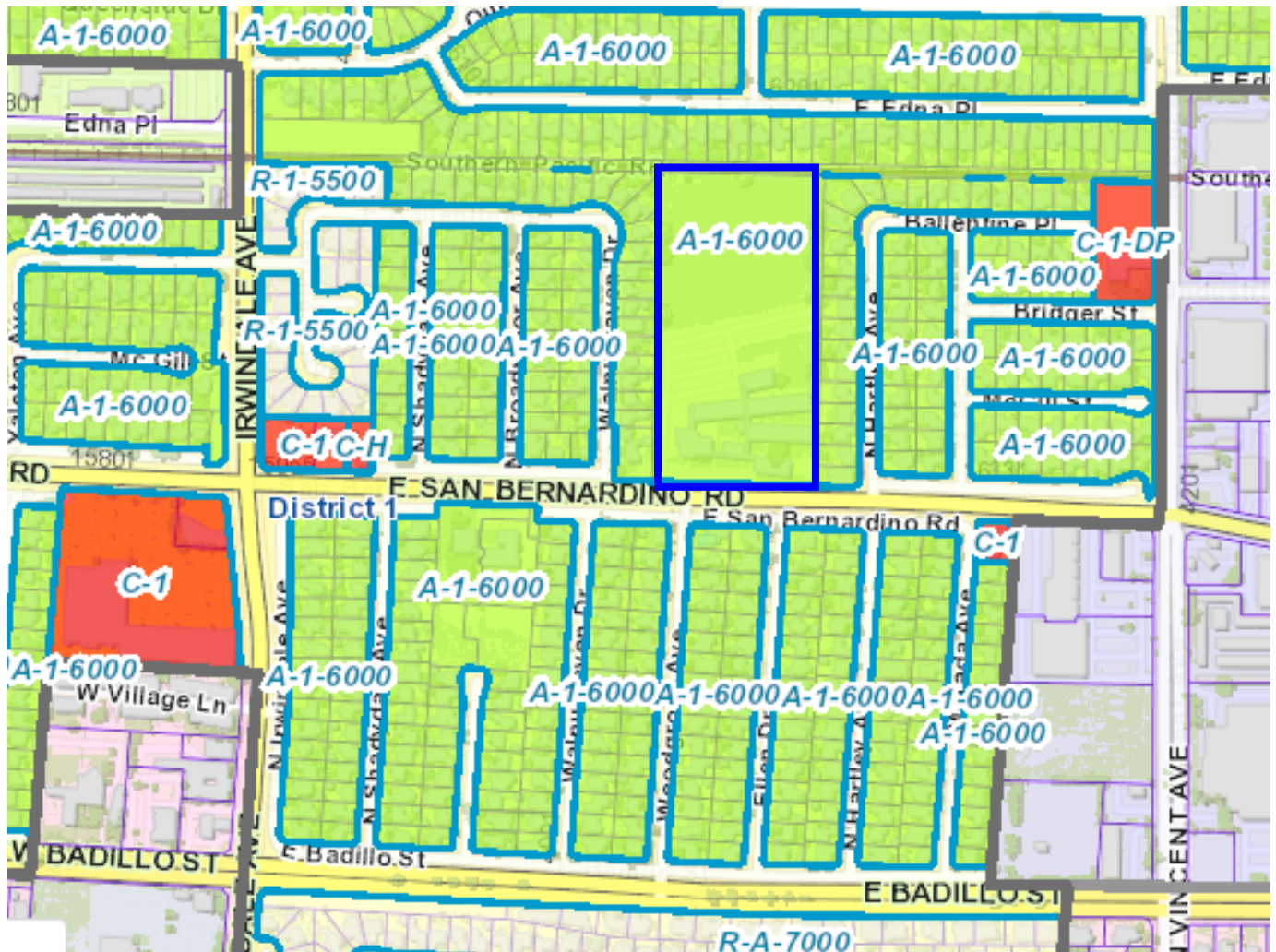


Source: Los Angeles County, Department of Regional Planning

 Project Site

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## Existing Zoning Designations



Source: Los Angeles County, Department of Regional Planning

 Project Site

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### 3.5 PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

- Provide for additional market-rate housing opportunities consistent with the County's Housing Element and State housing goals.
- Develop a Project that constructs new single-family residential units, which would help meet the region's demand for housing.
- Redevelop existing land uses that would utilize existing infrastructure, including water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.
- Redevelop an infill site to minimize environmental impacts.
- Ensure new residential development includes adequate open space and high-quality recreational amenities for future residents.
- Eliminate potential nuisances by redeveloping a vacant site.
- Provide a new single-family residential neighborhood that is scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.

### 3.6 PROJECT CHARACTERISTICS

"Project," as defined by the State CEQA Guidelines, means:

"the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is ... an activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies (14 Cal. Code of Reg. § 15378(a)(3))

The Project analyzed in this Draft EIR is the proposed 68-unit detached residential development project, described in greater detail in Section 3.7, below. The Draft EIR analyzes buildout at a Project level of detail, based upon the Project applications that are being considered by the County, compared to the existing conditions.

### 3.7 DESCRIPTION OF THE PROJECT

#### **Project Overview**

The proposed Project includes Project Number PRJ2020-001386, Vesting Tentative Tract Map Number 83183 (RPPL2020004447), Conditional Use Permit Number RPPL2021005384, and Environmental Assessment Number RPPL2020004450. The Project applicant would demolish the existing buildings on the site (the Griswold School) and associated accessory structures and develop the site with 68 detached residential condominium units, two common open space areas with landscaping totaling 35,780 square feet, stormwater infrastructure, private driveways and fire lanes, and 179 parking spaces. The proposed Project would have a density of approximately 7.15 dwelling units per acre.

As shown, the proposed residential development would include detached residential condominium units with private driveways and outdoor areas on one common lot. All lots would have front and back lawns, and driveways accessed from the Project's proposed internal, shared private drives as depicted in Figure 3-6, *Conceptual Site Plan*. The Project would also provide two common space areas with landscaping at the northern and southern portions of the site. In addition, designated areas would be provided adjacent to East

San Bernardino Road that would be developed with an underground biofiltration basin and landscaping. A total of 179 parking spaces would be provided onsite for the proposed residences. Figure 3-6, *Conceptual Site Plan* illustrates the proposed site and lot configurations.

### Architectural Design

The proposed Project consists of development of 68 two-story, detached residential condominium units. Each two-story home design would be less than 26 feet in height and would include attached two-car garages and driveway areas. The residences would range in size from approximately 1,677 square feet to 2,300 square feet for the design footprints, as shown in Table 3-1 below. The two-story design would consist of three different floor plans: Plan 3222 that consists of a 3-bedroom, 2.5-bathroom floor plan; Plan 3625 that consists of a 5-bedroom, 3-bathroom floor plan; and Plan 3627 that consists of a 5-bedroom, 3-bathroom floor plan.

**Table 3-1: Proposed Residential Units**

Floor Plan	Total SF	Bedrooms	Bathrooms
Plan 3222	1,677 SF	3	2.5
Plan 3625	2,197 SF	5	3
Plan 3627	2,300 SF	5	3

The Project includes three different elevation styles: Santa Barbara style, Coastal style, and Farmhouse style. The different elevation styles would feature three color schemes, for a total of nine visually unique elevations to be interspersed throughout the community. These elevation styles feature similar architectural elements, such as concrete roof tiles, stucco finishing, shutters, overhangs, and columns, as shown on Figure 3-7, *Elevations*.

### Access and Circulation

Access to the Project would be provided by a driveway from San Bernardino Road, located at the southwest corner of the project site. Seven new shared private drives and fire lanes would be constructed to provide internal circulation, as shown on Figure 3-6, *Conceptual Site Plan*. These shared private drives would feature parallel and perpendicular parking spaces for guests. The Project would include internal sidewalks and a new sidewalk would be constructed along the East San Bernardino Road frontage. Project residents would also have access to public transportation via a bus stop along San Bernardino Road, served by Foothill Transit, which would be relocated from its current location to east of the proposed driveway on East San Bernardino Road.

### Parking

The proposed Project would include garages, driveways, and on-street parking. Each residence would include a two-car garage and additional driveway spaces. The Project would also include approximately 43 on-street parking spaces, including three accessible (ADA) parking spaces. Table 3-2 shows the parking to be provided by the Project. Each home would also have 2 driveway spaces, which are not accounted for in the proposed parking.



**Table 3-2: Proposed Parking**

<b>Type of Parking</b>	<b>Required</b>	<b>Provided</b>
Garage Spaces	2 Covered Spaces per Unit (136 spaces)	136
Guest Parking	1 Space per 4 Units (17 spaces)	43
<b>Total Parking Spaces</b>	<b>153</b>	<b>179</b>
<b>Parking to Unit Ratio</b>		<b>2.63/dwelling unit</b>

### Recreation and Open Space

The Project includes two common open space areas to be used for passive recreation and landscaping, as shown on Figure 3-8, *Conceptual Landscape Plan*, Figure 3-9, *Conceptual Main Open Space Plan*, and Figure 3-10, *Conceptual Northern Open Space Plan*. The approximately 16,396 square foot main common open space would include a community open space area, playground, lawn area with bench seating, and short-term bike rack. The community open space area would include a wood shade structure, lighting, community BBQ, table and chair seating, and fire pit. The playground would be adjacent to the community open space area and include a rubberized surface and play equipment.

An approximately 29,384 square foot northern open space area would be located along the north end of the property and is designed for passive recreation and landscaping. The northern open space area would contain a walking path, bench seating, picnic tables, and community dog station, which would be separated from the rail line to the north of the site by a six-foot-high concrete sound wall. The Project would provide a total of approximately 35,780 square feet of programmed amenity area and approximately 62,443 square feet of common landscape area, including proposed front lawns, which would be maintained by the Homeowner's Association. Additionally, each home would include private back yard areas for a total of approximately 72,719 square feet of private open space.

### Landscaping

Landscaping proposed as part of the Project would consist of drought-tolerant ornamental trees, shrubbery, and groundcover. The Project would include the planting of approximately 231 trees. Trees provided as part of the Project would include species such as Date Palm, Queen Palm, Field Grown Olive, Little Gem Magnolia, California Sycamore, Brisbane Box, Strawberry Tree, Crape Myrtle, Paperback Melaleuca, Australian Willow, African Sumac, and Italian Cypress. The Project would be managed by a Homeowner's Association, which would be responsible for the regular maintenance of shared landscaping, including trees. Regular landscape maintenance would include the monitoring of tree health and the removal of diseased trees, if necessary. Shrubs and ground cover provided as part of the Project include Kangaroo Paw, Agave, Aloe, Bougainvillea, Dwarf Bottlebrush, Berkeley Sedges, Dwarf Natal Palm, Mediterranean Fan Palm, Pink Passion Dracaena Palm, Mexican Grass Tree, Trailing Ice Plant, Little Rev Flax Lily, Iris, Flapjack Paddle Plant, Hazel Spanish Lavender, Japanese Privet, Purple Needlegrass, Deer Grass, India Hawthorn, Groundcover Rosemary, Sage, Westringia, Compact Xylosma, Spanish Dagger, Coral Vine, Cat's Claw Vine, and Star Jasmine. Turf would be provided in the main common open space lawn area at the southern portion of the property. Landscaping would also be provided to screen above-ground utilities, including transformers. Proposed landscaping is shown on Figure 3-8, *Conceptual Landscape Plan*.

## **Walls**

The Project would include the construction of freestanding, six-foot-high concrete block walls along the east and west property lines. Along the northern property line, the existing concrete six-foot-high sound wall will remain in order to reduce noise from the rail line. An approximately six-foot-high concrete block wall would also be constructed along the yard lines to the south of Unit 1 and Unit 34 to limit noise from San Bernardino Road. Additional walls and fencing would be constructed within the Project site, as shown on Figure 3-11, *Conceptual Wall and Fence Plan*.

## **Lighting**

The Project would include lighting throughout the site, which would be oriented downward to limit light spill to surrounding properties. Project lighting would include area pole lights and security and decorative lighting in common areas and landscaped areas.

## **Infrastructure Improvements**

The proposed Project would include onsite infrastructure including new internal shared private drives, curb, gutter, sidewalk, and storm drain improvements, wet and dry utilities, and related infrastructure improvements.

### *Drainage*

Stormwater runoff in the Project vicinity currently flows from north to south to San Bernardino Road. A series of onsite storm drain facilities with Low Impact Development (LID) and Peak Storm elements are proposed. One infiltration basin is being proposed along the southern property line. Additionally, an onsite drainage swale is being proposed along the eastern property line to convey drainage from adjacent residences to the existing stormwater infrastructure in San Bernardino Road.

### *Water Infrastructure*

The Project would include private domestic water lines and private fire water lines onsite to connect with existing water mains in San Bernardino Road. The Project applicant would be required to install new eight-inch water lines along East San Bernardino Road that would connect to the existing eight-inch water pipeline along Hartley Avenue per the Azusa Light and Water Will Serve Letter dated March 18, 2020. The impacts associated with installation of new water lines were analyzed in the Initial Study. The new onsite water system would be compliant with the California Plumbing Code (Title 24) for efficient use of water.

### *Wastewater Infrastructure*

The proposed development would install new eight-inch private sewer lines onsite that would connect to the existing 8-inch sewer pipeline in San Bernardino Road.

## **Construction and Phasing**

Construction activities would include demolition of the existing structures, rectangular concrete pads, and sheds; removal of the existing utility infrastructure; grubbing, grading, excavation, and re-compaction of soils; utility and infrastructure installation; building construction; roadway pavement; and architectural coatings. Grading is expected to result in approximately 98,434 cubic yards of cut (with 8,068 cubic yards of rough grading, approximately 86,434 cubic yards of over-excavation, and approximately 3,932 cubic yards of spoils) and approximately 98,434 cubic yards of fill (with approximately 3,702 cubic yards of rough grading, approximately 86,434 cubic yards of over-excavation, and approximately 8,298 cubic yards of shrinkage). Overall, grading would balance onsite.

Construction activities are anticipated to last 21 to 27 months, with demolition, grading, and infrastructure development lasting nine (9) months and home construction lasting 12 to 18 months. Construction activities would include construction of new six-foot-high concrete walls along the eastern and western boundaries of



the Project. The wall along the northern property line, adjacent to the rail will remain. Project construction would occur within the hours allowed by Los Angeles County Code Title 12, Environmental Protection, Section 12.08.440, which states that construction shall occur only between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, with no construction allowed on Sundays and holidays.

### **General Plan and Zoning**

The Project site currently has an existing General Plan land use designation of Public and Semi-Public (P). The intent of the Public and Semi-Public (P) designation is to provide for areas of public and semi-public facilities and community-serving uses including public buildings and campuses, schools, hospitals, cemeteries, and fairgrounds, and airports and other major transportation facilities. As stated in the Land Use Element of the General Plan (2015a), “In the event that the public or semi-public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community character, are permitted”. The surrounding residential uses have existing General Plan land use designations of Residential 9 (H9), which allow up to 9 dwelling units per acre. The proposed Project would feature a density of 7.15 dwelling units per acre, which is consistent with the surrounding density.

The Project site has a zoning designation of Light Agricultural (A-1-6,000). The minimum lot size of land zoned A-1-6,000 is 6,000 square feet. According to Title 22, Section 22.16.030 of the Los Angeles County Zoning Code, single-family residences and crops are allowable uses for this zone. The 68 detached residential condominium units would be on a 9.61-acre common lot. As such, the Project would be consistent with the A-1-6,000 zoning designation.

The proposed Project would not require redesignation or a zone change. As a result of Project implementation, all other land use designations and zoning classifications in the Project vicinity would remain the same as under existing conditions.

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Limit of Work

SOUTHERN PACIFIC RAILROAD

Unit 17 D3627 PAD=433.09

Unit 16 D3625 PAD=432.90

Unit 15 D3222 PAD=432.71

Unit 14 D3625 PAD=432.55

Unit 13 D3627 PAD=432.37

Unit 12 D3222 PAD=432.17

Unit 11 D3627 PAD=432.01

Unit 10 D3625 PAD=431.83

Unit 9 D3627 PAD=431.65

Unit 8 D3222 PAD=431.45

Unit 7 D3627 PAD=431.29

Unit 6 D3222 PAD=431.10

Unit 5 D3625 PAD=430.94

Unit 4 D3627 PAD=430.76

Unit 3 D3625 PAD=430.57

Unit 2 D3222 PAD=430.38

Unit 1 D3627 PAD=430.22

Unit 35 D3625 PAD=433.71

Unit 36 D3627 PAD=433.79

Unit 37 D3222 PAD=433.87

Unit 38 D3625 PAD=434.07

Unit 39 D3222 PAD=434.31

Unit 40 D3627 PAD=432.90

Unit 41 D3222 PAD=432.99

Unit 42 D3627 PAD=433.12

Unit 43 D3222 PAD=433.29

Unit 44 D3625 PAD=433.59

Unit 45 D3627 PAD=432.79

Unit 46 D3625 PAD=432.89

Unit 47 D3627 PAD=433.01

Unit 48 D3222 PAD=433.19

Unit 49 D3625 PAD=433.50

Unit 50 D3222 PAD=432.12

Unit 51 D3625 PAD=432.14

Unit 52 D3222 PAD=432.30

Unit 53 D3627 PAD=432.52

Unit 54 D3625 PAD=432.82

Unit 55 D3627 PAD=432.02

Unit 56 D3222 PAD=432.12

Unit 57 D3627 PAD=432.24

Unit 58 D3222 PAD=432.41

Unit 59 D3625 PAD=432.72

Unit 60 D3625 PAD=431.36

Unit 61 D3627 PAD=431.43

Unit 62 D3222 PAD=431.53

Unit 63 D3625 PAD=431.75

Unit 64 D3222 PAD=432.00

Unit 65 D3627 PAD=431.70

Unit 66 D3627 PAD=431.88

Unit 67 D3627 PAD=430.71

Unit 68 D3625 PAD=430.89

Unit 18 D3625 PAD=434.64

Unit 19 D3627 PAD=434.46

Unit 20 D3625 PAD=434.27

Unit 21 D3222 PAD=434.07

Unit 22 D3627 PAD=433.82

Unit 23 D3222 PAD=433.73

Unit 24 D3625 PAD=433.57

Unit 25 D3627 PAD=433.39

Unit 26 D3625 PAD=433.20

Unit 27 D3222 PAD=433.00

Unit 28 D3627 PAD=432.85

Unit 29 D3625 PAD=432.67

Unit 30 D3222 PAD=432.46

Unit 31 D3625 PAD=432.32

Unit 32 D3627 PAD=432.13

Unit 33 D3222 PAD=431.93

Unit 34 D3625 PAD=431.89

Limit of Work

WEST SAN BERNARDINO RD.

N

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PLAN 3625 SANTA BARBARA "B"

PLAN 3627 FARMHOUSE "E"

PLAN 3222 SANTA BARBARA "B"

PLAN 3625 FARMHOUSE "E"

PLAN 3222 COASTAL "C"

PRIVATE STREET G



PLAN 3625 FARMHOUSE "E"

PLAN 3222 COASTAL "C"

PLAN 3627 FARMHOUSE "E"

PLAN 3222 SANTA BARBARA "B"

PLAN 3627 COASTAL "C"

PRIVATE STREET F

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## Conceptual Landscape Plan



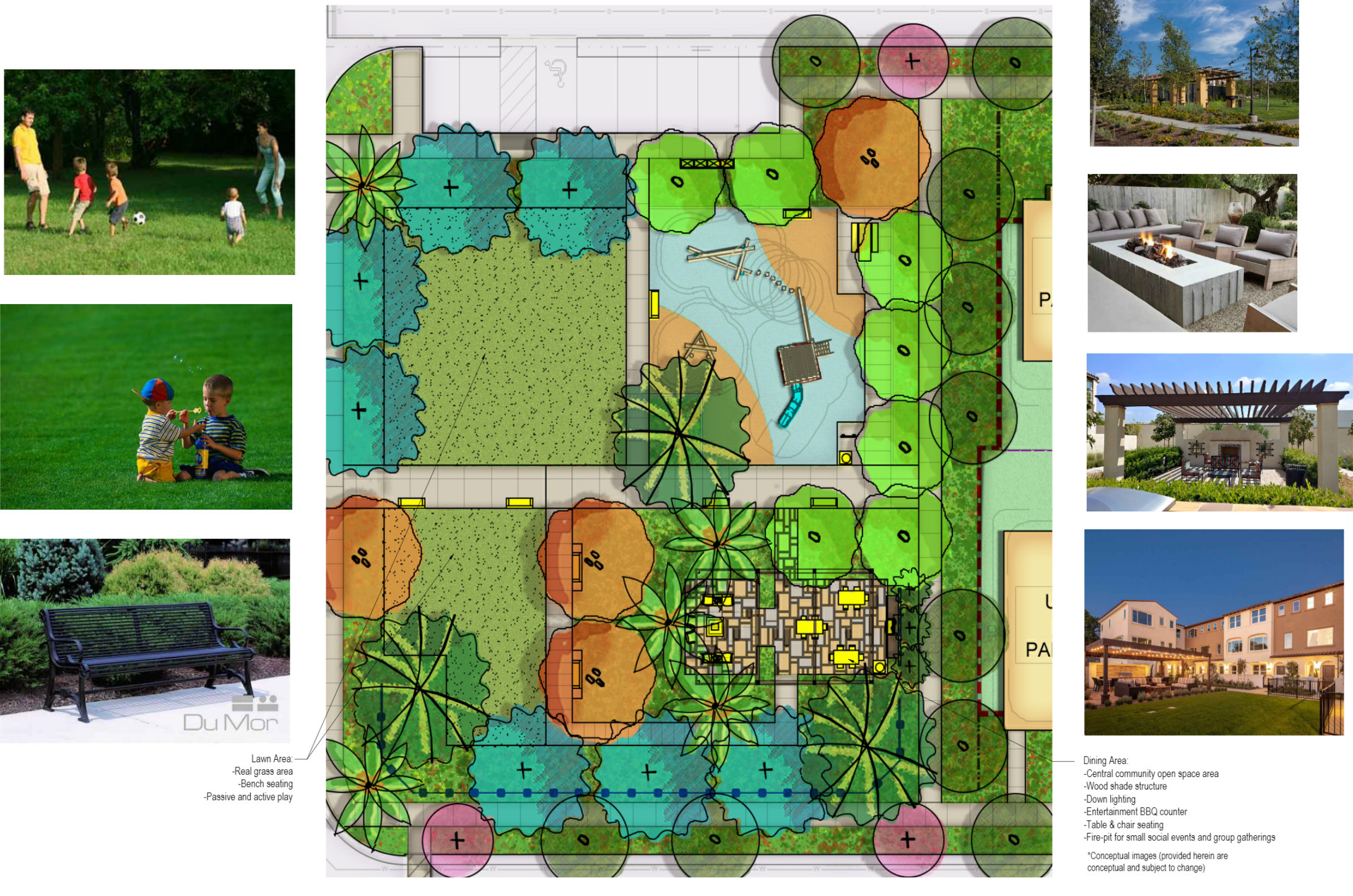
- [illegible]



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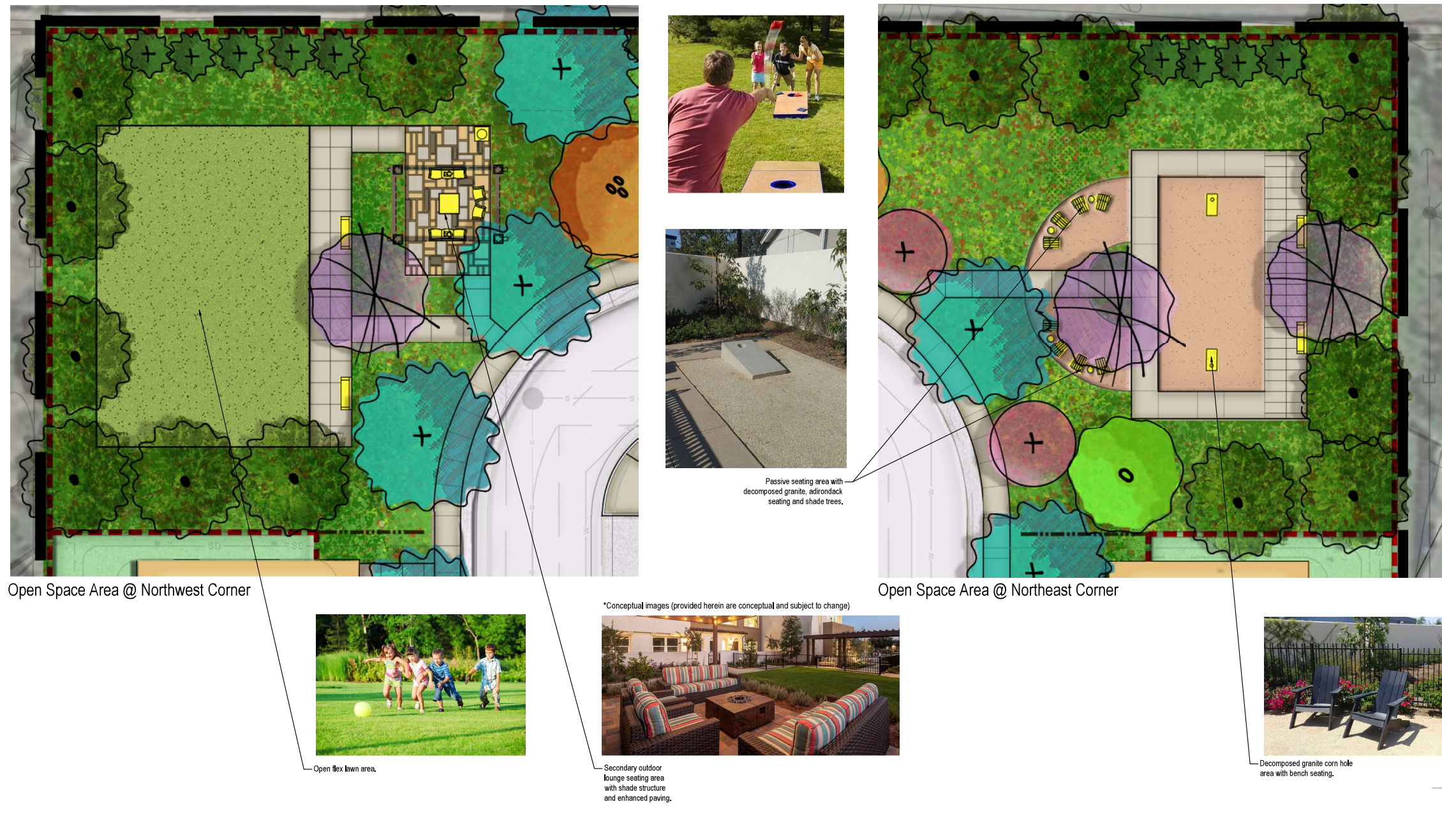
Conceptual Main Open Space Plan



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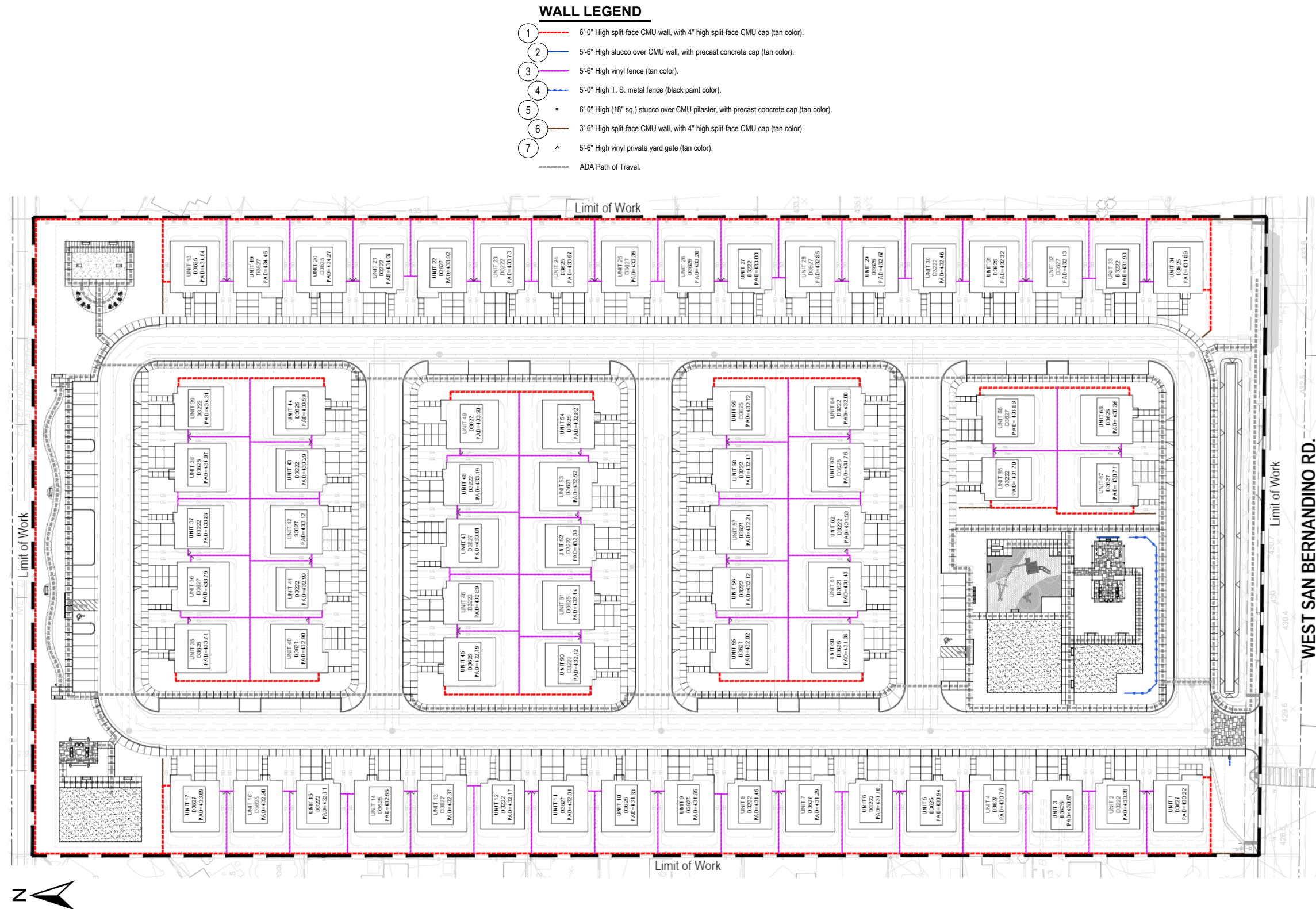
# Conceptual Northern Open Space Plan



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## Conceptual Wall and Fence Plan



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### 3.8 EXISTING PLANS, PROGRAMS, OR POLICIES AND PROJECT DESIGN FEATURES

Throughout the impact analysis in this Draft EIR, reference is made to Existing Plans, Programs, or Policies (PPPs) that are applied to all development on the basis of federal, state, regional or local laws and regulations, which effectively reduce environmental impacts. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts.

Additionally, reference is made to Project Design Features (PDFs) that are included as part of the design of the proposed Project. Where applicable, PDFs are listed to show their effect in reducing potential environmental impacts. These PDFs shall be incorporated into the Project's Mitigation Monitoring and Reporting Program and shall be installed in connection with development of the Project. The following PDFs are including as part of the Project:

- **PDF TR-1: Provide Pedestrian Network Improvements (CAPCOA SDT-1).** Sidewalks currently exist along the Project's frontage of San Bernardino Road and connections extend both east and west from the site to surrounding land uses. The Project includes construction of onsite, internal five-foot-wide sidewalks that will connect to the existing sidewalks along San Bernardino Road. Improvement plans for the proposed sidewalks shall be submitted to Public Works for review and approval prior to final map recordation.
- **PDF TR-2: Onsite Bicycle Parking.** As part of the Project design, the Project will provide bicycle parking in common areas in addition to private garages. Improvement plans shall be submitted to Public Works for review and approval prior to final map recordation. A note shall be shown on the Exhibit A map showing bicycle parking.
- **PDF TR-3: Onsite Parks (inspired by CAPCOA LUT-3).** The Project will construct two onsite park/open space areas that shall be made available for resident and public use. Improvement plans for the onsite open space shall be submitted to Public Works for review and approval prior to final map recordation. The signage shall include "Open to the Public" and the Street Improvement Plans shall demonstrate sidewalk accessibility. Upon completion of the Project, the open space will be conveyed to the homeowners' association formed to manage the Project ("HOA"). Any recorded instrument that references the public's use of the open space shall provide that the public's use of the open space is subject to any rules and regulations promulgated by the HOA related to the public's use of such open space and all HOA members and the general public shall comply with the rules and regulations promulgated by the HOA.

### 3.9 GOVERNING DOCUMENTS AND INTENDED USES OF THE EIR

Development and operation of the Griswold Residential Project will be governed by the following:

- The County of Los Angeles General Plan, as amended, which establishes policies governing land use, circulation, housing, noise, and safety throughout the County.

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

This Project-level Draft EIR examines the potential environmental impacts of the proposed Project and will be considered by the County and others in adopting and implementing the Project. The function of the Draft EIR is to enable the County of Los Angeles, other responsible agencies, and interested parties to evaluate the environmental impacts of the proposed Project and make informed decisions with respect to the requested discretionary approvals.

### 3.8 DISCRETIONARY APPROVALS AND PERMITS

As part of the proposed Project, the following discretionary actions are required from the County of Los Angeles:

- **Tentative Tract Map No. 83183** to create one parcel allowing for the development of 68 residential condominium units.
- **Exhibit Map** to review and approve the location, design, configuration, and impact of the proposed development of the project for 68 condominium units.
- **Conditional Use Permit No. RPPL2021005384** to allow for grading in excess of 100,000 cubic yards.
- **Environmental Assessment No. RPPL2020004450** for the Project's environmental review analysis and documents pursuant to CEQA.

Additional discretionary, ministerial and/or administrative actions may be necessary from other governmental agencies to fully implement the Project. The following subsequent actions and approvals may be necessary:

- Issuance of a Construction Activity General Construction Permit and National Pollutant Discharge Elimination Systems (NPDES) Permit from the Los Angeles Regional Water Quality Control Board



## 4. Environmental Setting

The purpose of this section is to provide a “description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation (NOP) is published, from both a local and a regional perspective” pursuant to CEQA Guidelines Section 15125(a). In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

### 4.1 PROJECT LOCATION

The Project site is 9.61 gross acres and is located at 16209 East San Bernardino Road, Covina, CA (APN: 8435-006-900) within the unincorporated Los Angeles County community of East Irwindale. The Project site is directly north of the intersection of San Bernardino Road and North Woodgrove Avenue.

The Project area is surrounded by Covina to the east; Baldwin Park to the west; Irwindale to the north; and West Covina to the south. Regional access is provided via Interstate 10 (I-10) located approximately one mile to the south and State Route 39 (SR-39), approximately one mile to the east. Local access is provided by East San Bernardino Road.

### 4.2 PROJECT SITE DESCRIPTION

The Project site consists of one 9.61-acre parcel that was previously developed with the Griswold School and associated accessory structures. At the time of the issuance of the NOP, the site was improved with six permanent structures, as well as associated improvements, such as paved recreational areas, parking lots, and patio areas. The school buildings were constructed in 1953 for use as the Griswold School, which was in operation through 1974. The school was reopened in 1978 for use by Tri-Community Adult Education. The school buildings had been vacant for approximately 3 years and the entire property, with the exception of the parking lot along San Bernardino Road, was fenced. Since the time of the publication of the NOP for the Draft EIR, the school buildings were damaged in a fire. As a result, the school buildings were demolished to eliminate public health and safety hazards related to the unsafe condition of the school buildings. Pursuant to State CEQA Guidelines Section 15125, the environmental baseline for the Draft EIR is February 1, 2022, the date the NOP was published. As of this date, the school buildings were vacant but intact. As such, the Draft EIR environmental baseline condition assumes the school buildings as vacant but intact.

The site is landscaped and includes grass/turf field areas, as well as shrubs, and mature trees. Vehicular access to the site is provided by existing driveways on East San Bernardino Road. The Project site is bounded by the Metrolink railroad to the north, single-family residences to the east and west, and East San Bernardino Road to the south.

