

**VALLEY COUNTY WATER DISTRICT
NEW HEADQUARTERS PROJECT
DRAFT INITIAL STUDY CHECKLIST /
MITIGATED NEGATIVE DECLARATION
BALDWIN PARK, CALIFORNIA**

Prepared for:

Valley County Water District
14521 Ramona Boulevard
Baldwin Park, California 91706

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE

The Valley County Water District (District or VCWD) is proposing the construction and operation of a new 15,122-square-foot District Headquarters that would include two main buildings (an Operations Building and Administration Building), a signage tower, and an Operations warehouse (Proposed Project). The District headquarters is currently located on 14521 Ramona Blvd in the City of Baldwin Park, approximately 2 miles south from the Proposed Project. Due to the aging condition of the building and need of upgraded facilities, the Proposed Project will serve as the new location of the District headquarters.

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Location

The Proposed Project site lies on the south side of Arrow Highway, between Calmview Avenue and Lante Street, at 15250 Arrow Highway, Baldwin Park, California 91706 (see Figure 1 - Project Vicinity Map and Figure 2 - Project Location Map). The Assessor's Parcel Numbers (APNs) for the Proposed Project site are APN 8413-006-021 and APN 8413-006-024. The main ingress and egress for the Proposed Project site would be from Lante Street; a secondary access point to the Proposed Project site would be from Arrow Highway. Properties surrounding the Project site are a mix of commercial/industrial and residential. Arrow Highway is the boundary between the City of Irwindale to the north and City of Baldwin Park to the south.

1.2.2 General Plan Designation/Zoning

The Proposed Project site has a land use designation of General Industrial (GI) and is zoned Industrial (I) by the City of Baldwin Park (City of Baldwin Park 2018a, 2018b, 2019a).

1.2.3 Surrounding Land Uses and Project Setting

The surrounding area is zoned for a variety of uses, including Industrial Commercial (I-C) and Industrial (I); and surrounding land uses are Commercial/Industrial and General Industrial (City of Baldwin Park 2018a, 2018b). It should be noted that the area north of Arrow Highway is within the City of Irwindale; the area is zoned as Agriculture (A1) and has an Open Space/Easement land use designation (City of Irwindale 2008).

1.3 PROJECT DESCRIPTION

The VCWD is proposing the construction and operation of a new 15,122-square-foot District Headquarters that would include two main buildings (an Operations Building and Administration Building), a signage tower, and an Operations warehouse (Proposed Project). The building would be located on a 2.4-acre parcel and would replace the existing District Headquarters on Ramona Boulevard.

The square footage of each building, along with the square footage of each room within each building, is presented in Table 1 below.

Table 1: Proposed Building Square Footages

Building	Square Footage
Administration Building (maximum height of 21 feet-4 inches)	
Public Lobby	686
Unisex Restrooms (2)	135
Board Room	1,103
Workstations	1,358
Archives Room	150
Board Room Storage	118
Women's Restroom	147
Men's Restroom	136
Electrical Room	114
General Manager's Office	247
GM Assistant's Office	143
Server Room	104
Copy/Storage	155
Finance Manager's Office	143
Quiet Room	63
Exterior Storage	63
Break Room	419
General Services Office	150
Human Resources Office	150
Meeting Room	280
Circulation	563
Structure	488
Administration Building Total Square Footage	6,915
Operation Building (maximum height of 20 feet-2 inches)	
Operations Manager's Office	195
OM Assistant's Workstation	116
Utility Service Supervisor's Workstation	114
Field Service Supervisor's Workstation	114
Inspector's Workstation	116
Management Analyst's Office	143
Treatment and Production Supervisor's Office	145
Water Quality Specialist's Office	147
Lab	141
Supervisory control and data acquisition (SCADA)	136
Computer Stations	
Janitorial	44
Meeting Room / Library	247
Bullpen	522
Copy/Storage	49
Storage	67
Mud Room	137
H ₂ O Station	19
Gym	425
Women's Locker Room / Bathroom	344
Men's Locker Room / Bathroom	392

Table 1: Proposed Building Square Footages

Building	Square Footage
Circulation	563
Structure	396
Operations Total Square Footage	4,572
Warehouse (maximum height of 21 feet-1 inch)	
Storage 1 (Future Office)	167
Storage 2	167
Tool Storage	600
Pipe Material	620
Warehouse	1,220
Washbay	580
Structure	281
Warehouse Total Square Footage	3,635
Total Square Footage	15,122

Note: The Signage Tower will have a maximum height of 30 feet-0 inches

1.4 CONSTRUCTION SCHEDULE

Construction of the Project is expected to commence July 2020 have a duration of approximately one year, reaching completion July 2021.

1.4.1 Construction Equipment

Construction of the Proposed Project would require use of the following construction equipment: D6 tractor, loader, truck and transfer hauler, backhoe, small skid steer, reach forklift, small rubber tire crane, concrete delivery trucks, and concrete pump for big rock.

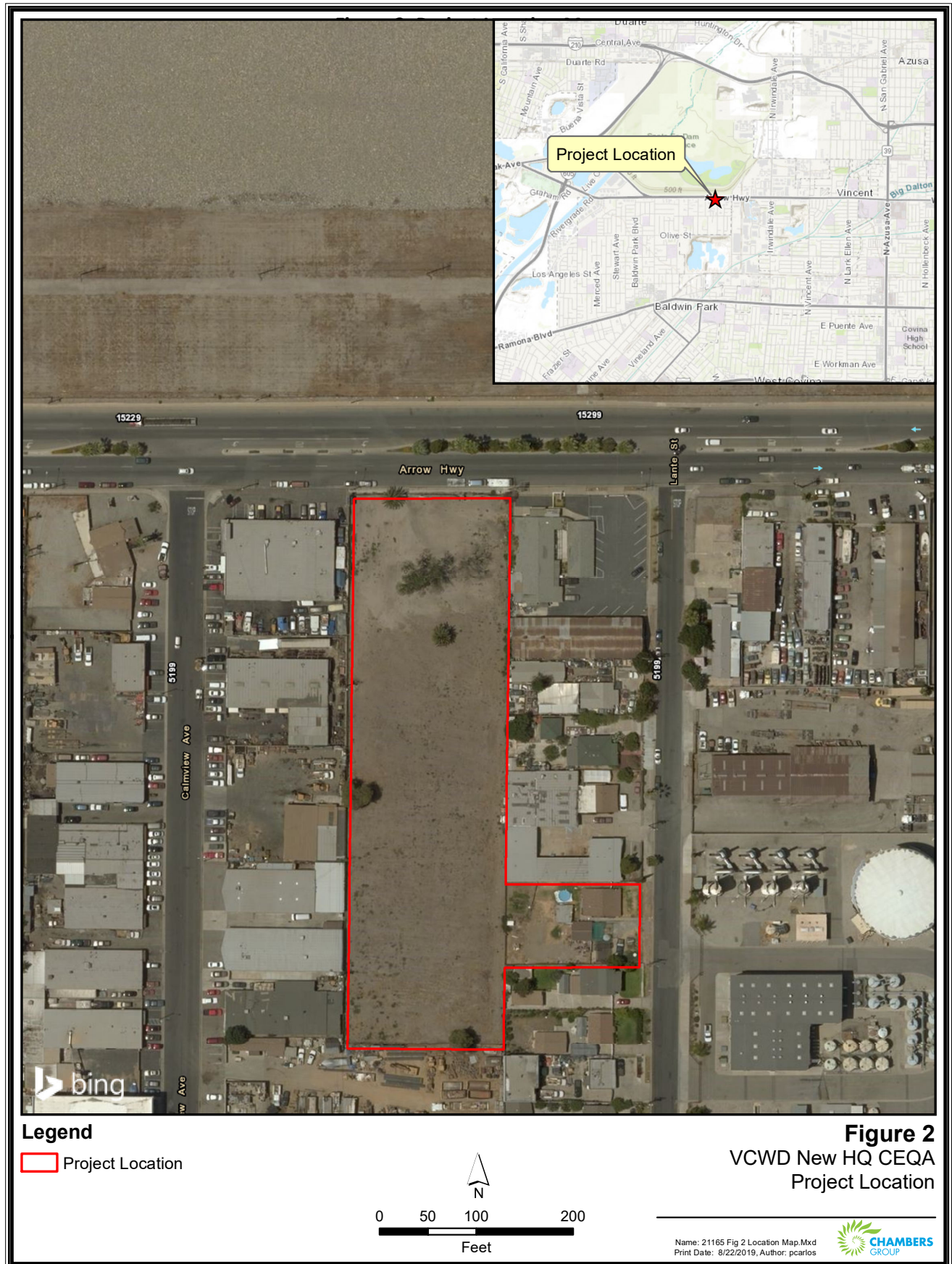
1.5 APPLICANT PROPOSED MEASURES (APM)

The following applicant proposed measures would be implemented as part of the Proposed Project design to provide a clear line of sight between the driver, bicyclist, or pedestrian.

- APM – 1:** Establish and maintain red curb no parking zones and post no parking signs along the entire project frontage on Arrow Highway (an already established no parking zone) and Lante Street (a partially established no parking zone).
- APM – 2:** The Proposed Project's frontage improvements between the back of curb and the property line should be composed of sidewalk and/or hardscape and avoid moderate height landscaping that might affect the sight distance of drivers egressing the Project's driveways.

The Proposed Project would also include construction of a 6-foot to 7-foot-high wall around the majority of the perimeter of the Proposed Project site, which would result in lower noise levels around the adjacent properties.





1.6 REQUIRED PERMITS AND APPROVALS

The Valley County Water District would act as the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project to approve the Proposed Project and adopt the CEQA document. A public agency other than the Lead Agency that has discretionary approval power over a project is referred to under the CEQA Guidelines as a “Responsible Agency.”

Responsible Agency:

City of Baldwin Park – issue building permit, traffic control permit, and tree permit (if required)

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐



Signature

Jose Martinez

Name

3/10/2020

Date

General Manager

Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

*Note: Instructions may be omitted from final document.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

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

4.1.1 Impact Analysis

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

Less than Significant Impact. Views of the existing residents and businesses adjacent to the Proposed Project site consist mostly of the residential, commercial, and industrial structures because the area, and City, is largely built out and is fully urbanized. While the San Gabriel River Trail and Santa Fe Dam are located north from the Proposed Project, they are not visible from the Proposed Project site or land uses in the vicinity of the Proposed Project site. Therefore, the construction of the Proposed Project would not block or impact any scenic views. In addition, the General Plan Health and Sustainability Element of the City of Baldwin Park indicates that no scenic vistas are designated within the City (City of Baldwin Park 2014). Therefore, construction and operation of the Proposed Project would not have a significant effect on any scenic vistas, and the presence of the Proposed Project would be consistent with the existing surroundings. Impacts would be less than significant.

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

No Impact. No state scenic highways are within the City of Baldwin Park. Additionally, the City does not contain any designated scenic resources such as rock outcroppings or trees within a scenic highway (City of Baldwin Park 2014). While historical buildings of significance may be present within the City, the Proposed Project does not contain any designated historic structures nor would it create a significant impact to the existing buildings surrounding the parcels. No impact would occur.