The Project site currently has an existing General Plan land use designation of Public and Semi-Public (P) and has a zoning designation of Light Agricultural (A-1-6,000).

### 4.3 TRANSPORTATION

#### Existing Site Access

Vehicular access to the existing site for is provided from an ingress and egress driveway on East San Bernardino Road.

### **Metro San Bernardino Line**

The Metrolink San Bernardino Line is located directly adjacent to the Project to the north. The line is also known as the San Gabriel Sub Line and consists of two rails lines adjacent to the Project site. According to Los Angeles Metro, the San Bernardino Line currently has 15 trains per day traveling to Los Angeles and 15 trains per day traveling to San Bernardino.

### **Existing Transit Service**

The Project site is currently served by Foothill Transit, which serves 22 different cities via 39 existing bus lines between Downtown Los Angeles and southwest San Bernardino County. The existing Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops is approximately every 20 minutes. Line 190 serves El Monte, Baldwin Park, Covina, and Pomona. Additionally, existing Foothill Transit Line 185 runs along Irwindale Avenue with stops located near the intersection of Irwindale Avenue and San Bernardino Avenue, less than a quarter mile away from the Project site. The transit frequency at these stops is approximately every 10 minutes. Line 185 serves Hacienda Heights, Industry, La Puente, West Covina, Irwindale, and Azusa. The Metrolink also runs just north of the site (San Bernardino Line) and has stops in Baldwin Park and Covina approximately 1.8 and 2.4 miles from the Project site, respectively.

### **Existing Bicycle and Pedestrian Facilities**

The existing and proposed bike network is presented in the Los Angeles County Bicycle Master Plan for the East San Gabriel Valley Planning Area. Class II bikeways are on-road, striped bike routes and Class III bike paths are shared on-road bike routes that are typically not striped with a separate bike lane. Irwindale Avenue is a proposed Class II bike route north of Badillo Street (it is an existing Class III bike route south of Badillo Street) along with portions of Vincent Avenue and San Bernardino Road east of Vincent Avenue. Existing pedestrian facilities (sidewalks and crosswalks) exist along San Bernardino Road and other roads within the Project vicinity.

## **REFERENCES**

Foothill Transit. Lines + Schedules. <http://foothilltransit.org/lines-and-schedules/>

Los Angeles County Public Works. Bicycle Master Plan. March 2012.  
<https://pw.lacounty.gov/tpp/bike/docs/bmp/FINAL%20Bicycle%20Master%20Plan.pdf>

Urban Crossroads. Griswold Residential (RPPL2020004447) Focused Transportation Analysis. 30 August 2021. Appendix M

Urban Crossroads. Griswold Residential (RPPL2020004447) Vehicle Miles Traveled (VMT) Analysis. 17 January 2021. Appendix N

## 5.0 Environmental Impact Analysis

This Chapter focuses on evaluating the significant environmental effects of the proposed Project, which is described in Chapter 3, *Project Description*. This Chapter describes the existing physical environmental setting (also referred to as “baseline”) for each environmental topic, and the impacts that would result from implementation of proposed Project. Because existing federal, state, and local regulations will also shape how the proposed Project is implemented, and provide requirements for avoiding and reducing environmental impacts, a discussion of relevant regulations, plans, programs, and policies pertinent to each environmental issue addressed in each environmental topic section is provided. Additionally, as necessary, feasible mitigation measures are identified to reduce the significant impacts of the proposed Project.

### Environmental Topics

The following section in this chapter analyzes the environmental topic listed below:

- 5.1 Transportation

The following environmental topics are analyzed in Chapter 6.0, *Other CEQA Considerations*:

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

This Draft EIR evaluates the direct and indirect impacts resulting from construction and ongoing operations of the proposed Project. Under CEQA, EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant. As discussed in Section 2.2, *EIR Scope and Content*, the Initial Study and Notice of Preparation (NOP) that was prepared for the proposed Project and the responses received were used to help determine the scope of the environmental issues to be addressed in the Draft EIR. Consistent with CEQA Guidelines Sections 15128 and 15063, issues considered Potentially Significant in the Initial Study are addressed in this section (Section 5.0, *Environmental Impact Analysis*) of this Draft EIR. Issues that the Initial Study determined to be less than significant or less than significant with mitigation incorporated (including: aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire), are addressed in Section 6.0, *Other CEQA Considerations*. A detailed analysis on the issue areas not covered in detail in this Draft EIR is included in the Initial Study provided in Appendix A.

## Format of Environmental Topic Sections

Each environmental topic section generally includes the following main subsections:

- **Regulatory Setting:** This subsection describes applicable federal, state, and local plans, policies, and regulations that the proposed project must address, and will shape its implementation.
- **Environmental Setting:** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance:** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.”
- **Methodology:** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant.
- **Environmental Impacts:** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
  - A statement of the CEQA threshold being analyzed.
  - The EIR’s conclusion as to the significance of the impact.
  - An impact assessment that evaluates the changes to the physical environment that would result from proposed project.
  - An identification of significance comparing identified impacts of the proposed project to the significance threshold with implementation of any existing regulations, prior to implementation of any required mitigation.
  - A discussion of potential cumulative impacts that could occur from implementation of the proposed project and other cumulative projects.
  - A list of any existing regulations that reduce potential impacts.
  - For each impact determined to be potentially significant, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
    - avoid a significant impact;
    - minimize the severity of a significant impact;
    - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
    - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the project; and/or
    - compensating for the impact by replacing or providing substitute resources or environmental conditions.
  - Actions to be taken to ensure effective implementation of required mitigation measures.

## Environmental Setting/Baseline

The “Environmental Setting” subsections describe current conditions regarding the environmental resource area reviewed. Pursuant to CEQA Guidelines Sections 15125(a) and 15126.2(a), an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. “This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The

description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives.”

An IS/NOP for the proposed Project was distributed on February 1, 2022 for a 30-day public review and comment period that ended on March 3, 2022. This time period generally provides the baseline condition for this Draft EIR.

## Thresholds of Significance/Significance Criteria

CEQA Guidelines Section 15382 defines a significant effect on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The “Thresholds of Significance” subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this Draft EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be “significant” (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a “significant” effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as “significant,” depending on the nature of the area affected. The thresholds of significance used to assess the significant of impacts are based on those provided in Appendix G of the CEQA Guidelines.

## Impact Significance Classifications

The following classifications are used throughout the impact analysis in this Draft EIR to describe the level of significance of environmental impacts:

- **Significant Impact:** A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself “shall not be considered a significant effect on the environment ... [but] may be considered in determining whether the physical change is significant.” As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.
- **No Impact:** No adverse effect on the environment would occur, and mitigation measures are not required.
- **Less than Significant Impact:** The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **Less than Significant Impact with Mitigation Incorporated:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval and applicable plans, programs, and policies, when implemented, will reduce the significant impact to a less-than-significant level.

- **Significant and Unavoidable Impact:** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures, standard conditions of approval, and applicable plans, programs, and policies would not reduce the impact to a less-than-significant level, and a significant and unavoidable impact would remain.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve a project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, that outweigh its significant unavoidable effects, and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(b)).

## Cumulative Impacts

Cumulative impacts refer to the combined effect of the proposed project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "[t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts. According to Section 15355 of the CEQA Guidelines, 'cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Draft EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects.

Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for transportation relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the relevant Southern California Regional Transportation Plan and relevant regional plans developed by the Southern California Association of Governments (SCAG). The cumulative analyses for other environmental issues use the list of projects approach, and identifies the list of past, present and probable future projects that were known of at the time the NOP was published.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to specific viewsheds. Thus, for example, in assessing aesthetic resources impacts, only development within and immediately adjacent to the project area would contribute to a cumulative visual effect is analyzed, whereas cumulative traffic impacts are based upon all development within the traffic study area of roadways and intersections. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic.

Table 5-1 provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by each agency, and Figure 5-1 shows the locations. Cumulative projects shown on Table 5-1 were either under consideration or approved but are not yet constructed as of February 1, 2020, the date of the NOP.

**Table 5-1: Cumulative Project List**

Project No.	Project Status	Project Name	Land Use	Size	
		Address/Location			
County of Los Angeles					
LA-1	Pending	16722 E. Arrow Highway	Single-Family Residential	9	DU
City of Irwindale					
I-1	Approved	5175 Vincent Avenue	Light Industrial	545,735	SF
I-2	Under Construction	Arrow Highway Business Park 16203 Arrow Highway	Warehouse	138,410	SF
City of West Covina					
WC-1		1611&1623 San Bernardino Road	Industrial /Condo	107,427 24	SF DU
City of Covina					
C-1	Under Construction	Covina Bowl Specific Plan 1065 W.San Bernardino Road	Mixed Use	132 12,000	DU SF
C-2	Under Construction	Covina iTec	Park & Ride Lot	400	PS
		1162 North Citrus Avenue	Multi-Family Residential	120	DU
		Covina, CA 91723	Office	17,000	SF
			Commercial Retail	4,800	SF

Project No.	Project Status	Project Name	Land Use	Size	
		Address/Location			
			Event Center (700 guests)	70	EMP
C-3	Proposed	Covina Commons Cyprus Villas 1000 N Azusa Ave	Single-Family Residential Restaurant Fast Food Drive Thru	61 6,000 7,000	DU SF SF
C-4	Approved	Covina Townhomes Geneva Place (between 3 <sup>rd</sup> & Citrus)	Multi-Family Residential Restaurant Commercial Retail	161 3,800 13,500	DU SF SF
C-5	Under Construction	City Ventures 156 W. San Bernardino Road	Multi-Family Residential Commercial Retail	52 5,794	DU SF

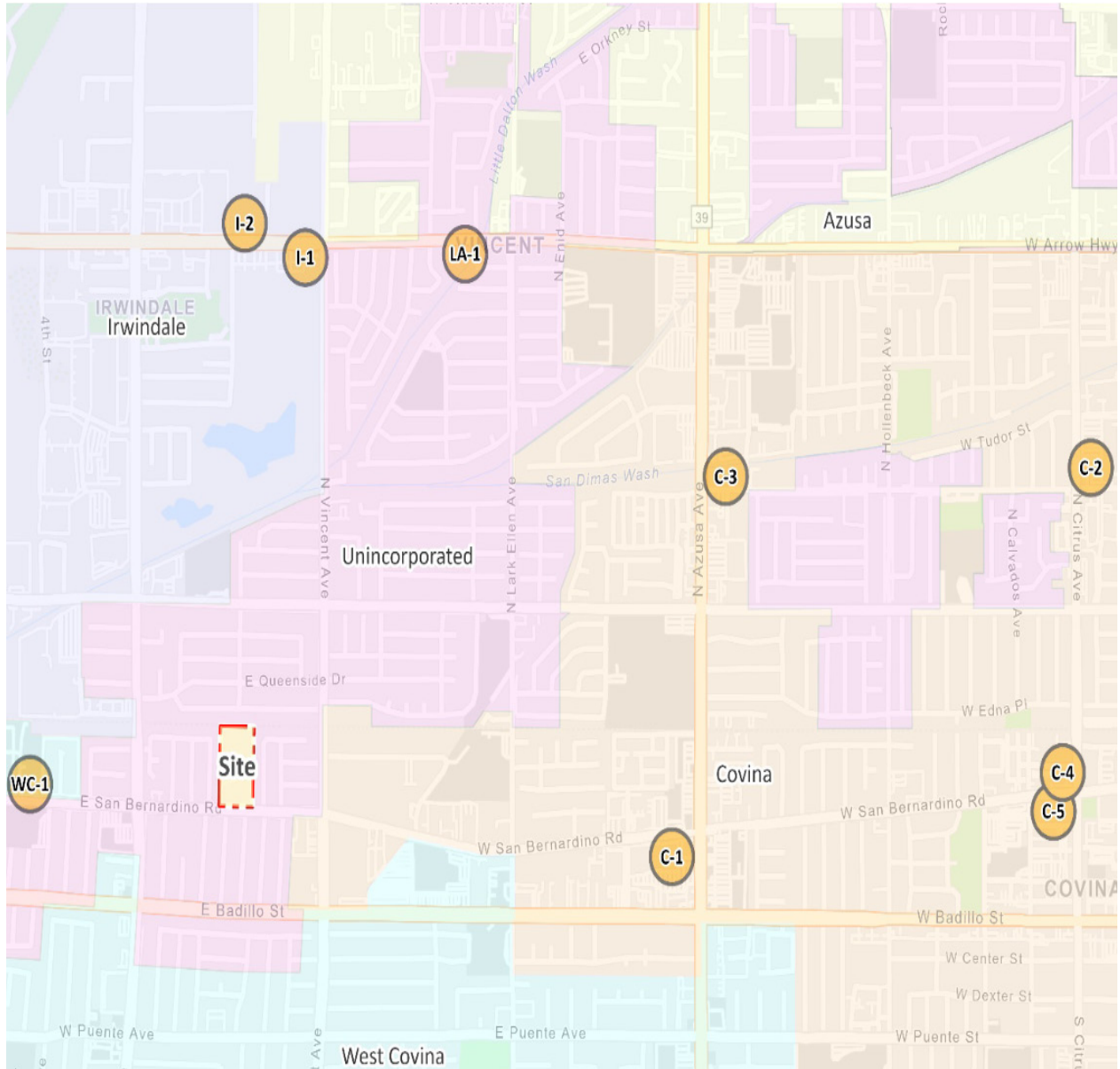
DU = Dwelling Unit GLSF = Gross Leasable Square Feet

SF = Square Feet

EMP=Employees



# Cumulative Projects



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# 5.1 Transportation

## 5.1.1 INTRODUCTION

This section describes the existing transportation and circulation conditions, criteria for vehicle miles traveled (VMT) analysis, and impacts from implementation of the proposed Project. As necessary, mitigation measures for significant transportation impacts resulting from the construction and operation of the proposed Project are also included. The proposed Project's impacts are analyzed in the context of existing and Project opening year conditions. This analysis is based on information contained in:

- *Griswold Residential (RPPL2020004447) Vehicle Miles Traveled (VMT) Analysis, Urban Crossroads, 27 October 2022, Appendix M*

## 5.1.2 REGULATORY SETTING

### Senate Bill 743 and CEQA Guidelines Section 15064.3

On September 27, 2013, Senate Bill (SB) 743 was signed into State law. The California legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

The SB 743 changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. SB 743 directed that the revised CEQA Guidelines “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099[b][1]); and that “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (Public Resources Code Section 21099[b][2]).

In response, the 2018 CEQA Guidelines include a new section (15064.3) that specifies that VMT is the most appropriate measure of transportation impacts, and automobile delay no longer is considered a significant environmental impact. Also, a Technical Advisory issued by the Governor's Office of Planning and Research (OPR) in December 2018 provides additional technical details on calculating VMT and assessing transportation impacts for various types of projects.

### Congestion Management Program

In 1990, the California Legislature enacted the Congestion Management Program (CMP) to implement Proposition 111, a state-wide transportation funding proposal that required local governments to implement mitigation measures to offset the impacts from new development on the regional transportation system. The CMP primarily utilized a LOS performance metric.

Senate Bill 743 contained amendments to the congestion management law that allows counties to opt out of the LOS standards that would otherwise apply in areas where CMPs are utilized. Pursuant to California Government Code § 65088.3, local jurisdictions may opt out of the CMP requirement without penalty if a majority of the local jurisdictions representing a majority of the County's population formally adopt resolutions requesting to opt out of the program. As of October 2019, the majority of local agencies representing the majority of the County's population have adopted resolutions to opt out of the program. Therefore, the CMP is no longer applicable in Los Angeles County.

## SCAG 2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020 the Southern California Association of Governments' (SCAG)'s Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) and the goals and policies relevant to the proposed project are listed below:

### Goals

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats

## County of Los Angeles General Plan

### Mobility Element

The Mobility Element of the Los Angeles County General Plan serves as the County's primary guide for transportation planning. The following goals and policies in the existing General Plan Mobility Element are relevant to the proposed Project:

- Goal M1** Street designs that incorporate the needs of all users.
- Policy M1.1** Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.
- Policy M1.2** Ensure that streets are safe for sensitive users, such as seniors and children.
- Policy M1.3** Utilize industry standard rating systems to assess sustainability and effectiveness of street systems for all users.
- Goal M2** Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.
- Policy M2.1** Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.
- Policy M2.2** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following street designs, whenever appropriate and feasible:
- Lane width reductions to 10 or 11 feet in low speed environments with a low volume of heavy vehicles.
  - Wider lanes may still be required for lanes adjacent to the curb, and where buses and trucks are expected.
  - Low-speed designs.
  - Access management practices developed through a community-driven process.
  - Back in angle parking at locations that have available roadway width and bike lanes, where appropriate.

- Policy M2.3** Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following intersection designs, whenever appropriate and feasible:
- Right angle intersections that reduce intersection skew.
  - Smaller corner radii to reduce crossing distances and slow turning vehicles.
  - Traffic calming measures, such as bulb-outs, sharrows, medians, roundabouts, and narrowing or reducing the number of lanes (road diets) on streets.
  - Crossings at all legs of an intersection.
  - Shorter crossing distances for pedestrians.
  - Right-turn channelization islands. Sharper angles of slip lanes may also be utilized.
  - Signal progression at speeds that support the target speed of the corridor.
  - Pedestrian push buttons when pedestrian signals are not automatically recalled.
  - Walk interval on recall for short crossings.
  - Left-turn phasing.
  - Prohibit right turn on red.
  - Signs to remind drivers to yield to pedestrians.
- Policy M2.4** Ensure a comfortable walking environment for pedestrians by implementing the following, whenever appropriate and feasible:
- Designs that limit dead-end streets and dead-end sidewalks.
  - Adequate lighting on pedestrian paths, particularly around building entrances and exits, and transit stops.
  - Designs for curb ramps, which are pedestrian friendly and compliant with the American Disability Act (ADA).
  - Perpendicular curb ramps at locations where it is feasible.
  - Pedestrian walking speed based on the latest standard for signal timing. Slower speeds should be used when appropriate (i.e., near senior housing, rehabilitation centers, etc.)
  - Approved devices to extend the pedestrian clearance times at signalized intersections.
  - Accessible Pedestrian Signals (APS) at signalized intersections.
  - Pedestrian crossings at signalized intersections without double or triple left or right turn lanes.
  - Pedestrian signal heads, countdown pedestrian heads, pedestrian phasing and leading pedestrian intervals at signalized intersections.
  - Exclusive pedestrian phases (pedestrian scrambles) where turning volume conflicts with very high pedestrian volumes.
  - Advance stop lines at signalized intersections.
  - Pedestrian Hybrid Beacons.
  - Medians or crossing islands to divide long crossings.
  - High visibility crosswalks.
  - Pedestrian signage.
  - Advanced yield lines for uncontrolled crosswalks.
  - Rectangular Rapid Flashing Beacon or other similar approved technology at locations of high pedestrian traffic.
  - Safe and convenient crossing locations at transit stations and transit stops located at safe intersections.
- Policy M2.5** Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:
- Bicycle signal heads at intersections.
  - Bicycle signal detection at all signalized intersections.

	<ul style="list-style-type: none"> <li>• Wayfinding signage.</li> <li>• Road diet techniques, such as lane narrowing, lane removal, and parking removal/restriction.</li> <li>• Appropriate lighting on all bikeways, including those in rural areas.</li> <li>• Designs, or other similar features, such as: shoulder bikeways, cycle tracks, contra flow bike lanes, shared use paths, buffered bike lanes, raised bike lanes, and bicycle boulevards.</li> </ul>
<b>Policy M2.6</b>	Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.
<b>Policy M2.7</b>	Require sidewalks, trails and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking.
<b>Policy M2.8</b>	Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.
<b>Policy M2.9</b>	Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.
<b>Policy M2.10</b>	Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture, and comfortable, safe waiting areas near transit stops.
<b>Policy M2.11</b>	In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths.
<b>Goal M3</b>	Streets that incorporate innovative designs.
<b>Policy M3.1</b>	Facilitate safe roadway designs that protect users, preserve state and federal funding, and provide reasonable protection from liability.
<b>Policy M3.2</b>	Consider innovative designs when part of an accepted standard, or when properly vetted through an appropriate engineering/design review, in compliance with all state and federal laws.
<b>Goal M4</b>	An efficient multimodal transportation system that serves the needs of all residents.
<b>Policy M4.3</b>	Maintain transit services within the unincorporated areas that are affordable, timely, cost-effective, and responsive to growth patterns and community input.
<b>Policy M4.5</b>	Encourage continuous, direct routes through a connected system of streets, with small blocks and minimal dead ends (cul-de-sacs), as feasible.
<b>Policy M4.6</b>	Support alternatives to LOS standards that account for a multimodal transportation system.
<b>Policy M4.7</b>	Maintain a minimum LOS D, where feasible; however, allow LOS below D on a case by case basis in order to further other General Plan goals and policies, such as those related to environmental protection, infill development, and active transportation.
<b>Policy M4.8</b>	Provide and maintain appropriate signage for streets, roads and transit.
<b>Policy M4.13</b>	Coordinate with adjacent jurisdictions in the review of land development projects near jurisdictional borders to ensure appropriate roadway transitions and multimodal connectivity.
<b>Goal M5</b>	Land use planning and transportation management that facilitates the use of transit.
<b>Policy M5.1</b>	Facilitate transit-oriented land uses and pedestrian-oriented design, particularly in the first-last mile connections to transit, to encourage transit ridership.
<b>Policy M6.4</b>	Minimize noise and other impacts of goods movement, truck traffic, deliveries, and staging in residential and mixed-use neighborhoods.
<b>Goal M7</b>	Transportation networks that minimizes negative impacts to the environment and communities.
<b>Policy M7.1</b>	Minimize roadway runoff through the use of permeable surface materials, and other low impact designs, wherever feasible.

## County of Los Angeles Bicycle Master Plan

The County of Los Angeles Bicycle Master Plan identifies improvements and policies to increase the bicycling population; increase cyclists' trip frequency and distance; improve bicyclist, pedestrian and motorist safety; and increase public awareness and support for bicycling. In terms of infrastructure, the Bicycle Master Plan provides direction for expanding the County's existing bikeway network. The system-wide approach for connecting gaps will ensure greater local and regional connectivity. The Bicycle Master Plan identifies Class I, Class II, Class III bicycle facilities throughout the County.

## Los Angeles County Code

The Los Angeles County Code Chapter 22.112 provides regulations for off-street parking. The following County Code parking requirements are for the residential uses proposed by the Project.

- Single Family Residences: 2 Covered Spaces per Unit
- Guest: 1 space per 4 units

### 5.1.3 ENVIRONMENTAL SETTING

#### Existing Site Access

Vehicular access to the existing site is currently provided from an ingress and egress driveway on San Bernardino Road.

#### Metro San Bernardino Line

The Metrolink San Bernardino Line is located directly adjacent to the Project to the north. The line is also known as the San Gabriel Sub Line and consists of two rails lines adjacent to the Project site. According to Los Angeles Metro, the San Bernardino Line currently has 15 trains per day traveling to Los Angeles and 15 trains per day traveling to San Bernardino. The Metrolink has stops in Baldwin Park and Covina approximately 1.8 and 2.4 miles from the Project site, respectively.

#### Existing Transit Service

The Project site is currently served by Foothill Transit, which serves 22 different cities via 39 existing bus lines between Downtown Los Angeles and southwest San Bernardino County. The existing Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops are approximately every 20 minutes. Line 190 serves El Monte, Baldwin Park, Covina, and Pomona. Additionally, existing Foothill Transit Line 185 runs along Irwindale Avenue with stops located near the intersection of Irwindale Avenue and San Bernardino Avenue, less than a quarter mile away from the Project site. The transit frequency at these stops are approximately every 10 minutes. Line 185 serves Hacienda Heights, Industry, La Puente, West Covina, Irwindale, and Azusa.

#### Existing Bicycle and Pedestrian Facilities

The existing and proposed bike network is presented in the Los Angeles County Bicycle Master Plan for the East San Gabriel Valley Planning Area. Class II bikeways are on-road, striped bike routes and Class III bike paths are shared on-road bike routes that are typically not striped with a separate bike lane. Irwindale Avenue is a proposed Class II bike route north of Badillo Street (it is an existing Class III bike route south of Badillo Street) along with portions of Vincent Avenue and San Bernardino Road east of Vincent Avenue. Existing pedestrian facilities (sidewalks and crosswalks) exist along San Bernardino Road and other roads within the Project vicinity.

### 5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- TR-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- TR-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);
- TR-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- TR-4 Result in inadequate emergency access.

The Initial Study established that the proposed Project would result in a less than significant impact related to Threshold TR-3 and no impacts would occur related to Threshold TR-4. Regarding Threshold TR-3, the Initial Study explained that Project implementation would not add incompatible uses to area roadways and that the proposed Project would be subject to the requirements and design standards of the Department of Public Works. Therefore, the proposed Project would not create a roadway hazard. Regarding Threshold TR-4, the Initial Study explained that direct access to the Project site would be provided by a new private roadway intersecting with San Bernardino Road. The proposed Project would also be required to construct internal access and provide fire suppression facilities, including three fire hydrants, in conformance with the County Code Title 32, Fire Code. The proposed Project would be subject to all requirements of the Fire Department and shall comply pursuant to the requirements of the Uniform Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, implementation of the proposed Project would not result in inadequate emergency access. Further, during construction, the Project would implement a construction traffic management plan per standard Los Angeles County Conditions of Approval, which would reduce potential impacts related to emergency access during Project construction to a level that is less than significant.

#### Vehicle Miles Traveled Significance Criteria

In July 2020, Los Angeles County updated its Transportation Impact Analysis Guidelines (County Transportation Guidelines) on evaluating transportation impacts in CEQA that provides the following screening criteria for land development projects that may result in a less than significant VMT impact:

- Small projects anticipated to generate low traffic volumes (i.e., fewer than 110 daily trips)
- Projects located within a Transit Priority Area (TPA) (i.e., within ½ mile of an existing “major transit stop” or an existing stop along a “high-quality transit corridor”) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be appropriate if a project:
  - Has a Floor Area Ratio (FAR) of less than 0.75;
  - Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
  - Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
  - Replaces affordable residential units with a smaller number of moderate- or high-income residential units.
- Projects that set aside 100 percent of the units, excluding manager’s units, as lower income.

The County Transportation Guidelines also established a significance threshold of 16.8% below the existing baseline for determining VMT impacts. The proposed Project is located in the South County Baseline Area,



which has an existing average 12.2 VMT per capita. The threshold after applying the 16.8% reduction is 10.2 VMT per capita.

### 5.1.5 METHODOLOGY

As previously described in Section 5.1.2, above, SB 743 required the California Governor's Office of Planning and Research to amend the State CEQA Guidelines to provide an alternative to LOS as the metric for evaluating transportation impacts under CEQA. The alternative metric for transportation impacts detailed in the State CEQA Guidelines is VMT. Jurisdictions had until July 1, 2020, to adopt and begin implementing VMT thresholds for traffic analysis. As outlined in State CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS is not analyzed as part of this Draft EIR.

#### Project Trip Distribution Methodology

The trip generation potential of the proposed Project was estimated using trip rates contained in the 10th Edition of the *Trip Generation Manual*, published by the Institute of Transportation Engineers (ITE), [Washington, D.C., 2017].

#### Vehicle Miles Traveled Methodology

VMT analysis included Project generated VMT calculations for Baseline conditions from Fehr and Peers, who has past and present SCAG models in-house and can provide Project level model runs and VMT by individual traffic analysis zones (TAZ). The SCAG model was reviewed to obtain the socioeconomic data (SED) assumptions for the TAZ that encompasses the project site. Given the Project size and the fact that the Project TAZ already includes residential uses, a new SCAG model run was determined to not be required for the Project. Rather, the SCAG model can be used to estimate the Daily VMT and Daily Residential VMT per capita for the project based on the VMT characteristics of the TAZ that contains the Project. The Residential VMT data was obtained from both the 2012 and 2040 versions of the model and the data was interpolated to provide a current year (2020) VMT estimate for the proposed Project.

Project-generated Home-Based (HB) vehicle trips (both work/commute vehicle trips and non-work vehicle trips that start and end at residential units) was then calculated for both the base year (2012) model and cumulative year (2040) model and linear interpolation was used to determine the Project's 2020 HB VMT. The Project's 2020 HB VMT was then used to calculate the proposed Project's (2020) HB VMT per capita.

### 5.1.6 ENVIRONMENTAL IMPACTS

#### **IMPACT TR-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.**

##### **Less than Significant Impact.**

##### **Operation**

The proposed Project would generate traffic from development of the proposed 68 detached residential condominium units. Access to the proposed Project would be provided via a full-access driveway on San Bernardino Road. The proposed driveway would be aligned with Woodgrove Avenue. This driveway would be a two way stop-controlled intersection.

## Project Trip Generation

Vehicle trips for the Project were generated by using the trip rates from the Institute of Transportation Engineers (ITE) Trip Generation (10th Edition, 2017). As shown in Table 5.1-1, the Project is anticipated to generate 642 new daily trips, including 50 A.M. peak hour and 67 P.M. peak hour trips.

**Table 5.1-1 Proposed Project Trip Generation**

		A.M. Peak Hour			P.M. Peak Hour			
Land Use	Units	In	Out	Total	In	Out	Total	Daily
Future Uses								
Single-Family Residential								
Trip Generation Rates <sup>1</sup>		0.19	0.56	0.74	0.62	0.37	0.99	9.44
Trip Generation	68 DU	12	38	50	42	25	67	642

Source: Appendix M

<sup>1</sup>Code 210, Single-Family Residential

Trip generation based on rates from Institute of Transportation Engineers' (ITE) Trip Generation (10th Edition)

## Transit Facilities

As described previously, the Metrolink San Bernardino Line operates directly north of the Project site. Based on the proposed site plan, Project operation would not result in any interruptions to Metrolink services along the San Bernardino Line or impacts to the rail tracks within the right-of-way. Overall, the proposed Project would not alter or conflict with existing Metro operations and impacts to the railway would be less than significant.

As described previously, the Project site is currently served by Foothill Transit, which serves 22 different cities via 39 existing bus lines between Downtown Los Angeles and southwest San Bernardino County. The existing Foothill Transit Line 190 would likely serve the proposed Project as it runs along San Bernardino Road with an existing bus stop in front of the Project. The transit frequency at these stops are approximately every 20 minutes. Line 190 serves El Monte, Baldwin Park, Covina, and Pomona. The Metrolink also runs just north of the site (San Bernardino Line) and has stops in Baldwin Park and Covina approximately 1.8 and 2.4 miles from the Project site, respectively. Line 190 currently has adequate capacity to serve Project residents. The proposed Project would include relocation of the Foothill Transit line bus stop in front of the Project. The proposed Project would not alter or conflict with existing bus stops and schedules, and impacts related to transit services would not occur.

## Bicycle Facilities

There are several roadways in the Project vicinity that currently have bicycle lanes, which include: Badillo Street, along with portions of Vincent Avenue and San Bernardino Road east of Vincent Avenue. Additionally, sidewalks currently exist adjacent to the site along San Bernardino Road.

The Project would not involve any off-site improvements that would remove the existing bicycle lanes or result in any identified impacts to bicycle routes. The existing bicycle routes would provide bicycle transportation opportunities for residents of the Project site. The Project would not conflict with any bicycle facilities.

## Pedestrian Facilities

Similarly, the Project site is bound by sidewalks along San Bernardino Road. The proposed Project would replace the existing sidewalks and add a crosswalk across San Bernardino Road, which would facilitate pedestrian use and walking to nearby locations. Therefore, the proposed Project would also not conflict with pedestrian facilities. Overall, Project impacts to transit, bicycle, and pedestrian facilities would be less than significant.

## Construction

### Construction Trip Generation

Construction of the proposed Project is anticipated to occur over a 21 to 27-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday A.M. peak period is 7:00 A.M. to 9:00 A.M., and the weekday P.M. peak period is 4:00 P.M. to 6:00 P.M. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. As shown on Table 5.1-2, the building construction phase of construction would generate the most vehicular trips per day with approximately 84 worker trips and 30 vendor trips per day, which would result in a total of 114 daily trips.

**Table 5.1-2: Daily Construction Vehicle Trips**

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Site Preparation	18	6	0
Grading	15	6	0.2
Building Construction	84	30	0
Paving	15	0	0
Architectural Coating	17	0	0

Source: Vista Environmental (Appendix B)

This equates to approximately 17.8 percent of the daily trips that would be generated by operation of the Project (as shown in Table 5.1-1). As described above, vendor delivery trucks would arrive and depart throughout the day and a majority of construction crews would arrive and depart outside the peak hours. Furthermore, the construction traffic would be temporary and intermittent depending on the phase of construction.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading plan and building plan review processes, the County permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

### Transit Facilities

As described previously, the Metrolink San Bernardino Line operates directly north of the Project site. Based on the proposed site plan, Project construction would not result in any interruptions to Metrolink services along the San Bernardino Line or impacts to the rail tracks within the right-of-way. As shown on Figure 3-1, *Conceptual Site Plan*, the proposed buildings would be set back by approximately 98 feet from the northern property line. As such, significant excavation for footings of proposed buildings would not take place in close proximity to the existing rail tracks and construction would not result in a physical impact to tracks. Overall, the proposed Project would not alter or conflict with existing Metro operations and impacts to the railway would be less than significant.

### Bicycle Facilities

The Project would not involve any off-site improvements that would remove the existing bicycle lanes or result in any identified impacts to bicycle routes. The Project would not conflict with any bicycle facilities.

## Pedestrian Facilities

The proposed Project would replace the existing sidewalks and add a crosswalk across San Bernardino Road, which would facilitate pedestrian use and walking to nearby locations. Therefore, the proposed Project would also not conflict with pedestrian facilities. Overall, Project impacts during construction to transit, bicycle, and pedestrian facilities would be less than significant.

### IMPACT TR-2: THE PROJECT WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B).

**Significant and Unavoidable Impact.** As described previously, CEQA Guidelines Section 15064.3(b) focuses on determining the significance of VMT related transportation impacts. The County of Los Angeles adopted VMT screening criteria within the County's Transportation Impact Analysis Guidelines. These criteria include 1) small projects that generate fewer than 110 trips, 2) projects located within a Transit Priority Area (within 0.5 mile of an existing major transit stop or a stop along a high-quality transit corridor), 3) projects that set aside 100 percent of units, excluding manager's units, as low income. Consistent with County Transportation Guidelines, projects that do not meet screening criteria are required to prepare a project level VMT analysis.

As demonstrated by Table 5.1-1, the County's VMT Screening threshold of 110 daily vehicle trips would be exceeded as the Project would result in 642 daily trips. Additionally, while the Project area is currently served by Foothill Transit Line 190, the peak headways are greater than 15 minutes during peak commute hours. Therefore, the Project is not located within 0.5-mile of an existing major transit stop or along a high-quality transit corridor. The proposed Project does not include any affordable housing. As such, since the proposed Project does not meet any of the screening criteria, a VMT analysis was prepared and is included as Appendix M.

As shown in Table 5.1-3, the Project's (2020) total daily VMT is 3,966 and HB VMT per capita is 15.1.

**Table 5.1-3: Project Home-Based VMT Per Capita**

	<b>Year 2040</b>	<b>Year 2020</b>
Population	259	262
Home-Based (HB) VMT	3,661	3,966
Home-Based VMT per Capita	14.1	15.1

Source: VMT & LOS Analysis, Appendix M

The County Transportation Guidelines provides VMT calculations for baseline (2020) conditions in South County, the area where the Project is located. The County Transportation Guidelines establish a significance threshold of 16.8% VMT per capita below the existing baseline. The South County's HB VMT per capita for baseline (2020) conditions is 12.2 and the South County's HB VMT per capita for baseline (2020) conditions with a 16.8% reduction is 10.2. The threshold of significance for VMT impacts within the South County is therefore 10.2 HB VMT per capita. Table 5.1-4 compares the Project generated HB VMT per capita to the South County's baseline HB VMT per capita. The Project's baseline HB VMT per capita of 15.1 is 48.04% above the County's current baseline HB VMT per capita threshold of 10.2.

**Table 5.1-4: Home-Base Per Capita Comparison**

	<b>Home-Based VMT per Capita</b>
Threshold	10.2
Project	15.1
Percent Change	+48.04%
<b>Potentially Significant?</b>	<b>Yes</b>

Source: VMT Analysis (Appendix M)

As detailed above in Table 5.1-4, baseline Project generated VMT exceeds the County's HB VMT threshold by 48.04%. Therefore, the Project would need to reduce its daily VMT by 1,284 VMT.<sup>1</sup> Transportation demand management (TDM) strategies have been evaluated for reducing VMT impacts determined to be potentially significant. The effectiveness of TDM strategies to reduce VMT has been determined based on the Quantifying Greenhouse Gas Mitigation Measures California Air Pollution Control Officers Association (CAPCOA) Manual (CAPCOA 2010). Multiple TDM measures are incorporated into the Project design, including PDF TR-1 and PDF TR-2, which include constructing onsite sidewalks to connect to offsite sidewalks and providing bike parking. These two TDMs provide a VMT reduction of 2.0%.

Additionally, the Project would implement PDF TR-3, which includes constructing two onsite open space/park areas that are to be open to the residents and the public for recreation activities. PDF TR-3 would provide a VMT reduction of 0.25% (10 VMT). Additionally, the onsite public parks would have an effect to the surrounding area not contemplated by the CAPCOA. The parks would also be within a 0.25-mile walk of approximately 800 homes in the surrounding neighborhood, which would result in a 118 VMT reduction in the surrounding community for a total reduction of 128.1 VMT.

Despite implementation of PDF TR-1 through PDF TR-3, impacts related to VMT would remain potentially significant and require additional mitigation. Therefore, the Project applicant would implement MM TR-1, which requires the Project applicant to create a website in multiple languages describing and coordinating the for a rideshare program for the Project site that would be available to the greater community. The website would function as a resource for encouraging and implementing these VMT reduction measures by providing one consolidated location for people to connect with others within the community. The website would be managed and maintained by the property management company for the Project. The website would encourage and facilitate ridesharing. Although Metro offers commute rideshare matching through [ridematch.info](http://ridematch.info), the community-specific program established by the Project may appeal to members of the community, who would be matched with other members of the community and would include matches for midday trips for shopping and medical appointments. Pursuant to MM TR-1, the Project would also provide carpool/vanpool loading/unloading area and parking spaces adjacent to the main open space area onsite to discourage the use of single occupancy automobiles. The CAPCOA Manual suggests that a carpooling program could result in a 0.4 to 0.7% VMT (16 to 28 VMT) reduction, and that a ridesharing program could result in a 1 to 15% VMT (39 to 594.9 VMT) reduction. Car-sharing and ridesharing programs in Los Angeles County are not entirely new, but the focus on a specific community and inclusion of midday ridesharing will have an additional effect. The VMT Analysis conservatively estimates that the combined effect would be a 0.1% VMT (4 VMT) reduction. This analysis then conservatively applies only half of the potential reduction to the Project or 0.05% (2 VMT). The carpooling and ridesharing programs would be available to the entire community. The unincorporated community (i.e., unincorporated Covina) area was used based on its proximity to the Project location to calculate potential reductions. The 2016 SCAG RTP/SCS traffic model shows that the average VMT per capita for the unincorporated community area is 26.64. Census data show that the population of unincorporated Covina (2016) is approximately 48,539. Total VMT in the unincorporated community area is 1,293,079 ( $26.64 \times 48,539 = 1,293,079$ ) per day. The VMT reduction credited to the Project is therefore 647 VMT ( $1,293,079 \times 0.0005 = 647$ ). In total, Mitigation Measure TR-1, which facilitates and encourage people to reduce VMT on multiple levels, would reduce the 1,293,079 daily VMT in the unincorporated community area by 647 VMT.

In addition to CAPCOA related VMT reductions, the Project applicant pursued other potential VMT reducing programs and actions. Other regional transportation measures that may reduce VMT include but are not limited to subsidizing transit to students, providing transit stop shelters, or contributing to the County's shuttle service program. These regional transportation measures were discussed with agency representatives and the additional measures were determined infeasible at the Project level, as programs are currently not

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<sup>1</sup> 15.1 Home-Based VMT per capita multiplied by 262 residents is 3,956 VMT. 10.2 Home-Based VMT per capita multiplied by 262 residents is 2,672 VMT. Therefore, the Project would need to reduce its VMT by 1,284 VMT to meet the threshold.

available in the Project's area but will generally be implemented as the surrounding communities develop. Table 5.1-5 summarizes the VMT reduced by implementing required on-site PDFs and mitigation strategies. The Project could reduce 79 daily VMT from the Project site under CAPCOA's recommended measures and an additional 775.1 daily VMT from market derived data beyond CAPCOA, as shown in Table 5.1-5. In total the 854.1 VMT reduction does not reduce the Project's daily VMT below the County's significance threshold. Therefore, despite implementation of PDF TR-1, PDF TR-2, PDF TR-3, and MM TR-1, baseline Project generated VMT would not be reduced to a less than significant level. As such, impacts are significant and unavoidable.

**Table 5.1-5: CAPCOA and CAPCOA-Inspired Daily VMT Reductions**

	Measure #	Description	VMT Reduced
<b>Reduction Outlined within CAPCOA</b>			
PDF TR-1	SDT-1	Provide Pedestrian Network Improvements	79
PDF TR-2	SDT-7	Provide Bike Parking with Multi-Unit Projects	Grouped Strategy
<b>Subtotal</b>			<b>79</b>
<b>Reduction Outside of CAPCOA (Data and Calculations Derived from Market-Based Research and Market-Based Data)</b>			
PDF TR-3	LUT-3	Increase Diversity of Urban and Suburban Developments (Onsite Parks)	128.1
MM TR-1	TRT-3	Provide Ride-Sharing Programs	647
<b>Subtotal</b>			<b>775.1</b>
<b>TOTAL</b>			<b>854.1</b>

### 5.1.7 CUMULATIVE IMPACTS

As detailed previously regarding Impact TR-1, the proposed Project would not result in significant impacts related to conflict with a program, plan, or policy and impacts would not be cumulatively considerable. As such, cumulative impacts to conflict with a program, plan, or policy addressing the circulation system would not occur.

The County Transportation Guidelines provide that land use projects should consider both short- and long-term project effects on VMT. Short-term effects are to be evaluated in a detailed project-level VMT analysis. Long-term, or cumulative effects, in contrast, are determined through consistency with the SCAG RTP/SCS. The County Transportation Guidelines state that projects that are consistent with the SCAG RTP/SCS would have a less than significant cumulative impact on VMT. This is because the RTP/SCS is a regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. The proposed Project is surrounded by single-family residences or areas planned for urban development. The Project site is zoned as Light Agricultural (A-1-6,000), which under Title 22 allows for low density residential development. In addition, based on SCAG model data, with an estimate of 3.85 persons per household within the community of unincorporated Covina, the proposed Project would result in a net increase of approximately 262 new residents. Overall, the SCAG 2020-2045 RTP/SCS population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,500 additional persons, yielding an approximately 20.4% growth rate. The unincorporated areas of Los Angeles are projected to have a population of 1,258,000 persons and 419,300 housing units by 2045. The proposed Project would generate approximately 262 residents, which represents approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. Thus, as the proposed Project is consistent with the Los Angeles County General Plan and zoning designations for the site, which SCAG relies on to determine projections, the proposed Project is within SCAG's 2020-2045 RTP/SCS growth forecast. As such, the Project's cumulative VMT impact would be presumed to be less than significant.

## 5.1.8 EXISTING STANDARD CONDITIONS, PROJECT DESIGN FEATURES, PLANS, PROGRAMS, OR POLICIES

### Project Design Features

**PDF TR-1: Provide Pedestrian Network Improvements (CAPCOA SDT-1).** Sidewalks currently exist along the Project's frontage of San Bernardino Road and connections extend both east and west from the site to surrounding land uses. The Project includes construction of onsite, internal five-foot-wide sidewalks that will connect to the existing sidewalks along San Bernardino Road. Improvement plans for the proposed sidewalks shall be submitted to Public Works for review and approval prior to final map recordation.

**PDF TR-2: Onsite Bicycle Parking.** As part of the Project design, the Project will provide bicycle parking in common areas in addition to private garages. Improvement plans shall be submitted to Public Works for review and approval prior to final map recordation. A note shall be shown on the Exhibit A map showing bicycle parking.

**PDF TR-3: Onsite Parks (inspired by CAPCOA LUT-3).** The Project will construct two onsite park/open space areas that shall be made available for resident and public use. Improvement plans for the onsite open space shall be submitted to Public Works for review and approval prior to final map recordation. The signage shall include "Open to the Public" and the Street Improvement Plans shall demonstrate sidewalk accessibility. Upon completion of the Project, the open space will be conveyed to the homeowners' association formed to manage the Project ("HOA"). Any recorded instrument that references the public's use of the open space shall provide that the public's use of the open space is subject to any rules and regulations promulgated by the HOA related to the public's use of such open space and all HOA members and the general public shall comply with the rules and regulations promulgated by the HOA.

### Plans, Programs, or Policies

- SCAG 2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy
- County of Los Angeles General Plan Mobility Element
- Los Angeles County Code

## 5.1.2 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impact TR-2 would be **potentially significant**.

Upon implementation of regulatory requirements, Impact TR-1 would be **less than significant**.

## 5.1.9 MITIGATION MEASURES

**MM TR-1: Provide Ride Share Program (CAPCOA TRT-3).** The Project applicant/developer shall create a website in multiple languages describing and coordinating the following carpooling/ridesharing programs for the Project site that shall be made available to the greater community. The website shall function as a resource for encouraging and implementing VMT reduction measures by providing one consolidated location for people to connect with others within the community. The website shall be managed and maintained by the property management company for the Project. The website shall encourage and facilitate ridesharing by providing a means for community members to be matched with other members of the community and shall include matches for midday trips for shopping and medical appointments. The Project shall also provide carpool/vanpool loading/unloading area and parking spaces near the main open space area to discourage the use of single occupancy automobiles. The Project Applicant shall submit a memorandum to Public Works for review and approval detailing the metrics that will be used to measure program participation and the

expected frequency of the reporting prior to final map recordation. The Project shall implement the websites and programs prior to certificate of occupancy. A bond shall be required prior to final map recordation to guarantee these items are completed.

### 5.1.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

For Impact TR-2, PDF TR-1 through PDF TR-3 and MM TR-1 have been included. However, with incorporation of PDF TR-1 through PDF TR-3 and MM TR-1, home-based VMT would still be above the threshold established by Los Angeles County. There are no other feasible mitigation measures available to reduce this impact. As such, impacts related to Impact TR-2 would be significant and unavoidable.

Impact TR-1 would be less than significant.

## REFERENCES

County of Los Angeles General Plan Mobility Element.

[https://planning.lacounty.gov/assets/upl/project/gp\\_final-general-plan-ch7.pdf](https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch7.pdf)

Los Angeles County Code.

[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=LOS\\_ANGELES\\_CO\\_CODE](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=LOS_ANGELES_CO_CODE)

Quantifying Greenhouse Gas Mitigation Measures. California Air Pollution Control Officers Association. (CAPCOA 2010) <http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>

Transportation Impact Analysis Guidelines. Los Angeles County Public Works. July 2020.

<https://dpw.lacounty.gov/traffic/docs/Transportation-Impact-Analysis-Guidelines-July-2020-v1.1.pdf>

Urban Crossroads. Griswold Residential (RPPL2020004447) Vehicle Miles Traveled (VMT) Analysis. 27 October 2022. Appendix M



## 6 OTHER CEQA CONSIDERATIONS

### 6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” Potential environmental effects of the proposed Project and mitigation measures are discussed in detail throughout Chapter 5 of this EIR.

#### Transportation

As detailed, in Section 5.1, *Transportation*, baseline Project generated VMT exceeds the County’s baseline VMT threshold by 48.04%. Under 2010 Quantifying Greenhouse Gas Mitigation Measures CAPCOA Manual guidance, for projects in suburban areas, the global maximum project VMT reduction is 15%. The Project could reduce 79 VMT from the Project site under CAPCOA’s recommended measures and an additional 775.1 VMT from market derived data beyond CAPCOA. In total the 854.1 VMT reduction does not reduce the Project VMT below the County’s significance threshold. Therefore, with the implementation of the proposed TDM measures, which are included as PDF TR-1, PDF TR-2, and PDF TR-3, and MM TR-1, Project generated VMT would not be reduced to a less than significant level. As such, impacts are significant and unavoidable on a project-level.

### 6.2 GROWTH INDUCEMENT

This section analyzes the growth inducement potential of the proposed Project and the associated secondary effects of growth the Project might permit. As required by CEQA Guidelines Section 15126.2(e), an EIR must:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Thus, based on CEQA, a project could have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities;
- Remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or would add substantial capacity that could accommodate additional unplanned growth;
- Remove obstacles to growth through changes in existing regulations pertaining to land development;

- Result in the need to expand one or more public service facilities to maintain desired levels of service; or
- Involve some other action that could encourage and facilitate other activities that could significantly affect the environment.

As CEQA Guidelines Section 15126.2(e) states that growth-inducing effects are not to be construed as necessarily beneficial, detrimental or of little significance to the environment; the following information is provided as additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of developing the land use concepts examined in the preceding sections of this EIR.

**Establish substantial new permanent employment opportunities or otherwise stimulate economic activity such that it would result in the need for additional housing, businesses, and services to support increased economic activities?**

As discussed in Section 3.0, *Project Description*, the Project site consists of one parcel totaling 9.61-acres. At the time of the issuance of the Notice of Preparation (NOP), the site was comprised of the former Griswold School, and was improved with six permanent structures, as well as associated improvements, such as paved recreational areas, parking lots, and patio areas. The former buildings were constructed in 1953 for use as the Griswold School through 1974. The school was reopened in 1978 for use by Tri-Community Adult Education. The school buildings had been vacant for approximately three years and the entire property, with the exception of the parking lot along San Bernardino Road, was fenced. Since the time of the publication of the NOP for the Draft EIR, the school buildings were damaged in a fire. As a result, the school buildings were demolished to eliminate public health and safety hazards related to the unsafe condition of the school buildings. Pursuant to State CEQA Guidelines Section 15125, the environmental baseline for the Draft EIR is generally February 1, 2022, the date the NOP was published. As of this date, the school buildings were vacant but intact. As such, the Draft EIR environmental baseline condition assumes the school buildings as vacant but intact.

The proposed Project would redevelop the Project site to provide 68 detached residential condominium units for a density of approximately 7.15 dwelling units per acre on a site that allows for residential development at up to 9 dwelling units per acre. The Project would create temporary construction jobs during the approximately 21-to-27-month construction period. However, the Project would develop housing in an area designated for residential uses. Additionally, the proposed detached residential condominium units would be adequately served by existing commercial services within the vicinity of the Project. Overall, the Project would provide housing and would not establish substantial new permanent employment opportunities or result in the need for additional housing, businesses, or services to support increased economic activities.

**Remove Obstacles to Growth, e.g., Through the Construction or Extension of Major Infrastructure Facilities that do not Presently Exist in the Project Area or Would Add Substantial Capacity that Could Accommodate Additional Unplanned Growth?**

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable or to expand the development potential of redevelopment areas.

The proposed Project applicant would develop the onsite infrastructure necessary to serve the proposed detached residential condominium units. The Project applicant would construct private domestic water lines and private fire water lines onsite to connect with existing water mains in San Bernardino Road and the

Project applicant would be required to install new 8-inch water lines in East San Bernardino Road that would connect to the existing 8-inch water pipeline in Hartley Avenue. A new line would be required, depending upon the condition of the existing 8-inch water line. Impacts associated with construction of a new water line, if required, have been analyzed in the Initial Study, included as Appendix A to this EIR. The new onsite water line would be solely for purposes of providing water supplies to the proposed residences and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water. Additionally, should a new 8-inch water line be installed into East San Bernardino Road, it would be sized to serve the proposed development and would not have additional capacity. The proposed development would also install new 8-inch private sewer lines onsite that would connect to the existing 8-inch sewer pipeline in East San Bernardino Road. Stormwater runoff in the Project vicinity currently flows from north to south to East San Bernardino Road. A series of onsite storm drain facilities with Low Impact Development (LID) and Peak Storm elements are proposed. One infiltration basin is being proposed along the southern property line. Additionally, an onsite drainage swale is being proposed along the eastern property line to convey drainage from adjacent residences to the existing stormwater infrastructure in East San Bernardino Road.

Overall, the proposed Project would install new onsite infrastructure systems and upon approvals, would connect to existing off-site systems that currently have capacity to serve the Project area, with the exception of the 8-inch line in East San Bernardino Road. The new 8-inch water main would serve to replace the existing water main and would only serve the proposed Project and surrounding, existing developments. The new onsite and offsite infrastructure would not provide additional capacity beyond what is needed to serve the proposed Project. In addition, development of the proposed Project would not result in an expansion of overall capacity, or extension of major infrastructure. Therefore, infrastructure improvements would not result in significant growth inducing impacts.

#### **Remove Obstacles to Growth Through Changes in Existing Regulations Pertaining to Land Development?**

The Project site has a County General Plan land use designation of Public and Semi-Public (P) and a zoning designation of Light Agricultural (A-1-6,000). A Project could directly induce growth if it would remove barriers to population growth such as change to a jurisdiction's general plan and zoning code, which allows new development to occur in underutilized areas. The proposed Project does not include amendments to the Los Angeles County General Plan or Zoning as residential development up to nine dwelling units per acre is allowed pursuant to the General Plan.

The proposed Project is surrounded by single-family residences or areas planned for urban development. In addition, based on the SCAG model population data, with an estimate of 3.85 persons per household within the community of unincorporated Covina, the proposed Project would result in a net increase of approximately 262 new residents. Overall, the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy's (2020-2045 RTP/SCS) population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,500 additional persons, yielding an approximately 20.4% growth rate. The unincorporated areas of Los Angeles are projected to have a population of 1,258,000 persons and 419,300 housing units by 2045. The proposed project would generate approximately 262 residents, which represents approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. Thus, the proposed increase in housing units and population as a result of the proposed project is within SCAG's 2020-2045 RTP/SCS growth forecast. Therefore, impacts related to growth from changes in existing regulations pertaining to land development would be less than significant.

**Result in the Need to Expand One or More Public Service Facilities to Maintain Desired Levels of Service?**

The proposed Project is expected to incrementally increase the demand for fire protection and emergency response, police protection, and school services. However, as discussed in the Initial Study prepared for this Project, the estimated 262 new residents associated with the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service. Based on service ratios and build out projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

**Involve Some Other Action that Could Encourage and Facilitate Other Activities that Could Significantly Affect the Environment?**

The proposed Project applicant does not propose changes to any of the County's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The proposed Project would comply with all applicable County plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within the Initial Study, included as Appendix A, and this Draft EIR to ensure that the Project minimizes environmental impacts. The proposed Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

## 6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources are not justified (e.g., the project involves the wasteful use of energy).

The proposed Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project area that are currently developed with school uses would be committed to detached residential condominium units once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
  - Changes in views associated with construction of the new buildings and associated development (see Section 1, *Aesthetics*, of Appendix A).
  - Increased VMT from vehicles traveling to and from the Project site (see Section 5.1, *Transportation*).

- Emissions of air pollutants associated with Project construction and operation (see Section 3, *Air Quality*, of Appendix A).
  - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, lighting, heating and cooling systems, appliances, and the like (see Section 6, *Energy*, of Appendix A).
  - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 13, *Noise*, of Appendix A).
- Construction of the proposed Project as described in Section 3.0, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the proposed Project, as demonstrated in the analyses contained in Section 6, *Energy*, of the Initial Study, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-generating and conserving project design features, including those required by the California Building Code (CBC), California Energy Code Title 24, which specify green building standards for new developments. In addition, as listed in Section 3.0, *Project Description* and Initial Study Section 6, *Energy*, the proposed Project includes project design features that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 6, *Energy Resources*, of the Initial Study (included as Appendix A).

## 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment.” However, CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the Draft EIR. The following environmental issue areas would not be significant or would not be significant with mitigation measures incorporated, as detailed below. Additional information on each topic is provided in the Initial Study, which is included in Appendix A. The full text of the Plan, Program, or Policies (PPPs), Project Design Features (PDFs) and Mitigation Measures referenced below is provided in Table 1-1 of Section 1.0, *Executive Summary*.

### Aesthetics

#### **AES-1 Would the Project have a substantial adverse effect on a scenic vista?**

The proposed Project is not required to prepare an aesthetics analysis as it would meet the requirements of Public Resources Code Section 21081.3 since the buildings onsite are abandoned and dilapidated, the site is surrounded by urban uses, the Project includes the construction of housing, the proposed homes would not substantially exceed the height of the former structure, and the Project would not create a new source of light or glare. Nevertheless, the Initial Study includes the discussion of impacts related to aesthetics. As discussed in the Initial Study, which is included as Appendix A herein, the Project site is within an urbanized area of unincorporated Los Angeles County, surrounded by residential developments. Given the distance of the Project site to any scenic features, impacts from development of the Project site with detached residential condominium units to scenic vistas would be less than significant.

#### **AES-2 Would the Project Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site is located within a fully developed urban area and is not located in the vicinity of a County regional riding or hiking trail. Thus, the proposed project would not result in impacts related to regional riding or hiking trails and scenic views.

**AES-3 Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

As discussed in the Initial Study, which is included as Appendix A herein, the proposed Project is not located within view of a state scenic highway, as there are no designated scenic highways within the vicinity. The nearest state-designated scenic highway is California State Route 2, approximately 11 miles from the proposed Project (Caltrans 2020). The nearest eligible scenic highway is Highway 39, approximately 3.5 miles from the Project site. The proposed Project would not result in impacts to trees, rock outcroppings, or historic buildings within a state scenic highway. Therefore, no impacts to scenic resources within a state scenic highway would occur.

**AES-4 Would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site is designated as Public and Semi-Public (P) within the General Plan. The surrounding areas are designated as Residential 9 (H9), which allows for single-family residences at a density of up to nine dwelling units per net acre. The proposed Project would have a density of approximately 7.15 du/acre, which is consistent and compatible with the surrounding residential densities. Thus, the Project would not conflict with applicable General Plan buildout densities that govern scenic quality. In addition, the Project would be consistent with the General Plan Conservation and Natural Resource Element goals and policies related to scenic quality. The Project site is currently zoned A-1-6,000 (Light Agriculture with 6,000 square foot lot minimum). The Project would be consistent with the 6,000 square foot lot minimums as the project would consist of one common lot encompassing the entire 9.61-acre parcel. As shown in the Project plans incorporated herein, the proposed Project would be consistent with the setbacks, maximum height requirements, and all additional development standards outlined in Section 22.140.580 of the Los Angeles County Code. Thus, the Project would not conflict with applicable zoning or other regulations governing scenic quality.

**AES-5 Would the Project create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?**

At the time the NOP for this Draft EIR was issued, the Project site was developed with six permanent buildings: three classroom buildings, an administration building, a cafeteria, and a library. The proposed Project would introduce additional sources of light from new building security lighting, streetlights, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from the Project. However, the Project would only slightly increase lighting and glare compared to the existing condition and new landscaping would be provided throughout the Project site that would limit impacts from new sources of light and glare. Landscaping, including trees, would limit spill of light to adjacent properties. Further, the Project would include temporary lighting during construction activities, which would be hooded and oriented downward to prevent spill of light. Also, as a standard condition of Project approval, the proposed Project would be required to comply with lighting standards detailed in the County's Code, which would require construction-related and operations-related Project lighting to be shielded, diffused or indirect to avoid glare to both on and offsite residents, pedestrians, and motorists. Compliance with the County Code would

be implemented through the construction permitting and plan check process. Therefore, impacts associated with new lighting would be less than significant.

### **Cumulative Aesthetics**

As noted in Impact AES-1, the Project site is relatively flat and does not contribute to any prominent scenic vistas under existing conditions. There are no viewsheds or scenic vistas located within the Project site or vicinity. Other developments proposed in the cumulative study area would be required to comply with the applicable governing policies, which include policies and regulations to preserve vistas and important scenic resources. Accordingly, with buildout of the Project and other developments within the Project's viewshed, impacts to scenic vistas would not be cumulatively significant and the Project's contributions would be less than cumulatively considerable.

As discussed in Impact AES-2, the Project site is not within close proximity to a regional hiking trail. Therefore, the Project has no potential to contribute to a cumulatively considerable impact to views from regional trails. As discussed in Impact AES-3, the Project site is not within close proximity to any designated State or County scenic routes. Therefore, the Project has no potential to contribute to a cumulatively significant impact to scenic resources within a designated scenic route.

The Project would not conflict with applicable design regulations set forth in Section 22.140.580 of the Los Angeles County Code for the A-1-6,000 (Light Agriculture with 6,000 square foot lot minimum) zoning designation. Therefore, the Project has no potential to contribute to cumulatively considerable scenic quality impacts. Moreover, any new development in the surrounding area would be subject to applicable development regulations and design standards imposed by the governing jurisdiction, which would ensure that development incorporates high quality building materials, architectural design, and landscaping to avoid potential adverse effects to local scenic quality.

With respect to potential cumulative light and glare impacts, the Project would be required to comply with lighting standards detailed in the County's Code. Any development project in the cumulative study area would be required to comply with the light reduction requirements applicable in their respective jurisdiction. Although cumulative development in the Project's surrounding area is expected to introduce new sources of artificial lighting and potentially reflective materials, the required compliance with the governing development code requirements would ensure that future cumulative development does not introduce substantial sources of artificial lighting or glare. As such, the Project would not contribute to cumulatively considerable, adverse impacts to the existing daytime or nighttime views of the Project sites or their surroundings.

### **Agriculture and Forestry Resources**

#### **AG-1 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?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site is developed for urban uses and located in an area that is completely developed for urban uses. The California Department of Conservation Important Farmland mapping identifies the Project site as Urban and Built-Up land (CDC 2021). No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the Project or converted to a non-agricultural use. Thus, significant impacts related to agriculture resources would not occur.

**AG-2 Would the Project conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site is zoned as Light Agriculture (A-1-6,000), is not in a Williamson Act contract, and the Project vicinity is void of agricultural uses. Thus, significant impacts related to agriculture resources would not occur.

**AG-3 Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site and vicinity is void of forest land or timberland. Thus, significant impacts related to forestry resources would not occur.

**AG-4 Would the Project result in the loss of forest land or conversion of forest land to non-forest use?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site and vicinity is void of forest land or timberland. Thus, significant impacts related to forestry resources would not occur.

**AG-5 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?**

As the Project site and vicinity do not include forestry or agricultural resources, no other changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest/timberland land to non-forest or non-timberland use. Thus, significant impacts related to agriculture and forestry resources would not occur.

**Cumulative Agriculture and Forestry Resources****Agricultural Resources**

The cumulative study area for agricultural resources for this Draft EIR is the County of Los Angeles as these resources are regularly assessed on the countywide level as part of the state's FMMP. Agricultural use in the County has declined over the last several decades as the result of urban expansion and economic conditions. Consequently, the County has set forth goals and policies to protect agriculture within the County General Plan. The Project site is located within an urban area of Los Angeles County and there are no existing agricultural activities currently onsite or in the surrounding area and the Project would not result in the conversion of farmland. Therefore, the Project would not cumulatively contribute to the conversion of farmland.

**Forest Resources**

The Project site is located within an urban area of Los Angeles County and there are no forest resources or woodland vegetation within the vicinity of the Project site. As discussed, Project implementation would not directly impact forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project would not cumulatively contribute to forest resource impacts.



## Air Quality

### **AQ-1 Would the Project conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?**

As discussed in the Initial Study, which is included as Appendix A herein, the proposed Project would support the South Coast Air Quality Management District's (SCAQMD)'s Air Quality Management Plan (AQMP) objectives to promote infill/redevelopment and balance jobs and housing for Los Angeles County and would not conflict with implementation of the AQMP. As a result, the proposed Project would not result in growth that is substantially greater than what was anticipated. Furthermore, as substantiated by the Air Quality, Greenhouse Gas, and Energy Analysis prepared for the proposed Project (included herein as Appendix B), the emissions resulting from construction and operation of the proposed Project would be less than the SCAQMD's prescribed regional and localized significance thresholds.

### **AQ-2 Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

As discussed in the Initial Study, which is included as Appendix A herein, CalEEMod results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds with implementation of PPP AQ-1 (compliance with SCAQMD Rule 403) and PPP AQ-2 (compliance with SCAQMD Rule 1113). Further, emissions from operation of the proposed Project would not exceed the applicable SCAQMD regional thresholds of significance. Therefore, impacts related to construction and operational emissions would be less than significant.

### **AQ-3 Would the Project expose sensitive receptors to substantial pollutant concentrations?**

As discussed in the Initial Study, which is included as Appendix A herein, the daily construction emissions generated onsite by the proposed Project are evaluated against SCAQMD's Localized Significance Thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. The closest sensitive receptors to the Project are located adjacent to the east and west sides of the project site. The SCAQMD LST Methodology states that projects with boundaries located closer than 25 meters (82 feet) to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, the LSTs for a receptor distance of 25 meters is used to evaluate LST emissions. Emissions during the peak construction activity would not exceed any of the SCAQMD's localized significance thresholds. No local CO Hotspots are anticipated to be created from the proposed Project and no CO Hotspot modeling was performed. Therefore, impacts related to CO hotspots generated from the proposed Project would be less than significant. Furthermore, exposure of emissions of diesel particulate matter to onsite residents from trains along the Metrolink San Bernardino Line would be below SCAQMD health risk thresholds. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

### **AQ-4 Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

As discussed in the Initial Study, which is included as Appendix A herein, construction of the detached residential condominium units would not result in odors that affect a substantial amount of people. As such, impacts related to odors would be less than significant.

### Cumulative Air Quality

Per SCAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the SCAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described in Impacts AQ-2 and AQ-3 above, emissions from construction and operation of the proposed Project would not exceed SCAQMD's thresholds for any criteria pollutant at the regional or local level after implementation of existing regulations. Therefore, construction and operational-source emissions would not be cumulatively considerable, and cumulative air quality impacts would be less than significant.

### Biological Resources

**BIO-1 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**

As discussed in the Initial Study, which is included as Appendix A herein, and as demonstrated by the Biological Constraints Analysis, included as Appendix C, at the time the NOP was issued, the Project site was developed with six buildings that are surrounded by paved surfaces with grass turf on the northern portion of the site. Ornamental trees are scattered throughout site. The Project site is located within an urbanized area. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on or adjacent to the site. Therefore, the Project would not result in a substantial adverse effect, either directly or through habitat modification, to candidate, sensitive, or special status species and impacts would be less than significant.

**BIO-2 Would the Project have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFSW?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site does not contain riparian habitat or other sensitive natural communities as demonstrated by the Biological Constraints Analysis, included as Appendix C. Therefore, the Project would not result in a substantial adverse effect on sensitive natural communities and no impacts would occur.

**BIO-3 Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site does not contain state or federally protected wetlands and is currently developed with six buildings, paved surfaces, and grass turf. Therefore, the Project would not result in a substantial adverse effect on state or federally protected wetlands and no impacts would occur.

**BIO-4 Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

As discussed in the Initial Study, which is included as Appendix A herein, Project implementation would not interfere with the movement of any native resident or migratory fish or wildlife species or with any established native resident or migratory wildlife corridors. However, the existing trees on the site have the potential to provide habitat for nesting migratory birds and roosting bats. Many of these trees would be removed during construction. Therefore, the proposed Project has the potential to impact active bird nests or bat roosts if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA and California Fish and Game Code, could result in a potentially significant impact if requirements of the MBTA and California Fish and Game Code are not followed. Implementation of Mitigation Measures BIO-1 (Special-Status Roosting Bats), BIO-2 (Bat Relocation), and BIO-3 (Nesting Birds) would ensure compliance with federal and State regulations and would require a roosting bat and nesting bird survey to be conducted prior to the commencement of construction during roosting and nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.<sup>1</sup>

**BIO-5 Would the Project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?**

As discussed in the Initial Study, which is included as Appendix A herein, the site is currently developed and contains a few trees on the site, none of which are native. Therefore, the Project would not convert an oak woodland or other unique native woodland and no impact would occur.

**BIO-6 Would the Project conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?**

As discussed in the Initial Study, which is included as Appendix A herein, the site is currently developed and does not contain any protected species on the site. During operation, the Project would be managed by a Homeowners Association, which would be responsible for the regular maintenance of shared landscaping, including trees. Regular landscape maintenance would include the monitoring of tree health and the removal of diseased trees, if necessary. Therefore, the Project would not conflict with local policies or ordinances and no impacts would occur.

**BIO-7 Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation plan, or other approved state, regional, or local habitat conservation plan?**

As discussed in the Initial Study, which is included as Appendix A herein, the Project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation

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<sup>1</sup> Prior to demolition of the former onsite buildings, Mitigation Measures BIO-1 through BIO-3 were implemented to ensure demolition did not impact roosting bats or nesting birds. The pre-construction survey report is included as Appendix N.

Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur.

### **Cumulative Biological Resources**

This cumulative impact analysis for biological resources considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site as well as the projects identified in Section 5.0, *Environmental Impact Analysis*, Table 5-1, *Cumulative Project List*. None of the projects identified in Table 5-1 are proposed adjacent to the Project site. However, there are multiple cumulative projects within the general vicinity of the Project. A general biological assessment has been conducted to assess potential impacts associated with development of the proposed Project. The proposed Project would not have significant impacts related to jurisdictional waters, wildlife movement, local ordinances or regulations protecting biological resources, habitat conservation plans, plant communities, and habitat fragmentation. In addition, although the proposed Project could have significant impacts to sensitive species and nesting birds, compliance with the Mitigation Measures BIO-1 through BIO-3 would reduce impacts to less than significant levels.

The cumulative projects would be required to comply with applicable survey requirements pursuant to Los Angeles County requirements and mitigation for biological resources. Since all projects would be required to implement their respective mitigation measures, their contribution would not be cumulatively considerable. There are no projects that would, in combination with the Project, produce a significant impact to biological resources.

### **Biological Resources Mitigation Measures**

**Mitigation Measure BIO-1: Special-Status Roosting Bats.** To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in tree cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:

- a) To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
- b) If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified bat specialist shall conduct a pre-construction survey to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats.
- c) Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified bat specialist no greater than seven (7) days prior to tree disturbance or structure removal to more precisely determine the presence or absence of roosting bats.
- d) If bats are not detected, but the qualified bat specialist determines that roosting bats may be present at any time of year, it is preferable to bring down trees or structures in a controlled manner using heavy machinery. In order to ensure the optimum warning for any roosting bats that may still be present, the trees or structures shall be nudged lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. Trees or structures may then be pushed to the ground slowly under the supervision of a bat specialist. Felled trees shall remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts shall not be sawn up or mulched immediately. A period of at least 48 hours shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.
- e) Maternity season lasts from March 1 to September 30. Trees or structures determined to be maternity roosts shall be left in place until the end of the maternity season or until the roost has fully

fledged. A structure containing a hibernating colony shall be left in place until a qualified biologist determines that the bats are no longer hibernating.

- f) The bat specialist shall document all demolition monitoring activities and prepare a summary report to the County upon completion of tree disturbance or building demolition activities. If Townsend's big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.

**Mitigation Measure BIO-2: Bat Relocation.** If confirmed occupied bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality shall be constructed and maintained at a suitable undisturbed area. The design and location of the artificial bat roosts shall be determined by the bat specialist in consultation with CDFW.

- a) In exceptional circumstances, such as when roosts cannot be avoided and bats cannot be evicted by non-invasive means, it may be necessary to capture and transfer the bats to appropriate natural or artificial bat roosting habitat in the surrounding area. Bats raising young or hibernating shall not be captured and relocated. Capture and relocation shall be performed by the bat specialist in coordination with CDFW and shall require a Scientific Collection Permit and be subject to approval by Los Angeles County Department of Regional Planning (DRP) and CDFW.
- b) A monitoring plan shall be prepared for the replacement roosts, which shall include performance standards for the use of the replacement roosts by the displaced species, as well as provisions to prevent harassment, predation, and disease of relocated bats.
- c) Annual reports detailing the success of roost replacement and bat relocation shall be prepared and submitted to Los Angeles County Department of Regional Planning and CDFW for five (5) years following relocation or until performance standards are met, whichever period is longer.