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

Less than Significant Impact. As discussed in Section 4.1.1 (a), the City is fully urbanized with no scenic vistas designated within the City. Currently, the parcel is vacant, with sparse vegetation and scattered debris. The construction of the Proposed Project would improve the existing visual character because the vacant parcel would be developed with structures consistent with surrounding uses, and would include ornamental landscaping to improve the existing character. Impacts would be less than significant.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant Impact. Existing light sources from the areas around the Proposed Project consist of lights from the businesses and residences within the vicinity of the Proposed Project. No lighting is currently located within the vacant parcel. Any lighting on the parcel would be spillover from neighboring buildings. During construction, the Proposed Project would generate light and glare from the presence of vehicles and equipment. Sources of light and glare would come from light emitted from the vehicles and equipment. Once operational, the Proposed Project would include new permanent lighting from outdoor building lights and security lighting for the parking area.

While the Proposed Project would include installation of new permanent lighting, this type of lighting would be consistent with lighting offered at the existing buildings within the area. The Proposed Project would comply with Municipal Code, Chapter 153.140.040 (shown below), which addresses minimization of light and glare for day and nighttime uses (City of Baldwin Park 2014) and would include any shielding or barriers to minimize spill over into other businesses and residences. The Proposed Project would not schedule construction activities during nighttime hours. Impacts would be less than significant.

SUBCHAPTER 153.140 – PERFORMANCE STANDARDS: §153.140.040 Light and Glare

- (A) Safety lighting. Lighting for safety purposes shall be provided at entryways, along walkways, between buildings and within parking areas.
- (B) Lighting support structure height. Lighting support structures shall not exceed the maximum permitted building height for the zone in which they are located. However, in no event shall a lighting support structure exceed a height of 40 feet.
- (C) Candle-power. The candle-power of all lights shall be the minimum required to accomplish the purpose of the light.
- (D) Constant light. Flickering or flashing lights shall not be permitted. All lights shall be constant and shall not change intensity or color more often than once every 30 minutes.
- (E) Buffer areas. Light sources shall not be located in buffer areas, except those required to illuminate pedestrian walkways.

- (F) Lighting orientation and shielding. All lights shall be directed, oriented and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct motorists' vision.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.1 Impact Analysis

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

No Impact: The Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation produces maps and statistical data to analyze impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status. The Proposed Project site is categorized as 'Other Land' as part of the FMMP due to its location in an industrial neighborhood in the City of Baldwin Park in Los Angeles County (California Department of Conservation 2016). The California Department of Conservation defines 'Other Land' as vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres. Thus, the Proposed Project would not convert Prime Farmland or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impact would occur.

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

No Impact: The Proposed Project site is zoned for industrial uses and is not in a Williamson Act contract (City of Baldwin Park 2018b). No impact would occur.

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

No Impact: The Proposed Project site is zoned for industrial uses and is not zoned for forest land or timberland. The Proposed Project site, per its designated zoning, is intended for the development of industries engaged in general assembly, manufacturing, and processing and as a support for commercial uses (City of Baldwin Park 2015a). The Proposed Project site, although located near the Santa Fe Dam Recreation Area, would not result in the conversion of any farmland or forest land to another use. No impact would occur.

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

No Impact: The Proposed Project site is zoned for industrial uses and is not zoned for forest land or timberland (City of Baldwin Park 2018a). No forest land would be lost or converted to non-forest uses for the purpose of the Proposed Project. No impact would occur.

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

No Impact: The Proposed Project is the construction and operation of a new 15,122-square-foot District Headquarters that would include two main buildings (an Operations Building and Administration Building), a signage tower, and an Operations warehouse. No other changes are anticipated in the existing environment during construction or operation which could result in conversion of Farmland to nonagricultural use or the conversion of forest land to non-forest use. No impact would occur.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section describes the existing air quality setting and potential effects from Proposed Project implementation on the site and its surrounding area. Construction air quality modeling was performed through use of the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. The model output is provided in Appendix A.

4.3.1 Environmental Setting

The Proposed Project site is located in the City of Baldwin Park in the County of Los Angeles. The Proposed Project site is located within the South Coast Air Basin (Air Basin), and air quality regulation is administered by the South Coast Air Quality Management District (SCAQMD). The SCAQMD implements the programs and regulations required by the federal and State Clean Air Acts.

Atmospheric Setting

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographical features. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with physical features of the landscape to determine their movement and dispersal and, consequently, their effect on air quality. The combination of topography and inversion layers generally prevents dispersion of air pollutants in the Air Basin.

The climate of the Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific, which results in a mild climate tempered by cool sea breezes. Although the Air Basin has a semiarid climate, the air near the surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the basin by offshore winds, the ocean effect is dominant. Periods of heavy fog are frequent; and low stratus clouds, often referred to as "high fog," are a characteristic climate feature. Average temperatures for Azusa (WRCC 2016), which is the nearest monitoring station with historical data, range from an average low of 40 degrees Fahrenheit (°F) in December to an average high of 92 °F in August. Rainfall averages approximately 19 inches a year, with almost all annual rainfall coming from the fringes of mid-latitude storms from late November to early April and summers being almost completely dry.

Winds are an important parameter in characterizing the air quality environment of a project site because they determine the regional pattern of air pollution transport and control the rate of dispersion near a source. Daytime winds in the Air Basin are usually light breezes from off the coast as air moves regionally onshore from the cool Pacific Ocean. These winds are usually the strongest in the dry summer months. Nighttime winds in the Air Basin result mainly from the drainage of cool air off the mountains to the east, and they occur more often during the winter months and are usually lighter than the daytime winds. Between the periods of dominant airflow, periods of air stagnation may occur, both in the morning and evening hours. Whether such a period of stagnation occurs is one of the critical determinants of air quality conditions on any given day.

During the winter and fall months, surface high-pressure systems north of the Air Basin, combined with other meteorological conditions, can result in very strong winds from the northeast called “Santa Ana Winds.” These winds normally have durations of a few days before predominant meteorological conditions are reestablished. The highest wind speed typically occurs during the afternoon due to daytime thermal convection caused by surface heating. This convection brings about a downward transfer of momentum from stronger winds aloft. It is not uncommon to have sustained winds of 60 miles per hour with higher gusts during a Santa Ana Wind.

Regulatory Setting

The Proposed Project site lies within the Air Basin, which is managed by the SCAQMD. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been established for the following criteria pollutants: carbon monoxide (CO), ozone (O₃), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), inhalable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead. The CAAQS also set standards for sulfates, hydrogen sulfide, and visibility.

Areas are classified under the Federal Clean Air Act as either “attainment” or “nonattainment” areas for each criteria pollutant, based on whether the NAAQS have been achieved or not. Attainment relative to the State standards is determined by the California Air Resources Board (CARB). The Air Basin has been designated by the Federal Environmental Protection Agency (EPA) as a nonattainment area for O₃ and PM_{2.5}. Currently, the Air Basin is in attainment with the NAAQS for CO, SO₂, NO₂, and PM₁₀. The Air Basin is designated as partial nonattainment for lead based on data from two source-specific monitors in Vernon and the City of Industry that are both near battery recycling facilities. The 2012 Lead State Implementation Plan (SIP) for Los Angeles County provides measures to meet attainment of lead by December 31, 2015. Current monitoring data show that lead is now below the standards at all monitoring stations; however, three years of meeting the standards is required before Los Angeles County can request to be redesignated by the EPA.

The EPA has designated the Air Basin as extreme nonattainment for the 8-hour average ozone standard. In 2015, the EPA strengthened its 8-hour “primary” and “secondary” ozone standards to 0.070 parts per million (ppm). The previous standard, set in 2008, was 0.075 ppm. The SCAQMD, the agency principally responsible for comprehensive air pollution control in the Air Basin, adopted the 2016 Air Quality Management Plan (AQMP) in March 2016 that provides measures to reduce 8-hour ozone levels to below the federal standard by 2037.

Additionally, the EPA has designated the Air Basin as nonattainment for PM_{2.5}. In 1997, the EPA established standards for PM_{2.5} (particles less than 2.5 micrometers), which were not implemented until

March 2002. The 1997 PM_{2.5} standard of 15 micrograms per cubic meter (µg/m³) was attained on August 24, 2016. However, on December 14, 2012, the EPA revised the primary annual PM_{2.5} NAAQS from 15 µg/m³ to 12 µg/m³. The 2012 AQMP provides measures to reduce PM_{2.5} emissions to within the federal standard by December 31, 2025. PM_{2.5} is a subset of the PM₁₀ emissions whose standards were developed to complement the PM₁₀ standards that cover a full range of inhalable particle matter. For the PM₁₀ health standards, the annual PM₁₀ standard was revoked by the EPA on October 17, 2006; and the 24-hour average PM₁₀ attainment status for the Air Basin was redesignated to attainment (maintenance) on July 26, 2013.

The Air Basin has been designated by CARB as a nonattainment area for O₃, NO₂, PM₁₀, and PM_{2.5}. Currently, the Air Basin is in attainment with the State ambient air quality standards for CO, SO₂, and sulfates and is unclassified for visibility-reducing particles and hydrogen sulfide. The adopted AQMPs provide measures to meet the State standards for O₃, NO₂, PM₁₀, and PM_{2.5}. **Error! Reference source not found.** presents the designations and classifications applicable to the Proposed Project area.

Table 2: Designations/Classifications for the Project Area

Pollutant	Averaging Time Standard	National Standards Attainment Date ¹	California Standards ²
1979 1-Hour Ozone (O ₃) ³	1-Hour (0.12 ppm)	Nonattainment (Extreme) 2/6/2023	Nonattainment
1997 8-Hour Ozone (O ₃) ⁴	8-Hour (0.08 ppm)	Nonattainment (Extreme) 6/15/2024	
2008 8-Hour Ozone (O ₃)	8-Hour (0.075 ppm)	Nonattainment (Extreme) 7/20/2032	
2015 8-Hour Ozone (O ₃)	8-Hour (0.070 ppm)	Nonattainment (Extreme) 8/3/2038	
Carbon Monoxide (CO)	1-Hour (35 ppm) 8-Hour (9 ppm)	Attainment (Maintenance) 6/11/2007 (attained)	Maintenance
Nitrogen Dioxide (NO ₂) ⁵	1-Hour (100 ppb)	Unclassifiable/Attainment Attained	Attainment
	Annual (0.053 ppm)	Attainment (Maintenance) 9/22/1998	
Sulfur Dioxide (SO ₂) ⁶	1-Hour (75 ppb)	Designation Pending/ Pending	Attainment
	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/Attainment 3/19/1979 (attained)	
Particulate Matter (PM ₁₀)	24-Hour (150 µg/m ³)	Attainment (Maintenance) 7/26/2013	Nonattainment
Particulate Matter (PM _{2.5})	24-Hour (35 µg/m ³)	Nonattainment (Serious) 12/31/2019	Nonattainment
	1997 Annual (15.0 µg/m ³)	Attainment 8/24/2016	
	Annual (12.0 µg/m ³)	Nonattainment 12/31/2025	

Table 2: Designations/Classifications for the Project Area

Pollutant	Averaging Time Standard	National Standards Attainment Date ¹	California Standards ²
Lead (Pb)	3-Months Rolling (0.15 µg/m ³)	Nonattainment (Partial) ⁷ 12/31/2015	Nonattainment

¹ Obtained from <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14>

² Obtained from <http://www.arb.ca.gov/desig/adm/adm.htm>.