**Mitigation Measure BIO-3: Nesting Birds.** Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season, which generally runs from February 1 – August 31 (as early as January 1 for some raptors), to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent shall provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.

## Cultural Resources

### **CUL-1 Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?**

As discussed in the Initial Study, which is included as Appendix A herein and as described in the Cultural Resources Assessment, which is included as Appendix D, at the time the NOP was issued, the Project site was developed with the vacant Griswold Elementary School. The Project site was used as an elementary school between 1953 and 1974. It was later used as an adult school between 1978 and 2017. As the Griswold School buildings are over 45 years old, a Historic Resource Evaluation was conducted, and is included herein as Appendix E. As substantiated by the Historic Resource Evaluation, the buildings are an example of Mid-Century Modern school architecture but are not eligible for listing as a historic resource as the buildings do not meet any of the historic resource criteria. As such, the school facility does not meet the definition of a historical resource pursuant to CEQA and impacts related to historic resources would be less than significant.

### **CUL-2 Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?**

As discussed in the Initial Study, included as Appendix A herein, the Project site has been previously disturbed from both agricultural uses and development, including ground disturbance to depths for installation of the existing utility infrastructure that serves the site. A records search for the Project site was conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) that included California Points of Historical Interest (PHI), California Historical Landmarks (CHL), the CRHR, the NRHP, the California State Historic Resources Inventory (HRI), and historic topographic maps (FCS 2021). The records search conducted for the proposed Project identified that two archaeological resources (P-19-187085 and P-19-187977) are located within one-half mile of the Project site. The closest resource (P-19-187065) to the Project is located approximately 0.4 mile southwest of the site. In addition, the Cultural Resources Survey determined that due to the absence of any previously recorded archaeological resources with physical remains within one-half mile of the Project site, the area has a moderate to low level of sensitivity for archaeological resources (FCS 2021). However, Project grading and excavation would remove and recompact the loose alluvium that currently underlies the upper three (3) feet of soil. As the Project site has a low to moderate level of sensitivity for archaeological resources and the site has been previously disturbed, the Cultural Resources Assessment (Appendix D) determined that Mitigation Measure CUL-1 (Archaeological Monitoring) shall be included to require retention of an archaeologist for monitoring during

initial grubbing and scraping and provide spot check throughout project ground disturbing activities. With implementation of Mitigation Measure CUL-1, impacts to cultural resources would be less than significant.<sup>2</sup>

**CUL-3 Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is mapped as being underlain by surficial sediments of alluvial gravel, sand, and silt (Qa). A records search conducted with the University of California Museum of Paleontology identified that the closest previously discovered fossil locality is 2.5 miles away from the Project site within the Miocene Puente Formation, and that the area has a low level of sensitivity for paleontological resources (Finger 2020). Additionally, previous onsite ground disturbances have further reduced the potential of the site to contain paleontological resources. The Paleontological Resource Survey determined that shallow excavation ( $\leq 15$  feet) in the Project site is unlikely to impact paleontological resources (Appendix F). However, in the event paleontological resources are incidentally discovered during the construction process, Mitigation Measure CUL-2 (Paleontological Incidental Discoveries) is included to require retention of a paleontological resource specialist to evaluate the incidental discovery. With implementation of Mitigation Measure CUL-2, impacts to paleontological resources would be less than significant.

**CUL-4 Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?**

As discussed in the Initial Study, included as Appendix A herein, there are no records of human remains on the Project site. In the event that human remains are encountered on the Project site, the Project applicant would be required to halt all development activities and comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 and contact the Los Angeles County Coroner. If it is determined that the human remains are of Native American descent, the Native American Heritage Commission should be contacted, who will in turn contact the likely descendants. They will be informed of the encounter and in consultation with the property owner, a decision will be made on how to proceed. Only after this decision and all necessary actions occur can development activities recommence. Through mandatory compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, included as Mitigation Measure CUL-3 (Human Remains), any potential impacts to disturbing human remains, including remains of Native American ancestry, would be less than significant.

**Cumulative Cultural Resources**

**Historic Resources:** The Project's contribution to cumulative impacts to historical resources was analyzed in context with past projects in Los Angeles County. As discussed in Impact CUL-1, the former Griswold School facility does not meet the definition of a historical resource pursuant to CEQA. Therefore, Project implementation would have no potential to contribute towards a significant cumulative impact to historical sites and/or resources. With compliance with County regulations and project-specific mitigation for cumulative projects, cumulative impacts would be less than significant, and the Project would make no contribution.

**Archaeological Resources:** The Project's impact to prehistoric archaeological resources was analyzed in the context of the East San Gabriel Valley region of Los Angeles County, which is identified as sensitive for

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<sup>2</sup> As demolition of the former Griswold buildings did not include grading or excavation, Mitigation Measures CUL-1 through CUL-3 were not applicable to demolition activities. Nevertheless, an archaeological monitor was present onsite during demolition activities.

archaeological resources. Construction activities within the Project site – as with other development projects in the region – may uncover subsurface prehistoric archaeological resource that meet the CCR § 15064.5 definition. However, mitigation has been included to reduce the potential of the Project to contribute to a significant cumulative impact to archaeological resources. With compliance with project-specific mitigation, the Project's contribution to cumulative impacts would be less than cumulatively considerable.

**Paleontological Resources:** The geographic area of potential cumulative impacts related to paleontological resources includes areas that are underlain by similar geologic units from the same time period. A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. The East San Gabriel Valley area of Los Angeles County, including the Project site, has a low sensitivity for paleontological resources. Nevertheless, incorporation of Mitigation Measure CUL-2 and compliance with County General Plan policies, protect paleontological resources from loss or destruction and requires that new development include appropriate mitigation to preserve the quality and integrity of these resources, avoid them when possible, and salvage and preserve them if avoidance is not possible. These measures would reduce the potential for the Project's contribution to cumulative impacts to less than cumulatively considerable.

**Disturbance of Human Remains:** Mandatory compliance with the provisions of California Health and Safety Code § 7050.5, Public Resources Code § 5097 et seq., and CEQA Guidelines Section 15064.5 (included as Mitigation Measure CUL-3) would assure that the Project, in addition to all development projects, treat human remains that may be uncovered during development activities in accordance with prescribed, respectful and appropriate practices, thereby avoiding significant cumulative impacts.

### **Cultural Resources Mitigation Measures**

**Mitigation Measure CUL-1: Archaeological Monitoring.** Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified archaeologist has been retained, from a qualified professional archaeologist meeting the Secretary of Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A stating that the archaeologists have been retained and shall be present at pre-grade meetings and for all initial ground disturbing activities. The archaeologist shall provide spot check monitoring as determined necessary by the retained archaeologist.

In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist shall be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find would need to occur.

In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the County shall be immediately notified. The archaeologist shall be contacted to flag the area in the field and shall determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)).

If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the County. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C). If unique archaeological



resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the developer/applicant's expense.

**Mitigation Measure CUL-2: Paleontological Incidental Discoveries.** Prior to commencement of any grading activity on site, the owner/applicant shall provide written evidence to the Director of Regional Planning, or designee that a qualified paleontologist has been retained and either the paleontologist, or a representative, shall be onsite if excavations penetrate the bedrock formations.

In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The project applicant shall then inform the Los Angeles County Natural History Museum of the find and retain a qualified paleontologist. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Criteria for discard of specific fossil specimens shall be made explicit by the qualified paleontologist. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery shall be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

**Mitigation Measure CUL-3: Human Remains.** If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code § 5097.98). The Coroner shall determine whether the remains are of forensic interest. If the Coroner, with the aid of the County-approved Archaeologist, determines that the remains are prehistoric, s/he shall contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98).

## Energy

### **E-1 Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

As discussed in the Initial Study, included as Appendix A herein, and demonstrated by the Air Quality, GHG, and Energy Analysis included as Appendix B, construction activities related to the proposed Project would not result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Demolition of the existing buildings and infrastructure that exist onsite would need to be undertaken; however, the energy usage required for demolition activities would be similar to other construction activities throughout California, and the demolition needed to implement the proposed Project is not considered to be wasteful. Construction would occur in three phases over a 21 to 27-month period and the demand for construction-related electricity and fuels would be limited to that time frame. The Project site is within an area where existing infrastructure would provide for efficient delivery of electricity and natural gas to the Project and the Project would not inhibit the development of other alternative energy sources.

Furthermore, other existing and future regulations are likely to result in more efficient use of all types of energy, and reduction in reliance on non-renewable sources of energy. These include the federal Energy Independence and Security Act, the state Long Term Energy Efficiency Strategic Plan, SB 350, and AB 1007 (described above), which are designed to reduce reliance on non-renewable energy resources and reduce demand by providing federal tax credits for purchasing fuel-efficient items and improving the renewable fuel, appliance, and lighting standards. Thus, operation of the proposed Project would not use large amounts of energy or fuel in a wasteful, inefficient, or unnecessary manner, and impacts would be less than significant.

## **E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project would be required to meet the Title 24 energy efficiency standards in effect during permitting of the Project. The Project is subject to and shall be in compliance with the Los Angeles County Green Building Standards Code. The Green Building Standards Code requirements which must be complied with include Green Building, Low-Impact Development, and Drought Tolerant Landscaping. The County's Green Building Standards Code, Title 31, states that the purpose of the County's Green Building Standards Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices. The proposed Project would be designed to meet all applicable State building energy efficiency standards as well as to meet the County's energy efficiency standards. Redevelopment of the site would not result in obstruction of opportunities for use of renewable energy due to the addition of photovoltaic (PV) panels on each home, as required by the California Building Energy Efficiency Standards (Title 24). Thus, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur.

## **Cumulative Energy**

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within Southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the Southern California region.

All development projects throughout the region would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed mixed uses would be primarily attributable to transportation, especially vehicular use. However, state fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the state Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and would be less than cumulatively considerable.

## **Geology and Soils**

**GEO-1 Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

**substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.**

As discussed in the Initial Study, included as Appendix A herein, and as further described in the Geotechnical & Infiltration Evaluation, included as Appendix G, there are no known active or potentially active faults within the Project site or within the immediate area. The nearest fault line is the Sierra Madre Fault located approximately three (3) miles to the north of the Project site (CGS 2020). Since no known faults existing within a mile of the Project site, and since the site is not located within an Alquist-Priolo Earthquake Fault Zone, impacts related to rupture would be less than significant.

**ii. Strong seismic ground shaking?**

As discussed in the Initial Study, included as Appendix A herein, while development of the Project could subject people and structures to hazards from ground shaking, the Project would be required to adhere to the requirements of the CBC, included as PPP GEO-1, which would reduce impacts related to ground shaking to a less than significant level.

**iii. Seismic-related ground failure, including liquefaction and lateral spreading?**

As discussed in the Initial Study, included as Appendix A herein, the depth of groundwater on the Project site is anticipated to be at a depth of 150 feet or greater, therefore, the potential for liquefaction to occur is low (Geotek 2020). Compliance with the CBC, as included as Existing Plans, Programs, or Policies (PPP) GEO-1 (CBC Compliance), would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Compliance with the requirements of the CBC and County Code for structural safety (included as PPP GEO-1) would reduce hazards from seismic-related ground failure, including liquefaction and settlement to a less than significant level.

**iv. Landslides?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is relatively flat and does not contain any hills or steep slopes, nor is surrounded by any hills or steep slopes. However, the Project is located approximately 0.48 miles (2,537 feet) south from the nearest landslide zone. Therefore, there is limited potential for landslides to occur on the project site or in the vicinity of the Project. Due to the lack of onsite and offsite hills and slopes, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts related to landslides would be less than significant with implementation of the Project.

**GEO-2 Would the Project result in substantial soil erosion or the loss of topsoil?**

As discussed in the Initial Study, included as Appendix A herein, during construction activities, soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. Additionally, during a storm event, soil erosion could occur at an accelerated rate. The increased erosion potential could result in short-term water quality impacts. The proposed Project would increase the impervious surface area on the project site compared to existing conditions. This would change the volume of stormwater runoff generated from the Project site. However, since the Project site is relatively flat, soil erosion would be controlled via implementation of standard erosion control practices required by a Stormwater Pollution Prevention Plan (SWPPP) during construction (included as PPP WQ-1 [National Pollutant Discharge Elimination System (NPDES) / SWPPP]). Once developed, the Project's implementation would not increase the

volume of runoff from the Project site because the proposed Project would include landscaped pervious surfaces intended to capture stormwater runoff, as well as new drainage infrastructure designed to accommodate the increase in stormwater runoff. In addition, implementation of the Project requires County approval of a site-specific Water Quality Management Plan (WQMP), which would ensure that the County Code, RWQCB requirements, and appropriate operational best management practices (BMPs) would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant.

**GEO-3 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?**

As discussed in the Initial Study, included as Appendix A herein, based on the relatively flat topography of the site, lack of a free face nearby and lack of a liquefaction hazard area, the Geotechnical Report determined that there is no potential for lateral spreading on the site and it is not considered to be a hazard (Geotek 2020). Thus, impacts related to lateral spreading would be less than significant. However, the Geotechnical Report identified that seismic induced settlement onsite could be about 1 inch; and differential seismic settlement is estimated as less than 1/2-inch over a 40-foot span (Geotek 2020). The Project includes excavation and re-compaction of soils, and development of foundation systems in compliance with the CBC, as included as PPP GEO-1, which would require proper construction of building foundations to reduce impacts related to settlement and subsidence would not occur onsite.

**GEO-4 Would the Project be located on expansive soil, as defined in Table 18010B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

As discussed in the Initial Study, included as Appendix A herein, as described by the Geotechnical Report, onsite alluvium varied from a poorly graded sand, silty sand to a sandy silt. The sandy soils were noted to range from loose to very dense and the silt soils possessed a medium stiff to hard consistency (Geotek 2020). However, the soils onsite would be excavated to a minimum of six (6) feet below existing or finished grade and at least seven (7) feet beyond the building perimeters, reconditioned, and recompacted as engineered fill to support the proposed building structures. As part of reconditioning the compacted engineered fill, the soils would be moisture conditioned, as required by the CBC for expansive soils (Geotek 2020). Furthermore, prior to approval of building construction, an engineering level design geotechnical report is required to be prepared and submitted to the County that details the Project designs that have been included to address potential geotechnical and soil conditions pursuant to the CBC requirements, that are included in the County Code Chapter in Title 26 and implemented by PPP GEO-1. Compliance with the CBC, through design level geotechnical specifications that would be reviewed and approved by the County Engineer, per PPP GEO-1 would ensure that potential impacts related to expansive soils would be less than significant.

**GEO-5 Would the Project have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?**

As discussed in the Initial Study, included as Appendix A herein, the Project would connect into existing sewer infrastructure and would not use septic tanks or alternative methods for disposal of wastewater. Therefore, no impacts would occur related to alternative wastewater disposal methods.

**GEO-6 Would the Project conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, CH.2.104)?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is relatively flat with a gentle slope to the southwest and the surrounding area is also relatively flat. The site is also not located within a Hillside Management Area. As such, the Project would not conflict with the Hillside Management Area Ordinance and no impacts would occur.

### **Cumulative Geology and Soils**

Geotechnical impacts are site-specific rather than cumulative in nature. Direct and indirect impacts related to geology and soils would be mitigated through mandatory conformance with the California Building Code, County of Los Angeles Ordinances, and site-specific geotechnical recommendations, which will be incorporated as part of the Project's design and construction efforts. With the exception of erosion hazards, potential hazardous effects related to geologic and soil conditions are unique to each project site, and inherently restricted to the developments proposed. That is, issues including fault rupture, seismic ground shaking, liquefaction, landslides, and expansive soils would involve effects to (and not from) the development, are specific to conditions on the property, and are not influenced by or additive with the geologic and/or soils hazards that may occur on other, off-site properties. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effects at the Project site.

Impacts related to erosion and loss of topsoil could be cumulatively considerable. However, as discussed in Impact GEO-2, mandates related to the NPDES permit, preparation of a WQMP, Erosion Control Plan, and SWPPP, as well as compliance with SCAQMD Rule 403 (Fugitive Dust) incorporate measures during construction activities to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project site would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and related projects within the cumulative study area would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards would be less than significant.

### **Greenhouse Gas Emissions**

#### **GHG-1 Would the Project generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?**

CEQA Guidelines Section 15064.4(a) states that "[t]he determination of the significance of [GHG] emissions calls for a careful judgment by the lead agency. ... A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of [GHG] emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Quantify [GHG] emissions resulting from a project; and/or (2) Rely on a qualitative analysis or performance-based standard." Further, when determining whether a project would have a significant impact related to GHG emissions, the lead agency should consider:

- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and

must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. (CEQA Guidelines, Section 15064.4(b).)

A quantitative analysis was conducted as described in the Initial Study (included in Appendix A). As demonstrated by the Air Quality, GHG, and Energy Analysis, the Project would result in 898.44 metric tons of amortized construction and operational GHG emissions, which for reference, is below the 2008 SCAG Interim screening threshold for all land use types of 3,000 metric tons of carbon dioxide (CO<sub>2</sub>) equivalent (MTCO<sub>2</sub>e) per year.

However, the County of Los Angeles has not adopted a revised quantitative GHG emissions threshold for new development projects. The previously adopted Community Climate Action Plan 2020 (2020 CCAP) expired, and the County is now in the process of adopting the new and updated 2045 Los Angeles County Climate Action Plan (Draft 2045 CAP). The Draft 2045 CAP proposes a target of carbon neutrality by 2045 with interim targets for 2025 and 2035. The Draft 2045 CAP builds upon the 2020 CCAP by including new emissions reduction targets that address both GHG emissions from General Plan buildout and the projected reductions needed to reach carbon neutrality by 2045, in accordance with the state's most recent efforts to achieve net zero.

Pursuant to Option 2 of Section 15064.4(a) of the State CEQA Guidelines, the lead agency has determined that in the interim, prior to adoption of the Draft 2045 CAP, that the appropriate determination of significance for GHG emissions is through a qualitative analysis that been prepared, which considers the Proposed Project's consistency with the Draft 2045 CAP, as well as with other regional regulations including the California Air Resources Board's (CARB) 2022 Scoping Plan Update, and the SCAG 2020-2045 RTP/SCS. (See Tables 6-1 through 6-3 below). As shown in Tables 6-1 through 6-3 under impact GH-2, the Proposed Project would be consistent with the 2022 Scoping Plan, the SCAG 2020-2045 RTP/SCS, and with the Draft 2045 CAP, including the goals contained in the 2022 Scoping Plan (and Draft 2045 CAP) to reach carbon neutrality by 2045. Therefore, impacts related to GHG emissions would be less than significant.

**GHG-2 Would the Project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

As discussed in the Initial Study, included as Appendix A herein, the Project's significance with respect to GHG emissions is evaluated based on its consistency with applicable GHG reduction actions in the SCAG 2020-2045 RTP/SCS and the CARB's 2022 Scoping Plan Update, as well as those in the County's previous 2020 CCAP and Draft 2045 CAP.

As shown in Table 6-1, the proposed Project would be consistent with CARB's 2022 Scoping Plan Update, which was prepared in order to meet the carbon neutrality goal targets developed in Executive Order B-55-18 and codified in Assembly Bill 1279. As shown in Table 6-2, the proposed Project would be consistent with the 2022-2045 RTP/SCS.

**Table 6-1: Project Consistency with CARB's 2022 Scoping Plan Update**

<b>AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action</b>	<b>Proposed Project Consistency with Scoping Plan Actions</b>
<b>GHG Emissions Reductions Relative to the SB 32 Target</b> 40% below 1990 levels by 2030.	<b>No Conflict.</b> Senate Bill 32 and Assembly Bill 197 have codified this emission target into statute that requires emissions reductions for sources covered by the AB 32 inventory, which includes new home construction and was part of the current Title 24, Part 6 building energy requirements that require all new homes constructed in the State to be designed to use zero net energy. The

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
	Project will meet this Strategy through increased energy efficiency design standards (i.e., enhanced insulation, and energy efficient fixtures and appliances, etc.) and through installation of a rooftop PV solar system on each home. As such, the proposed Project would not conflict with this Strategy.
<b>Smart Growth / Vehicle Miles Traveled (VMT)</b> VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	<b>No Conflict.</b> Senate Bill 375 directs each regional MPO (SCAG is MPO for project area) to adopt a SCS/RTP that meet this reduction target. The Connect SoCal (SCAG 2020) was prepared to meet these reduction targets and as detailed in Table 6-3, the proposed Project is consistent with the 2020-2045 SCS/RTP. As such, the proposed Project would not conflict with this Strategy.
<b>Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)</b> 100% of LDV sales are ZEV by 2035.	<b>No Conflict.</b> Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2035. The proposed Project will be designed to meet the 2022 Title 24, Part 6 requirements that require all new garages to be designed to be EV charger ready. As such, the proposed Project would not conflict with this Strategy.
<b>Truck ZEVs</b> 100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	<b>No Conflict.</b> Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2045. The freight trucks associated with the proposed Project would be limited to trucks making deliveries to the Project site during construction and operation of the Project. No trucks would be maintained by the proposed Project or potentially charged on the Project site. As such, the proposed Project would not conflict with this Strategy.
<b>Aviation</b> 20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	<b>Not Applicable.</b> The proposed residential Project would not utilize any aviation fuel.
<b>Ocean-going Vessels (OGV)</b> 2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	<b>Not Applicable.</b> The proposed residential Project would not utilize any OGVs.
<b>Port Operations</b> 100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	<b>Not Applicable.</b> The proposed residential Project would not impact any operations at any ports.
<b>Freight and Passenger Rail</b> 100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	<b>Not Applicable.</b> The proposed residential Project would not impact any freight or passenger rail operations.
<b>Oil and Gas Extraction</b>	

<b>AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action</b>	<b>Proposed Project Consistency with Scoping Plan Actions</b>
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	<b>Not Applicable.</b> The proposed residential Project would not impact any oil and gas extraction activities.
<b>Petroleum Refining</b> CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	<b>Not Applicable.</b> The proposed residential Project would not impact any petroleum refining activities.
<b>Electricity Generation</b> Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO <sub>2</sub> e) in 2030 and 30 MMTCO <sub>2</sub> e in 2035. Retail sales load coverage 134 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	<b>No Conflict.</b> Senate Bill 100 requires that 100 percent of retail sales of electricity be generated by renewable or zero-carbon source of electricity by December 1, 2045. Title 24, Part 6 building energy requirements that require all new homes constructed in the State to be designed to use zero net energy. The Project will meet this Strategy through increased energy efficiency design standards (i.e., enhanced insulation, and energy efficient fixtures and appliances, etc.) and through installation of a rooftop PV solar system on each home. As such, the proposed Project would not conflict with this Strategy.
<b>New Residential and Commercial Buildings</b> All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	<b>No Conflict.</b> The new 2022 Title 24, Part 6 building energy requirements require all new homes constructed in the State to be wired for electric appliances, including water heaters, regardless of if natural gas appliances are installed. As such, the proposed Project would not conflict with this Strategy.
<b>Existing Residential Buildings</b> 80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	<b>Not Applicable.</b> The proposed residential Project would not include any existing residential buildings.
<b>Existing Commercial Buildings</b> 80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	<b>Not Applicable.</b> The proposed residential Project would not include any existing commercial buildings.
<b>Food Products</b> 7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	<b>Not Applicable.</b> The proposed residential Project would not include any commercial food production activities.
<b>Construction Equipment</b> 25% of energy demand electrified by 2030 and 75% electrified by 2045.	<b>No Conflict.</b> Executive Order N-79-20 requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible, by 2035. All construction equipment fleets utilized during construction of the proposed Project are required to be registered with CARB and meet CARB's current emission reductions regulations, which are anticipated to be updated to meet Executive Order N-79-20 requirements. As such, the proposed Project would not conflict with this Strategy.
<b>Chemicals and Allied Products; Pulp and Paper</b> Electrify 0% of boilers by 2030 and 100% of boilers by 2045.	<b>Not Applicable.</b> The proposed residential Project would not include any pulp and paper production activities.



<b>AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action</b>	<b>Proposed Project Consistency with Scoping Plan Actions</b>
Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	
<b>Stone, Clay, Glass, and Cement</b> CCS on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	<b>Not Applicable.</b> The proposed residential Project would not include any stone, clay, glass and cement production activities.
<b>Other Industrial Manufacturing</b> 0% energy demand electrified by 2030 and 50% by 2045.	<b>Not Applicable.</b> The proposed residential Project would not include any other industrial manufacturing activities.
<b>Combined Heat and Power</b> Facilities retire by 2040.	<b>Not Applicable.</b> The proposed residential Project would not include any existing combined heat and power facilities.
<b>Agriculture Energy Use</b> 25% energy demand electrified by 2030 and 75% by 2045.	<b>Not Applicable.</b> The proposed residential Project would not include any commercial agriculture activities.
<b>Low Carbon Fuels for Transportation</b> Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	<b>Not Applicable.</b> The proposed residential Project would not include any production of fuels for transportation.
<b>Low Carbon Fuels for Buildings and Industry</b> In 2030s, biomethane 135 blended in pipeline. Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	<b>Not Applicable.</b> The proposed residential Project would not include any production of fuels for buildings and industry.
<b>Non-combustion Methane Emissions</b> Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	<b>Not Applicable.</b> The proposed residential Project would not include the operation of any landfill or dairy.
<b>High GWP Potential Emissions</b> Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	<b>Not Applicable.</b> The proposed residential Project would not include the production of any products that use refrigerants.

**Table 6-2: Project Consistency with SCAG 2020-2045 RTP/SCS**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<b>Connect SoCal Goals</b>	
<b>Goal 1:</b> Encourage regional economic prosperity and global competitiveness.	<b>Not Applicable.</b> This Goal is directed at SCAG and the County of Los Angeles and does not apply to the proposed Project. This strategy calls on encouraging regional economic prosperity and global competitiveness. The proposed Project would not interfere with such policymaking.

<b>Goal 2:</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The Project site is located in an urbanized area within the County of Los Angeles. The Project proposes to construct a new residential development within an infill site. The proposed Project would provide residents and visitors with convenient access to public transit and opportunities for biking and walking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>Goal 3:</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Consistent.</b> The Project would improve public safety infrastructure near the Project site by providing new lighting within the Project site and around the perimeter, including new outdoor lighting, wayfinding, and security lighting. Pedestrian areas would include pathways and entryways into the Project would be well lit for security. Pedestrian access to the site would be distinct from the vehicle driveway and the Project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The Project would be subject to Site Plan review to ensure vehicle and pedestrian safety throughout the Project.
<b>Goal 4:</b> Increase person and goods movement and travel choices within the transportation system.	<b>Not Applicable.</b> This strategy calls on SCAG to increase person and goods movement and travel choices across the transportation system. The proposed Project would not interfere with this goal.
<b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality.	<b>Consistent.</b> The Project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds for criteria pollutants. Further, the proposed Project would be consistent with the County's Draft 2045 CAP, the County's CAP and with the 2022 Scoping Plan Update, as detailed in Table 6-1, Table 6-2, and Table 6-3, respectively.
<b>Goal 6:</b> Support healthy and equitable communities.	<b>Consistent.</b> The Project would be consistent with this Goal by providing energy-efficient residential development and by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality. The Project includes bicycle parking spaces for the residential uses within the Project. The project would encourage pedestrian travel by locating the Project on an infill site in an urban area. Additionally, the Project would provide a mix of housing units (68 homes with three or five bedrooms) in order to encourage equitable access to transit.
<b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Not Applicable.</b> This goal is directed towards SCAG and does not apply to individual development projects. The proposed Project would be located in proximity to public transit opportunities.
<b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Not Applicable.</b> This Goal is directed towards SCAG and does not apply to the proposed Project. This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase efficiency. The proposed Project would not interfere with this goal.
<b>Goal 9:</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>Consistent.</b> The proposed Project would construct 68 detached residential condominium units in an urban area. The Project site would be located next to a bus

	stop and would provide pedestrian and bicycle connectivity to encourage use of alternative transportation.
<b>Goal 10:</b> Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Consistent.</b> The proposed Project site is currently developed with a vacant school. As such, the Project site is fully disturbed. Therefore, the Project would not encroach on agricultural lands or protected habitats. As such, the Project would not interfere with this goal.
<b>Connect SoCal Strategies</b>	
<b>Strategy 1:</b> Focus growth near destinations and mobility options.	<b>Consistent.</b> The proposed Project would construct 68 detached residential condominium units on an infill site in an urban area. The Project site would be located next to a bus stop and would provide pedestrian and bicycle connectivity to encourage use of alternative transportation.
<b>Strategy 2:</b> Promote diverse housing choices.	<b>Consistent.</b> The proposed Project would construct 68 detached residential condominium units on an infill site in an urban area in order to assist the County in meeting its housing needs.
<b>Strategy 3:</b> Leverage technology innovations.	<b>Not Applicable.</b> This strategy is directed to SCAG and jurisdictions and does not apply to the proposed Project. This strategy aims to promote low emission technologies, improve access to services through technology, and identify ways to incorporate micro power grids into communities. The proposed Project would not interfere with this strategy.
<b>Strategy 4:</b> Support implementation of sustainability policies.	<b>Consistent.</b> The proposed Project would incorporate Green Building Measures, including water efficient landscaping, efficient lighting, low-flush toilets, energy efficient appliances, and PV panels.
<b>Strategy 5:</b> Promote a Green Region.	<b>Consistent.</b> The proposed Project would include open space areas and walkways. Additionally, the development would emphasize sustainability features, including energy efficiency features, that promote more resource efficient development. The Project site is also located adjacent to a bus stop.

The Draft 2045 CAP includes 17 strategies that are forecasted to cumulatively reduce GHG emissions by 108 million MTCO<sub>2e</sub> between 2015 and 2045. Table 6-3 is provided for informational purposes to demonstrate that the Project would be consistent with applicable actions from the Draft 2045 CAP for residential developments.

**Table 6-3: Project Draft 2045 CAP Consistency**

<b>Applicable County Measure</b>	<b>Project Consistency</b>
ES3.1—Require rooftop solar PV for all new development.	<b>Consistent.</b> In accordance with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, the Project's residential uses would be required to have solar PV.
ES5.1—Identify new requirements for new development, including reach codes, ordinances, and conditions of approval to reduce GHG emissions from energy use, transportation, waste, water, and other sources. Include affordable housing considerations in these requirements, and develop supporting measures (financial support,	<b>Not Applicable.</b> This action is intended for County staff and leadership; however, the Project would not prohibit achievement of this action.

technical assistance, or other incentives) to defray potential additional first costs in order to maintain housing affordability.	
T3.3—Enhance pedestrian and bicycle environments through energy efficient pedestrian-scale lighting and shading to promote active transportation. Build shade structures at major transit stops, such as those identified in Metro's Active Transportation Strategic Plan, prioritizing communities with high heat vulnerability. Develop and implement a Shaded Corridors Program.	<b>Consistent.</b> Project lighting would include street pole lights and security and decorative lighting in common areas and landscaped areas, which would enhance pedestrian connectivity within the site. Further, the Project would relocate and enhance the existing bus stop along San Bernardino Road to promote the use of transit.
T4.5—Develop and implement a transportation demand management (TDM) ordinance that requires projects to incorporate measures such as subsidized transit passes and car share.	<b>Not Applicable.</b> This action is intended for County staff and leadership; however, the Project would not prohibit achievement of this action as the Project would implement Mitigation Measure TR-1, which promotes rideshare and car sharing.
T6.3—Require all new development to install EVCSs through a condition of approval/ordinance. Residential development must install EVCSs; nonresidential development must install EVCSs at a percentage of total parking spaces.	<b>Consistent.</b> The proposed Project will be designed to meet the 2022 Title 24, Part 6 requirements that require all new garages to be designed to be EV charger ready. As such, the proposed Project would not conflict with this action.
E2.1—Adopt an ordinance requiring all new buildings to be fully electric with no natural gas hookups. Include affordable housing considerations in these requirements, and develop supporting measures (financial support, technical assistance, or other incentives) to defray potential additional first costs in order to maintain housing affordability.	<b>Consistent.</b> The new 2022 Title 24, Part 6 building energy requirements require all new homes constructed in the State to be wired for electric appliances, including water heaters, regardless of if natural gas appliances are installed. As such, the proposed Project would not conflict with this Strategy.
E3.2—Adopt a concrete code for new construction that limits embodied carbon emissions; specify code requirements of carbon intensity limit for concrete.	<b>Not Applicable.</b> This action is intended for County staff and leadership; however, the Project would not prohibit achievement of this action.
E3.3—Adopt reach code requirements that include performance standards to limit the amount of embodied carbon associated with construction.	<b>Not Applicable.</b> This action is intended for County staff and leadership; however, the Project would not prohibit achievement of this action.
E6.3—Incentivize residents to replace water-intensive landscaping, such as grasses, with water-conserving landscaping through a new ordinance along with education and incentive programs.	<b>Consistent.</b> The Project would replace existing landscaping, which was comprised mostly of grass areas, with drought-tolerant landscaping that would require less water use.
A3.2—Expand County tree planting both in the public right-of-way and on private property.	<b>Consistent.</b> The Project would include the planting of approximately 231 trees. Trees provided as part of the Project would include species such as Date Palm, Queen Palm, Field Grown Olive, Little Gem Magnolia, California Sycamore, Brisbane Box, Strawberry Tree, Crape Myrtle, Paperbark Melaleuca, Australian Willow, African Sumac, and Italian Cypress.

As shown in Table 6-3, the Project would promote sustainable and energy efficient development by conforming to the energy related systems under the scope of the California Energy Code and prominent sustainability features consistent with CALGreen and Draft 2045 CAP requirements. Based on Project phasing, Project development would be subject to the 2022 Title 24 standards. In accordance with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, the Project's residential uses

would be required to have solar. Additionally, the Project would comply with the County's drought-tolerant and native landscaping requirements, as set forth within Part 21 of Chapter 22.52 of Title 22 of the County Code. Therefore, the Project would be consistent with the County's Draft 2045 CAP strategies through compliance and adherence to County regulations.

Furthermore, as reference, the Project would comply with reduction measures for new residential development as outlined in the County's 2020 CCAP and Title 24 that reduce GHG emissions. As shown in Table 6-4, the proposed Project would be consistent with the County's prior 2020 CCAP, although this CCAP is no longer active.

**Table 6-4: Project 2020 CCAP Consistency**

County Measure	Measure Description	Project Consistency
<b>CATEGORY 1: GREEN BUILDING AND ENERGY</b>		
<b>Existing County Initiatives</b>		
Energy Upgrades to Existing Structures	Provide rebates and incentives for energy retrofit efficiency projects.	<b>Not Applicable.</b> The proposed Project does not include any existing structures.
Los Angeles County Code (Title 31)	Implement sustainable policies for new building design.	<b>Consistent.</b> The proposed Project would comply with the County's Green Building Standards Code (Title 31) through implementation of: <ul style="list-style-type: none"> <li>• Year 2022 or later Title 24 Part 6 energy efficiency requirements, which require new buildings to be designed to use zero net energy that is achieved through installation of rooftop solar PV panels;</li> <li>• Utilization of only Energy-Star certified appliances per CalGreen mandatory requirements;</li> <li>• Per CalGreen mandatory requirements, a minimum of 65 percent of construction waste will be diverted from landfills; and</li> <li>• Water conservation measures that include, but not limited to low flow fixtures.</li> </ul>
Commercial Building Performance Partnership	Provide financial mechanisms for energy conservation upgrades to existing building.	<b>Not Applicable.</b> The proposed Project does not include any commercial uses or existing commercial structures.
Renewable Energy and Clean Fuels Program	Implement projects to accelerate the use of compressed natural gas as an alternative fuel.	<b>Not Applicable.</b> This is a residential project. The proposed Project would not impair the County's ability to implement projects that accelerate the use of compressed natural gas.
<b>CAP Actions</b>		
BE-1: Green Building Development	Promote and incentivize at least Tier 1 voluntary standards within CalGreen for all new residential and nonresidential buildings.	<b>Consistent.</b> The CAP was prepared based on the 2013 CalGreen standards, the project will be required to meet the 2022 CalGreen or later standards that now have made most

County Measure	Measure Description	Project Consistency
	Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers	of the 2013 Tier 1 voluntary standards mandatory. This includes installation of low flow fixtures and energy-star appliances as well as a 65 percent reduction in construction waste, which are also all regulatory requirements in the County.  By way of comparison, according to the 2022 Energy Code Title 24 Part 6 Fact Sheet, the California Energy Commission estimates that over 30 years the 2022 Title 24 standards will reduce GHG emissions by 16,230 MMTCO <sub>2</sub> e per year, when compared to the 2019 Title 24 standards.
BE-2: Energy Efficiency	Conduct energy efficiency retrofits for at least 25% of existing commercial buildings over 50,000 square feet and at least 5% of existing single-family residential buildings.	<b>Not Applicable.</b> The proposed Project does not include any existing commercial or residential buildings.
BE-3: Solar Installations	Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses.	<b>Consistent.</b> Per current Title 24 Part 6 requirements, rooftop solar PV panels will be installed on all homes and will be of adequate size to achieve net zero energy usage.
BE-4: Alternative Renewable Energy Programs	Implement pilot projects for wind, geothermal, and other currently viable forms of alternative renewable energy.	<b>Not Applicable.</b> The implementation of the action is primarily dependent on the County's Internal Services Department (ISD). However, as discussed above, rooftop solar panels will be installed on all homes in compliance with current Title 24 Part 6 requirements.
BE-5: Wastewater Treatment Plant Biogas	Encourage renewable bio-gas projects.	<b>Not Applicable.</b> The proposed Project does not include a wastewater treatment plant. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of wastewater treatment facilities (CAP, p. C-5).
BE-6: Energy Efficiency Retrofits of Wastewater Equipment	Encourage the upgrade and replacement of wastewater treatment and pumping equipment.	<b>Not Applicable.</b> The proposed Project does not include a wastewater treatment plant. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of wastewater treatment facilities (CAP, p. C-5).
BE-7: Landfill Biogas	Partner with the owners and operators of landfills with at least 250,000 tons of waste-in-place to identify incentives to capture and clean landfill gas to beneficially use the biogas to generate electricity, produce biofuels, or otherwise offset natural gas or other fossil fuels.	<b>Not Applicable.</b> The proposed Project does not include a landfill. Implementation of this emission reduction strategy will be achieved through the Los Angeles County ISD's partnerships with the operators of landfills (CAP, p. C-5).
<b>CATEGORY 2: LAND USE AND TRANSPORTATION</b>		
<b>Existing County Initiatives</b>		
Healthy Design Ordinance	The HDO promotes (1) better walking environments with wider sidewalks, shade trees, and pedestrian	<b>Consistent.</b> The proposed Project would install an internal sidewalk system that would

County Measure	Measure Description	Project Consistency
	thru-way connections; (2) more bicycling with short- and long-term bicycle parking; (3) improved access to healthy foods through farmers markets and allowing a community garden as a legally-permitted use.	connect with the existing sidewalks and maintain the existing public sidewalk system on the north side of San Bernardino Avenue. The proposed Project would also include planting approximately 231 trees. Additionally, the proposed Project would provide bicycle parking at the open space areas. Each home would have a private outdoor area that may be used for as gardens for growing food.
Bicycle Master Plan	Promote bicycle ridership and bike-friendly designs throughout the County.	<b>Consistent.</b> As discussed above, the Project will provide bicycle parking spaces at the open space areas and the Project would provide an internal walkway/bikeway system that would connect to the bikeway system on San Bernardino Avenue.
Sustainable Transportation Programs	Implement sustainable transportation programs to increase the efficiency of the transportation network.	<b>Not Applicable.</b> This strategy is aimed at County initiatives. The Project would not conflict with this.
<b>CAP Actions</b>		
LUT-1: Bicycle Programs and Supporting Facility Improvements	Construct and improve bicycle infrastructure to increase biking and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and “end-of-trip” facilities. Construct and improve bicycle infrastructure to increase bicyclist access to transit and transit stations/hubs.	<b>Consistent.</b> The Project would provide bicycle parking spaces at the open space areas and the Project would provide an internal walkway/bikeway system that would connect to the existing Foothill Transit Bus Stop on the project site.
LUT-2: Pedestrian Network Improvements	Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Program the construction of pedestrian projects toward the goal of completing 15,000 linear feet of new pedestrian improvements/amenities per year.	<b>Consistent.</b> The Project would provide bicycle parking spaces at the open space areas and the Project would provide an internal walkway/bikeway system that would connect to the existing Foothill Transit Bus Stop on the project site.
LUT-3: Transit Expansion	Work with Los Angeles County Metropolitan Transportation Authority (LA Metro) on a transit program that prioritizes transit by creating bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.	<b>Not Applicable.</b> This action is applicable to the County and LA Metro. However, the Project would provide bicycle parking spaces at the open space areas and there is an existing Foothill Transit Bus Stop on the Project site.
LUT-4: Travel Demand Management	Encourage ride- and bike-sharing programs and employer-sponsored vanpools and shuttles. Encourage market-based bike sharing programs that support bicycle use around and between transit stations/hubs. Implement marketing strategies to publicize these programs and reduce commute trips.	<b>Not Applicable.</b> The action is applicable to large employers at the City or County level. However, pursuant to Mitigation Measure TR-(Provide Ride Share Program), the Project applicant/developer shall create a website as a resource to encourage and facilitate ridesharing.
LUT-5: Car-Sharing Program	Implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis.	<b>Not Applicable.</b> The action is applicable to large employers at the City or County level.

County Measure	Measure Description	Project Consistency
LUT-6: Land Use Design and Density	Promote sustainability in land use design, including diversity of urban and suburban developments.	<b>Consistent.</b> The proposed Project is located in an area that includes residential uses within the direct vicinity of the site and commercial uses within the general vicinity of the site that will allow for the use of alternative transportation methods.
LUT-7: Transportation Signal Synchronization	Improve the network of traffic signals on the major streets throughout Los Angeles County.	<b>Not Applicable.</b> The proposed Project does not include the installation of signals and signals are not warranted by the proposed Project.
LUT-8: Electric Vehicle Infrastructure	Install EV charging facilities at County-owned public venues and ensure that at least one-third of these charging stations will be available for visitor use.	<b>Not Applicable.</b> The proposed Project does not include any County-owned public venues.
LUT-9: Idling Reduction Goal	Encourage idling limits of 3 minutes for heavy-duty construction equipment as feasible within manufacturer's specifications.	<b>Consistent.</b> The operators of all construction equipment used during construction of the Project would be required to adhere to all County requirements, that includes a three-minute idling limit for all heavy-duty construction equipment.
LUT-10: Efficient Goods Movement	Support regional efforts to maximize the efficiency of the goods movement system throughout the unincorporated areas.	<b>Not Applicable.</b> The proposed Project would consist of a residential development that would not alter any patterns of goods movement.
LUT-11: Sustainable Pavements Program	Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation.	<b>Not Applicable.</b> This action applies to County efforts to maintain and rehabilitate aging roadways throughout the County.
LUT-12: Electrify Construction and Landscaping	Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	<b>Consistent.</b> The operators of all construction equipment used during construction of the Project would be required to adhere to all County requirements, including utilizing electric equipment wherever feasible.

**CATEGORY 3: WATER CONSERVATION AND WASTEWATER****Existing County Initiatives**

	Conservation Rebates, smart gardening workshops, and storm water controls	<b>Not applicable.</b> This measure does not apply to residential projects.
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**CAP Actions**

WAW-1: Per Capita Water Use Reduction Goal	Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. The State goal is a 20% reduction in per capita water use compared to baseline levels.	<b>Not Applicable.</b> This action is to be achieved at the water supplier level, not at the Project level. The proposed Project's water conservation measures would include low flow fixtures and toilets and the use of water efficient landscape irrigation systems.
WAW-2: Recycled Water, Water Supply Improvement Programs, and Stormwater Runoff	Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes consistent with the appropriate provisions of Title 22 and approval of the California Department of Health Services. Manage stormwater, potential treatment, and protect local groundwater supplies.	<b>Consistent.</b> The proposed Project would implement BMPs for water quality control, including onsite detention and treatment facilities.

**CATEGORY 4: WASTE REDUCTION, REUSE AND RECYCLING**



County Measure	Measure Description	Project Consistency
<b>Existing County Initiatives</b>		
	Recycling programs for community waste and construction and demolition waste that divert 50% of solid wastes to recycling or re-use instead of landfill.	<b>Consistent.</b> Per CalGreen mandatory requirements, the Project applicant shall require construction waste to be hauled offsite for sorting, resulting in diversion of 65% of construction-related waste.
<b>CAP Actions</b>		
SW-1: Waste Diversion Goal	For the County's unincorporated areas, adopt a waste diversion goal to comply with all state mandates to divert at least 75% of waste from landfill disposal by 2020.	<b>Consistent.</b> This measure applies to the County's efforts to achieve a countywide waste diversion goal. The Project would be consistent with this goal through adherence to the CalGreen requirements.
<b>CATEGORY 5: LAND CONSERVATION AND TREE PLANNING</b>		
<b>Existing County Initiatives</b>		
	Implementation of the urban forestry plan and oak woodlands conservation management plan.	<b>Neutral.</b> This action pertains to the County and there are currently no oak trees on the Project site. However, the proposed Landscape Plan includes the planting of trees on the Project site.
<b>CAP Actions</b>		
LC-1: Develop Urban Forests	Support and expand urban forest programs within the unincorporated areas.	<b>Neutral.</b> This action pertains to the County. However, the proposed Landscape plan includes the planting of trees on the Project site.
LC-2: Create New Vegetated Open Space	Restore and revegetate previously disturbed land and/or unused urban and suburban areas.	<b>Neutral.</b> The proposed Project would develop an energy-efficient Project that includes two common open space areas and the planting of 231 trees.
LC-3: Promote the Sale of Locally Grown Foods and/or Products	Establish local farmers markets and support locally grown food.	<b>Neutral.</b> The proposed Project is a residential development, where each home will have a private outdoor area that can be used to grow food.
LC-4: Protect Conservation Areas	Encourage the protection of existing land conservation areas.	<b>Not Applicable.</b> The proposed Project does not include any land conservation areas. The proposed Project would not conflict with or impede the County's ability to implement this strategy for existing land conservation areas.

Source: Los Angeles County 2015b.

Finally, the Project would be consistent with the County's Countywide Sustainability Plan (Our County sustainability plan) by promoting the use of alternative energy sources through provision of solar panels and EV charger pre-wiring.

In summary, the proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts related to GHG emissions would be less than significant.

### Cumulative Greenhouse Gas Emissions

GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes,

and past and present human-related activities. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the state's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Executive Order S-3-05, Executive Order B-30-15, AB 32, and SB 32 recognizes that California is the source of substantial amounts of GHG emissions and recognizes the significance of the cumulative impact of GHG emissions from sources throughout the state and sets performance standards for reduction of GHGs.

The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. CEQA Guidelines Section 15183.5(b) states that compliance with GHG related plans can support a determination that a project's cumulative effect is not cumulatively considerable. As the Project would be implemented in compliance with applicable plans for the reduction of GHG emissions, detailed previously, the contribution of the Project to significant cumulative GHG impacts would be less than cumulatively considerable. Also, it is presumed that future projects in the County shall comply with the Los Angeles County Draft 2045 CAP and other applicable state and local GHG reduction regulations and policies.

## **Hazards and Hazardous Materials**

### **HAZ-1 Would the Project create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?**

As discussed in the Initial Study, included as Appendix A herein, the proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state regulations that are implemented by the County of Los Angeles during building permitting for construction activities.

#### **Asbestos**

Additionally, based on the age of the onsite school buildings, it is possible that asbestos-containing building materials are present in the existing structures on the Project site. As a result, asbestos surveys and abatement would be required prior to demolition of the existing buildings pursuant to the existing SCAQMD, California Division of Occupational Health and Safety (Cal/OSHA), and Section 19827.5 of the California Health and Safety Code requirements. SCAQMD Rule 1403 requires notification of the SCAQMD prior to commencing any demolition or renovation activities that involve asbestos containing materials. Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that an onsite representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of asbestos-containing materials. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with asbestos-containing materials. With compliance with

AQMD Rule 1403, included as PPP HAZ-1 (SCAQMD Rule 1401), potential impacts related to the disposal or accidental release of asbestos-containing materials would be less than significant.<sup>3</sup>

#### Lead

It is also possible that lead-based paint may be present. Pursuant to existing regulations, a lead-based paint survey shall be completed prior to any activities with the potential to disturb suspected lead based painted surfaces. The regulations specify actions to manage and control exposure to lead-based paint (per the Code of Federal Regulations Title 29, Section 1926.62 and California Code of Regulations Title 8 Section 1532.1) that cover the demolition, removal, cleanup, transportation, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. In addition, Cal/OSHA's Lead in Construction Standard requires the project to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. With compliance to the Cal/OSHA requirements, included as PPP HAZ-2 (Lead), potential impacts related to the disposal or accidental release of lead-based paint would be less than significant.<sup>4</sup>

#### Onsite Soils

Historically, the property and surrounding properties were occupied by orchard land from at least 1928 until at least 1952. A wide variety of pesticides may have been used during this period, including those containing persistent compounds such as arsenic and lead. Therefore, the Limited Phase II ESA conducted soils testing and compared the laboratory test results to the US Environmental Protection Agency (EPA) and CAL-EPA/ Department of Toxic Substances Control (DTSC) residential screening levels. The Phase II ESA found that no organochlorine pesticides were detected in the soil samples. As such, the onsite soils are not contaminated with organochlorine pesticides. The Phase II ESA also found that concentrations of lead ranged from 6.13 to 66 ppm and are lower than the Regional Screening Levels (RSLs) established by the Environmental Protection Agency (EPA) for this metal. Therefore, the onsite soils are not contaminated with lead. However, the Phase II ESA testing identified arsenic in soils samples at concentrations higher than the residential RSLs established by the EPA. The Phase II ESA describes that excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 (Soils Testing Plan) has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 (Health and Safety Plan) is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. As described in Section 3, Air Quality, standard dust mitigation measures (pursuant to AQMD Rule 403) would be implemented during all soil handling activities, which would be implemented through the County's construction permitting process. With implementation of MM HAZ-1 (Soils Testing Plan) and MM HAZ-2 (Health and Safety Plan), impacts related to the disposal or accidental release of contaminants in soils would be less than significant. While the Project would involve the use and disposal of various hazardous materials, compliance with federal and state regulations, and implementation of MM HAZ-1 (Soils Testing Plan) and MM HAZ-2 (Health and Safety Plan) would reduce impacts related to

<sup>3</sup> Asbestos surveys and abatement were conducted according to Cal/OSHA and SCAQMD requirements prior to building demolition.

<sup>4</sup> A lead-based paint survey was conducted, and a lead compliance plan was prepared and followed during building demolition.

the handling of hazardous materials within one-quarter mile of a sensitive land use to a less than significant level.

Operation of the proposed Project includes activities related to residential development, which generally uses common hazardous materials, including: solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. Although the project would utilize common types of hazardous materials, normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, schools, or workers in the vicinity of the Project. However, the existing Hazardous Waste Management infrastructure in the County is inadequate to handle the hazardous waste currently being generated throughout the County. Therefore, operation of the proposed Project may generate household hazardous wastes that would adversely impact Hazardous Waste Management infrastructure. As such, Mitigation Measure HAZ-3 (Hazardous Waste Education) has been included to require provision of education materials on the proper management and disposal of household hazardous waste to homeowners. With implementation of MM HAZ-3 (Hazardous Waste Education), operational impacts related to routine transport, use, disposal, or accidental release of hazardous materials during operation of the Project would be less than significant.

**HAZ-2 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 or waste into the environment?**

*Construction*

As discussed in the Initial Study, included as Appendix A herein, Accidental Releases. While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, excavation, grading, and construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, implementation of the proposed Project could potentially result in the accidental release of hazardous materials. The use of BMPs during construction implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit (and included as PPP WQ-1) would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

*Contaminated Soils*

Due to the existence of the contaminated soils and excavation activities that would occur during Project construction, implementation of the proposed Project has the potential to result in upset or accident conditions involving the release of hazardous materials into the environment.

Implementation of PPP AQ-1, which requires compliance with SCAQMD Rule 403 for fugitive dust control, would ensure that exposed soils that potentially contain arsenic or other hazardous materials would not result in fugitive dust. Additionally, Mitigation Measure HAZ-1 is included to require preparation of a soils testing plan and to outline disposal requirements. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in Project excavation and soil handling of the presence of arsenic onsite. With implementation of Mitigation Measure HAZ-1 and HAZ-2 impacts related to hazards from contaminated soils would be less than significant.

#### *Asbestos Containing Materials*

Asbestos abatement contractors must follow state regulations contained in California Code of Regulations Sections 1529, and 341.6 through 341.14 as implemented by SCAQMD Rule 1403 to ensure that asbestos removed during demolition or redevelopment of the existing buildings is transported and disposed of at an appropriate facility. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition permit until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. These requirements are included as PPP HAZ-1 to ensure that the Project applicant submits verification to the County that the appropriate activities related to compliance with existing asbestos regulations have occurred, which would reduce the potential of impacts related to asbestos to a less than significant level.

#### *Lead-Based Materials*

The lead exposure guidelines provided by the U.S. Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62, and state regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1, as implemented by Cal/OSHA. Cal/OSHA's Lead in Construction Standard requires Project applicants to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan to be submitted to Cal/OSHA must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. These requirements are included as PPP HAZ-2 to ensure that the Project applicant submits verification to the County that the appropriate activities related to existing lead regulations have occurred, which would reduce the potential of impacts related to lead-based materials to a less than significant level.

#### *Undocumented Hazardous Materials*

As described previously, the Project site has a history of various uses that includes use and storage of hazardous materials. As a result, there is the potential for undocumented hazardous material to exist onsite. However, the existing federal and state regulations related to hazardous materials and construction includes procedures to follow in case hazardous materials are uncovered during construction activities.

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such

materials are accidentally released, to prevent or to mitigate injury to health or the environment. These regulations are detailed previously and include, but are not limited to, the federal Resource Conservation and Recovery Act, the Occupational Safety and Health Act that is implemented by OSHA, and the Hazardous Materials Transportation Act. Additionally, the California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27). Furthermore, Mitigation Measure HAZ-1 would reduce impacts related to other soil contamination not identified previously. Thus, with implementation of existing regulations and Mitigation Measures HAZ-1 and HAZ-2, impacts related to upset or accident conditions involving the release of hazardous materials into the environment would be less than significant.

### *Operation*

As described above, the risks related to upset or accident conditions involving the release of hazardous materials into the environment would be adequately addressed through compliance with existing federal, state, and local regulations such as County Code Chapter 12.80 and Chapter 12.52. Development under the proposed Project would involve detached residential condominium units that would use and store common hazardous materials such as paints, solvents, and cleaning products. Also, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. Normal routine use of these products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the Project. In addition, a Water Quality Management Plan (WQMP) is required to be implemented for the Project (as further discussed in Section 8, Hydrology and Water Quality and included as PPP WQ-2. The BMPs that would be implemented as part of the WQMP would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the Project. As a result, operation of the proposed Project would not result in 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, and impacts would be less than significant.

### **HAZ-3 Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is located 0.27 miles from the closest school, which is Merwin Elementary Schools, located at 16125 Cypress Street, Covina, CA 91722, and 0.3 miles from Manzanita Elementary School, located at 4131 North Nora Avenue, Covina, CA 91722. Thus, the proposed Project would not be within one-quarter mile of a school. However, the Project is directly adjacent to, and within, a quarter mile, of existing residences.

As described in the previous responses, Project construction would involve the use and disposal of various hazardous materials. However, all storage, handling, use, and disposal of these materials are regulated by federal and state regulations and will be subject to County guidelines, such as those included as PPP HAZ-1 and PPP HAZ 2. In addition, PPP AQ-1 and Mitigation Measures HAZ-1 and HAZ-2 would ensure that contaminated soils are not released into the environment and impacts would be less than significant.

### **HAZ-4 Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

As discussed in the Initial Study, included as Appendix A herein, according to the DTSC EnviroStor database, the Project site is not located on a federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site (DTSC 2020). Therefore, the proposed Project would not result in an impact related to a known hazardous materials site pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment.

**HAZ-5 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?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project is not within an airport land use plan and is located approximately 5.5 miles to the east of the closest airport or public use airport (San Gabriel Airport). Additionally, the residential development would not be of a sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Therefore, the proposed Project would not result in impacts to an airport land use plan, or where such a plan has not been adopted, and would not result in a safety hazard or excessive noise for people residing or working in the Project area.

**HAZ-6 Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. During short-term construction activities, the proposed Project is not anticipated to result in any substantial traffic queuing on nearby streets, and all construction equipment would be staged within the Project site. The proposed Project does not include any changes to public or private roadways that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. During the operational phase of the proposed Project, onsite access would be required to comply with standards established by the County. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to County's fire standards. The proposed Project would provide adequate emergency access to the site via private shared streets from San Bernardino Road. Further, access to and from the project site for emergency vehicles would be reviewed and approved by the County as part of the approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Therefore, impacts related to emergency response and evacuation plans associated with construction and operation of the proposed Project would be less than significant.

**HAZ-7 Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:**

**i. Within a high fire hazard area with inadequate access?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is not located within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (CalFire 2020). Therefore, no impacts would occur.

**ii. Within an area with inadequate water and pressure to meet fire flow standards?**

As discussed in the Initial Study, included as Appendix A herein, the Project would include onsite water pipes that connect to the existing water line in San Bernardino Road. Furthermore, the project is required to comply with Los Angeles County Code Sections 20.16.040 and 20.16.060, which set water flow requirements for residential developments, onsite water lines, and fire hydrants. The Fire Hydrant Flow Report that was conducted by Azusa Light & Water found that the existing hydrant has a flow of 4,290 gallons per minute at 20 pounds per square inch (psi), which meets the required flow standard of 1,250 fpm at 20 psi for 2 hours (FIRE 2020). Therefore, the Project would have adequate water and pressure to meet fire flow standards and impacts would be less than significant.

### **iii. Within proximity to land uses that have the potential for dangerous fire hazard?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is not within proximity to land uses that have the potential for a dangerous fire hazard as the area surrounding the site is developed with detached residential condominium units and is not in an area with excessive amounts of dry brush that pose significant fire risks. Additionally, the proposed Project consists of residential land uses and would not generate potential impacts related to a dangerous fire hazard. Therefore, impacts would be less than significant.

### **HAZ-8 Does the proposed use constitute a potentially dangerous fire hazard?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project would develop residential land uses. None of the uses related to the proposed Project would constitute a potentially dangerous fire hazard and impacts would not occur.

### **Cumulative Hazards and Hazardous Materials**

Cumulative land use changes within the County would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. All hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety. Thus, if hazardous materials are found to be present on future project sites, appropriate remediation activities would be required pursuant to standard federal, state, and regional regulations. Compliance with Mitigation Measures HAZ-1 and HAZ-2 and the relevant federal, state, and local regulations during operation and construction throughout the Project site and, as well as during the construction and operation of related projects would ensure that cumulative impacts from hazardous materials would be less than significant.

### **Hazards and Hazardous Materials Mitigation Measures**

**Mitigation Measure HAZ-1: Soils Testing Plan.** Prior to issuance of a grading permit, a soils testing plan for arsenic shall be prepared by a qualified hazardous materials consultant and shall detail procedures and protocols for testing any soils that require offsite disposal. Based on testing results soils shall be transported and disposed of per California Hazardous Waste Regulations to an appropriately permitted landfill. Any soil contaminated with concentrations of arsenic exceeding 12 ppm shall be removed and transported to an appropriately permitted disposal facility prior to site grading and development activities. Should the volume of arsenic impacted soil exceed 50 cubic yards, a SCAQMD Rule 1466 permit would be required and shall be implemented during soil excavation and removal activities. Soils testing and disposal requirements shall be included within all grading permits and specifications.



**Mitigation Measure HAZ-2: Health and Safety Plan.** Due to the potential for onsite soils to contain elevated levels of arsenic, a Health and Safety Plan shall be prepared in compliance with OSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal/OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719). The Health and Safety Plan shall address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that elevated levels of arsenic are encountered during grading and excavation and shall include any applicable recommendations contained in all Phase I and Phase II ESAs. The Health and Safety Plan shall have emergency contact numbers, maps to the nearest hospital, allowable worker exposure times, and mandatory personal protective equipment requirements. The Health and Safety Plan shall be signed by all workers involved in the removal of the contaminated soils to demonstrate their understanding of the risks of excavation.

**Mitigation Measure HAZ-3: Hazardous Waste Education.** As part of the Home Buyer's package, the project Applicant/Owner shall provide new homeowners education materials on the proper management and disposal of household hazardous waste. The educational materials shall provide new homeowners with links to the County Department of Public Works' website regarding the Los Angeles County Household Hazardous Waste Collection Program and provide the addresses of permanent household hazardous waste collection centers.

## Hydrology and Water Quality

### **WQ-1 Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface of groundwater quality?**

As discussed in the Initial Study, included as Appendix A herein, demolition of existing structures, grading, stockpiling of materials, excavation and the import/export of soil and building materials, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality. However, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES General Construction Permit and included as PPP WQ-1 (NPDES/SWPPP) would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a qualified SWPPP developer (QSD) is required to be included in the SWPPP for the Project. Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, included as PPP WQ-1, which would be verified during the County's construction permitting process, would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

The proposed Project would result in operation of additional residential uses on the site that could generate pollutants such as, suspended solids, nutrients, bacteria/viruses/pathogens, pesticides, oil and grease, trash and debris. These pollutants could potentially discharge into surface waters and result in degradation of

water quality. However, the Project would be required to comply with the NPDES permit requirements, which are included in the Los Angeles County Code Chapter 12.80, that would limit the potential for pollutants to discharge from the site. Pursuant to the existing requirements, construction includes installation of drainage infrastructure that would convey runoff to the south to a basin for infiltration and treatment. After treatment through the infiltration basin, flows that have not infiltrated into site soils would be conveyed to the existing stormwater culvert in East San Bernardino Road. In compliance with the NPDES Permit and Los Angeles County Code, development projects are required to prepare an LID report, included as PPP WQ-2 (LID). The LID report identifies non-structural, structural, and source control and treatment control BMPs to protect surface water quality. The LID report is required to be approved prior to the issuance of a building or grading permit (Appendix L). In addition, the County's permitting process would ensure that all BMPs in the LID report would be implemented during construction and operation. An example BMP would include the stenciling of storm drain inlets and catch basins onsite, which would be a HOA requirement. Overall, implementation of the LID report pursuant to the existing regulations (included as PPP WQ-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

**WQ-2 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?**

As discussed in the Initial Study, included as Appendix A herein, water to the Project site would be provided by Azusa Light and Water (ALW). The Main San Gabriel Groundwater Basin provides approximately 66.2 percent of ALW's water supply. The remaining supply comes from the San Gabriel River (33.8%). Watermaster provides management of groundwater supplies within the Main San Gabriel Groundwater Basin through their yearly Operating Safe Yield. The supply of water from ALW would be sufficient during both normal years and multiple dry year conditions to meet all of the service area's estimated needs, including the proposed Project. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. Furthermore, as discussed previously, the project would include an infiltration basin and would comply with required LID standards, which would ensure the Project would not significantly decrease groundwater infiltration onsite. Thus, impacts related to groundwater supplies would be less than significant.

**WQ-3 Would the Project substantially alter the existing drainage pattern of the site or area, including through the alternation of a Federal 100-year flood hazard area of County Capital Flood floodplain: the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:**

**i. Result in substantial erosion or siltation on- or off-site?**

As discussed in the Initial Study, included as Appendix A herein, the Project site does not include, and is not adjacent to, a stream or river, or within a floodplain. The Project site and surrounding area is urban and developed. The Project would implement existing regulations and BMPs that would reduce any potential erosion or siltation. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in substantial erosion or siltation would be less than significant.

**ii. Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or off-site?**

As discussed above, the Project site does not include, and is not adjacent to, a stream or river, or within a floodplain. Implementation of the Project would not alter the course of a stream or river. The Project would not result in an increase in impervious surfaces over current conditions. With implementation of the BMPs, the Project would result in a 25-year storm flow of 17.61 cubic feet per second (cfs), which is a 0.44 cfs decrease in runoff on the site (Moran 2021). Therefore, stormwater runoff from the site would decrease compared to existing runoff flow. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in the substantial increase or depth of surface runoff resulting in flooding would be less than significant.

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

As discussed above, the Project site does not include, and is not adjacent to, a stream or river, or within a floodplain. Implementation of the Project would not alter the course of a stream or river. The Project would not result in an increase in impervious surfaces over current conditions. With implementation of the BMPs, the Project would result in a 25-year storm flow of 17.61 cubic feet per second (cfs), which is a 0.44 cfs decrease in runoff on the site (Moran 2021). Therefore, stormwater runoff from the site would decrease compared to existing runoff flow. Overall, with implementation of the existing regulations and provision of BMPs that would be verified by the County during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction and operation that could result in creating or contributing runoff water exceeding the capacity of existing or planned systems would be less than significant.

**iv. Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?**

As discussed in the Initial Study, included as Appendix A, according to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (Map 06037C1700F), the Project site is located in Zone X, which is an area located outside of the 100-year and 500-year floodplains. Therefore, development of the Project would not impede or redirect flood flows, and no impacts would occur.

**WQ-4 Would the Project otherwise place structures in Federal 100-year flood hazards or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?**

As discussed above, the Project site is not within a flood hazard zone and would not place structures in a Federal 100-year flood hazard zone or County Capital Flood Severe Flood Hazard Area. Therefore, impacts relating to flood hazards would not occur.

**WQ-5 Would the Project conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?**

As discussed in the Initial Study, included as Appendix A, pursuant to Chapter 12.84 of the County's Code (Low-Impact Development Standards), construction, and operation BMPs would be implemented as a standard condition of the proposed Project, which would reduce impacts to water quality during construction and operation, including those impacts associated with soil erosion and siltation. The LID Standards require that new development: (1) mimics undeveloped stormwater runoff rates and volumes in any storm event up to and including the Capital Flood; (2) prevents pollutants of concern from leaving the development site in stormwater as the result of storms, up to and including a Water Quality Design Storm Event; and (3) minimizes

hydromodification impacts to natural drainage systems. Compliance with Chapter 12.48 of the County's Code would be implemented through the development permitting and plan check process. As described previously, with implementation of the Project, the implementation of BMPs would result in a 25-year storm flow of 17.61 cubic feet per second (cfs), which is a 0.44 cfs decrease in runoff on the site (Moran 2021). Therefore, stormwater runoff from the site would decrease compared to existing runoff flow. Development of the proposed Project would comply with Los Angeles County's LID and would incorporate BMPs that are consistent with LID. Therefore, impacts related to conflict with the County's LID would be less than significant.

**WQ-6 Would the Project use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?**

As discussed in the Initial Study, included as Appendix A, wastewater from the Project site is conveyed via County sewer infrastructure to the San Jose Creek Water Reclamation Plant which is designed for a capacity of 100 million gallons of wastewater per day. No wastewater treatment systems, onsite or offsite, are proposed as part of the Project and therefore, no impacts would occur.

**WQ-7 Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

As discussed in the responses above, the site is not within a flood hazard zone. Additionally, the Project site is located approximately 30 miles from the Pacific Ocean shoreline and no inland bodies of water are close enough to the project site to pose a flood hazard from a seiche. Therefore, the Project site is not located within a flood hazard, tsunami hazard, or seiche zone and is not at risk of release of pollutants due to inundation and no impacts would occur.

**WQ-8 Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

As discussed in the responses above, development of the proposed Project would comply with Los Angeles County's LID and would incorporate BMPs that are consistent with LID. Therefore, impacts related to conflict with the water quality control plan or sustainable groundwater management plan would be less than significant.

**Cumulative Hydrology and Water Quality**

**Water Quality:** The geographic scope for cumulative impacts related to hydrology and water quality includes the San Gabriel River watershed because cumulative projects and developments could incrementally exacerbate the existing impaired condition and could result in new pollutant related impairments. However, related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a LID plan (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration, in areas permitted. The NPDES permit requirements have been set by the California State Water Resources Control Board and implemented by the Los Angeles RWQCB to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable with compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the proposed Project would be implemented in compliance with all regulations, as would

be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

**Drainage:** The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above, with implementation of the Project the onsite pervious surfaces would increase, and stormwater runoff would be accommodated by the proposed stormwater drainage basin infrastructure. Additionally, existing drainage flow patterns would be maintained. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative Projects that could cumulatively combine to impact drainage. Thus, cumulative impacts related to drainage would be less than significant.

## Land Use and Planning

### LU-1 Would the Project physically divide an established community?

As discussed in the Initial Study, included as Appendix A herein, the Project site is bounded by a railway easement to the north, San Bernardino Road to the south, and single-family residential developments to the east and west. The proposed Project would replace the existing school buildings with detached residential condominium units and would not physically divide an established community. The land uses proposed for the site are consistent with the land uses designated by County's General Plan, as well as consistent with residential land uses in the immediate Project vicinity. In addition, Project implementation would not disturb or alter access to any existing adjacent uses. Therefore, the proposed Project would not result in the physical division of any established community, and no impacts would occur.

### LU-2 Would the Project cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect?

As discussed in the Initial Study, included as Appendix A herein, the Project site currently has a General Plan land use designation of Public and Semi-Public (P). The P designation allows residential land uses because the area surrounding the Project site is similar to and compatible with the proposed detached residential condominium units. The existing surrounding residential uses are designated as Residential 9 (H9), which allows for single-family residential uses at densities of up to 9 dwelling units per net acre. Therefore, the Project's density of approximately 7.15 du/acre would be consistent and compatible with the surrounding residential densities. Therefore, the proposed Project is consistent and compatible with the General Plan. Title 22 describes and elaborates on permitted land uses and contains more specific information related to allowable building intensities and development standards. The Project site has a zoning designation of A-1-6,000, which requires a minimum lot size of 6,000 square feet. According to Title 22, Section 22.16.030 of the Los Angeles County Code, single-family residences, including detached residential condominium units, are allowable uses in this zone. The proposed Project would develop 68 detached residential condominium units within the 9.61-acre Project site. The Project would include one multi-family residential lot of 9.61 acres. The proposed Project would comply with the minimum required lot area requirement set forth in Title 22 of the Los Angeles County Code, and the proposed Project would not conflict with the land use plan, policies, or regulations.

### LU-3 Would the Project conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

The proposed Project is within an urbanized residential area of unincorporated Los Angeles County. The proposed Project is not located within any habitat conservation plan or natural community conservation plan and is not located in a Hillside Management Area or Significant Ecological Area.

### **Cumulative Land Use and Planning**

Cumulative projects in Los Angeles County would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Similar to the General Plan, cumulative projects in the Los Angeles County region would utilize regional planning documents such as SCAG's RTP/SCS during planning, and the general plans of cities would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in these jurisdictions would be required to comply with the applicable land use plan or they would not be approved without a General Plan amendment.

While cumulative projects could include General Plan amendments and/or zone changes, modifications to existing land uses do not necessarily represent an inherent negative effect on the environment, particularly if the proposed changes involve changes in types and intensity of uses, rather than eliminating application of policies that were specifically adopted for the purpose of avoiding or mitigating environmental effects. Past and present cumulative projects do not involve amendments that would eliminate application of policies that were adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

### **Mineral Resources**

#### **MIN-1 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?**

As discussed in the Initial Study, included as Appendix A herein, no active mining operations exist within the Project site. While the mapping by the California Geological Survey shows that the Project site is partially in mineral resource zones MRZ-2 and MRZ-3, which indicates the potential for mineral deposits within the site, the Project area is fully developed with urban uses and has no history of mining. Implementation of the Project would not cause the loss of availability of mineral resources valuable to the region or state, and impacts would be less than significant.

#### **MIN-2 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?**

As discussed in the Initial Study, included as Appendix A herein, no mineral extraction activities occur on the site currently, or historically. As such, the proposed Project would not result in the loss of availability of a known mineral resource as the mineral resource was nor previously available for extraction. Therefore, impacts are less than significant.