³ 1-hour O₃ standard (0.12 ppm) was revoked, effective June 15, 2005; however, the Air Basin has not attained this standard based on 2008-2010 data has some continuing obligations under the former standard.

⁴ 1997 8-hour O₃ standard (0.08 ppm) was reduced (0.075 ppm) in 2008; the 1997 O₃ standard and most related implementation rules remain in place until the 1997 standard is revoked by U.S. EPA.

⁵ New NO₂ 1-hour standard, effective August 2, 2010; attainment designations January 20, 2012; annual NO₂ standard retained.

⁶ The 1971 annual and 24-hour SO₂ standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO₂ 1-hour standard. Area designations are expected in 2012, with Basin designated Unclassifiable/Attainment.

⁷ Partial Nonattainment designation – Los Angeles County portion of Basin only. Expect redesignation to attainment based on current monitoring data.

Monitored Air Quality

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the air basin. Estimates of the existing emissions in the Air Basin provided in the Final 2016 AQMP, March 2017 (SCAQMD 2017), indicate that, collectively, mobile sources account for 33 percent of the volatile organic compounds (VOC), 88 percent of emissions from nitrogen oxides (NO_x), and 35 percent of directly emitted PM_{2.5}, with another 10 percent of PM_{2.5} from road dust. However, the mobile source regulations currently in place are anticipated to reduce the share of emissions currently produced by mobile sources; and by 2031 mobile source emissions are anticipated to create 14 percent of VOC emissions, 30 percent of NO_x emissions, and 23 percent of PM_{2.5} emissions with another 14 percent of PM_{2.5} from road dust.

The SCAQMD has divided the Air Basin into 38 air monitoring areas with a designated ambient air monitoring station representative of each area. The Proposed Project site is located in Air Monitoring Area 9, which covers east San Gabriel Valley. The nearest air monitoring station to the Proposed Project site is the Azusa Monitoring Station, which is located approximately 2.4 miles northeast of the Proposed Project site at 803 North Loren Avenue, Azusa. Since historical concentrations of carbon monoxide were found to be well below State and federal limits throughout the Air Basin, SCAQMD discontinued monitoring carbon monoxide levels on March 31, 2013. It should be noted that due to the air monitoring station's distance from the Proposed Project site, recorded air pollution levels at the air monitoring station reflect with varying degrees of accuracy local air quality conditions at the Proposed Project site. Table 3 presents the composite of gaseous pollutants monitored from 2016 through 2018.

Table 3: Ambient Air Quality Monitoring Summary

Air Pollutant	2016	2017	2018
Ozone (O₃)			
Max 1 Hour (ppm)	0.111	0.118	0.115
Days > CAAQS (0.09 ppm)	9	7	3
Max 8 Hour (ppm)	0.106	0.114	0.099
Days > NAAQS (0.070 ppm)	39	62	42
Days > CAAQS (0.070 ppm)	40	64	43
Nitrogen Dioxide (NO₂)			
Max 1 Hour (ppb)	74.2	65.6	70.8
Days > NAAQS (100 ppb)	0	0	0
Days > CAAQS (180 ppb)	0	0	0
Particulate Matter (PM₁₀)			
Max Daily California Measurement	74.6	83.9	78.3
Days > NAAQS (150 µg/m ³)	0	0	0
Days > CAAQS (50 µg/m ³)	12	7	10
National Average (20 µg/m ³)	33.7	31.7	32.7
Particulate Matter (PM_{2.5})			
Max Daily National Measurement	32.1	24.9	41.8
Days > NAAQS (35 µg/m ³)	0	0	1
National Average (12 µg/m ³)	10.1	10.4	10.8
State Average (12 µg/m ³)	10.1	ND	10.8
Abbreviations: > = exceed ppm = parts per million ppb = parts per billion µg/m ³ = micrograms per cubic meter CAAQS = California Ambient Air Quality Standard NAAQS = National Ambient Air Quality ND = Insufficient or No Data Bold = exceedance Measurements taken from Azusa Monitoring Station Source: http://www.arb.ca.gov/adam/			

4.3.2 Impact Analysis

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

Less than Significant Impact. CEQA requires a discussion of any inconsistencies between a Proposed Project and applicable general plans (GP) and regional plans (CEQA Guidelines Section 15125; AQMD 2005, 2008). The regional plan that applies to the Proposed Project includes the SCAQMD AQMP. Therefore, this section discusses any potential inconsistencies of the Proposed Project with the AQMP and the City of Baldwin Park General Plan (City of Baldwin Park 2002c).

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the Proposed Project would interfere with the region's ability to comply with federal and State air quality standards. If the decision-makers determine that the Proposed Project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Air Quality Handbook (1993) states that “New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP.” Strict consistency with all aspects of the plan is usually not required. A Proposed Project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Air Quality Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP
- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase

Both of these criteria are evaluated in the following sections.

Criterion 1 – Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in this Air Analysis, it was determined that short-term construction impacts and long-term operations impacts would not result in significant impacts based on the SCAQMD regional, local, and toxic air contaminant thresholds of significance.

Therefore, the Proposed Project is not expected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criterion 2 – Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the Proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Proposed Project are based on the same forecasts as the AQMP. The Regional Comprehensive Plan and Guide consist of three sections: Core Chapters, Ancillary Chapters, and Bridge Chapters. The Growth Management, Regional Mobility, Air Quality, Water Quality, and Hazardous Waste Management chapters constitute the Core Chapters of the document. These chapters currently respond directly to federal and State requirements placed on the Southern California Association of Governments (SCAG). Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this Project, the City’s General Plan defines the assumptions that are represented in the AQMP.

The Proposed Project consists of construction and operation of a new District Headquarters that would include an Operations Building, an Administration Building, and an Operations warehouse. The Proposed Project site is designated as Industrial in the General Plan and is zoned Industrial. The Proposed Project is consistent with the current land use designations and would not require a General Plan Amendment or zone change. In addition, project construction would be required to comply with SCAQMD Rules and Regulations, including Rules 402 and 403 that control the emissions of air contaminants, odors, and fugitive dust. Therefore, based on the above, the Proposed Project is not anticipated to exceed the AQMP assumptions for the Proposed Project site and is found to be consistent with the AQMP for the second criterion.

Based on the discussion above, the Proposed Project will not result in an inconsistency with the SCAQMD AQMP. Accordingly, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

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

Less than Significant Impact. As shown above in Table 3, the Proposed Project area is designated as a federal and/or State nonattainment area for ozone and PM_{2.5}. To estimate if the Proposed Project may adversely affect the air quality in the region, the SCAQMD has prepared the CEQA Air Quality Handbook (SCAQMD 1993) to provide guidance to those who analyze the air quality impacts of proposed projects. The SCAQMD CEQA Air Quality Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table 4.

Table 4: Regional Thresholds of Significance

	Pollutant Emissions (Pounds/Day)						
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	Lead
Construction	75	100	550	150	150	55	3
Operation	55	55	550	150	150	55	3

Source: SCAQMD 2019, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

Air emissions related to construction of the Proposed Project may have the potential to exceed the State and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts, the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided *Final Localized Significance Threshold Methodology* (LST Methodology), July 2008, which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO₂, CO, PM₁₀, and PM_{2.5}.

The LST Methodology provides look-up tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The look-up tables provide 1-acre, 2-acre, and 5-acre project sizes; the 2-acre project site was utilized, since that is the nearest size to the 2.4 acre Proposed Project site. As detailed above, the Proposed Project site is located in Air Monitoring Area 9, which covers east San Gabriel Valley. The nearest sensitive receptors to the Proposed Project site are single-family homes located adjacent to the east side of the Proposed Project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. Table 5 below shows the LSTs for NOx, CO, PM₁₀ and PM_{2.5} for both construction and operational activities.

Table 5: Local Thresholds of Significance

Activity	Allowable Emissions (pounds/Day) ¹			
	NO _x	CO	PM ₁₀	PM _{2.5}
Construction	128	953	7	5
Operation	128	953	2	2

¹ The nearest sensitive receptors are single-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: SCAQMD's Mass Rate Look-Up Tables for two acres in Air Monitoring Area 9 found at:

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

Construction Emissions

Construction of the Proposed Project would create air emissions primarily from equipment exhaust and fugitive dust. The air emissions from the Proposed Project were analyzed through use of the CalEEMod model (see Appendix A). Construction activities for the Proposed Project are anticipated to start in July 2020 and be completed by July 2021. The construction activities would include: (1) site preparation that consists of removing vegetation, stones, and debris from the project site; (2) grading of the 2.4-acre project site; (3) building construction of the proposed 6,915-square-foot Administrative Building, 4,572-square-foot Operation Building, and 3,635-square-foot warehouse building; (4) paving of the proposed 92-space parking lot; and (5) application of architectural coatings on the new structures and parking lot areas.

Table 6 shows the estimated worst-case summer or winter daily emissions that would be predicted from each construction activity for the Proposed Project, based on the default construction equipment assumptions provided by the CalEEMod model.

Table 6: Construction-Related Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions in pounds/day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Site Preparation	1.71	20.59	11.79	0.02	1.62	0.83
Grading	1.99	22.01	10.55	0.02	4.09	2.47
Building Construction	2.43	18.46	16.07	0.03	1.25	1.00
Paving	1.58	10.70	12.38	0.02	0.75	0.59
Architectural Coatings	15.28	1.54	1.98	0.00	0.14	0.10
Maximum Daily Construction Emissions	15.28	22.01	16.07	0.03	4.09	2.47
SCAQMD Regional Thresholds	75	100	550	150	150	55
Exceed Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.

As shown in Table 6, maximum daily construction emissions would not exceed SCAQMD regional criteria pollutant thresholds. In addition, construction emissions would be short-term, limited only to the period when construction activity is taking place. As such, construction-related regional emissions would be less than significant for the Proposed Project.

The Proposed Project's construction-related air emissions from fugitive dust and onsite diesel emissions may have the potential to exceed the State and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. The nearest sensitive receptors to the Proposed Project site are single-family homes located adjacent to the east side of the Proposed Project site.

The local (onsite) air quality emissions from construction were analyzed using the SCAQMD's Mass Rate LST look-up tables and the methodology described in LST Methodology, prepared by SCAQMD, revised July 2008. In order to determine if any of the analyzed pollutants require a detailed analysis of the local air quality impacts, each phase of construction was screened using the LST look-up tables. Table 7 shows the onsite emissions from the CalEEMod model for the different construction phases and the calculated emissions thresholds.