### **Cumulative Mineral Resources**

Cumulative projects within the East San Gabriel Valley area of Los Angeles County would have the potential to result in a cumulative impact if they cause a loss of availability of a known mineral resource valuable to

the region and the state or caused a loss of availability of an important mining site delineated in a local general plan or other land use plan. Most of the areas designated as MRZ-2 within the East San Gabriel Valley area are built out with urban uses. Therefore, redevelopment or reuse of currently developed land within the vicinity of the Project in the East San Gabriel Valley area would not affect the availability of mineral resources. Thus, cumulative projects within the East San Gabriel Valley area, like the Project, would not result in the loss of availability of a known mineral resource and potential cumulative impacts would be less than significant.

## Noise

### **NOI-1 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 County General Plan or noise ordinance (Los Angeles Country Code, Title 12, Chapter 12.08), or applicable standards of other agencies?**

As discussed in the Initial Study, included as Appendix A herein, noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: demolition, excavation and grading, building construction, architectural coating, paving. Noise levels generated by heavy construction equipment can range from approximately 74 A-weighted decibels (dBA) to 90 dBA when measured at 50 feet. Section 12.08.440 of the Los Angeles County Code limits construction activities to between 7:00 A.M. and 7:00 P.M. on weekdays and Saturdays, and restricts construction activities from occurring on Sundays or holidays. During the allowable times of construction, Section 12.08.440 limits mobile equipment construction noise impacts to 75 dBA and stationary equipment construction noise impacts to 60 dBA at the nearby single-family homes. Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. The construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators.

The Noise Impact Analysis, included as Appendix K, analyzed noise construction noise against the County's mobile equipment threshold of 75 dBA at the nearby single-family homes. Additionally, since the County has not yet adopted a construction-related noise threshold that accounts for an increase above ambient noise, a plus 5 dBA above ambient threshold was utilized. This is considered a conservative threshold because it is likely that any threshold for construction-related noise increases above ambient conditions that the County may adopt in the future would be higher than this, due to the temporary, short-term nature of construction activities.

The existing ambient noise level at single-family homes to the west, east, and north of the site are approximately 67.6 dBA equivalent sound level (Leq) and the ambient noise level at single-family homes to the south of the Project site is approximately 68.4 dBA Leq. Mobile construction equipment would result in noise levels ranging from 71 to 73 dBA Leq at the sensitive receptors west and east of the Project site, which would result in an increase of 5.4 dBA above ambient noise levels of 67.6 dBA Leq. At the single-family homes to the north and south of the Project site, mobile construction equipment would result in noise levels ranging from 64 to 66 dBA Leq and 63 to 65 dBA Leq respectively, which would be below existing ambient noise levels of 67.6 and 68.4 dBA Leq respectively. In all locations, the resulting noise levels would be lower than the County's mobile equipment threshold of 75 dBA Leq. Mobile construction-related noise would exceed the existing ambient noise by up to 5.4 dBA at the single-family homes on the east and west sides

of the Project site. As such, mobile construction equipment activities would create an exceedance of the plus 5 dBA above ambient threshold at the single-family homes located on the west and east sides of the Project site. Therefore, Mitigation Measure NOI-1 is included to require a minimum of 8-foot-high temporary sound blanket or wall along the east or west property lines prior to the start of grading. With implementation of Mitigation Measure NOI-1, impacts related to mobile construction noise would be less than significant.

Stationary construction equipment would result in noise levels ranging from 64 to 68 dBA Leq at distances of 100 feet from the nearest single-family residences, which would be 0.4 dBA above the ambient noise levels of 67.6 dBA. At distances of 160 feet from the nearest single-family residences, stationary equipment noise levels would range from 60 to 64 dBA Leq, which would be below ambient noise levels. At distances of 230 feet, stationary equipment noise levels would range from 56 to 60 dBA Leq, which would be below ambient noise levels. Therefore, operation of stationary construction equipment within 100 feet from the nearby homes would exceed the County's stationary equipment threshold of 60 dBA by as much as 8 dBA. In order to reduce stationary construction equipment noise, Mitigation Measure NOI-1 is included to require a minimum 8-foot-high temporary sound blanket or sound wall to be placed next to the stationary equipment on the side of the nearest homes and that the stationary equipment shall be located a minimum of 100 feet away from any offsite residential property line. With implementation of Mitigation Measure NOI-1, the noise levels at 100 feet would be 60 dBA for an air compressor, and 56 dBA for a generator and welder/torch, which would all be within the County's 60 dBA stationary construction noise standard. Therefore, with implementation of Mitigation Measure NOI-1, stationary construction noise impacts would be less than significant.

Once the proposed Project is operational, noise levels generated at the Project site would occur from stationary equipment such as heating, ventilation, and air conditioning (HVAC) units that would be installed for the new development, internal street and driveway vehicle movements, trash removal activity, and activity at outdoor gathering areas. Typically, air conditioning units are located away from sensitive receivers and shielded to ensure that noise from operation of the units does not have the potential to result in an impact. Additionally, Los Angeles County Code Section 12.08.570 exempts outdoor activities and refuse collection vehicles from the noise standards set forth in County Code Chapter 12.08. County Code Section 12.08.530 sets forth thresholds of 50 dBA at nearby sensitive receptors for air conditioning equipment. As discussed in Appendix O to this Draft EIR, the outdoor air conditioning condenser units noise levels were modeled at 3 feet from the property line wall and then compared to the County noise standards. The noise level created from both the proposed 3 Ton and 4 Ton condenser units for both cooling and heating modes would be a maximum of 40.2 dBA at three feet from the Project property line, which would be within the County's 50 dBA noise standard. Therefore, the proposed air conditioner units would create a less than significant noise impact at the adjacent residential properties. Further, the lowest measured ambient noise level near the Project site is 67.6 dBA Leq. As such, the onsite operational noise sources would be below existing ambient noise levels. To ensure compliance with County Code standards, the County's building and plan check permitting process includes verification that the location of operational noise sources would not result in an exceedance of County Code standards. Thus, the County's standards development permitting process would ensure that the proposed Project would not generate onsite operational noise that would exceed noise standards.

The Project would not result in exposure of persons to, or generation of, noise levels in excess of standards established in the County Noise Ordinance or the General Plan Noise Element. The Project site is not near a noise-generating site (e.g., airport, industrial site). The Interstate 210 Freeway (also known as the Foothill Freeway) is about 9,265 feet (1.75 miles) from the Project site. The Project would conform to Title 12 Chapter 12.08 ("Noise Control Ordinance") of the Los Angeles County Code, which provides a maximum exterior noise level of 45 decibels (dB) between 10:00 P.M. and 7:00 A.M. (nighttime) and 50 dB from 7:00 A.M. to



10 P.M. (daytime) in Noise Zone II (residential areas). The Project site will not create noise in excess of these limits, nor will residents of the Project be exposed to noise in excess of these limits. Therefore, impacts would be less than significant.

Since, neither the General Plan nor the County Code provide any policies or regulation defining what constitutes a “substantial permanent increase to ambient noise levels”, the noise increase thresholds developed by the Federal Transit Administration (FTA) for a moderate impact have been utilized, which determined a significant impact would occur if a project would increase the noise by 3 dB, where the ambient noise level is 55 dB or less, 2 dB, where the ambient noise level is between 55 and 60 dBA community noise equivalent level (CNEL), or would increase the noise by 1 dB, where the ambient noise level is between 60 and 75 dBA CNEL. In the existing year with Project conditions noise would range from 62.5 to 67.1 dBA CNEL. Implementation of the proposed Project would generate a noise level increase of up to 0.1 dBA CNEL on the study area roadway segments, which is less than the 1 and 2 dBA CNEL thresholds. Thus, offsite traffic noise impacts in the opening year plus Project condition would be less than significant. In the opening year (2023) with Project conditions noise would range from 62.7 to 67.3 dBA CNEL. Implementation of the proposed Project would generate a noise level increase of up to 0.1 dBA CNEL on the study area roadway segments, which is less than the 1 and 2 dBA CNEL thresholds. Thus, off-site traffic noise impacts in the opening year plus Project condition would be less than significant.

#### **NOI-2 Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?**

As discussed in the Initial Study, included as Appendix A herein, demolition, excavation, and grading activities are required for implementation of the Project and can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec peak particle velocity (PPV) at 25 feet. Section 12.08.570 of the County Code exempts construction activities from the vibration standards, provided construction activities occur between 7:00 A.M. and 7:00 P.M. on weekdays, excluding holidays. Since the County does not provide a quantifiable vibration level for construction activities that occur during allowable times, Caltrans standards have been utilized, which define the threshold of perception from transient sources that include mobile construction equipment to 0.25 inch per second PPV. At distances of 25 feet from construction, vibration levels are anticipated to range from 0.003 to 0.21 in/sec PPV. These vibration levels would not be sustained during the entire construction period but would occur only during the times that heavy construction equipment is operating in the vicinity of the sensitive receivers. Based on typical propagation rates, the vibration level at the nearest sensitive receptors (2 feet away from the proposed Project) would be 1.43 inch per second PPV, which would exceed the Caltrans distinctly perceptible vibration level of 0.25 inch per second PPV for transient sources. Mitigation Measure NOI-2 is provided to restrict any off-road equipment with 150 horsepower engine or greater from operating within 10 feet of either the east or west property lines. Based on typical propagation rates, the vibration level at the nearest homes (12 feet away from proposed construction activities with implementation of Mitigation Measure NOI-2) would be 0.03 inch per second PPV, which is within the 0.25 inch per second PPV threshold. Therefore, with implementation of Mitigation Measure NOI-2, construction-related vibration impacts would be less than significant.

Operation of the proposed detached residential condominium units would include heavy trucks for residents moving in and out of the residential units and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, typical vibration levels for the heavy truck activity at normal traffic speeds would be approximately 0.006 in/sec PPV, based on the FTA Transit Noise Impact and Vibration Assessment. Truck movements on site would be travelling at

very low speed, so it is expected that truck vibration at nearby sensitive receivers would be less than the vibration threshold of 0.08 in/sec PPV for fragile historic buildings and 0.04 in/sec PPV for human annoyance, and therefore, would be less than significant.

**NOI-3 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 of public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project is not within an airport land use plan or within the vicinity of a private airstrip. The Project site is located approximately 5.5 miles to the east of the closest airport or public use airport (San Gabriel Airport). Due to the distance from the closest airport, the Project would not expose people residing in the Project area to excessive noise levels from aircraft.

**Cumulative Noise**

Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project area. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts. The majority of the nearby area is already developed, and any new projects would likely be redevelopment of existing uses.

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, Section 12.08.440 of the Los Angeles County Code requires construction activities to not occur within the hours of 7:00 P.M. and 7:00 A.M. on weekdays or anytime on Sundays and federal holidays. Also, construction noise and vibration are localized in nature and decreases substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise and vibration levels, more than one source emitting high levels of construction noise would need to be in close proximity to the proposed Project construction. As the surrounding area is developed with residential homes, there are no cumulative projects within hearing distance of the Project area. Thus, construction noise and vibration levels from the projects would not combine to become cumulatively considerable, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project in the opening year cumulative traffic volumes on the roadways in the Project vicinity. The noise levels associated with these traffic volumes with the proposed Project were identified previously in Initial Study Table NOI-5. As shown, cumulative development along with the proposed Project would increase local noise levels by a maximum of 0.1 dBA CNEL. As the increase is much lower than the 1.0 and 2.0 dBA threshold for local roadway segments, cumulative impacts associated with traffic noise would be less than significant.

**Noise Mitigation Measures**

**MM NOI-1: Temporary Sound Barriers and Permanent Walls.** Construction plans and specifications shall require that a minimum eight-foot-high temporary sound barrier (e.g., fiberglass core sound blanket or a 0.5-inch-thick wooden panel sound wall) shall be placed on the eastern and western property lines prior to commencement of Project grading. Temporary sound blankets or sound walls shall be maintained until the permanent six-foot-high concrete masonry unit (CMU) wall that are depicted in the Wall Plan for the Project are constructed along the east and west property lines. Construction plans and specifications shall also state

that stationary construction equipment shall be located a minimum of 100 feet from the property line of any offsite residence. Noise control requirements shall be noted and depicted on Project construction drawings/plans.

**MM NOI-2: Vibration Control.** The Project construction plans and specifications shall state that operation of off-road construction equipment that is 150 horsepower or greater shall not occur within 10 feet of either the east or west property lines in order to limit construction-related vibration levels at the nearby residences. Typical construction equipment that is less than 150 horsepower include backhoes, skid steers, skip loaders, and tractors, that are capable of performing all grading and excavation activities within the 10-foot-wide areas adjacent to the east and west property lines. Noise control requirements shall be noted and depicted on Project construction drawings/plans.

## Population and Housing

**POP-1 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)?**

Based on a SCAG population density factor of 3.85 persons per household for the community of unincorporated Covina, the proposed Project would result in a net increase of approximately 262 new residents. Overall, the SCAG 2020-2045 RTP/SCS population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,500 additional persons, yielding an approximately 20.4% growth rate. The unincorporated areas of Los Angeles are projected to have a population of 1,258,000 persons and 419,300 housing units by 2045. The proposed Project would generate approximately 262 residents, which represents approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. Thus, as the proposed Project is consistent with the Los Angeles County General Plan and zoning designations for the site, which SCAG relies on to determine projections, the proposed Project is within SCAG's 2020-2045 RTP/SCS growth forecast.

Furthermore, the proposed Project is located in an urbanized residential area of unincorporated Los Angeles County and is surrounded by residential uses. The Project would be served by new onsite sewer main lines that would be maintained by the Los Angeles County Consolidated Sewer Maintenance District, and each residence would be served by a separate house lateral, which would be maintained by the property owner. In addition, vehicular access would be provided by new private shared streets from San Bernardino Road. Because the Project proposes development in an already built-out neighborhood, it would not indirectly induce population growth through the extension of roads or other infrastructure. In addition, the proposed Project would not create employment opportunities that could induce population growth. Therefore, potential impacts related to inducement of unplanned population growth, either directly or indirectly, would be less than significant.

**POP-2 Would the Project displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?**

As discussed in the Initial Study, included as Appendix A herein, the existing Project site does not provide any residential uses. Therefore, the proposed Project would not displace a substantial number of existing people and would also provide 68 new residential units on the Project site. With construction of the additional housing units, replacement housing would not need to be constructed elsewhere. Therefore, there would be no impacts related to the displacement of substantial numbers of existing people or housing.

### Cumulative Population and Housing

Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As discussed, SCAG's 2020-2045 RTP/SCS serves as a long-range vision plan for development in the counties of Riverside, San Bernardino, Imperial, Los Angeles, Orange, and Ventura. The Project would not exceed the SCAG population, housing, and employment growth projections for the County as the Project would be consistent with the General Plan designation for the site. Further, the Project would represent a nominal percentage of SCAG's overall projections for unincorporated Los Angeles County. The Project would result in a generation of approximately 262 residents at full buildout. Based on the growth projections analyzed in SCAG's 2020-2045 RTP/SCS, full buildout of the Project would represent approximately 0.0002 percent of the forecasted population in 2045 and approximately 0.001 percent of the forecasted growth between 2016 and 2045 for the County's unincorporated area. The Project is within the growth projections used to prepare RTP/SCS as it is consistent with the General Plan designation for the site; thus, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

### Public Services

**PS-1 Would the Project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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?

As discussed in the Initial Study, included as Appendix A herein, fire protection and emergency medical services in the County of Los Angeles are provided by the Los Angeles County Fire Department (LACoFD) from 175 fire stations. There are currently five (5) county operated fire stations located within 3.5 miles of the Project site. Station 48, which is located 1.3 miles from the project site is the first responding unit. LACoFD's average response time for on-scene services is approximately five (5) minutes and their standard is to arrive on scene within 30 minutes. Station 48, which is located 1.3 miles from the Project is the first responding station to the site. Station 48 would have an on-scene response time of approximately four (4) to five (5) minutes to the Project site. Because the Project site is within 3.5 miles of five (5) existing fire stations and the Project site is within a developed area that is currently served by these stations, the Project would not result in the requirement to construct a new fire station. In addition, the County of Los Angeles Fire Department Fire Prevention Fees requires a developer impact fee be paid prior to the issuance of a building permit, which provides funding for the acquisition, construction, improvement, and equipping of fire station facilities. Additionally, the proposed Project would remove the existing school, which was constructed pursuant to fire code standards of 1953 and develop new building structures pursuant to the most recent California building and fire codes, which would improve the structural fire safety over the existing buildings. California's building/fire codes are published in their entirety every three years and were most recently updated in 2019. As with all projects within the County, the proposed Project would be required per County permitting to comply with existing regulations within the Los Angeles County Fire Code. The Project would require the installation of various fire protection systems, including sprinkler systems. Therefore, with implementation of the California building and fire codes, and payment of developer fees, impacts related to fire protection services would be less than significant.

**Sheriff protection?**

As discussed in the Initial Study, included as Appendix A herein, the Los Angeles County Sheriff Department (LASD) provides law enforcement and protection services in unincorporated Los Angeles County, including the Project area. The Project site would be served by the San Dimas Sheriff's Station, which is located approximately 8.1 roadway miles from the Project site. In 2020, the San Dimas Sheriff's Station had 137 personnel which includes sworn and non-sworn positions. Based on the LASD's 2019 Synopsis, the total population of the area served by the San Dimas Sheriff's Station was 84,240 people. The San Dimas Station's officer to population ratio is approximately 1.63 officers per 1,000 population. The residential population of the Project site would be approximately 262 residents and based on the Sheriff's Department's 2019 staffing of 1.63 officers per thousand population, the proposed Project would not require any additional officers. Furthermore, the Project site is part of an existing patrol area covered by the Los Angeles County Sheriff's Department. Therefore, with existing personnel at the San Dimas Sheriff's Station, law enforcement personnel are anticipated to be able to respond in a timely manner, and within set standard response times, to emergency calls in the Project area. Therefore, the proposed Project would not result in the need for, new or physically altered police protection facilities. Thus, substantial adverse physical impacts associated with the provision of new or expanded facilities would not occur.

**Schools?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is located within the Covina Valley Unified School District (CVUSD) boundary. The Project site is within the school boundaries of Manzanita Elementary School, Las Palmas Middle School, and Northview High School. The Covina Valley Unified School District uses the State's Student Yield Factor for Unified School Districts, which is 0.7 students per dwelling unit (Office of Public School Construction 2009). Using this factor, the proposed 68 residences could result in approximately 48 new students that would range in age from elementary through high school. While development of the new residential units would increase the number of students, this increase would be accommodated by the existing schools. The enrollment for the schools serving the project site ranged by 183 students in the elementary school, 121 students in the middle school, and 141 students in the high school between the 2019-2020 and the 2013-2014 school years (CDE 2020). Furthermore, none of the schools serving the Project site are near their capacity limits according to the CVUSD. Thus, the 48 new students generated from the proposed Project would be accommodated by existing school facilities. Additionally, the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. Therefore, impacts related to school facilities would be less than significant.

**Parks?**

As discussed in the Initial Study, included as Appendix A herein, the proposed open space and recreation area on the Project site and the facilities provided by the Los Angeles County Department of Parks and Recreation would provide park services to the proposed Project. According to the 2016 Countywide Comprehensive Parks and Recreation Needs Assessment, the most recent park needs assessment, there are 3.3 acres of local and regional recreation park per 1,000 residents, which is less than the 4.0 acres per 1,000 goal included in the Los Angeles County General Plan. For regional open space and natural areas, there are 86.2 acres per 1,000 people countywide. Based on the Project's generation of 262 new residents, the Project would result in a demand for 0.84 acre of local parkland and 1.3 acres of regional parkland. A large portion of the Project's park demand would be met onsite with the Project's provision of 0.82 acre

(35,780 square feet) of recreational amenities including walkways, gathering spaces, barbeques, and a playground for use by residents within the complex. In addition, the Project would be required to pay parkland fees in compliance with County Code Section 21.28.140. These fees would be used for acquiring local parkland or developing new or rehabilitating existing recreational facilities within the County. The County currently has over 69,595 acres of parkland, with approximately 998 acres within 1.5 miles of the Project site. As such, with provision of onsite recreational amenities and payment of park fees, the Project would not result in significant environmental impacts related to parks.

### **Libraries?**

As discussed in the Initial Study, included as Appendix A herein, the Los Angeles County Public Libraries would provide library services to the Project via the West Covina Library, located approximately 1.49 miles southwest of the Project site, and the Baldwin Park Library, located approximately 2.04 miles west of the Project site. The Project would be required to pay library facilities mitigation fees as set forth in County Code Section 22.246.060 which would serve to minimize impacts to library services. As such, impacts related to library services would be less than significant.

### **Other public facilities?**

As discussed in the Initial Study, included as Appendix A herein, the Project is not expected to result in significant demand for other public facilities or services. The Project is not perceived to create capacity or service level problems or result in substantial adverse physical impacts for any other public facility. As such, the Project would not significantly adversely affect other public facilities or services, and therefore would not require the construction of new or modified public facilities. Less than significant impacts would occur to other public facilities.

### **Cumulative Public Services**

The Project would not significantly increase the need for public services in the Project area, in the cities surrounding the Project site, or within the region. As discussed above, the Project applicant would pay the required Development Impact Fees for residential development within the County. Additionally, as discussed above, the Project would not impact acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or result in the need for new or the expansion of existing government services and facilities. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees. Therefore, the past, present, and future projects would not result in a cumulative impact related to the provision of public services.

### **Recreation**

#### **REC-1 Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

As discussed in the Initial Study, included as Appendix A herein, and above, the Project applicant would provide approximately 35,780 square feet of onsite recreational amenities. Residents are anticipated to utilize the onsite open space to a greater degree than offsite facilities due to convenience and proximity. In this way, the Project's provision of onsite open space would reduce the use of area parks by Project residents. Nevertheless, some Project residents would still be expected to utilize other public recreational facilities. As a result, the proposed Project would create a limited incremental increase in the use of area parks. The Project would be subject to the County's Code to provide local park space or pay a fee in lieu of the

provision of park space, which would be used for the purpose of acquiring, developing, improving and expanding open space and park lands. Los Angeles County Code Section 21.24.340 requires that the subdivider of a residential subdivision shall provide local park space to serve the subdivision, pay a fee in lieu of the provision of such park land in accordance with the provisions of Section 21.28.140, provide local park space containing less than the required obligation but developed with amenities equal in value to the park fee, or do a combination of the above in accordance with the requirements of this title. Therefore, due to the limited increase in residents near existing park and recreational facilities, and compliance with Section 21.24.350 of the County's Code, the Project's contribution to deterioration of parks and recreational facilities would be less than significant. Furthermore, existing regulations ensure that future funding for parkland acquisition would be proportional to increases in population and cumulative impacts would be less than significant.

**REC-2 Does the Project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?**

As discussed in the Initial Study, included as Appendix A herein, the proposed Project would include approximately 35,780 square feet of recreational amenities, approximately 62,443 square feet of designated common open space, and approximately 72,719 square feet of private open space within the Project site. The potential adverse effects associated with implementation of the proposed Project, including development of the proposed recreational areas, have been considered throughout the analysis for the Project. Development of the open space area would not have any potentially significant impacts outside of those analyzed for the whole of the Project. The Project would be required to pay parkland fees in compliance with County Code Section 21.28.140 to satisfy park obligation. Therefore, the proposed Project does not include recreational facilities that would have an adverse physical effect on the environment.

**Cumulative Recreation**

The Project provide recreational amenities within the site and would not significantly increase the need for recreational facilities in the Project area, in the cities surrounding the Project site, or within the region. As discussed above, the Project applicant would pay the required fees pursuant to County Code Section 21.28.140. Additionally, as discussed above, the Project would not impact performance objectives or result in the need for new or the expansion of existing recreational facilities. Related projects in the region would be required to demonstrate their level of impact on recreational facilities and also pay their proportionate development fees. Therefore, the past, present, and future projects would not result in a cumulative impact related to the provision of recreational facilities.

**Transportation**

**TRAN-3 Would the Project substantially increase hazards due to a road design feature (e.g., sharp curves? Or incompatible uses (e.g., farm equipment)?**

As discussed in the Initial Study, included as Appendix A herein, Project implementation would not add incompatible uses to area roadways. The Project would be subject to the requirements and design standards of the Department of Public Works and the Project would not create a roadway hazard. Further, during construction, the Project would implement a construction traffic control plan, as included in PDF TR-4, which would reduce impacts related to traffic hazards during Project construction. Thus, impacts would be less than significant.

**TRAN-4 Would the Project result in inadequate emergency access?**

As discussed in the Initial Study, included as Appendix A herein, Project development would not result in inadequate emergency access as direct access to the site would be provided by a new private roadway intersecting with San Bernardino Road. The Project would also be required to construct internal access and provide fire suppression facilities, including three fire hydrants, in conformance with the County Code Title 32, Fire Code. The Project would be subject to all requirements of the Fire Department and shall comply pursuant to the requirements of the Uniform Code and Section 503 of the California Fire Code (Title 24, California Code of Regulations, part 9). As such, Project implementation would not result in inadequate emergency access and no impacts would occur.

**PDF TR-4: Construction Traffic Control Plan.** Prior to issuance of construction permits, a traffic control plan shall be submitted by the applicant and approved by the County. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

### Cumulative Transportation

The evaluation of Impacts TR-3 and TR-4 concluded that the proposed Project would not result in significant impacts related to incompatible uses, hazards due to roadway design, or emergency access. The proposed circulation layout would be required to be installed in conformance with County design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the County and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities that would not allow potential cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features and emergency access would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

### Tribal Cultural Resources

**TCR-1 Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

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

As discussed in the Initial Study, included as Appendix A herein, in compliance with these AB 52 requirements, on July 15, 2021, the County sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity.

- Gabrieleno Tongva, San Gabriel Band of Mission Indians
- Gabrieleno Band of Mission Indians-Kizh Nation

Additionally, on July 22, 2021, the County requested a Sacred Lands File (SLF) search from the Native American Heritage Commission. On August 19, 2021, the NAHC responded that the SLF search yielded



negative results for known tribal cultural resources or sacred lands within a 1-mile radius of the Project site. The Gabrieleno Band of Mission Indians-Kizh Nation requested consultation regarding the proposed Project. The Gabrieleno Band of Mission Indians-Kizh Nation considers the area sensitive for cultural resources as several sites are located nearby. As such, the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction. With implementation of Mitigation Measures TCR-1 (Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities), TCR-2 (Unanticipated Discovery of Human Remains and Associated Funerary Object) and TCR-3 (Procedures for Burials and Funerary Remains), which require Native American monitoring and procedures for unanticipated discoveries, impacts to tribal cultural resources would be less than significant on a Project and cumulative-level.

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

As discussed in the Initial Study, included as Appendix A herein, and as discussed above, to avoid potential adverse effect to tribal cultural resources, Mitigation Measures TCR-1 through TCR-3 have been included to provide for Native American monitoring of excavation and grading activities. There are no known tribal cultural resources on or adjacent to the site and no potentially significant impacts are anticipated.

Additionally, as described previously, Mitigation Measures TCR-2 and California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the Project site, disturbance of the site shall halt until the coroner has conducted an investigation. If the coroner determines that the remains are those of a native America, they shall contact the Native American Heritage Commission. Therefore, with implementation of Mitigation Measures TCR-1 through TCR-3, impacts to Tribal Cultural Resources would be less than significant.

### **Cumulative Tribal Cultural Resources**

The Project's potential to result in cumulatively considerable impacts to tribal cultural resources were analyzed in conjunction with other projects located in the influence areas of the tribes in the region. There is potential for tribal cultural resources to be uncovered during construction activities from the Project. Other development projects within the region would have a similar potential to uncover tribal cultural resources. Cumulative impacts would be reduced by each development project's compliance with applicable regulations, consultations required by SB 18 and AB 52, and project-specific mitigation. Project implementation of Mitigation Measures CUL-1 and CUL-3 and TCR-1 through TCR-3 would reduce project-level impacts to less than significant, and the Project's contribution for cumulatively significant impacts on inadvertent discoveries on tribal cultural resources would also be reduced to less than significant.

### **Tribal Cultural Resources Mitigation Measures**

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

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

demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

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

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

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

#### **MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects.**

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

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

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

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

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

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

**MM TCR-3: Procedures for Burials and Funerary Remains.**

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

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

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

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

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

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

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

**Utilities and Service Systems****UT-1 Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?**

As discussed in the Initial Study, included as Appendix A herein, domestic water services are provided to the Project site by Azusa Light and Water, and wastewater treatment services are provided to the area by the Los Angeles County Sanitation Districts. The Project would install new water and sewer infrastructure on the site and connect to the new 8-inch water main and 8-inch sewer main in San Bernardino Road. As per the

Will Serve Letter provided by Azusa Light and Water, dated March 18, 2020, the project would install a new 8-inch water main in San Bernardino Avenue as a condition of approval (ALW 2020).

Additionally, as per the sewer Will Serve Letter for the Project, dated August 14, 2020, from the Los Angeles County Sanitation District, the District has capacity to serve the Project. Per the City of West Covina's Sewer Outlet Approval Letter, dated December 3, 2020, the Project applicant would be required to pay in-lieu fees due to the City's 8-inch sewer in East San Bernardino Road being over-capacity; this sewer line will service the Project. As such, Mitigation Measure UT-1 (Sewer Fees) is included to require the Project applicant to pay all applicable in-lieu fees to the City of West Covina, as set forth in the fee program in West Covina Municipal Code Section 17-208.

In addition, the Project applicant would construct onsite storm water drainage facilities that would convey storm water into two onsite infiltration basins along San Bernardino Road. Runoff from properties adjacent to the Project site will be directly conveyed in a culvert to the stormwater drain in San Bernardino Road. The Project would also connect to existing electric power, natural gas, and telecommunication facilities. Therefore, the Project would not result in the relocation or construction of new or expanded wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities that could cause environmental effects. Additionally, the construction of the new 8-inch water main would serve to replace the existing water main and would only serve the proposed Project and surrounding, existing developments. Thus, with inclusion of MM UT-1 (Sewer Fees), impacts would be less than significant.

**UT-2 Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?**

As discussed in the Initial Study, included as Appendix A herein, and as described above, Azusa Light and Water is responsible for supplying potable water to the Project site and its region. The 2020 Azusa Light and Water's Urban Water Management Plan (UWMP) details that Azusa Light and Water has adequate supplies to serve its customers during normal, dry year, and multiple dry year demand through 2045 with projected population increases and accompanying increases in water demand. Furthermore, Azusa Light and Water forecasts for water demand are based on population projections of SCAG, which rely on adopted land use designations contained within the general plans that cover the geographic area. Implementation of the Project would not change the land use designation or zoning of the project site. The UWMP assumes a future water demand through 2045 of 148 gallons per capita per day. Thus, the Project would generate a demand of approximately 38,776 gallons of water per day or 43.5 acre-feet per year, which is within the anticipated increased demand and supply for water. Additionally, this is a conservative estimate because Azusa Light and Water's actual water use during FY 2019-20 was 147 gallons per capita per day. Redevelopment of the Project site would also be required to be compliant with CalGreen/Title 24 requirements for low flow plumbing fixtures and irrigation, which would provide for efficient water use. Furthermore, the UWMP states that due to Azusa Light and Water's diverse water supply portfolio, water supplies may be re-apportioned during multiple dry years to meet Azusa Light and Water's water demands, and that a single dry year or a multiple dry year period will not compromise Azusa Light and Water's ability to provide a reliable supply of water to its customers. Additionally, per the Will Serve Letter dated March 18, 2020, Azusa Light and Water's has capacity to serve the proposed Project. Therefore, Azusa Light and Water has sufficient water supplies available to serve the Project during normal, dry and multiple dry years, and impacts would be less than significant.

**UT-3 Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?**

As discussed in the Initial Study, included as Appendix A herein, based on the Los Angeles County Sanitation sewage flow generation rate of 260 gallons per day of wastewater per single-family residence, the Project would result in generation of 17,680 gallons per day of wastewater. Wastewater generated from the Project site would be treated by the Los Angeles County Sanitation Districts, which convey wastewater from the Project site to the San Jose Creek Water Reclamation Plant. The San Jose Creek Water Reclamation Plant provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day (mgd) (LACSD). Per the sewer Will Serve Letter for the Project, dated August 14, 2020, the Los Angeles County Sanitation Districts has capacity to serve the Project (LACSD, 2021). The San Jose Creek Water Reclamation Plant currently processes an average flow of 58.5 mgd of wastewater, resulting in a remaining capacity of approximately 41.5 mgd of wastewater. This remaining capacity is adequate to serve the Project and the Project would not result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Thus, with payment of in-lieu fees to the City of West Covina, which would be utilized to upgrade the sewer line in East San Bernardino Road, impacts would be less than significant on a Project-level and would not be cumulatively considerable and impacts would be less than significant.

**UT-4 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?**

A majority of the solid waste from the unincorporated area of Los Angeles County, where the Project site is located, that was disposed of in landfills, went to the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is permitted to accept 12,100 tons per day of solid waste and is permitted to operate through October 2037. In 2021, the facility received an average of 7,830 tons per day. Thus, the facility had additional capacity of 4,270 tons per day (CalRecycle 2021). Project construction would generate solid waste for landfill disposal in the form of demolition debris from the existing buildings and infrastructure that would be removed from the site. Demolition would result in 3,715 tons of debris. However, Section 5.408.1 of the 2019 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 1,300 tons of debris. As the Mid-Valley Sanitary Landfill had additional capacity of 2,500 tons per day, the facility would be able to accommodate the addition of solid waste during construction of the proposed Project. Based on the default CalEEMod solid waste generation rate of 0.41 ton per year per resident, the 262 residents are estimated to generate 107.42 tons of solid waste per year (or 2.07 tons per week). Overall, operation of the Project is anticipated to generate 2.07 tons (4,140 pounds) of solid waste per week. As Sunshine Canyon Landfill had additional capacity of 4,270 tons per day, the facility would be able to accommodate the addition of 4,140 pounds of solid waste per week from operation of the proposed Project. Thus, impacts related to solid waste generation and landfill capacity or conflict with federal, state, and local regulations related to solid waste would be less than significant.

**UT-5 Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

As discussed in the Initial Study, included as Appendix A herein, implementation of the Project would result in new development that would generate an increased amount of solid waste. The Project would comply with the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of

operational solid waste. Therefore, development of the Project would be consistent with all state and federal regulations, and impacts would not occur.

### **Cumulative Utilities and Service Systems**

**Water:** Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary sources of water that include groundwater, surface water, and purchased or imported water.

As described previously, the Project site is currently served by the Azusa Light and Water's water utility and would connect to the existing and planned water infrastructure. The construction activities related to the new onsite and offsite water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. Thus, potential cumulative impacts from off-site water system expansions would not be generated by the proposed Project.

As discussed above, the Project would result in an increase in water demand of 43.5 acre-feet per year. It is anticipated that existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand in addition to forecast demand for Azusa Light and Water's entire service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require new or expanded entitlements, and cumulative impacts would be less than significant.

**Wastewater:** Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes the sewer system that serves the Project site and conveys wastewater to the San Jose Creek Water Reclamation Plant.

As described previously, with the proposed Project, the wastewater treatment plant would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. However, per the City of West Covina's Sewer Outlet Approval Letter, dated December 3, 2020, the Project applicant would be required to pay in-lieu fees due to the City's 8-inch sewer in East San Bernardino Road being over-capacity; this sewer line will service the Project. The continued regular assessment, maintenance, and upgrades of the sewer system by the Los Angeles County Sanitation Districts would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less than significant cumulative impact.

**Stormwater:** The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above, the Project applicant would install onsite storm water drainage facilities that would convey storm water into two onsite infiltration basins along San Bernardino Road. Runoff from properties adjacent to the Project site will be directly conveyed in a culvert to the stormwater drain in San Bernardino Road. In addition, pursuant to state and regional regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and cumulative impacts related to drainage infrastructure would be less than significant.

**Solid Waste:** The geographic scope of cumulative analysis for landfill capacity is the service area for the Mid-Valley Sanitary Landfill, which serves the Project site. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. The Mid-Valley Sanitary Landfill is permitted to accept 7,500 tons per day of solid waste and is permitted to operate through April 2033. In December 2019, the facility received an average of 5,000 tons per day. Thus, the facility had additional capacity of 2,500 tons per day (CalRecycle). The 0.29 tons of solid waste per day from operation of the Project would represent approximately 0.01 percent of Mid-Valley Sanitary Landfill's daily remaining capacity. Therefore, the landfill would have sufficient capacity to serve the Project and the increase in solid waste from full buildout of the Project. Cumulative impacts would be less than significant.