Table 7: Construction-Related Local Criteria Pollutant Emissions

Activity	Onsite Pollutant Emissions in pounds/day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site Preparation	19.92	11.27	1.49	0.79
Grading	21.34	9.94	3.94	2.43
Building Construction	17.43	14.90	0.95	0.91
Paving	10.65	11.78	0.58	0.54
Architectural Coatings	1.53	1.82	0.09	0.09
Maximum Daily Construction Emissions	21.34	14.90	3.94	2.43
SCAQMD Thresholds for 25 meters¹	128	953	7	5
Exceed Thresholds?	No	No	No	No

¹ The nearest sensitive receptors are single-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: CalEEMod Version 2016.3.2 and SCAQMD's Mass Rate Look-Up Tables for 2 acres in Air Monitoring Area 9.

The data provided in Table 7 shows that construction-related emissions would not exceed SCAQMD's local air concentration thresholds. In addition, construction emissions would be short-term, limited only to the period when construction activity is taking place. As such, construction-related local air concentrations would be less than significant for the Proposed Project.

Operational Emissions

The Proposed Project consists of a new District Headquarters that would include an Operations Building, an Administration Building, and an Operations warehouse. The Proposed Project may generate air emissions from vehicular emissions, area sources, energy usage, and from the proposed 125-kilowatt

backup diesel generator. Table 8 shows the estimated worst-case daily emissions from operation of the Proposed Project.

Table 8: Operations-Related Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions in pounds/day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area Sources ¹	0.35	0.00	0.01	0.00	0.00	0.00
Energy Usage ²	0.00	0.03	0.03	0.00	0.00	0.00
Mobile Sources ³	0.30	1.32	3.15	0.01	0.77	0.21
Backup Generator ⁴	0.16	0.44	0.40	0.00	0.02	0.02
Total Project Emissions	0.81	1.79	3.59	0.01	0.79	0.23
SCAQMD Regional Thresholds	55	55	550	150	150	55
Exceed Thresholds?	No	No	No	No	No	No

Notes:

¹ Area sources consist of emissions from consumer products, architectural coatings, and landscape equipment.

² Energy usage consists of emissions from onsite natural gas usage.

³ Mobile sources consist of emissions from vehicles and road dust.

⁴ Backup Generator based on a 125-kW (190 Horsepower) diesel generator that has a cycling schedule of 30 minutes per week.

Source: CalEEMod Version 2016.3.2.

As shown in Table 8, operations-related emissions would not exceed SCAQMD regional thresholds. As such, operations-related regional emissions would be less than significant for the Proposed Project.

The Proposed Project's operations-related onsite air emissions may have the potential to exceed the State and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from operations were analyzed in the same manner detailed above for construction emissions. Table 9 shows the emissions from the CalEEMod model and the emissions thresholds from the look-up tables.

Table 9: Operations-Related Local Criteria Pollutant Emissions

Activity	Onsite Pollutant Emissions in pounds/day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	0.00	0.01	0.00	0.00
Energy Usage	0.03	0.03	0.00	0.00
Mobile Sources	1.32	3.15	0.77	0.21
Backup Generator	1.79	3.59	0.79	0.23
Total Project Emissions	3.14	6.79	1.56	0.44
SCAQMD Threshold for 25 meters ¹	128	953	2	2
Exceed Threshold?	No	No	No	No

Notes:

¹ The nearest sensitive receptors are single-family homes located adjacent to the east side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25 meter threshold.

Source: CalEEMod Version 2016.3.2 and SCAQMD's Mass Rate Look-Up Tables for 2 acres in Air Monitoring Area 9.

The data provided in Table 9 shows that none of criteria pollutants would exceed the SCAQMD local emissions thresholds at the nearest sensitive receptors. As such, operations-related local emissions would be less than significant for the Proposed Project.

Accordingly, the Proposed Project would not result in a cumulative considerable net increase of any criteria pollutant.

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

Less than Significant Impact. The nearest sensitive receptors to the Proposed Project site are single-family homes located adjacent to the east side of the project site. As discussed above in (b), the local concentrations of criteria pollutant emissions have been calculated for construction and operational activities. The analysis above found that less than significant criteria pollutant concentrations would occur during construction and operation of the Proposed Project.

In addition to the criteria pollutant emissions impacts analyzed above, the Proposed Project has the potential to expose nearby sensitive receptors to toxic air contaminants (TACs). According to SCAQMD methodology, health effects from TACs are usually described in terms of "individual cancer risk." "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

Construction-Related TAC Emissions

Construction of the Proposed Project would generate TAC emissions from the onsite operation of diesel-powered equipment in the form of diesel particulate matter (DPM). Given the relatively limited number of heavy-duty construction equipment, the varying distances to the nearby sensitive receptors that construction equipment would operate, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations (CCR) Title 13, Article 4.8,

Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes and requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet; currently, no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment, and by January 2023 no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, less than significant short-term toxic air contaminant impacts would occur during construction of the Proposed Project.

Operations-Related TAC Emissions

Operation of the Proposed Project would create TAC emissions from operation of a 125-kilowatt (190 horsepower) backup diesel generator equipped with a diesel particulate filter (DPF) that will limit DPM created from the backup generator. Backup generators typically cycle on for 30 minutes on a weekly basis in order to keep the engine lubricated and ready to use in case of a power outage. The typical cycling of a backup generator would operate for approximately 26 hours per year. SCAQMD Rule 1110.2 exempts emergency standby generators that operate less than 200 hours per year from obtaining an air permit. The SCAQMD has developed the operating hour exemption limits based on levels that were determined to result in the generation of inconsequential emissions from backup generators. As such, the cancer risk created from the backup generator's TAC emissions to the nearby sensitive receptors is anticipated to be negligible. Therefore, through adherence to the backup generator operating time limits detailed in Rule 1110.2, less than significant long-term toxic air contaminant impacts would occur during operation of the Proposed Project.

Therefore, implementation of the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

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

Less than Significant Impact. Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints, and solvents and from emissions from diesel equipment. The objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Due to the transitory nature of construction odors, a less than significant odor impact would occur; and no mitigation would be required.

Potential sources of odor emission during operation of the Proposed Project would include diesel emissions from the backup generator as well as from trash storage areas. As detailed above, the operation of the backup diesel generator would be limited to 200 hours or less per year and would include an exhaust stack with a diesel particulate filter that would limit the exhaust and associated odors created from the generator to negligible levels. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Due to the distance of the nearest sensitive receptor from the project site and through compliance with SCAQMD's rules that include Rule 402 (SCAQMD 1976; odor regulations) and Rule 1110.2 (backup generator regulations) and the City's trash storage regulations (Chapter 153: Zoning Code), a less than

significant impact related to odors would occur during the ongoing operations of the Proposed Project. Operational-related odor impacts would be less than significant, and no mitigation would be required.

Therefore, construction and operation of the Proposed Project would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

4.4 BIOLOGICAL RESOURCES

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

4.4.1 Impact Analysis

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

Less than Significant with Mitigation Incorporated. The Proposed Project is located within a land use area designated for General Industrial and zoned as Industrial (City of Baldwin Park 2018a, 2018b).

The Project site is south of Arrow Highway and is surrounded by commercial, industrial, and residential buildings. The Proposed Project site is fenced; is heavily disturbed; and consists of dirt, sand, gravel, sparse vegetation, and trash and debris. Due to the disturbed nature of the area, the Proposed Project site is not expected to be a suitable habitat to house any sensitive or special status species. According to the City's Health and Sustainability Element, Initial Study/Negative Declaration, the City is predominantly suburban with limited to no natural habitat (City of Baldwin Park 2014, 2015b). The Proposed Project site is not listed within any Significant Ecological Areas according to the Los Angeles County Department of Regional Planning (Los Angeles County 2015). A California Natural Diversity Database (CNDDB) desktop search was conducted to identify if any burrowing owls have been detected in the Proposed Project vicinity. Burrowing owls can be found in both open and dry grasslands, margins of airports and golf courses, and in vacant urban lots. The results of the search resulted in negative findings. No burrowing owls were present in the CNDDB in a 5-mile radius from the Proposed Project site.

While the Proposed Project is not considered to be suitable habitat, it is possible that birds may be using the existing vegetation as temporary nests because of the quality of the land. The Proposed Project would avoid vegetation removal activities during nesting season (February to September). The following mitigation has been included in to minimize any potential impacts to nesting birds during construction due to their potential presence in vacant and urban environments.

Although only a few small trees and a small number of shrubs were observed on the Proposed Project site, the Proposed Project has the potential to disturb ground-nesting birds and birds nesting in trees located in the buffer area of the project site. Implementation of mitigation measure BIO-1 would reduce impacts on nesting birds to a level less than significant and comply with the Migratory Bird Treaty Act which protects the removal of listed migratory birds or their parts such as eggs and nests from private property.

BIO-1: Nesting Birds. If Project clearing and construction must occur during the avian nesting season (February to September), a survey for active nests must be conducted by a qualified biologist one to two weeks prior to the activities to determine the presence/absence, location, and status of any active nests on or adjacent to the Project site. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on site, a suitable buffer determined by the qualified biologist (e.g., 30 to 50 feet for passerines) should be established around such active nests. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest site shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the District within five days after the survey.

With implementation of mitigation measure BIO-1, impacts would be less than significant.

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

Less than Significant Impact. The Proposed Project site does not include riparian habitat, wetland, or a sensitive natural community and is currently graded and vacant (USFWS 2019). The Proposed Project site and surrounding areas are predominantly built out and consist primarily of industrial businesses mixed with commercial and residential at the southern boundary. The Proposed Project is located approximately 1,300 feet south of the Santa Fe Reservoir (Google 2019). However, construction and operational activities would remain within the Proposed Project site and would not create a significant impact on the reservoir. Therefore, impacts to riparian or sensitive habitats would be less than significant.

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

No Impact. According to the U.S. Fish and Wildlife Service National Wetland Inventory Map, the Proposed Project is not located on any protected wetlands or areas that appear to contain wetlands, marshes, or vernal pools (USFWS 2019). No impact would occur.

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

Less Than Significant with Mitigation Incorporated. The Proposed Project is located in an urbanized area primarily surrounded by commercial industrial uses. As discussed in Section 4.4.1 (a), the Proposed Project is not located within an ecologically sensitive area. No water bodies are present that can provide an adequate habitat for migratory fish. The area is not designated for a wildlife nursery site. The Project site is not a designated habitat for any endangered species or any species of concern.

While the Proposed Project is not found to contain suitable habitat for migratory species, the Proposed Project has the potential to disturb ground-nesting birds and birds nesting in trees located in the buffer area of the Project site. Implementation of mitigation measure BIO-1 would reduce impacts on nesting birds to a level less than significant and comply with the Migratory Bird Treaty Act which protects the removal of listed migratory birds or their parts such as eggs and nests from private property.

Implementation of BIO-1 would result in less than significant impacts to trees and migratory wildlife with mitigation incorporated.

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

Less than Significant with Mitigation Incorporated. Trees and shrubs were observed on the Proposed Project site. The Proposed Project would require the removal of the trees during construction. As previously discussed in Section 4.4.1 (d), the Proposed Project would comply with Chapter 153 of the Zoning Code by obtaining a permit from the Tree Officer prior to the removal of any mature trees in the area (City of Baldwin Park 2012). Implementation of BIO-2, would result in less than significant impacts in compliance with the local tree policy.