#### **Utilities and Service Systems Mitigation Measures**

**MM UT-1: Sewer Fees.** Prior to the issuance of building permits, per the Will Serve Letter dated December 3, 2020, the project applicant shall pay all applicable in-lieu sewer upgrade fees to the City of West Covina.

#### **Wildfire**

**WF-1 If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

As discussed in the Initial Study, included as Appendix A herein, the Project is located within an urban developed area and is not located within an identified wildland fire hazard area. Additionally, the Project would not contain any emergency facilities, nor does it serve as an emergency evacuation route. Implementation of the proposed Project would be required to adhere to the following chapters of the Los Angeles County Code to reduce potential fire hazards. Additionally, the Project would be in compliance with any further guidelines from the Los Angeles County Fire Department related to fire prevention and is subject to approval by the County's Building and Safety Division. Therefore, no impacts would occur.

**WF-2 If located in or near state responsibility areas of 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?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is not within an area identified as a wildland hazard area and adjacent areas to the site are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks and result in exposure of persons to pollutant concentrations from a wildfire. Therefore, no impacts would occur.

**WF-3 If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the Project require the installation or maintenance of associated infrastructures (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 or the environment?**

As discussed in the Initial Study, included as Appendix A herein, the Project site is not within a wildland hazard area, and development of the Project does not include infrastructure that would exacerbate fire risks. The Project site is located within an urban setting and wildfire risks would not occur.

**WF-4 If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the Project expose people or structures to significant risks, including downslope or downstream floodings or landslides, as a result of runoff, poste-fire slope instability, or drainage changes?**

As discussed in the Initial Study, included as Appendix A herein, and as described in the responses above, the Project site is not located within an area identified as a wildland hazard area. In addition, the site is located in a flat area that does not contain large slopes. Thus, the Project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires. Therefore, no impacts would occur.

**WF-5 If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

As discussed in the Initial Study, included as Appendix A herein, and as described in the responses above, the Project is not within a wildland hazard area. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires and no impacts would occur.

**Cumulative Wildfire**

As discussed in Impacts WF-1 through WF-5, above, the Project would not result in impacts related to wildfire. Therefore, there is no potential for the Project to combine with impacts from other projects to result in cumulative impacts related to wildfire.

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## 7.0 Alternatives

This section addresses alternatives to the proposed Project and describes the rationale for including them in the Draft EIR. The section also discusses the environmental impacts associated with each alternative and compares the relative impacts of each alternative to those of the proposed Project. In addition, this section describes the extent to which each alternative meets the Project objectives.

### 7.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the Project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are potentially feasible and which are necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (CEQA Guidelines Section 15364).

Based on the CEQA requirements described above, the alternatives addressed in this Draft EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and

- The requirement of the *CEQA Guidelines* to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (*CEQA Guidelines* Section 15126.6(e)).

Neither the CEQA statute, the *CEQA Guidelines*, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, “the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice” (*CEQA Guidelines* 15126(f)).

## 7.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of implementation of the proposed Project, the significant impacts must be considered, although it is recognized that alternatives aimed at reducing the significant and unavoidable impacts would also avoid or reduce impacts that were found to be less than significant or reduced to below a level of significance with implementation of mitigation measures. The analysis in Chapter 5 and Chapter 6 of this Draft EIR determined that impacts related to the following would remain significant and unavoidable or require mitigation to reduce impacts to a less than significant level.

### Biological Resources

As detailed in Section 6.4, the proposed Project has the potential to impact active bird nests or bat roosts if vegetation and trees are removed during the nesting season. Implementation of Mitigation Measures BIO-1 (Special-Status Roosting Bats), BIO-2 (Bat Relocation), and BIO-3 (Nesting Birds) would ensure compliance with federal and State regulations and would require a roosting bat and nesting bird survey to be conducted prior to the commencement of construction during roosting and nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.

### Cultural Resources

As detailed in Section 6.4, Project grading and excavation would remove and recompact the loose alluvium that currently underlies the upper three (3) feet of soil. As the Project site has a low to moderate level of sensitivity for archaeological resources and the site has been previously disturbed, the Cultural Resources Assessment (Appendix D) determined that Mitigation Measure CUL-1 (Archaeological Monitoring) shall be included to require retention of an archaeologist for monitoring during initial grubbing and scraping and provide spot check throughout project ground disturbing activities. With implementation of Mitigation Measure CUL-1, impacts to cultural resources would be less than significant.

The Paleontological Resource Survey determined that shallow excavation ( $\leq 15$  feet) in the Project site is unlikely to impact paleontological resources (Appendix F). However, in the event paleontological resources are incidentally discovered during the construction process, Mitigation Measure CUL-2 (Paleontological Incidental Discoveries) is included to require retention of a paleontological resource specialist to evaluate the incidental discovery. With implementation of Mitigation Measure CUL-2, impacts to paleontological resources would be less than significant.

There are no records of human remains on the Project site. In the event that human remains are encountered on the Project site, the Project applicant would be required to halt all development activities and comply with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 and contact the Los Angeles County Coroner. Through mandatory compliance with California Health and Safety

Code Section 7050.5 and Public Resources Code Section 5097.98, included as Mitigation Measure CUL-3 (Human Remains), any potential impacts to disturbing human remains, including remains of Native American ancestry, would be less than significant.

### **Hazards and Hazardous Materials**

As detailed in Section 6.4, historically, the property and surrounding properties were occupied by orchard land from at least 1928 until at least 1952. The Phase II ESA testing identified arsenic in soils samples at concentrations higher than the residential RSLs established by the EPA. The Phase II ESA describes that excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. As described in Section 3, Air Quality, standard dust mitigation measures (pursuant to AQMD Rule 403) would be implemented during all soil handling activities, which would be implemented through the County's construction permitting process. With implementation of MM HAZ-1 and MM HAZ-2, impacts related to the disposal or accidental release of contaminants in soils would be less than significant. The existing Hazardous Waste Management infrastructure in the County is inadequate to handle the hazardous waste currently being generated throughout the County. Therefore, operation of the proposed Project may generate household hazardous wastes that would adversely impact Hazardous Waste Management infrastructure. As such, Mitigation Measure HAZ-3 has been included to require provision of education materials on the proper management and disposal of household hazardous waste to homeowners. With implementation of MM HAZ-3, operational impacts related to routine transport, use, disposal, or accidental release of hazardous materials during operation of the Project would be less than significant.

### **Noise**

As detailed in Section 6.4, the Noise Impact Analysis, included as Appendix K, analyzed noise construction noise against the County's mobile equipment threshold of 75 dBA at the nearby single-family homes. Mobile construction equipment would result in noise levels ranging from 71 to 73 dBA equivalent sound level (Leq) at the sensitive receptors west and east of the Project site; 64 to 66 dBA Leq at the single-family homes to the north of the Project site; and 63 to 65 dBA Leq at the single-family homes south of the Project site, all of which would be lower than the County's mobile equipment threshold of 75 dBA Leq. Mobile construction-related noise would exceed the existing ambient noise by up to 5.4 dBA at the single-family homes on the east and west sides of the Project site. As such, mobile construction equipment activities would create an exceedance of the plus 5 dBA above ambient threshold at the single-family homes located on the west and east sides of the Project site. Stationary construction equipment would result in noise levels ranging from 64 to 68 dBA Leq at distances of 100 feet from the nearest single-family residences, which would result in an increase of 1.4 dBA above ambient, 60 to 64 dBA Leq at distances of 160 feet from the nearest single-family residences, which would be 3.6 dBA less than ambient, and 56 to 60 dBA Leq at distances of 230 feet from the nearest single-family residences, which would be 7.6 dBA less than ambient. Therefore, operation of stationary construction equipment within 100 feet from the nearby homes would exceed the County's stationary equipment threshold of 60 dBA by as much as 8 dBA. Therefore, Mitigation Measure NOI-1 is included to require a minimum of 8-foot-high temporary sound blanket or wall along the east or west property lines prior to the start of grading. With implementation of Mitigation Measure NOI-1, impacts related to mobile and stationary construction noise would be less than significant.

Based on typical propagation rates, the vibration level at the nearest sensitive receptors (2 feet away from the proposed Project) would be 1.43 inch per second PPV, which would exceed the Caltrans distinctly perceptible vibration level of 0.25 inch per second PPV for transient sources. Mitigation Measure NOI-2 is

provided to restrict any off-road equipment with 150 horsepower engine or greater from operating within 10 feet of either the east or west property lines. Based on typical propagation rates, the vibration level at the nearest homes (12 feet away from proposed construction activities with implementation of Mitigation Measure NOI-2) would be 0.03 inch per second PPV, which is within the 0.25 inch per second PPV threshold. Therefore, with implementation of Mitigation Measure NOI-2, construction-related vibration impacts would be less than significant.

### **Tribal Cultural Resources**

As detailed in Section 6.4, the Gabrieleno Band of Mission Indians-Kizh Nation considers the area sensitive for cultural resources as several sites are located nearby. As such, the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction. With implementation of Mitigation Measures TCR-1 (Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities), TCR-2 (Unanticipated Discovery of Human Remains and Associated Funerary Object) and TCR-3 (Procedures for Burials and Funerary Remains), which require Native American monitoring and procedures for unanticipated discoveries, impacts to tribal cultural resources would be less than significant.

### **Utilities and Service Systems**

As detailed in Section 6.4, per the sewer will serve letter for the Project, dated August 14, 2020, from the Los Angeles County Sanitation District, Districts has capacity to serve the Project. Per the City of West Covina's Sewer Outlet Approval Letter, dated December 3, 2020, the Project applicant would be required to pay in-lieu fees due to the City's 8-inch sewer in East San Bernardino Road being over-capacity; this sewer line will service the Project. As such, Mitigation Measure UT-1 is included to require the Project applicant to pay all applicable in-lieu fees to the City of West Covina, as set forth in the fee program in West Covina Municipal Code Section 17-208. Thus, with payment of in-lieu fees to the City of West Covina, which would be utilized to upgrade the sewer line in East San Bernardino Road, impacts would be less than significant.

### **Transportation**

As detailed, in Section 5.1, *Transportation*, baseline Project generated vehicle miles traveled (VMT) exceeds the County's baseline VMT threshold by 48.04%. Transportation demand management (TDM) strategies have been evaluated for reducing VMT impacts determined to be potentially significant. The Project could reduce 79 VMT from the Project site under CAPCOA's recommended measures and an additional 775.1 VMT from market derived data beyond CAPCOA. In total the 854.1 VMT reduction does not reduce the Project VMT below the County's significance threshold. Therefore, with the implementation of the proposed TDM measures, which are included as PDF TR-1, PDF TR-2, and PDF TR-3, and MM TR-1, baseline Project generated VMT would not be reduced to a less than significant level. As such, impacts are significant and unavoidable.

Thus, this alternatives analysis is focused on the ability to reduce vehicle miles traveled. In addition, this alternative analysis is focused on reducing the need for mitigation. The alternative that would reduce the significant and unavoidable impacts and would require the least mitigation is considered the environmentally superior alternative. The proposed Project would require mitigation related to the following: cultural resources, paleontological resources, hazards and hazardous materials, noise, transportation, tribal cultural resources, and utilities and service systems. In addition, this alternatives analysis evaluates the potential of the alternative(s) to meet the Project objectives pursuant to the requirements of the CEQA Guidelines described previously.

## **7.3 PROJECT OBJECTIVES**

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.



- Provide for additional market-rate housing opportunities consistent with the County's Housing Element and State housing goals.
- Develop a Project that constructs new single-family residential units, which would help meet the region's demand for housing.
- Redevelop existing land uses that would utilize existing infrastructure, including: water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.
- Redevelop an infill site to minimize environmental impacts.
- Ensure new residential development includes adequate open space and high-quality recreational amenities for future residents;
- Eliminate potential nuisances at a vacant site through redevelopment;
- Provide a new single-family residential neighborhood that is scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.

## 7.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

- **Alternate Site Alternative:** An alternate site for the proposed Project was eliminated from further consideration based on the lack of adequate alternate sites. The Project site is underutilized in the existing condition. The Project objectives are to redevelop an existing underutilized parcel and implement new single-family housing near employment and utilize existing infrastructure, all of which are consistent with the opportunities provided by the Project site. In addition, due to the urban and built out nature of the County of Los Angeles, development of 68 detached residential condominium units and common open space areas on another large site at a different location would likely require demolition of existing structures, require similar mitigation, and have similar impacts as the proposed Project. Furthermore, development of the Project on a vacant site of similar size would likely be located further from job centers and would increase VMT as few large sites are available for infill development within the County of Los Angeles. CEQA specifies that the key question regarding alternative site consideration is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location." Given the size and nature of the proposed Project and the Project objectives, it would be infeasible to develop and operate the Project on an alternative site with fewer environmental impacts. Therefore, the Alternative Site Alternative was rejected from further consideration.
- **Renovation of Existing Griswold School Buildings Alternative:** Renovation of the existing onsite buildings was eliminated from further consideration. Since the time of the publication of the NOP for the Draft EIR, the school buildings were damaged in a fire. As a result, the school buildings were demolished to eliminate public health and safety hazards related to the unsafe condition of the school buildings. Pursuant to State CEQA Guidelines Section 15125, the environmental baseline for the Draft EIR is generally defined as February 1, 2022, the date the NOP was published. As of this date, the school buildings were vacant but intact. As such, the Draft EIR environmental baseline condition assumes the school buildings as vacant but intact. Renovation and reopening of the existing

Griswold School as a school campus would likely require extensive renovations or reconstruction of school buildings (as they existed as of February 1, 2022), which would require similar mitigation, and have similar impacts as the proposed Project. Furthermore, this alternative would not meet any of the Project objectives and would not supply housing in Los Angeles County. Therefore, the Reuse of Existing Griswold School Buildings Alternative was rejected from further consideration.

## 7.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

In addition to the No Project Alternative, two alternatives to the proposed Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the objectives of the Project, may avoid or substantially lessen any of the significant effects of the proposed Project, and are feasible from a development perspective. These alternatives have been developed based on the criteria identified in Section 7.1, and are described below:

**Alternative 1: No Project/No Build.** Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Therefore, under this alternative, no development would occur on the Project site, and it would remain in its existing condition with six existing school buildings, paved recreational areas, parking lots, and patio areas. However, as described in Section 4.2, the existing school buildings have been vacant for approximately 3 years and are significantly deteriorated. Therefore, it is reasonable to assume that the Project site would remain underutilized in the long-term. Thus, in the No Project/No Build condition it is reasonably expected that the school buildings are not reoccupied. Hence, this alternative compares impacts of the proposed Project with existing site conditions.

**Alternative 2: Reduced Project Alternative.** Under this alternative, a reduction in the number of residential units would be built, which would result in increased setbacks, larger lots, and additional open space. The Project site has a General Plan land use designation of Public and Semi-Public (P) and a zoning designation of Light Agricultural (A-1-6000). This allows for development of single-family residences on lots that have a minimum of 6,000 square feet. This alternative would develop 11 single-family residences, which would be developed on individual lots and result in a density of 1.14 dwelling units per acre. The buildout of the site at a decreased density would result in 57 fewer residential units than the proposed Project. Onsite recreational amenities would be increased to approximately 7.6 acres.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval but would likely not require a Conditional Use Permit for grading in excess of 100,000 cubic yards.

Like the proposed Project, this alternative would not require a General Plan Amendment from the existing land use designation of P (Public and Semi-Public), or a Zone change from A-1-6,000 (Light Agricultural) designation.

**Alternative 3: Buildout of Existing Land Use and Zoning Alternative.** Under this alternative, the Project site would be developed to the maximum allowable density pursuant to the Los Angeles County General Plan and would result in a density of 8.9 dwelling units per acre. An increase in the number of residential units would be built, which would result in decreased setbacks, smaller lots, and 19,645 square feet less open space for a total of 78,578 square feet of recreational amenities and open space. This alternative

would consist of developing 85 multi-family residential units. The buildout of the site at an increased density would result in 17 more residential units than the proposed Project.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval and would likely require a Conditional Use Permit for grading in excess of 100,000 cubic yards. Like the proposed Project, this alternative would not require a General Plan Amendment from the existing land use designation of P (Public and Semi-Public), or a Zone change from A-1-6,000 (Light Agricultural) designation.

## 7.6 ALTERNATIVE 1: NO PROJECT/NO BUILD

Under this alternative, the proposed Project would not be approved, and no development would occur. The existing three industrial buildings would remain. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." In addition, the no project includes what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under this alternative, no development would occur on the Project site, and it would remain in its existing condition with six existing school buildings, paved recreational areas, parking lots, and patio areas. However, as described in Section 4.2, the existing school buildings have been vacant for approximately 3 years and are significantly deteriorated. Therefore, it is reasonable to assume that the Project site would remain underutilized and vacant in the long-term. Thus, under this alternative, it is reasonably expected that the school buildings are not reoccupied. Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the proposed Project in contrast to the result from not approving, or denying, the proposed Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

### 7.6.1 ENVIRONMENTAL IMPACTS

#### **Aesthetics**

The No Project/No Build Alternative would maintain the existing school character of the Project site. As described in the Initial Study, included as Appendix A, in Section 1, *Aesthetics*, the Project site is developed with six permanent buildings: three classroom buildings, an administration building, a cafeteria, and a library, a parking area, and a playground. All six of the buildings are one-story in height and most of the buildings are boarded up. The vegetation on site consists of a grass area on the northern portion of the site, which is regularly mowed, and some ornamental trees scattered throughout the site.

As discussed in Section 5 of the Initial Study, the exteriors of the buildings possess characteristics of the Mid-Century Modern style. The six rectangular buildings are connected by covered walkways. The primary materials throughout the buildings are concrete, sprayed-on stucco, metal window walls, metal louvered vents and brise soleil, and wood and metal slab doors.

In comparison to the proposed Project, the No Project/No Build Alternative would not increase the building density or change the character of the site from one of institutional school uses to residential development. This alternative would not result in a change in the visual height, scale, and mass of the development on the site. The existing grass area and playground at the northern portion of the site would remain. However, the landscaping on the Project site would not be improved, and the site would not be redeveloped to be

consistent with surrounding residential development. Overall, the No Project/No Build Alternative would not develop residential structures on the Project site and views of the Project site would not change. In addition, lighting and glare would not increase and would remain the same as existing conditions.

### **Agricultural and Forestry Resources**

The No Project/No Build Alternative would retain the existing school character of the site. As discussed in Section 3.0, *Project Description*, the Project site has a zoning designation of Light Agriculture (A-1-6000). According to Chapter 22.16 of Los Angeles County Code, Agricultural Zones (Zones A-1 and A-2) allows for single-family residential development, outdoor recreational uses, and public and institutional facilities. However, the site is not designated as Farmland and has not recently been used for agricultural activities. Additionally, there are no forestry or timberland resources within the Project vicinity. As such, both the No Project/No Build Alternative and proposed Project would result in the same level of less than significant impacts to agricultural resources and no impacts to forestry resources.

### **Air Quality**

Under the No Project/No Build Alternative, the existing onsite buildings would remain onsite and likely would remain vacant. There would be no construction emissions under the No Project/No Build Alternative as no construction would occur onsite. Due to the fact that the existing buildings are heavily deteriorated, the site would likely remain vacant, and no regular operations would occur onsite. As such, the alternative would result in significantly lowered emissions in comparison to the air quality emissions from the proposed Project. Although the proposed Project's emissions would be less than the South Coast Air Quality Management District's (SCAQMD) thresholds and would be less than significant, the No Project/No Build Alternative would generate less impacts to air quality.

### **Biological Resources**

Under the No Project/No Build Alternative, the ornamental trees and vegetation onsite would not be disturbed and would remain in its existing conditions. There would be no potential impacts to nesting birds or roosting bats as the trees and buildings would remain onsite and would not require any removal. Although mitigation measures required of the Project would reduce biological resource impacts to less than significant levels, the No Project/No Build Alternative would generate less impacts to biological resources as compared with the Project and would not require mitigation.

### **Cultural Resources**

Under the No Project/No Build Alternative, no grading would occur and there would be no potential impacts to unknown archaeological resources and paleontological resources that may be buried below ground. The existing conditions would remain, and no construction, including ground disturbing activities, would occur onsite. Although mitigation measures required for the Project would reduce cultural impacts to less than significant levels, the No Project/No Build Alternative would avoid impacts to cultural resources associated with the Project and would not require mitigation.

### **Energy**

Under the No Project/No Build Alternative, the existing onsite buildings would remain onsite and likely would remain vacant. There would be no construction emissions under the No Project/No Build Alternative as no construction would occur onsite. Due to the fact that the existing buildings are heavily deteriorated, the site would likely remain vacant, and no regular operations would occur onsite. As such, the alternative would result in significantly lower energy use in comparison to the energy use associated with the proposed Project. Although the proposed Project's energy use would be less than significant, the No Project/No Build Alternative would generate less impacts to energy.

**Geology and Soils**

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. This alternative would not result in the development of any residences, which would be required to comply with the CBC to ensure impacts related to seismicity are reduced. Thus, impacts under the No Project/No Build Alternative would be reduced compared to the less than significant impacts of the proposed Project.

**Greenhouse Gas Emissions**

Under the No Project/No Build Alternative, the existing onsite buildings would remain onsite and likely would remain vacant. There would be no construction greenhouse gas (GHG) emissions under the No Project/No Build Alternative as no construction would occur onsite. Due to the fact that the existing buildings are heavily deteriorated, the site would likely remain vacant, and no regular operations would occur onsite. As such, the alternative would result in significantly lowered GHG emissions in comparison to the emissions from the proposed Project. Although the proposed Project's emissions would be less than the SCAQMD thresholds and would be less than significant, the No Project/No Build Alternative would generate less impacts to greenhouse gas emissions.

**Hazards and Hazardous Materials**

As discussed in Section 9, *Hazards and Hazardous Materials*, of the Initial Study (Appendix A), the proposed Project would require excavation and disposal of soils contaminated with arsenic. Excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. Additionally, Mitigation Measure HAZ-2 required for the proposed Project, is included to require the developer to provide new homeowners with educational materials on the proper management and disposal of household hazardous waste. The No Project/No Build Alternative would not require these mitigation measures because the existing onsite contaminated soils would remain in place, no construction would occur, and no residences would be developed. Thus, potential impacts related to removal and disposal of contaminated soils and the addition of hazardous materials within the proposed residences would be avoided by the No Project/No Build Alternative.

**Hydrology and Water Quality**

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under the No Project/No Build Alternative because no new development would occur which would result in off-site flooding or erosion. This alternative would not introduce new sources of water pollutants from either construction on the site or new operations on the site, because no new development would occur. However, this alternative would not include installation of new low-impact development (LID), source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would occur under the proposed Project. The storm water leaving the site would not be filtered and would continue to contain sediment and other potential pollutants associated with the existing conditions of the site. Therefore, the No Project/No Build Alternative would reduce impacts to hydrology and water quality that would occur from the proposed Project. However, the beneficial drainage improvements would not occur. Overall, hydrology and water quality impacts would be less than significant, but greater than the impacts related to the proposed Project.

**Land Use and Planning**

The Project site has a County General Plan designation of Public and Semi-Public (P) and is zoned A-1-6000. No General Plan Amendments or zone change would be required to allow for the development of the

proposed Project as it would be consistent with the existing General Plan designation and zoning. Development of the site for 68 detached residential condominium units would conform with normal current and historic growth patterns of the region and would integrate into the planned development of the adjacent and nearby areas. The site would also provide both vehicular and pedestrian access and would include off-site improvements along San Bernardino Avenue including sidewalks to increase walkability.

The No Project/No Build Alternative would maintain the existing conditions on the Project site. No impacts related to land use and planning would occur by retention of the existing onsite uses. However, this alternative would not include the proposed improvements along San Bernardino Road as included in the proposed Project. Overall, land use impacts related to the No Project/No Build would be less than the Project.

### **Mineral Resources**

The No Project/No Build Alternative would retain the existing school character of the site. As discussed in the Initial Study in Section 12, *Mineral Resources*, the site is designated as mineral resource zones MRZ-2 and MRZ-3. However, the site has not recently or historically been used for mineral resource extraction. As such, both the No Project/No Build Alternative and proposed Project would result in the same level of less than significant impacts to mineral resources.

### **Noise**

The No Project/No Build Alternative would not generate noise sources as vehicle trips to and from the site would not occur most days. In addition, this alternative would not involve exterior construction related to noise and vibration as the vacant Project site would remain in place. As such, the alternative would not require Mitigation Measures NOI-1 and NOI-2 to reduce impacts related to construction noise and vibration. Additionally, this alternative would not generate a residential population that could be impacted by roadway and railway noise sources. As a result, the No Project/No Build Alternative would avoid potential impacts related to noise and would not generate any noise. Thus, impacts related to noise would be less than the proposed Project.

### **Population and Housing**

The No Project/No Build Alternative would maintain the existing conditions on the Project site. The alternative would not generate the potential residential population increase of approximately 262 residents that would occur with development of the proposed 68 detached residential condominium units. No impacts related to population growth would occur by retention of the existing onsite uses. However, this alternative would not provide additional housing that would be within the projected housing growth in Los Angeles County. Overall, population and housing impacts related to the No Project/No Build would be less than the Project.

### **Public Services**

The No Project/No Build Alternative would maintain the existing conditions on the Project site. The alternative would not generate the potential residential population increase of approximately 262 residents that would result in an increased demand on public services such as fire protection, sheriff protection, school services, parks, or libraries. No impacts related to public services would occur by retention of the existing onsite uses. Overall, public services impacts related to the No Project/No Build would be less than the Project.

### **Recreation**

The No Project/No Build Alternative would maintain the existing conditions on the Project site. The alternative would not generate the potential residential population increase of approximately 262 residents that would result in an increased demand on recreational facilities. No impacts related to recreational facilities would occur by retention of the existing onsite uses. However, this alternative would not provide 35,780 square

feet of recreational amenities, 62,443 square feet of designated common open space, and 72,719 square feet of private open space within the Project site. Overall, recreation impacts related to the No Project/No Build would be less than the Project.

### **Transportation**

As described in Section 5.1, *Transportation*, the proposed Project would result in an increase of 50 a.m. peak hour trips and 67 p.m. peak hour trips. Baseline Project generated VMT exceeds the County's baseline VMT threshold by 48.04%. Even with implementation of the limited feasible TDM measures as discussed above, a potential reduction in Project VMT of a global maximum of 15.0% would not achieve the County's target threshold of 16.8% below current baseline HB VMT per capita. Therefore, with the implementation of the proposed TDM measures, which are included as PDF TR-1 and PDF TR-2, and MM TR-1 through MM TR-3, baseline project generated VMT would not be reduced to a less than significant level. As such, impacts are significant and unavoidable.

As the No Project/No Build Alternative would result in extremely limited vehicle trips to the site and the buildings would remain vacant, the alternative would not result in significant impacts to VMT or the circulation system. Thus, potential impacts to transportation under the No Project/No Build Alternative would be less than the proposed Project.

### **Tribal Cultural Resources**

The proposed Project involves construction that could result in inadvertent impacts to unknown buried tribal cultural resources. Therefore, the Project requires mitigation to reduce the potential impacts to these resources that could occur during construction. However, the No Project/No Build Alternative would not involve ground disturbance; no excavation or grading would occur. Hence, this alternative would not have the potential to impact unknown buried tribal cultural resources and mitigation is not required. Thus, potential impacts to tribal cultural resources under the No Project/No Build Alternative would be less than the proposed Project.

### **Utilities and Service Systems**

The No Project/No Build Alternative would maintain the existing conditions on the Project site. The alternative would not generate the increase of 68 residences and potential residential increase of approximately 262 residents that would result in an increased demand on utilities and service systems. No impacts related to utilities and service systems would occur by retention of the existing onsite uses as the site does not currently generate wastewater or solid waste and does not have a significant water demand. However, the beneficial drainage improvements would not occur that serve to reduce stormwater generation. Additionally, this alternative would not require Mitigation Measure UT-1 to ensure payment of in-lieu sewer upgrade fees to the City of West Covina. Overall, utilities and public services impacts related to the No Project/No Build would be less than the Project.

### **Wildfire**

The No Project/No Build Alternative would retain the existing school character of the site. As discussed in the Initial Study in Section 20, *Wildfire*, the site is located in an urban setting and is not in an area designated as a fire hazard severity zone. As such, both the No Project/No Build Alternative and proposed Project would result in no impacts related to wildfire.

## **7.6.2 CONCLUSION**

### **Ability to Reduce Impacts**

The No Project/No Build Alternative would result in the continued vacancy of the existing school buildings within the Project site. As a result, the No Project/No Build Alternative would avoid the significant and unavoidable transportation impacts that would occur from the Project and all of the potential construction

impacts. Additionally, operational impacts would be reduced and the mitigation measures that are identified in Chapters 5.0 and 6.0 of this EIR and within the Initial Study would not be required, which include measures related to biological resources, cultural resources, paleontological resources, hazards and hazardous materials, transportation, tribal cultural resources, and utilities. However, the environmental benefits of the Project would also not be realized, such as improvements to storm water quality and provision of needed housing within Los Angeles County. The No Project/No Build Alternative would not install storm water filtration features in accordance with LID design guidelines that would filter and slow the volume and rate of runoff; and this alternative would not provide additional needed housing to meeting the regions housing demands.

#### **Ability to Achieve Project Objectives**

As shown in Table 7-3, the No Project/ No Build Alternative would not meet any of the Project objectives. The site would not be redeveloped to provide housing to help meet the region's demand for housing, would not provide a development consistent with surrounding residential densities, would not develop housing to assist the County in meeting its housing needs, and would not redevelop an underutilized site,. Overall, this alternative would not meet any of the objectives of the proposed Project.

## **7.7 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE**

Under this alternative, the number of residences would be reduced, which would result in increased setbacks and increased recreational area. The Project site has a General Plan land use designation of Public and Semi-Public (P) and a zoning designation of Light Agricultural (A-1-6000). This allows for development of single-family residences on lots that have a minimum of 6,000 square feet. This alternative would develop 11 single-family residences, which would be developed on individual lots and result in a density of 1.14 dwelling units per acre. Each individual single-family residence would be constructed on an individual 8,000 square foot lot. The buildout of the site at a decreased density would result in 57 fewer residential units than the proposed Project.

To support the Reduced Project Alternative, parking spaces would be provided at the same rate as the proposed Project at 2.63 spaces per dwelling unit. The Reduced Project Alternative would include 29 parking spaces, including 22 garage spaces. Under the Reduced Project Alternative, the recreational amenities would be increased to 7.6 acres.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval but would likely not require a Conditional Use Permit for grading in excess of 100,000 cubic yards. Like the proposed Project, this alternative would not require a General Plan Amendment from the existing land use designation of P (Public and Semi-Public) or a Zone change from A-1-6000 (Light Agricultural) designation.

### **7.7.1 ENVIRONMENTAL IMPACTS**

#### **Aesthetics**

The Reduced Project Alternative would result in a single-family residential development that would be lower in visual density than the proposed Project. Views of the Project site would change from views of 68 detached residential condominium units to that of 11 large lot single-family residences. Additionally, the Alternative would provide for further visual buffering from public viewpoints due to the increased landscaping and recreational areas.

While the Reduced Project Alternative would be less dense than surrounding residential areas, the Reduced Project Alternative would have a residential character that is generally consistent with the proposed Project and would be visually compatible with the existing and future built environment in the Project area. Section



1, *Aesthetics*, of the Initial Study describes that development surrounding the Project site consists of single-story and two-story homes at a density of up to nine dwelling units per acre, which would also be consistent with the visual character of this alternative.

Overall, views of the Project site would be visually less dense with implementation of the Reduced Project Alternative. However, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts related to visual character and quality.

Additionally, both the proposed Project and the Reduced Project Alternative would introduce additional sources of light and glare that would result in similar less than significant impacts with implementation of the County Code lighting regulations that require lights to be directed and shielded away from adjacent land uses to prevent light from shining onto adjacent properties. In addition, exterior building materials would consist of stucco, wood, stone veneer, and other similar materials that do not have highly reflective surfaces. Therefore, lighting and glare related impacts would be similar and less than significant under both the proposed Project and the Reduced Project Alternative.

### **Agricultural and Forestry Resources**

The Reduced Project Alternative would demolish the existing school and construct 11 single-family residences. As discussed in Section 3.0, *Project Description*, the Project site has a zoning designation of Light Agriculture (A-1-6000). According to Chapter 22.16 of Los Angeles County Code, Agricultural Zones (Zones A-1 and A-2) allows for single-family residential development, outdoor recreational uses, and public and institutional facilities. However, the site is not designated as Farmland and has not recently been used for agricultural activities. Additionally, there are no forestry or timberland resources within the Project vicinity. As such, both the Reduced Project Alternative and proposed Project would result in the same level of less than significant impacts to agricultural resources and no impacts to forestry resources.

### **Air Quality**

Under the Reduced Project Alternative, the 9.61-acre site would be developed with 11 large lot single-family residences. The Reduced Project Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction-related air quality emissions. However, the demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases would include the entire site; and therefore, would have the same level of maximum daily emissions, which were determined to be less than significant, as detailed in Section 3, *Air Quality*, of the Initial Study. Thus, like the proposed Project, the Reduced Project Alternative would result in less than significant construction impacts related to air quality.

As detailed in Table AQ-2 of the Initial Study, operation of the Project would result in 4.46 lbs/day of VOC emissions, 4.74 lbs/day of NO<sub>x</sub>, 18.52 lbs/day of CO, 0.05 lbs/day of SO<sub>x</sub>, 3.90 lbs/day of PM<sub>10</sub>, and 1.12 lbs/day of PM<sub>2.5</sub>, which are below their respective SCAQMD thresholds. However, as detailed in Table 7-1 below, the Reduced Project Alternative would result in 538 fewer daily vehicular trips than the proposed Project, resulting in fewer vehicular emissions. In addition, the Reduced Project Alternative would include 57 fewer residential units. This reduction in residential units and daily vehicular trips would result in a reduction of pollutant emissions. Thus, daily operational emissions from the Reduced Project Alternative would not exceed SCAQMD thresholds and would result in less than significant operational air quality impacts. Therefore, the Reduced Project Alternative would generate less overall air quality emissions than the proposed Project.

**Biological Resources**

Under the Reduced Project Alternative, the 9.61-acre site would be developed with 11 residential units. As with the proposed Project, development of this alternative would also require removal of existing vegetation and trees and would require implementation of mitigation measures MM BIO-1 through MM BIO-3. As such, the impacts to biological resources would be reduced under the proposed Project and Reduced Project to less than significant with mitigation. Overall, impacts to biological resources from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

**Cultural Resources**

The Reduced Project would develop fewer residential units than the proposed Project but would require the same site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project. Therefore, similar to the proposed Project, this alternative would require MM CUL-1 to avoid impacts to cultural resources by requiring archaeological monitoring. Additionally, MM CUL-2 would be required to reduce impacts to paleontological resources should any be incidentally discovered. As such, the impacts to cultural resources would be reduced under the proposed Project and Reduced Project to less than significant with mitigation. Overall, impacts to cultural resources from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

**Energy**

The Reduced Project Alternative would redevelop the Project site to provide 11 single-family residences that would require energy supplies. Like the proposed Project, the Reduced Project Alternative would be developed in compliance with the Calgreen/Title 24 requirements related to energy and would include similar features to reduce energy consumptions, such as solar panels. As described in Section 4, *Energy*, of the Initial Study, the proposed Project would not use large amounts of energy or fuel in a wasteful manner. Because the Reduced Project Alternative would result in 57 fewer residences and would implement the same energy efficient infrastructure, this alternative would demand less energy. However, both impacts of the proposed Project and the Reduced Project Alternative would not use large amounts of energy or fuel in a wasteful or inefficient manner and impacts in both conditions would be less than significant.