The City of Baldwin Park's Chapter 153 of Zoning Code, Section 153.165 discusses the City's tree preservation and protection policy. Subsection 153.165.090 outlines the requirements for tree removal on private property. Under this section, no person shall remove a Mature Tree or Required Tree on private property without first obtaining a permit from the Tree Officer (City of Baldwin Park 2012). A tree permit shall be granted by the officer if it meets one of the following findings:

1. The Mature Tree or Required Tree constitutes a nuisance or hazard by virtue of its condition, location, species, proximity to existing structures, walkways, or utilities.
2. The removal of the Mature Tree or Required Tree is deemed necessary by a certified arborist to protect the health of other trees in the vicinity due to disease or infestation affecting the subject tree.
3. The substantial trimming or removal of the Mature Tree or Required Tree is deemed necessary to accommodate solar access pursuant to the California Solar Shade Control Act of 1979.
4. The substantial trimming or removal of the Mature Tree or Required Tree is necessary to prevent a substantial inconvenience or financial hardship to the property owner.
5. A suitable replacement tree in terms of species and ultimate size would be planted within six months of the permitted removal of the subject tree.

The Tree Officer would decide the size, location, and species of the replacement tree. Other factors that would be considered include the size, location, type of tree, number of trees on the property and surrounding neighborhood. The Proposed Project currently contains approximately five trees (City of Baldwin Park 2012). The Proposed Project shall implement the following measures to comply with local policies relating to tree removal.

BIO-2: The District would coordinate with the Tree Officer to decide on the status of the trees, if the tree removal activities are covered under the Zoning Code's exemption, and if replacement trees are required within the Proposed Project site. If a permit is required, the permit would be obtained prior to construction activities.

With implementation of mitigation measure BIO-2, impacts related to trees within the Proposed Project site would be less than significant.

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

No Impact. As discussed in Section 4.4.1 (a), the Proposed Project is not located within a significant ecological area. According to the City's General Plan Open Space and Conservation Element, the City of Baldwin Park is completely urbanized with no forest, wildlife, or other similar resources. The Proposed Project site is within an area primarily for industrial uses; and the area is not designated as, or would be considered, a suitable habitat for species or for conservation uses (City of Baldwin Park 2002d). No impact would occur.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.5.1 Impact Analysis

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

No Impact. The City contains several areas with historic, cultural, and architectural significance. The Baldwin Park Historical Society identifies structures of regional and local importance. The society has an extensive collection of information of historic buildings and other research documents pertaining to the history of the City (City of Baldwin Park 2014). The Proposed Project site does not have any designated historic structures within the property. During construction of the Proposed Project, no buildings within the vicinity of the site would be removed or modified to accommodate the Proposed Project. No impacts would occur.

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

Less than Significant with Mitigation Incorporated. The Proposed Project site is located on a vacant property in an urbanized area with land uses consisting primarily of industrial and commercial businesses, with some residential properties at the southern boundary of the Proposed Project site. The City of Baldwin Park is completely urbanized. The areas surrounding the Proposed Project are fully developed, and ground-disturbing activities have occurred through the installation of building foundations and utility lines. The Proposed Project would not include grading that would extend in depths reaching native soils. The depth of disturbance would be 10 feet below existing grade for the infiltration system and 5 to 6 feet for the buildings. Any grading that would occur would be within depths where previous utility lines were placed during the development of the surrounding areas. Given that the Proposed Project is surrounded by development, and surrounding areas are covered by impervious surfaces, any surface finds of archaeological resources would not be visible. However, should resources be uncovered during ground-disturbing activities that were not previously identified, the following mitigation measure would be implemented should any resources be discovered. Impacts would be less than significant with mitigation incorporated. Discussion on tribal cultural resources is provided in Section 4.18.

CUL-1: If archaeological or paleontological resources are discovered during construction, all construction activities in the general area of the discovery shall be temporarily halted until the resource is examined by a qualified monitor, retained by the District. The monitor shall recommend next steps (i.e., additional excavation, curation, preservation, etc.).

Therefore, impacts would be less than significant with mitigation incorporated.

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

Less than Significant Impact. No cemeteries are known to be located within the Proposed Project site. The areas surrounding the Proposed Project are fully developed, and ground-disturbing activities have occurred through the installation of building foundations, as well as installation of utility lines to service the area. However, because resources are often buried and not easily identifiable, the Proposed Project would be subject to the standard condition of approval if any cultural resources, including human remains, are identified. During Proposed Project construction, activities would be halted and an archaeologist must be available to evaluate the find. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. As a result, impacts would be less than significant.

4.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section describes the potential energy usage effects from implementation of the Proposed Project. Construction and operational energy usage modeling was performed through use of the CalEEMod Version 2016.3.2 and EMFAC2017 models. The EMFAC2017 model output files are provided in Appendix B, and the CalEEMod model output files are provided in Appendix C and were also utilized for the greenhouse gas emissions analysis.

4.6.1 Impact Analysis

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

Less than Significant Impact. The following calculates the potential energy consumption associated with the construction and operation of the Proposed Project and provides a determination of whether energy consumption utilized by the Proposed Project is wasteful, inefficient, or an unnecessary consumption of energy resources.

Construction Energy Usage

Construction activities for the Proposed Project would consume energy in three general forms:

- Petroleum-based fuels used to power off-road construction vehicles and equipment on the Proposed Project Site, construction worker traveling to and from the Proposed Project Site, as well as delivery and haul truck trips (e.g., hauling demolition material to offsite reuse and disposal facilities)
- Electricity associated with the conveyance of water that would be used during Project Proposed construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power
- Energy used in the production of construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass

Construction-Related Electricity

Construction activities for the Proposed Project would require the consumption of electricity. Where possible, electricity would be supplied to the Proposed Project site by Southern California Edison and would be obtained from the existing electrical lines in the vicinity of the Proposed Project site. The use of electricity from existing power lines rather than temporary diesel- or gasoline-powered generators would minimize impacts on energy use. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary and nominal and would cease upon the completion of construction. Overall, construction activities associated with the Proposed Project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Since the Proposed Project is an infill project surrounded by development, it is anticipated that only nominal improvements would be required to Southern California Edison distribution lines and equipment from development of the Proposed Project. Where feasible, the new service installations

and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with City's guidelines and requirements would ensure that the Proposed Project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with grading, construction, and development. Construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Natural Gas

Construction activities for the Proposed Project would not involve the consumption of natural gas. Natural gas would not be supplied to support construction activities; thus, no demand would be generated by construction. Since the Proposed Project site is located in a developed portion of the City that has natural gas lines in the vicinity of the Proposed Project, construction of the Proposed Project would be limited to the relocation of existing natural gas line (if necessary) within the Proposed Project site. Construction-related energy usage impacts associated with the relocation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, the Proposed Project would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service. Therefore, construction-related impacts to natural gas supply and infrastructure would be less than significant.

Construction-Related Petroleum Fuels

Construction of the Proposed Project would utilize petroleum fuels for both off-road equipment and from on-road vehicles that include automobiles for transporting workers to and from the Proposed Project site as well as trucks transporting dirt from the Proposed Project site and building supplies to the Proposed Project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions utilized in the CalEEMod model run (see Appendix B) and the fuel usage calculations provided in the 2017 Off-road Diesel Emission Factors spreadsheet, prepared by CARB (<https://ww3.arb.ca.gov/msei/ordiesel.htm>). The off-road construction equipment fuel calculations are shown in Appendix B, which found that the off-road equipment utilized during construction of the Proposed Project would consume 29,833 gallons of fuel (CARB 2017b).

For the on-road construction trips, the fleet average miles per gallon rates have been calculated through use of the EMFAC2017 model (<https://www.arb.ca.gov/emfac/2017/>); and the EMFAC2017 model printouts are provided in Appendix B. Appendix B also shows the on-road construction vehicle trips modeled in CalEEMod and the fuel usage calculations, which found that the on-road construction-related vehicle trips would consume 4,728 gallons of fuel.

As shown in Appendix B, the combined fuel used from off-road construction equipment and on-road construction trips for the Proposed Project would result in the consumption of 34,560 gallons of fuel. Construction activities associated with the Proposed Project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the Proposed Project would not result in the

wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the Proposed Project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the Proposed Project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete; it is reasonable to assume that the production of building materials such as concrete, steel, and other materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy Usage

The ongoing operation of the Proposed Project would require the use of energy resources for multiple purposes, including electrical usage associated with lighting, heating/ventilation/air conditioning (HVAC), appliances, electronics, transport of water and solid waste disposal, natural gas usage for heating of the buildings, and petroleum fuel usage associated with new vehicle trips to the Proposed Project site and landscape equipment.

Operations-Related Electricity Usage

Operation of the Proposed Project would result in consumption of electricity at the Proposed Project site. According to the CalEEMod model run provided in Appendix B, operation of the Proposed Project would utilize 176,273 kilowatt-hours per year of electricity. It should be noted that the Proposed Project would comply with all federal, State, and City requirements related to the consumption of electricity, including the CalGreen Building Standards. Therefore, it is anticipated that the Proposed Project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the Proposed Project's electricity demand. Thus, impacts with regard to electrical supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Operations-Related Natural Gas Usage

Operation of the Proposed Project would result in consumption of natural gas at the Proposed Project site. According to the CalEEMod model run provided in Appendix B, operation of the Proposed Project would consume 3123 thousand British Thermal Units (MBTU) per year of natural gas. It should be noted that, the Proposed Project would comply with all federal, State, and City requirements related to the consumption of natural gas, including CCR Title 24, Part 6 Building Energy Efficiency Standards and CCR Title 24, Part 11: California Green Building Standards. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the Proposed Project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the Proposed Project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Operations-Related Petroleum Fuel Usage

Operation of the Proposed Project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the Proposed Project site. According to the CalEEMod model run provided in Appendix B, operation of the Proposed Project would generate an additional 358,944 vehicle miles traveled per year. According to the EMFAC2017 model run (see Appendix B), the fleet average miles per gallon rate for all gasoline-powered vehicles in southern California in the year 2020 is 24.6 miles per gallon. Based on this rate, operation of the Proposed Project would use 14,602 gallons of transportation fuel per year. It should be noted that the Proposed Project would comply with all federal, State, and City requirements related to the consumption of transportation energy that includes CCR Title 24, Part 11 California Green Building Standards that require all new non-residential parking lots to provide preferred parking for clean air vehicles as well as provide electric vehicle charging spaces. Therefore, it is anticipated the Proposed Project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles, and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the Proposed Project's demand. Thus, impacts with regard to transportation energy supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

In conclusion, the Proposed Project would comply with regulatory compliance measures outlined by the State and City related to Air Quality, Greenhouse Gas Emissions (GHG), Transportation/Circulation, and Water Supply. Additionally, the Proposed Project would be constructed in accordance with all applicable City Building and Fire Codes. Therefore, the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

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

Less than Significant Impact. Energy consumption from new projects that do not include residential uses, such as the Proposed Project, are primarily controlled by CCR Title 24, Part 11 California Green Building Standards Code (CalGreen), which provides minimum requirements for bicycle parking, carpool/vanpool/electric vehicle parking spaces, use of water-efficient plumbing and landscaping fixtures, recycling and use of recycled materials in building products. The City adopted CalGreen in 2019 and codified it under Section 150.140 of the Municipal Code and defers solely to CalGreen, as there are currently no other adopted energy plans in the region (City of Baldwin Park 2019b). Specific CalGreen requirements applicable to the Proposed Project include requiring that a minimum of 65 percent of construction waste be diverted from landfills and providing bicycle parking spaces, as well as providing electric vehicle charging stations within the proposed parking lot. Through implementation of the above programs, regulations, and policies, the Proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.7.1 Impact Analysis

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The Proposed Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest fault to the Proposed Project site is the Duarte Fault in the Sierra Madre Fault Zone, which is approximately 5 miles north of the site (California Department of Conservation 2019). No active fault zones are located within the City of Baldwin Park (City of Baldwin

Park 2002a). Because Southern California is a seismically active region, and the City is located between the Sierra Madre and Walnut Creek faults, it is highly likely that regional earthquakes would occur that could affect the Proposed Project site. All structures and onsite facilities would be designed in accordance with the Uniform Building Code Seismic Safety Standards to minimize the hazards from earthquakes and other seismic activities. Since the design and construction of the Proposed Project would conform to the specific mandated structural design requirements to protect against strong seismic shaking and the Proposed Project is not located within an Alquist-Priolo Earthquake Fault Zone, the potential impacts due to rupture of a known earthquake fault are less than significant.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Proposed Project site is located closest to the Sierra Madre Fault, which is approximately 5 miles north of the site. The Proposed Project is located in between the Sierra Madre and Walnut Creek fault lines. Its location exposes the region to the risk of large earthquakes of magnitude 7.0 or greater. These are expected to occur along at least one of the active faults in the region in a time period equivalent to the historic record (City of Baldwin Park 2015c). All structures and onsite facilities would be designed in accordance with the Uniform Building Code Seismic Safety Standards to minimize the hazards from earthquakes and other seismic activities. Since the design and construction of the Proposed Project would be required to conform to the specific mandated structural design requirements to protect against strong seismic shaking, the potential impacts due to strong seismic ground shaking are less than significant.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

No Impact: Liquefaction occurs when loosely packed, water-logged soils/sediments near the ground surface lose their strength during strong ground shaking. The Proposed Project site is not located within a liquefaction zone (California Department of Conservation 2019). Therefore, the Proposed Project would result in no impact to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

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

No Impact. Landslides are the movement of rock, debris, and soils moving down a slope. The Proposed Project site is not located near or within areas that are susceptible to landslides (California Department of Conservation 2019). Landslide potential in the area of the Proposed Project is considered low as the Proposed Project site is relatively flat. Therefore, the Proposed Project would result in no impact to the risk of loss, injury, or death involving landslides.

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

Less than Significant Impact. The Proposed Project would not result in substantial soil erosion or loss of topsoil. Although short-term impacts would normally occur during construction work, the Proposed Project area involved is only approximately 2.4 acres. The Proposed Project would include the development of a Stormwater Pollution Prevention Plan (SWPPP) to address and control stormwater

pollution. The implementation of a SWPPP is required for projects disturbing more than 1 acre of developed land. Construction activities would result in a minor amount of soil disturbance. If soil is not contained and is directly exposed to rain, soil erosion and sediment could flow off site. However, this impact is considered less than significant, as erosion and sediment control best management practices (BPMs) identified in the SWPPP would be implemented as part of the Proposed Project. These would result in less than significant impacts.

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

No Impact. Lateral spreading is defined as landslides that occur on gentle slopes caused by earthquake-induced liquefaction. Subsidence occurs when a sudden sinking of the ground's surface occurs. The Proposed Project site is not located on a geologic unit or soil that is unstable. Extraction of the area that could result in subsidence within the Proposed Project is not proposed. The City of Baldwin Park is not located in areas of subsidence (USGS 2019). As discussed in section 4.6.1 a) iii) and iv), the Proposed Project site is not located within a liquefaction zone; and the landslide potential in the area is considered low. Therefore, no impact would occur.

- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

No Impact. The Proposed Project site would not be located on expansive soil (USGS 2019). Given the developed character of the City, no significant adverse constraints related to expansive soils are anticipated. The Proposed Project would not create substantial direct or indirect risks to life or property. All structures and onsite facilities would be designed in accordance with the Uniform Building Code Seismic Safety Standards to minimize the hazards from earthquakes and other seismic activities. No impact would occur.

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

Less than Significant Impact. The City of Baldwin Park Health and Sustainability Element states that the City is serviced by the Los Angeles Sanitation District with a network of sewer lines. The Proposed Project site relies on sewers for wastewater disposal. Septic tanks are not used within the City (City of Baldwin Park 2014, 2015b). While the Proposed Project includes the construction of restroom facilities for the employees which would increase the generation of wastes and wastewater, the Proposed Project would tie in to existing network lines and would not require the installation of septic tanks or other alternative systems. Impacts would be less than significant.

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

Less than Significant Impact with Mitigation. According to the City's Health and Sustainability Element, the City is located in the San Gabriel Valley Basin with alluvial deposits that are too young geologically to contain significant fossils in their undisturbed and original location. The City is not considered paleontologically sensitive (City of Baldwin Park 2014, 2015b). Surface deposits in Baldwin

Park and around the Project site consist of younger Quaternary Alluvium, derived as deposits from the San Gabriel Mountains to the north and San Gabriel River. These deposits are unlikely to contain significant fossils (City of Baldwin Park 2015c). However, in the event that paleontological resources are encountered during the course of project development, implementation of CUL-1 would result in less than significant impacts to a paleontological resource or unique geologic feature.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section describes the potential global climate change effects from implementation of the Proposed Project. GHG emission modeling was performed through use of the CalEEMod Version 2016.3.2. The CalEEMod model output files are provided in Appendix C.

4.8.1 Impact Analysis

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

Less Than Significant Impact. Significant legislative and regulatory activities directly and indirectly affect climate change and GHGs in California. The primary climate change legislation in California is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 focuses on reducing greenhouse gas emissions in California, and AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In addition to AB 32, Executive Order B-30-15 was issued on April 29, 2015, that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. In September 2016, AB 197 and Senate Bill (SB) 32 codified into statute the GHG emission reduction targets provided in Executive Order B-20-15.

CARB is the State agency charged with monitoring and regulating sources of emissions of GHGs in California that contribute to global warming in order to reduce emissions of GHGs. The CARB Governing Board approved the 1990 GHG emissions level of 427 million tons of CO₂ equivalent (MtCO₂e) on December 6, 2007. Therefore, in 2020, annual emissions in California are required to be at or below 427 MtCO₂e. The CARB Board approved the Climate Change Scoping Plan (Scoping Plan) in December 2008, the First Update to the Scoping Plan in May 2014, and California's 2017 Climate Change Scoping Plan in November 2017 (CARB 2008, 2014, 2017a). The Scoping Plans define a range of programs and activities that will be implemented primarily by State agencies but also include actions by local government agencies. Primary strategies addressed in the Scoping Plans include new industrial and emission control technologies; alternative energy generation technologies; advanced

energy conservation in lighting, heating, cooling, and ventilation; reduced-carbon fuels; hybrid and electric vehicles; and other methods of improving vehicle mileage. Local government will have a part in implementing some of these strategies. The Scoping Plans also call for reductions in vehicle-associated GHG emissions through smart growth that will result in reductions in vehicle miles traveled (CARB 2010, 2016, 2017a, 2018).

The CalEEMod model used above to calculate the criteria pollutant emissions was also utilized to calculate the GHG emissions associated with construction and operation of the Proposed Project (see Appendix C). The CalEEMod model calculated GHG emissions generated from the Proposed Project that include construction and operation of a new District Headquarters that would include an Operations Building, an Administration Building, and an Operations warehouse. Per the analysis methodology presented in the SCAQMD Working Group meetings, the construction emissions were amortized over 30 years. Table 10 shows the estimated GHG emissions that would be predicted from development of the Proposed Project.

Table 10: Annual Greenhouse Gas Emissions from the Proposed Project

Activity	Greenhouse Gas Emissions in metric tons/year			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources	0.00	0.00	0.00	0.00
Energy Usage	62.71	0.00	0.00	62.95
Mobile Sources	163.67	0.01	0.00	163.90
Backup Generator ¹	1.88	0.00	0.00	1.89
Solid Waste	2.86	0.17	0.00	7.09
Water and Wastewater	16.42	0.09	0.00	19.22
Total Construction Emissions Amortized over 30 Years ²	9.86	0.00	0.00	9.91
Total Project Emissions	257.40	0.27	0.00	264.96
SCAQMD Draft Threshold of Significance				3,000
Exceed Threshold?				No

Notes:

¹ Backup Generator based on a 125-kW (190 Horsepower) diesel generator that has a cycling schedule of 30 minutes per week.

² Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2016.3.2 (see Appendix C).

This analysis proposes to use the “Tier 3” quantitative threshold for all land use projects (SCAQMD 2010) as recommended by the SCAQMD. The SCAQMD proposes that if a project generates GHG emissions below 3,000 MTCO₂e, it could be concluded that the Project’s GHG contribution is not “cumulatively considerable” and is therefore less than significant under CEQA. As shown in Table 10, the Proposed Project would generate 264.96 MTCO₂e per year, which would not exceed SCAQMD draft annual threshold of 3,000 MTCO₂e. As such, it could be concluded that the Project’s GHG contribution is not “cumulatively considerable” and is therefore less than significant under CEQA.

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

Less than Significant Impact. The California State Legislature adopted AB 32 in 2006, which requires the state's GHG emissions by 2020 to meet the GHG emissions level created in 1990, and adopted AB 197 and SB 32 in 2016, which require the state's GHG emissions to be 40 percent below 1990 levels by 2030.

In order to achieve the target provided in AB 32, the SCAQMD developed a Working Group that developed a tiered approach in order to determine if proposed land use projects would contribute to an exceedance of the GHG emissions targets detailed in AB 32. As shown above in Table 10, the Proposed Project would generate 264.96 MTCO₂e per year from construction and operation of the Proposed Project. The GHG emissions generated from the Proposed Project would be within the "Tier 3" quantitative threshold of 3,000 MTCO₂e per year for all land use projects as recommended by the SCAQMD.

The SCAQMD has not yet updated its Tier 3 quantitative threshold to address AB 197 and SB 32. However, it is anticipated that the Tier 3 thresholds would be reduced around 40 percent, which is equivalent to how much more stringent AB 197 and SB 32 are over AB 32. Since the Proposed Project's GHG emissions are 97 percent below the Tier 3 threshold, it is anticipated that the Proposed Project's GHG emissions would remain less than significant under any future thresholds developed to address AB 197 and SB 32. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs. Less than significant impacts would occur.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.9.1 Environmental Setting

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Proposed Project by Ninyo & Moore in April 2019 (Appendix D). The objective of the Phase I ESA is to evaluate for recognized environmental conditions (RECs). The term recognized environmental conditions means “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.”