**Geology and Soils**

Grading and development of the entire 9.61-acre site would still occur under the Reduced Project Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. The alternative would still result in additional persons and structures on the Project site that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, this alternative would be required to meet the same regulatory requirements as the proposed Project. Overall, impacts to geology and soils from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

**Greenhouse Gas Emissions**

The Reduced Project Alternative would reduce the amount and length of construction activities compared to the proposed Project, which in turn would result in less overall construction related GHG emissions. In addition, the Reduced Project Alternative would generate fewer emissions from operation of residential units because 57 fewer residences would be developed compared to the proposed Project. The Reduced Project Alternative would also result in 538 fewer daily vehicular trips and fewer VMT. Therefore, the Reduced Project Alternative would generate less GHG emissions than the proposed Project.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 898.44 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) per year (as shown in Table GHG-1 of the Initial Study). Under the Reduced Intensity Alternative GHG emissions would be approximately 80 percent less,

which would be approximately 179.69 metric tons of CO<sub>2</sub>e per year. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. Similar to the proposed Project, the Reduced Project Alternative would be consistent with the Los Angeles County Community Climate Action Plan (CCAP), the California Air Resources Board 2022 Scoping Plan Update, and the Southern California Association of Government's (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the Reduced Project Alternative would generate less overall GHG emissions than the proposed Project.

### **Hazards and Hazardous Materials**

As discussed in Section 9, *Hazards and Hazardous Materials*, of the Initial Study (Appendix A), the proposed Project would require excavation and disposal of soils contaminated with arsenic. Excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. Additionally, Mitigation Measure HAZ-3 is required for the proposed Project to provide new homeowners with educational materials on the proper management and disposal of household hazardous waste. The Reduced Project Alternative would also require this mitigation because construction would occur over the whole site in order to construct the 11 homes and recreational amenities. Overall, impacts to hazards and hazardous materials from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

### **Hydrology and Water Quality**

The Reduced Project Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, this alternative would also implement standard BMPs through the County's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project. Therefore, construction related hydrology and water quality impacts from the Project and Reduced Project Alternative would be similar to those of the proposed Project.

The Reduced Project Alternative is proposed to include fewer units to the acre and would result in a reduction of the total area of impervious surfaces compared to the proposed Project. However, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project. Therefore, the proposed Project and Reduced Project Alternative would result in less than significant impacts to hydrology and water quality.

### **Land Use and Planning**

The proposed Project and Reduced Project Alternative would implement single-family housing on the Project site and would not require a General Plan Amendment or Zoning Change. Similar to the proposed Project, this alternative would provide the residential land uses that would integrate into the planned development of the adjacent areas. However, the reduced development would provide fewer housing opportunities within the region as it would reduce the proposed Project by 57 residences, or 80 percent. This alternative would develop single-family residences similar to the proposed Project. Therefore, this alternative would be consistent with the SCAG RTP/SCS, County's Policy Plan, and zoning code. Overall, impacts to land use and planning from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

**Mineral Resources**

The Reduced Project Alternative would develop the Project site with 11 single-family residences. As discussed in the Initial Study in Section 12, *Mineral Resources*, the site is designated as mineral resource zones MRZ-2 and MRZ-3. However, the site has not recently or historically been used for mineral resource extraction. As such, both the Reduced Project Alternative and the proposed Project would result in the same level of less than significant impacts to mineral resources.

**Noise**

The Reduced Project Alternative would result in construction noise related to development of the site and 11 residential units. Compared to the proposed Project, this alternative would reduce the length of construction, which in turn would reduce the length of construction-related noise and vibration. Construction activities would not cause excessive noise and vibration and construction would occur within the hours allowable by the County Code Section 12.08.440, which states that construction shall occur only between the hours of 7 a.m. and 7 p.m. Monday through Saturday, with no construction allowed on Sundays and Federal holidays. However, like the proposed Project, this alternative would likely require implementation of Mitigation Measures NOI-1 and NOI-2 to reduce noise and vibration from construction activities to surrounding residences. As such, the proposed Project and Reduced Project Alternative would result in less than significant impacts to construction noise and vibration.

This alternative would generate noise from vehicular trips to and from the site and operation of the residential uses, such as exterior noise and mechanical equipment. The number of vehicular trips generated by this alternative would be approximately 538 fewer than those generated by the proposed Project, as would the number of units and amount of mechanical equipment. Hence, although less than significant under the proposed Project, traffic noise and operational noise under this alternative would be reduced. As a result, the proposed Project and the Reduced Project Alternative would result in less than significant impacts to operational and traffic noise.

**Population and Housing**

The Reduced Project Alternative would reduce the number of residential units on the site by 80 percent. Thus, this alternative would develop and operate 11 single-family residential units. This would result in approximately 42 residents at full occupancy, versus the proposed Project's 262 residents at full occupancy of the proposed Project, which is a reduction of 220 residents. The reduction in residential units by the Reduced Project Alternative would be within SCAGs projected growth, like the proposed Project, but would provide less housing. Thus, both the Reduced Project Alternative and the proposed Project would result in less than significant impacts related to population and housing; however, the Reduced Project Alternative would result in a reduced beneficial impact by providing fewer housing units. Reducing the number of residential units on the Project site, as would be done by the Reduced Project Alternative would incrementally reduce the housing provided to help the County achieve housing goals.

**Public Services**

As described above, under the Reduced Project Alternative, the Project site would be redeveloped to provide 11 single-family residential units. Like the proposed Project, this alternative would install security and fire protection systems, and because a new residential population would exist on the Project, additional calls for fire and police services would occur. Likewise, the residential population would generate students that would utilize local schools. As the population size associated with the Reduced Project Alternative would also be 84 percent lower than the proposed Project, this alternative would result in a lower demand for public services, including fire, police, and schools. Because the Project would result in less than significant impacts to public services, the smaller Reduced Project Alternative would also result in less than significant impacts. Thus, overall impacts are similar.

### Recreation

The Reduced Project Alternative would increase the onsite recreational amenities to approximately 7.6 acres. The 42 residents at full occupancy would utilize the 7.6 acres of exterior open space/recreation area that would be provided by the Reduced Project Alternative. As the population size associated with the Reduced Project Alternative would be reduced by 84 percent, the alternative would provide a higher ratio of parkland acreage per resident. Also, the number of residents would be less under this alternative, it would result in an incrementally lower demand for off-site parks and recreation facilities. Therefore, both the proposed Project and the Reduced Project Alternative would result in less than significant impacts related to parks and recreation; thus, overall impacts are similar.

### Transportation

As described in Section 5.1, *Transportation*, the proposed Project would result in an increase of 50 a.m. peak hour trips and 67 p.m. peak hour trips. Project generated VMT in the year 2020 would exceed the County's 2020 VMT threshold by 48.04%. Even with implementation of the limited feasible TDM measures e, a potential reduction in Project VMT of a global maximum of 15.0% would not achieve the County's target threshold of 16.8% below current baseline HB VMT per capita.

**Table 7-1: Reduced Project Alternative Trip Generation**

		A.M. Peak Hour			P.M. Peak Hour			
Land Use	Units	In	Out	Total	In	Out	Total	Daily
Trips								
Single-Family Residential								
Trip Generation Rates <sup>1</sup>		0.19	0.56	0.74	0.62	0.37	0.99	9.44
Trip Generation	11 DU	2	6	8	7	4	11	104

1- Code 210, Single-Family Residential

Trip generation based on rates from Institute of Transportation Engineers' (ITE) Trip Generation (10th Edition)

The Reduced Project Build would result in approximately 104 daily trips, as shown in Table 7-1. Pursuant to VMT screening criteria within the County's Transportation Impact Analysis Guidelines, projects that generate fewer than 110 trips screen out of preparing a VMT analysis. As such, the Reduced Project Alternative would screen out of preparing a VMT analysis and would result in less than significant impacts to VMT. Therefore, this alternative would not result in significant impacts to VMT or the circulation system. Thus, the Reduced Project Alternative would avoid the Project's significant and unavoidable VMT impacts, would not require mitigation to reduce VMT, and impacts from the alternative would be less than the proposed Project.

### Tribal Cultural Resources

The Reduced Project Alternative would require site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project; therefore, this alternative would require implementation of Mitigation Measures TCR-1 through TCR-3 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Reduced Project Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation. Overall, impacts to tribal cultural resources from development of the Reduced Project Alternative would be consistent with those from the proposed Project.

### Utilities and Service Systems

The Reduced Project Alternative would redevelop the Project site to provide single-family residences. Like the proposed Project, this alternative would include redevelopment of the onsite utilities and install LID and CalGreen/Title 24 compliant infrastructure that would connect to the existing infrastructure adjacent to the site. However, this alternative would result in a lower demand for water supplies, wastewater treatment, and landfill capacity because 80 percent fewer residential units would be developed. As described previously, the existing off-site infrastructure is adequate and would be able to meet the service demands

of the proposed Project, with the exception of the existing water line in San Bernardino Road. Therefore, offsite infrastructure be able to meet the needs of 80 percent fewer residences. Thus, impacts to utilities and service systems would be less than significant under both the proposed Project and the Reduced Project Alternative.

**Wildfire**

The Reduced Project Alternative would reduce the number of developed residences by 80 percent. As discussed in the Initial Study in Section 20, *Wildfire*, the site is located in an urban setting and is not in an area designated as a fire hazard severity zone. As such, both the Reduced Project Alternative and proposed Project would result in no impacts related to wildfire.

## 7.7.2 CONCLUSION

**Ability to Reduce Impacts**

The Reduced Project Alternative would reduce residential density on the site by 80 percent or by 57 residential units. With fewer units, this alternative would result in reduced light and glare from fewer residential structures, reduced air quality and GHG emissions from construction and operation, reduced energy usage, and reduced operational noise from fewer residents and vehicles. While reduced, these impacts are less than significant without mitigation under both the alternative and the proposed Project. Furthermore, this alternative would require the same mitigation measures that are required for the proposed Project to reduce impacts to a less than significant level for biological resources, cultural resources, paleontological resources, hazards and hazardous materials, construction noise and vibration, tribal cultural resources, and utilities. The Reduced Project Alternative would reduce the trips generated to an extent that would result in less than significant impacts related to VMT. As such, the Reduced Project Alternative would not require the mitigation measures related to VMT and would avoid the proposed Project's significant and unavoidable VMT impacts.

**Ability to Achieve Project Objectives**

As shown in Table 7-2, the Reduced Project Alternative would meet most of the Project objectives, but not to the same extent as the proposed Project. This alternative would not meet the objective to provide housing to meet the region's need for housing to the extent that the proposed Project would because residential units are reduced by 57 units and 80 percent. Additionally, while this alternative would provide increased buffering from surrounding residences, it would be at a significantly less dense scale when compared to surrounding residential densities.

## 7.8 BUILDOUT OF EXISTING LAND USE AND ZONING ALTERNATIVE

Under the Buildout of Existing Land Use and Zoning alternative, the Project site would be developed to the maximum allowable density pursuant to the Los Angeles County General Plan and would result in a density of 8.9 dwelling units per acre. An increase in the number of residential units would be built, which would result in reduced setbacks, smaller lots, and less open space. This alternative would consist of developing 85 multi-family residential units. The buildout of the site at an increased density would result in 17 more residential units than the proposed Project.

To support the Buildout of Existing Land Use and Zoning Alternative, parking spaces would be provided at the required rate of 2 covered spaces per dwelling unit and 1 guest parking spaces per 4 units. The Reduced Project Alternative would include 29 parking spaces, including 22 garage spaces. Under the Buildout of Existing Land Use and Zoning Alternative, the recreational amenities would be reduced, and the northern

open space area would be removed in order to accommodate the additional units. Additionally, the backyard area for each home would be reduced to patio areas.

Like the proposed Project, this alternative would require a Tentative Tract Map Approval and Site Plan Approval and would likely require a Conditional Use Permit for grading in excess of 100,000 cubic yards. Like the proposed Project, this alternative would not require a General Plan Amendment from the existing land use designation of P (Public and Semi-Public), or a Zone change from A-1-6000 (Light Agricultural) designation.

## 7.8.1 ENVIRONMENTAL IMPACTS

### **Aesthetics**

The Buildout of Existing Land Use and Zoning Alternative would result in a multi-family residential development that would be greater in visual density than the proposed Project. Views of the Project site would change from views of 68 detached residential condominium units to that of 85 multi-family residences. Additionally, the Alternative would provide for less visual buffering from public viewpoints due to the increased landscaping and recreational areas.

The Buildout of Existing Land Use and Zoning Alternative would have a residential character that is consistent with the proposed Project, but, due to the increased density would be less visually compatible with the existing and future built environment in the Project area. Section 1, *Aesthetics*, of the Initial Study describes that development surrounding the Project site consists of single-story and two-story homes on larger lots at a density of up to nine dwelling units per acre. As the Buildout of Existing Land Use and Zoning Alternative would result in a higher density and smaller recreational amenities, including a conversion from backyards to patios, it would not be as visually compatible with the surrounding homes that feature large yards.

Overall, views of the Project site would be visually denser with implementation of the Buildout of Existing Land Use and Zoning Alternative. However, both the Buildout of Existing Land Use and Zoning Alternative and the proposed Project would result in less than significant impacts related to visual character and quality.

Additionally, both the proposed Project and the Buildout of Existing Land Use and Zoning Alternative would introduce additional sources of light and glare that would result in similar less than significant impacts with implementation of the County Code lighting regulations that require lights to be directed and shielded away from adjacent land uses to prevent light from shining onto adjacent properties. In addition, exterior building materials would consist of stucco, wood, stone veneer, and other similar materials that do not have highly reflective surfaces. Therefore, lighting and glare related impacts would be similar and less than significant under both the proposed Project and the Buildout of Existing Land Use and Zoning Alternative.

### **Agricultural and Forestry Resources**

The Buildout of Existing Land Use and Zoning Alternative would demolish the existing school and construct 85 single-family residences. As discussed in Section 3.0, *Project Description*, the Project site has a zoning designation of Light Agriculture (A-1-6000). According to Chapter 22.16 of Los Angeles County Code, Agricultural Zones (Zones A-1 and A-2) allows for single-family residential development, outdoor recreational uses, and public and institutional facilities. However, the site is not designated as Farmland and has not recently been used for agricultural activities. Additionally, there are no forestry or timberland resources within the Project vicinity. As such, both the Buildout of Existing Land Use and Zoning Alternative and proposed Project would result in the same level of less than significant impacts to agricultural resources and no impacts to forestry resources.

**Air Quality**

Under the Buildout of Existing Land Use and Zoning Alternative, the 9.61-acre site would be developed with 85 large lot single-family residences. The Buildout of Existing Land Use and Zoning Alternative would increase the amount and length of construction activities compared to the proposed Project, which in turn would result in greater overall construction-related air quality emissions. However, the demolition, site preparation, grading, drainage/utilities/subgrade, and paving phases would include the entire site; and therefore, would have the same level of maximum daily emissions, which were determined to be less than significant, as detailed in Section 3, *Air Quality*, of the Initial Study. Thus, like the proposed Project, the Buildout of Existing Land Use and Zoning Alternative would result in less than significant construction impacts related to air quality.

As detailed in Table AQ-2 of the Initial Study, operation of the Project would result in 4.46 lbs/day of VOC emissions, 4.74 lbs/day of NO<sub>x</sub>, 18.52 lbs/day of CO, 0.05 lbs/day of SO<sub>x</sub>, 3.90 lbs/day of PM<sub>10</sub>, and 1.12 lbs/day of PM<sub>2.5</sub>, which are below their respective SCAQMD thresholds. The Buildout of Existing Land Use and Zoning Alternative would result in 17 more units than the proposed Project, which would result in additional vehicular trips to and from the Project site. This increase in residential units and daily vehicular trips would result in a increase of pollutant emissions. However, daily operational emissions from the Buildout of Existing Land Use and Zoning Alternative would likely not exceed SCAQMD thresholds and would result in less than significant operational air quality impacts. Therefore, while the Buildout of Existing Land Use and Zoning Alternative and proposed Project would both result in less than significant impacts related to air quality, the Buildout of Existing Land Use and Zoning Alternative would result in more emissions than the proposed Project.

**Biological Resources**

Under the Buildout of Existing Land Use and Zoning Alternative, the 9.61-acre site would be developed with 85 residential units. As with the proposed Project, development of this alternative would also require removal of existing vegetation and trees and would require implementation of mitigation measures MM BIO-1 through MM BIO-3. As such, the impacts to biological resources would be reduced under the proposed Project and Buildout of Existing Land Use and Zoning Alternative to less than significant with mitigation. Overall, impacts to biological resources from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

**Cultural Resources**

The Buildout of Existing Land Use and Zoning Alternative would develop more residential units than the proposed Project but would require the same site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project. Therefore, similar to the proposed Project, this alternative would require MM CUL-1 to avoid impacts to cultural resources by requiring archaeological monitoring. Additionally, MM CUL-2 would be required to reduce impacts to paleontological resources should any be incidentally discovered. As such, the impacts to cultural resources would be reduced under the proposed Project and Buildout of Existing Land Use and Zoning Alternative to less than significant with mitigation. Overall, impacts to cultural resources from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

**Energy**

The Buildout of Existing Land Use and Zoning Alternative would redevelop the Project site to provide 85 multi-family residences that would require energy supplies. Like the proposed Project, the Buildout of Existing Land Use and Zoning Alternative would be developed in compliance with the Calgreen/Title 24 requirements related to energy and would include similar features to reduce energy consumptions, such as solar panels. As described in Section 4, *Energy*, of the Initial Study, the proposed Project would not use large amounts of



energy or fuel in a wasteful manner. Because the Buildout of Existing Land Use and Zoning Alternative would result in 17 more residences and would implement the same energy efficient infrastructure, this alternative would demand more energy. However, both impacts of the proposed Project and the Buildout of Existing Land Use and Zoning Alternative would not use large amounts of energy or fuel in a wasteful or inefficient manner and impacts in both conditions would be less than significant.

### **Geology and Soils**

Grading and development of the entire 9.61-acre site would still occur under the Buildout of Existing Land Use and Zoning Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed Project. The alternative would still result in additional persons and structures on the Project site that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, this alternative would be required to meet the same regulatory requirements as the proposed Project. Overall, impacts to geology and soils from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

### **Greenhouse Gas Emissions**

The Buildout of Existing Land Use and Zoning Alternative would increase the amount and length of construction activities compared to the proposed Project, which in turn would result in greater overall construction related GHG emissions. In addition, the Buildout of Existing Land Use and Zoning Alternative would generate more emissions from operation of residential units because 17 additional residences would be developed compared to the proposed Project. The Buildout of Existing Land Use and Zoning Alternative would also result in more daily vehicular trips and VMT. Therefore, the Buildout of Existing Land Use and Zoning Alternative would generate more GHG emissions than the proposed Project.

The net increase in GHG emissions that would be generated from the operation of the proposed Project is 898.44 metric tons of CO<sub>2e</sub> per year (as shown in Table GHG-1 of the Initial Study). Under the Buildout of Existing Land Use and Zoning Alternative emissions would be approximately 25 percent greater, which would be approximately 1,123.05 metric tons of CO<sub>2e</sub> per year. Therefore, the overall volume of GHG emissions would be increased in comparison to the proposed Project. Similar to the proposed Project, the Building of Existing land Use and Zoning Alternative would be consistent with the CCAP, the 2022 Scoping Plan Update, and the 2020-2045 RTP/SCS. Therefore, the Buildout of Existing Land Use and Zoning Alternative would generate more overall GHG emissions than the proposed Project, but impacts would continue to be less than significant.

### **Hazards and Hazardous Materials**

As discussed in Section 9, *Hazards and Hazardous Materials*, of the Initial Study (Appendix A), the proposed Project would require excavation and disposal of soils contaminated with arsenic. Excavated soils may be used for backfill and grading; and although grading is anticipated to balance onsite, any soil that is disposed of off-site, would require testing for appropriate disposal. Thus, Mitigation Measure MM HAZ-1 has been included to require testing of any export soils and appropriate landfill disposal. Furthermore, Mitigation Measure HAZ-2 is included to require the preparation and implementation of a Health and Safety Plan to notify workers involved in project excavation and soil handling of the presence of arsenic onsite. Additionally, Mitigation Measure HAZ-3 is required for the proposed Project to provide new homeowners with educational materials on the proper management and disposal of household hazardous waste. The Buildout of Existing Land Use and Zoning Alternative would also require this mitigation because construction would occur over the whole site in order to construct the 85 homes and recreational amenities. Overall, impacts to hazards and hazardous materials from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

**Hydrology and Water Quality**

The Project and Buildout of Existing Land Use and Zoning Alternative would result in similar construction impacts compared to the proposed Project because similar construction activities and soil disturbances would occur. As a result, this alternative would also implement standard BMPs through the County's standard permitting process to reduce potential impacts related to water quality during construction, which is similar to the proposed Project. Therefore, construction related hydrology and water quality impacts from the Project and Reduced Project Alternative would be similar to those of the proposed Project.

The Buildout of Existing Land Use and Zoning Alternative is proposed to include additional units and would result in an increase of the total area of impervious surfaces compared to the proposed Project. Additionally, like the proposed Project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include onsite drainage, LID, source control, site design, and treatment control BMPs that are similar to those included in the proposed Project. Therefore, the proposed Project and Buildout of Existing Land Use and Zoning Alternative would result in less than significant impacts to hydrology and water quality, but impacts would be greater from the Buildout of Existing Land Use and Zoning Alternative.

**Land Use and Planning**

The Project and Buildout of Existing Land Use and Zoning Alternative would implement single-family or multi-family housing on the Project site and would not require a General Plan Amendment or Zoning Change. Similar to the proposed Project, this alternative would provide the residential land uses that would integrate into the planned development of the adjacent areas. However, the increased development would not be as consistent with the surrounding large-lot single-family residences. Since the Buildout of Existing Land Use and Zoning Alternative would be consistent with the General Plan designation for the site, this alternative would be consistent with the SCAG RTP/SCS, County's Policy Plan, and zoning code. Overall, impacts to land use and planning from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

**Mineral Resources**

The Buildout of Existing Land Use and Zoning Alternative would develop the Project site with 85 residences. As discussed in the Initial Study in Section 12, *Mineral Resources*, the site is designated as mineral resource zones MRZ-2 and MRZ-3. However, the site has not recently or historically been used for mineral resource extraction. As such, both the Buildout of Existing Land Use and Zoning Alternative and proposed Project would result in the same level of less than significant impacts to mineral resources.

**Noise**

The Buildout of Existing Land Use and Zoning Alternative would result in construction noise related to development of the site and 85 residential units assuming the Project site would be subdivided. Compared to the proposed Project, this alternative would increase the length of construction, which in turn would increase the length of construction-related noise and vibration. As with the proposed Project, construction activities would occur within the hours allowable by the County Code Section 12.08.440, which states that construction shall occur only between the hours of 7 a.m. and 7 p.m. Monday through Saturday, with no construction allowed on Sundays and Federal holidays. However, like the proposed Project, this alternative would likely require implementation of Mitigation Measures NOI-1 and NOI-2 to reduce noise and vibration from construction activities to surrounding residences. As such, the proposed Project and Buildout of Existing Land Use and Zoning Alternative would result in less than significant impacts to construction noise and vibration.

This alternative would generate noise from vehicular trips to and from the site and operation of the residential uses, such as exterior noise and mechanical equipment. The number of vehicular trips generated by this alternative would be greater than those generated by the proposed Project, as would the number

of units and amount of mechanical equipment. Hence, traffic noise and operational noise under this alternative would increase. However, the proposed Project and the Buildout of Existing Land Use and Zoning Alternative would result in less than significant impacts to operational and traffic noise, but impacts from the alternative would be greater.

**Population and Housing**

The Buildout of Existing Land Use and Zoning Alternative would increase the number of residential units on the site by 25 percent. Thus, this alternative would develop and operate 85 multi-family residential units. This would result in approximately 327 residents at full occupancy, versus the proposed Project's 262 residents at full occupancy of the proposed Project, which is an increase of 65 residents. The increase in residential units by the Buildout of Existing Land Use and Zoning Alternative would be within SCAGs projected growth, like the proposed Project. Thus, both the Buildout of Existing Land Use and Zoning Alternative and the proposed Project would result in less than significant impacts related to population and housing.

**Public Services**

As described above, under the Buildout of Existing Land Use and Zoning Alternative, the Project site would be redeveloped to provide 85 single-family residential units. Like the proposed Project, this alternative would install security and fire protection systems, and because a new residential population would exist on the Project, additional calls for fire and police services would occur. Likewise, the residential population would generate students that would utilize local schools. As the population size associated with the Buildout of Existing Land Use and Zoning Alternative would also be 20 percent higher than the proposed Project, this alternative would result in a higher demand for public services, including fire, police, and schools. However, with compliance with regulatory requirements, impacts to public services from both the proposed Project and the Buildout of Existing Land Use and Zoning Alternative would be less than significant.

**Recreation**

The Buildout of Existing Land Use and Zoning Alternative would reduce the shared recreational amenities onsite, remove the northern recreational area, and reduce the backyards to patios. The 327 residents at full occupancy would utilize the exterior open space/recreation area that would be provided by the Buildout of Existing Land Use and Zoning Alternative. As discussed, the alternative would include 19,645 square feet less open space than the proposed Project for a total of 78,578 square feet of recreational amenities and open space. As the population size associated with the Buildout of Existing Land Use and Zoning Alternative would be increased by 20 percent, the ratio of residents per area of parkland provided by the Buildout of Existing Land Use and Zoning Alternative would increase. Therefore, the Buildout of Existing Land Use and Zoning Alternative would place a higher demand on offsite recreational facilities than the proposed Project.

**Transportation**

As described in Section 5.1, *Transportation*, the proposed Project would result in an increase of 50 a.m. peak hour trips and 67 p.m. peak hour trips. Project generated VMT in the year 2020 would exceed the County's 2020 VMT threshold by 48.04%. Even with implementation of the limited feasible TDM measures as discussed above, a potential reduction in Project VMT of a global maximum of 15.0% would not achieve the County's target threshold of 16.8% below current baseline HB VMT per capita. As such, impacts are significant and unavoidable.

The Buildout of Existing Land Use and Zoning Alternative would result in more daily trips than the proposed Project. As such, the Buildout of Existing Land Use and Zoning Alternative would not screen out of preparing a VMT analysis pursuant to the County's Transportation Impact Analysis Guidelines. As such, the Buildout of Existing Land Use and Zoning Alternative would continue to result in significant and unavoidable VMT impacts.

Thus, the Buildout of Existing Land Use and Zoning Alternative would result in significant and unavoidable impacts, and impacts would be consistent with those analyzed for the proposed Project.

#### **Tribal Cultural Resources**

The Buildout of Existing Land Use and Zoning Alternative would require site preparation, grading, drainage/utilities/subgrade, which would disturb site soils to the same extent as the proposed Project; therefore, this alternative would require implementation of Mitigation Measures TCR-1 through TCR-3 to reduce potential impacts related to unknown buried tribal cultural resources. Thus, impacts under both the Buildout of Existing Land Use and Zoning Alternative and the proposed Project would be reduced to a less than significant level with incorporation of mitigation. Overall, impacts to tribal cultural resources from development of the Buildout of Existing Land Use and Zoning Alternative would be consistent with those from the proposed Project.

#### **Utilities and Service Systems**

The Buildout of Existing Land Use and Zoning Alternative would redevelop the Project site to provide single-family residences. Like the proposed Project, this alternative would include redevelopment of the onsite utilities and install LID and CalGreen/Title 24 compliant infrastructure that would connect to the existing infrastructure adjacent to the site. However, this alternative would result in a higher demand for water supplies, wastewater treatment, and landfill capacity because 25 percent more residential units would be developed. Thus, impacts to utilities and service systems would be greater under the Buildout of Existing Land Use and Zoning Alternative when compared to the proposed Project.

#### **Wildfire**

The Buildout of Existing Land Use and Zoning Alternative would increase the number of developed residences by 25 percent. As discussed in the Initial Study in Section 20, *Wildfire*, the site is located in an urban setting and is not in an area designated as a fire hazard severity zone. As such, both the Buildout of Existing Land Use and Zoning Alternative and proposed Project would result in no impacts related to wildfire.

## **7.8.2 CONCLUSION**

#### **Ability to Reduce Impacts**

The Buildout of Existing Land Use and Zoning Alternative would increase residential density on the site by 25 percent or by 17 residential units. With more units, this alternative would result in increased impacts related to light and glare from more residential structures, increased air quality and GHG emissions from construction and operation, increased energy usage, and increased operational noise from fewer residents and vehicles. While increased, these impacts are less than significant without mitigation under both the alternative and the proposed Project. Furthermore, this alternative would require the same mitigation measures that are required for the proposed Project to reduce impacts to a less than significant level for biological resources, cultural resources, paleontological resources, hazards and hazardous materials, construction noise and vibration, tribal cultural resources, and utilities. The Buildout of Existing Land Use and Zoning Alternative would increase the trips generated and would not avoid the proposed Project's significant and unavoidable VMT impacts. Overall, this alternative would not reduce any of the proposed Project's impacts.

#### **Ability to Achieve Project Objectives**

As shown in Table 7-2, the Buildout of Existing Land Use and Zoning Alternative would meet most of the Project objectives but would not provide as high quality of development that would be consistent with surrounding development due to the increased density and decreased setbacks of the alternative. The Buildout of Existing Land Use and Zoning Alternative would not meet the objective to provide single-family housing and would not include adequate onsite open space and high-quality recreational amenities for future

residents. Additionally, the Buildout of Existing Land Use and Zoning Alternative would not be properly scaled or buffered as proposed setbacks would be reduced in order to accommodate the additional residences.

## 7.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” when significant environmental impacts result from a proposed Project. The Environmentally Superior Alternative for the proposed project would be the No Project/No Build Alternative. The No Project/No Build alternative would avoid the significant and unavoidable impacts of the Project and all of the potential construction impacts, reduce many of the operational impacts, and would not be required to implement the mitigation measures that are identified in Chapters 5.0 and 6.0 of this EIR that are related to: biological resources, cultural resources, paleontological resources, hazards and hazardous materials, transportation, tribal cultural resources, and utilities. However, this alternative would not improve the environment by improving storm water runoff quality and contributing needed housing to help the County in meeting its housing goals.

Additionally, CEQA Guidelines Section 15126.6(3)(1) states:

*The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Emphasis added).*

Therefore, pursuant to CEQA, because the No Project/No Build Alternative has been identified as the Environmentally Superior Alternative, the Environmentally Superior Alternative among the other alternatives would be the Reduced Project Alternative, which would involve redevelopment of the site with 11 single-family residences and 7.6 acres of recreational amenities and common open space.

The Reduced Project Alternative would reduce the Project’s significant and unavoidable transportation impacts to a less than significant level and would implement the existing General Plan land use and zoning designations for the Project site. Because the Reduced Project Alternative would not include 80 percent fewer residences, it would not require implementation of Mitigation Measure TR-1, which provides VMT reductions. Additionally, the Reduced Project Alternative would avoid the proposed Project’s significant and unavoidable VMT impacts. However, this alternative would continue to require mitigation related to biological resources, cultural resources, paleontological resources, contaminated soils onsite, tribal cultural resources, and payment of in-lieu fees to the City of West Covina.

In addition, while the Reduced Project Alternative would meet most of the Project objectives, it would not meet them to the same extent as the proposed Project. This alternative would not meet the objective to provide housing to meet the region’s need for housing to the extent that the proposed Project would because residential units are reduced by 57 units and 80 percent. Additionally, while this alternative would provide increased buffering from surrounding residences, it would be at a significantly less dense scale when compared to surrounding residential densities.

Table 7-2 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 7-3 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

**Table 7-2: Impact Comparison of the Proposed Project and Alternatives**

	<b>Proposed Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Project</b>	<b>Alternative 3: Buildout of Existing Land Use and Zoning</b>
<b>Aesthetics</b>	Less than significant	Less; less than significant	Same as proposed Project; less than significant	Greater than proposed Project; less than significant
<b>Agricultural and Forestry Resources</b>	Less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
<b>Air Quality</b>	Less than significant	Less; but also less than significant	Less; but also less than significant	Greater than proposed Project; less than significant
<b>Biological Resources</b>	Less than significant with mitigation	Less; no impacts	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
<b>Cultural Resources</b>	Less than significant with mitigation	Less; no impacts	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
<b>Energy</b>	Less than significant	Less; but also less than significant	Less; but also less than significant	Greater than proposed Project; less than significant
<b>Geology and Soils</b>	Less than significant	Less; no impacts	Same as proposed Project; less than significant	Same as proposed Project; less than significant
<b>Greenhouse Gas Emissions</b>	Less than significant	Less; but also less than significant	Less; but also less than significant	Greater than proposed Project; less than significant
<b>Hazards and Hazardous Materials</b>	Less than significant with mitigation	Less; less than significant	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
<b>Hydrology and Water Quality</b>	Less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Greater than proposed Project; less than significant
<b>Land Use and Planning</b>	Less than significant	Less; no impacts	Same as proposed Project; less than significant	Same as proposed Project; less than significant
<b>Mineral Resources</b>	Less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
<b>Noise</b>	Less than significant with mitigation	Less; less than significant	Same as proposed Project; less than significant	Greater than proposed Project; less than significant
<b>Population and Housing</b>	Less than significant	Less; but also less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant

	<b>Proposed Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Project</b>	<b>Alternative 3: Buildout of Existing Land Use and Zoning</b>
<b>Public Services</b>	Less than significant	Less; but also less than significant	Less; but also less than significant	Greater than proposed Project; less than significant
<b>Recreation</b>	Less than significant	Less; no impacts	Less; but also less than significant	Greater than proposed Project; less than significant
<b>Transportation</b>	Significant and unavoidable	Less; less than significant	Less; less than significant	Same; Significant and unavoidable
<b>Tribal Cultural Resources</b>	Less than significant with mitigation	Less; no impacts, no mitigation required	Same as proposed Project; less than significant with mitigation	Same as proposed Project; less than significant with mitigation
<b>Utilities and Service Systems</b>	Less than significant with mitigation	Less; less than significant, no mitigation required	Less; less than significant with mitigation	Greater than proposed Project; less than significant with mitigation
<b>Wildfire</b>	Less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant	Same as proposed Project; less than significant
<b>Reduce Impacts of the Project?</b>		Yes	Yes	No
<b>Areas of Reduced Impacts Compared to the Project</b>		17	8, but requires same mitigation minus Transportation mitigation	0

**Table 7-3: Comparison of the Proposed Project and Alternatives Ability to Meet Objectives**

	<b>Proposed Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Project</b>	<b>Alternative 3: Buildout of Existing Land Use and Zoning</b>
Provide for additional market-rate housing opportunities consistent with the County's Housing Element and State housing goals.	Yes	No	Yes, but not to the same extent as the proposed Project.	Yes
Develop a Project that constructs new single-family residential units, which would help meet the region's demand for housing.	Yes	No	Yes, but not to the same extent as the proposed Project.	No
Redevelop existing land uses that would utilize existing infrastructure, including: water, sewer, arterial roadways, transit, and freeways; and provide non-vehicular (pedestrian and bicycle) circulation.	Yes	No	Yes, but not to the same extent as the proposed Project.	Yes
Redevelop an infill site to minimize environmental impacts.	Yes	No	Yes	Yes, but not to the same extent of the Project.
Ensure new residential development includes adequate open space and high-quality recreational amenities for future residents.	Yes	No	Yes	No

	<b>Proposed Project</b>	<b>Alternative 1: No Project/No Build</b>	<b>Alternative 2: Reduced Project</b>	<b>Alternative 3: Buildout of Existing Land Use and Zoning</b>
Eliminate potential nuisances at a vacant site through redevelopment.	Yes	No	Yes	Yes
Provide a new single-family residential neighborhood that is scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods.	Yes	No	Yes, but not to the same extent as the proposed Project.	No



## 8.0 EIR Preparers and Persons Contacted

### 8.1 EIR Preparers

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#### **Biological Resources Analysis**

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#### **First Carbon Solutions, Cultural Resources Assessment**

Stefanie Griffin, MA

#### **Geotek, Inc, Geotechnical and Infiltration Evaluation**

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#### **GPA Consulting, Historical Resource Assessment**

Audrey con Ahrens

#### **Moran Consulting Corporation, Hydrology Analysis**

Cesar Moran

#### **Paleontological Records Search**

Kenneth L. Finger, Ph.D.

#### **Vista Environmental, Air Quality, GHG, and Energy Analysis, Noise Impact Analysis**

Greg Tonkovich, AICP

### 8.2 Persons Contacted

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Firefighter Mackenzie, Los Angeles County Fire Department

San Dimas Sheriff Station, Los Angeles County Sheriff Department, Los Angeles County Fire Department

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