A computerized, environmental information database search was performed by Environmental Data Resources, Inc. (EDR) on April 2, 2019. The search included federal, state, tribal, and local databases. A summary of the environmental databases searched, their corresponding search radii, and number of noted properties of potential environmental concern, is presented in the EDR report in Appendix D. The review was conducted to evaluate whether the site or properties within the site vicinity have been documented as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects. The Proposed Project was not listed in the regulatory databases searched.

Offsite properties/facilities listed in the database report were evaluated as to their potential to impact soil and/or groundwater at the Proposed Project site. The San Gabriel Valley (Area 2), Arrow Parking on 5065 Calmview Avenue, and U.S. Rentals on 15402 East Arrow Highway were interpreted to represent a potential environmental concern to the Proposed Project, based on their proximity to the site, the nature of the database on which they are listed, and/or the assumed direction of the groundwater flow in the site vicinity (south-southwest).

Per the Phase I Environmental Site Assessment, likelihood is low that the listings for the other offsite properties listed in the database report represent a REC to the site at the current time.

Based on the historical agricultural use of the property, commercial pesticides and herbicides may have been applied to the site and site vicinity during the agricultural use of the land. Residual concentrations of these substances and/or their breakdown derivatives may be present in the site soils. The historical aerial photographs reviewed by Ninyo & Moore did not indicate the presence of buildings or other structures on the site where pesticides or herbicides may have been mixed or stored. Based on experience and the duration since pesticides/herbicides may have been applied (more than 60 years), the former agricultural usage of the site is considered a *de minimis*, or minor condition (Appendix D).

Site Observations

Ninyo & Moore evaluated the site for evidence of the potential environmental concerns shown in Table 11.

Table 11: Site Observations Summary

Conditions	Observed or Noted	Comments
Waste Generation/Storage/Disposal	X	Solid waste consisting of several small stockpiles of concrete, debris, soil, and gravel observed in various areas of the site. This is considered a <i>de minimis</i> condition.
Potential PCB-Containing Equipment	X	Three pole-mounted transformers were observed adjoining the site to the west and north. Staining or signs of release were not observed.
Drums	X	Two 55-gallon drums containing trash were observed in the northern portion of the site. Staining or signs of release around the drums were not observed.
Phase I ESA – Appendix D		

4.9.2 Impact Analysis

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

Less than Significant Impact. Material that is to be transported, stored, or disposed of during construction and operation of the Proposed Project has the potential to contain hazardous materials and could present a hazard to construction workers, the public, or the environment if improperly managed. Vehicles and equipment used for construction require the temporary, short-term use of potentially hazardous substances, such as fuels, lubricating oils, and hydraulic fluid. Once operational, chemicals to be used on site would be typical chemicals found in administrative offices such as cleaning materials and other office maintenance equipment. The District would be required to comply with all environmental regulations, and any applicable rules and regulations for handling hazardous materials. The City of Baldwin Park's Zoning Code provides performance standards relating to hazardous materials and wastes within the City (Section 153.140.030) and is provided below:

Hazardous materials standards. To protect the health and welfare of the residents and business community of the city, the use, storage, manufacturing or disposal of hazardous materials shall

be regulated and monitored according to standards established by the United States Environmental Protection Agency (EPA), the California Department of Health Services (DHS), the California Department of Toxic Substances Control (DTSC) and others to identify hazardous materials and prescribe handling, use and disposal practices.

Risk management and prevention program. A risk management and prevention program, together with an inventory statement that is in accordance with federal, state and local laws, shall be prepared for all structures and land uses using materials identified as hazardous by the EPA, DHS, DTSC or other agency, as applicable.

Flammable materials and open fires. The use and storage of flammable or explosive materials shall comply with the fire prevention code of the city and all applicable ordinances. No open burning is permitted unless a written permit for such activity has been issued by the South Coast Air Quality Management District.

Hazardous materials discharge. No liquid or solid waste or similar material that may contaminate water supplies, interfere with bacterial processes in sewage treatment or otherwise cause the emission of dangerous or offensive elements shall be discharged into the public sewer or private disposal system, except in accordance with the requirements of Baldwin Parks' Public Works Code and other applicable regulations.

Radioactivity. No activity that emits dangerous levels of radioactivity shall be permitted at any time.

The Proposed Project would comply with the City's performance standards on handling hazardous materials and hazardous wastes. BMPs implemented during construction would include proper procurement of hazardous materials, proper storage handling, preparation of spill prevention plans, disposal procedures, and provide training for handling any potentially hazardous materials. All chemicals would be properly stored, labeled, and discarded in accordance with the City guidelines and with CCR Title 22 Division 4.5 relating to hazardous materials. In the event of an emergency, the Proposed Project would coordinate with the City of Baldwin Park's Public Works Department for proper response procedures. The District shall comply with the City's Chapter 50 and 53 of the municipal code for Solid Waste Management and Construction and Demolition Materials Management for handling non-hazardous waste. The District shall coordinate with the City's Public Works Division to handle hazardous materials spills to reduce potential impacts relative to hazardous materials to less than significant levels.

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

Less than Significant Impact. The Phase I ESA reviewed historical resources and uses of the Proposed Project site. The site was vacant in 1928 and developed with two barns or residential-type buildings by 1964. The buildings and the majority of vegetation were removed from the site by 2016. Based on the historical agricultural use of the property, commercial pesticides and herbicides may have been applied to the site and site vicinity during the agricultural use of the land. Residual concentrations of these substances and/or their breakdown derivatives may be present in the site soils. The historical

aerial photographs reviewed by Ninyo & Moore did not indicate the presence of buildings or other structures on the site where pesticides or herbicides may have been mixed or stored. Based on experience and the duration since pesticides/herbicides may have been applied (more than 60 years), the former agricultural usage of the site is considered a *de minimis* condition. Several small debris, gravel, and soil stockpiles and two 55-gallon drums containing trash were observed on the site during the site reconnaissance. These are considered *de minimis* conditions.

The San Gabriel Valley (Area 2) was listed on the NPL database. The site is included in the area covered by the groundwater contaminant plume, which includes PCE, TCE, carbon tetrachloride, perchlorate, 1,4-dioxane, and NDMA. Due to the estimated depth to groundwater on site (approximately 200 feet below ground surface), this listing is not considered to be a REC to the site. According to EDR's Environmental Lien and AUL Search report, environmental liens or AULs were not found for the site. Based on historical research and the results of the Vapor Encroachment Screening Matrix (VESM) conducted by Ninyo & Moore, it is unlikely that a vapor encroachment condition (VEC) exists beneath the site.

Based on these findings, the Proposed Project would not create a significant hazard to the public due to the release of hazardous materials to the environment (Appendix D).

During the construction phase of the Proposed Project, there is a standard risk in construction sites for a potential spill or release of hazardous materials. As previously discussed in Section 4.9.1 (a), the Proposed Project would implement BMPs and comply with the City's performance standards on the handling of potentially hazardous materials in the event of an accidental release. Furthermore, the quantities of potentially hazardous materials to be used during construction are not of significant quantities in comparison to larger construction projects that require more complex development and subsurface activities. Any wastes generated would be disposed of in accordance with local guidelines, and BMPs would prevent the discharge of hazardous materials into the public. These include having drip pans and absorbent materials for spill cleanups. No significant risk of accidental upset or the release of hazardous substances is anticipated with the Proposed Project. Compliance with applicable rules and regulations to reduce potential impacts relative to hazardous materials and implementation of BMPs would result in impacts of less than significant levels.

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

No Impact. The nearest schools in the area include:

- Pleasant View Elementary School 0.4 mile to the southwest
- Geddes Elementary School 0.8 mile to the southwest
- North Park High School 0.9 mile to the southwest
- Margaret Heath Elementary School 0.9 mile to the west
- Jerry D. Holland Middle School 1 mile to the southwest
- Santa Fe School 1.1 mile to the southwest
- Merwin Elementary School 1.1 mile to the southeast
- Manzanita Elementary School 1.2 miles to the southeast (Google Earth 2019)

The Proposed Project is not anticipated to result in a release of hazardous emissions, hazardous or acutely hazardous materials, or substances in the vicinity of existing or proposed schools. As the closest schools are all over 0.25 mile from the Proposed Project site, no impact is expected.

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

No Impact. A review of federal and state standard and supplemental databases indicated that the Proposed Project site is not located within any identified hazardous material site pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or environment (DTSC 2019).

- e) *For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The Proposed Project site is located approximately 5 miles northeast of San Gabriel Valley Airport (Google Earth 2019). The Proposed Project is a new headquarters for the Valley County Water District and would involve employees working at the new headquarters during office hours on a regular basis after construction is complete. The Proposed Project site is not located within an airport land use plan (County of Los Angeles 2019). Thus, it would not result in safety hazard for people working in the area. No impact would occur.

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

Less than Significant Impact. The construction of the Proposed Project would not involve blocking or restricting any access routes. While the Proposed Project may introduce temporary delays to traffic during construction with vehicles entering and exiting the site, these incidents are limited during the construction phase. The Proposed Project would comply with the City's Public Safety Policy 1.3 that requires implementing the City's Multi-Hazard Functional Plan and Supplemental Emergency Preparedness Plans (City of Baldwin Park 2014). The Proposed Project would not interfere with emergency response plans or operations near the Proposed Project site. No impacts are expected.

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

No Impact. The City of Baldwin Park is an urban environment with little danger of wildfires and is not located within a very high fire hazard severity zone (City of Baldwin Park 2002a; County of Los Angeles Open Data 2019). The Proposed Project site is located in the heavily industrialized area along the northern boundary of the City of Baldwin Park. Additionally, the Proposed Project site contains limited vegetation; and all construction and operation activities would be conducted in compliance with standard safety protocols, which would minimize potential release of flammable materials (including fuel, lubricant, paint, and solvents). No impacts are expected.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.10.1 Impact Analysis

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

Less than Significant Impact. The Proposed Project is the construction and operation of a new 15,122-square-foot District Headquarters that would include two main buildings (an Operations Building and Administration Building), a signage tower, and an Operations warehouse. The Proposed Project would have the potential to result in increased runoff with the introduction of impervious surfaces such as the buildings and parking lot. The Proposed Project would also utilize potentially hazardous materials during construction work. These activities could potentially result in the generation of water quality pollutants that includes debris, silt, chemicals, and other solvents. During ground-disturbing activities and site preparations, excavated soil would be transported to a permitted landfill such as the El Sobrante landfill in Corona, which is the primary destination for solid waste collected in Baldwin Park (City of Baldwin Park 2014).

Any impacts from discharge or runoff from proposed construction activities would be minimized by the Proposed Project adhering to project BMPs. BMPs that would be implemented by the Proposed Project would involve but not be limited to adding signs in storm drains to discourage illegal dumping, enclosing materials that may contaminate water in cabinets or sheds, encouraging grading during dry seasons, and implementing erosion control plans compliant with the California Building Code.

Per the City's General Plan Health and Sustainability Element, all new development projects must comply with the City's procedures in controlling stormwater runoff in accordance with the countywide municipal stormwater permit program which is part of the National Pollutant Discharge Elimination System Permits (NPDES) to prevent violating water quality standards. The Proposed Project would comply with Chapter 52 of the City's Municipal Code to regulate stormwater runoff (City of Baldwin Park 2014, 2015b) and the General Plan Open Space and Conservation Policy below (City of Baldwin Park 2002d):

Policy 5.2 Continue enforcement of municipal NPDES Permit to protect water quality within the San Gabriel River watershed.

The Proposed Project would comply with the plans and procedures identified in the Storm Water Pollution Prevention Plan (SWPPP) for the Proposed Project. The SWPPP provides guidelines to minimize stormwater pollution from runoff during construction of the Proposed Project. The Proposed Project involves the construction and operation of the District headquarters. It would not consist of any specialized activities that involve the use of large quantities of water. The Proposed Project would not produce runoff water in quantities that would result in the significant degradation of surface and groundwater quality. While the Proposed Project would result in the increase of impervious surfaces, BMPs would allow any runoff to be minimized and/or be filtered prior to entering the public stormwater systems. These include but are not limited to swales, wattles, filters and other porous materials, and managerial BMPs such as spill prevention and waste reduction practices. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The Valley County Water District, the San Gabriel Valley Water Company, and the Valley View Mutual Water Company all provide potable water to the City of Baldwin Park, with VCWD as one of the largest suppliers. VCWD operates four production wells that extract groundwater from the Main San Gabriel Basin located in east Los Angeles County. The four production wells are the Clinton O. Nixon East Well and West Well and the Maine Street East Well and West Well, which extract a maximum of 8,450 gallons per minute combined from underground aquifers that are as deep as 300 feet below surface (VCWD 2019). Per the General Plan Health and Sustainability Element, VCWD is capable of meeting all demand scenarios including normal, single dry-year, and multiple dry-year conditions. The San Gabriel Valley Water Company also supplies water from groundwater wells for Baldwin Park and other surrounding cities. These wells are located in Baldwin Park and El Monte. Six of the reservoirs serve the City (City of Baldwin Park 2014, 2015b). VCWD obtains its groundwater from the Main San Gabriel Basin. VCWD has the pumping rights of approximately 5,959.01 acre-feet per year (approximately 2 billion gallons) (VCWD 2015).

The Proposed Project activities do not involve ground excavation or drilling that would impact the City's wells or the groundwater quality. The Proposed Project would connect to the existing water lines and would not result in significant decrease in groundwater supplies nor would it exceed the approved groundwater usage. The Proposed Project would comply with applicable SWPPP procedures and BMPs to restrict the discharge of contaminated runoff into local storm drains. The Proposed Project would also comply with the City's General Plan Open Space and Conservation Element policies, shown below, where feasible (City of Baldwin Park 2002d). As a result, impacts would be less than significant.

Goal 5.0 Conserve and protect groundwater supply and water resources.

- *Policy 5.1* Encourage water conservation through education, use of drought-tolerant landscapes, and water conserving technology.
- *Policy 5.2* Promote the use of native plant material in landscapes and drought-tolerant trees, especially in landscapes of City properties.
- *Policy 5.3* Encourage use and production of reclaimed water.

Goal HS-8 Achieve a high level of water conservation and continue to improve quality of local groundwater.

- *Policy 8.01* Promote drought-tolerant landscaping and water conservation technologies and techniques.
- *Policy 8.02* Protect and restore above and below groundwater bodies from the negative impacts of stormwater pollution.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i) *result in substantial erosion or siltation on- or off-site;*

Less than Significant Impact. The Proposed Project would be constructed on a currently undeveloped parcel and would not impact any nearby streams or rivers. The nearest area to hold a large body of water is the Santa Fe Dam, located north of Arrow Highway. The Proposed Project does not include activities that would require access to the dam or result in the interruption of services of the dam or change the dam's site characteristics. While the Proposed Project could result in soil erosion and increased runoff due to the presence of additional impervious surfaces, implementation of the SWPPP and the BMPs would restrict or minimize the amount of runoff and ensure that runoff would be filtered to prevent any contaminants from percolating into the ground or into public sewer drains. The Proposed Project would implement BMPs, and runoff would be limited to the Proposed Project site and would not impact any streams or rivers, impacts would be less than significant.

- ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

Less than Significant Impact. As discussed in 4.10.1 (a), the Proposed Project would result in increased runoff due to construction activities and with the addition of impervious surfaces. However, the proposed construction activities would be limited to the undeveloped parcel, and the Proposed Project does not involve the disturbance or alteration of a stream, river, or water body. Implementation of BMPs would restrict or minimize contaminants percolating into the ground or discharged to public sewers. While the Proposed Project would permanently introduce impervious surfaces to the area, the Proposed Project would implement the SWPPP and provide project-specific BMPs to minimize surface runoff. Impacts would then 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 or polluted runoff; or*
- iv) impede or redirect flood flows?*

No Impact. The Proposed Project would not result in runoff that would exceed the existing or planned capacities of stormwater drainage systems. As previously discussed in 4.10.1 (a) through (c), the Proposed Project would result in increased runoff due to the construction and operational activities, especially with the addition of impervious surfaces to the site. According to the City's General Plan Health and Sustainability Element, the City is not located within a 100-year flood hazard area, and the National Flood Insurance Program rate maps classify the City as having little chance of flooding (City of Baldwin Park 2014, 2015b; FEMA 2019). No activities are proposed that would alter the existing topography that would impede or redirect flood flows. The implementation of the SWPPP and incorporation of project BMPs would minimize polluted runoff and result in less than significant impacts.

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

No Impact. The Proposed Project is located inland and is not in the vicinity of an ocean, river, or stream.

The Santa Fe Dam is considered a dry dam that is utilized to control heavy runoff and support groundwater maintenance. The Santa Fe Dam is maintained by the Army Corps of Engineers and is located in the City of Irwindale. Any potential future overflow and failure of the dam would result in spillage into the San Gabriel River wash and a secondary control area. Any downstream areas of inundation would impact the west area of the City of Baldwin Park (City of West Covina 2019). Because of the current conditions of the dam, the topography of the City, and the lack of structures located within a flood zone area, no impact would occur. The Proposed Project is not located in a flood hazard area and would not result in the risk of release of pollutants due to inundation. No impact would occur.

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

Less than Significant Impact. In 2015, the District prepared an Urban Water Management Plan for the City of Baldwin Park to direct urban water supplies and evaluate supply sources, efficient uses, reclamation, and demand management activities. The Proposed Project would not conflict or obstruct the District's Urban Water Management Plan because the Proposed Project would not involve the

modification of any water systems or wells within the area. The Proposed Project does not include any construction or operational activities that would require changes to the projects and policies identified in the Urban Water Management Plan.

The Proposed Project would result in an increase use of water during construction and operation. However, the waste demands for a commercial facility are not expected to exceed VCWD's pumping rights. According to the Urban Water Management Plan, the projected demands for potable and raw water for commercial facilities are four times less than single-family residential dwellings (VCWD 2015). Impacts would be less than significant.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.11.1 Impact Analysis

a) *Would the project physically divide an established community?*

No Impact. The Proposed Project site is located on vacant lot adjacent to industrial and commercial businesses; thus, the Proposed Project would not divide an established community. While the southern boundary is adjacent to residential properties, the Proposed Project would not prevent resident access to the nearby roadways, transit facilities, or any other public service and utility. The Proposed Project would be consistent with existing zoning and land use designations and would not divide an existing community. No impact would occur.

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

No Impact. The Proposed Project is the construction and operation of a new 15,122-square-foot District Headquarters that would include two main buildings (an Operations Building and Administration Building), a signage tower, and an Operations warehouse). The Project would be consistent with existing zoning and land use designations, as the Proposed Project would not require rezoning or general plan amendments. The Proposed Project is in the Industrial (I) zone for which offices (business and professional) and warehouses are specifically permitted uses with the acquisition of a Conditional Use Permit (CUP) per City of Baldwin Zoning Code (City of Baldwin 2015a). The Proposed Project is an allowed use for the site. The Proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.1 Impact Analysis

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

No Impact. The Proposed Project site is not identified as being within a significant mineral resource zone in the California Department of Conservation's Mineral Land Classification Map. In addition, the map notes only one site, about 2 miles southwest of the Project site, in the City of Baldwin Park as a State Division of Mines and Geology designated classified mineral resource deposit area (California Department of Conservation, 2019). No impact would occur.

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

No Impact. The Proposed Project would be limited to an area of 2.4 acres in size and would not result in loss of availability of a known or locally important resource. As noted above, only one site, about 2 miles southwest of the Proposed Project site, has been designated as a classified mineral resource deposit area in the City of Baldwin Park (California Department of Conservation, n.d.). In addition, no mineral resource extraction would occur as part of the Proposed Project. No impact would occur.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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This section describes the existing noise setting and potential noise and vibration effects from project implementation on the site and its surrounding area (study area). Construction noise modeling was performed through use of the Roadway Construction Noise Model (RCNM) Version 1.1. The model output is provided in Appendix E along with the noise measurement printouts and a photo index of the noise measurement locations.

4.13.1 Environmental Setting

Currently, the primary sources of noise within the study area consist of vehicles operating on Arrow Highway and Lante Street as well as from equipment and activities at the adjacent industrial properties. In order to determine the existing noise levels, three short-term (10 minute) ambient noise measurements were taken on the project site between 2:46 p.m. and 3:21 p.m. on Tuesday, December 17, 2019. The results of the noise level measurements are presented in Table 12, and the noise measurement printouts and photos of the noise measurement sites are provided in Appendix E.

Table 12: Existing Noise Level Measurements

Site No.	Site Description	Start Time of Measurement	Measured Noise Levels (dBA)	
			Average (L _{eq})	Maximum (L _{max})
1	On shared property line with 5113 Lante Street, approximately 25 feet west of Lante Street centerline.	3:11 PM	48.9	57.1
2	On northeastern portion of project site, approximately 10 feet west of northwest corner of 5135 Lante Street	3:59 PM	56.7	67.0
3	On southeastern portion of project site, approximately 50 feet from football field	53.6	50.2 10:45 AM	56.6 5:36 PM

Source: Larson-Davis Model 831 Type 1 sound level meters programmed in “slow” mode to record noise levels in “A” weighted form.

dBA: The relative loudness of sounds in air as perceived by the human ear.

L_{eq}: The method to describe sound levels that vary over time, resulting in a single decibel value that takes into account the total sound energy over a period of time.

City of Baldwin Park Noise Standards

For construction activities within the City of Baldwin Park, Municipal Code Section 130.37(E) prohibits the operation of any equipment or outside construction work within 500 feet of a residential zone between the hours of 7:00 p.m. and 7:00 a.m. It should be noted that only the easternmost portion of the Project site that is adjacent to Lante Street is located within 500 feet of a residential zone, since the existing single-

family homes adjacent to the east side of the Project site are existing nonconforming uses, since these properties are zoned Industrial.

For operational activities, the Municipal Code Section 130.4 limits onsite noise sources from Industrial zoned property to 70 dBA at the property line; and Sec 153.140.070 of the Zoning Code limits onsite noise sources from Industrial zoned property to 65 dBA at the property line anytime of the day. As detailed above, all adjacent properties, including the single-family homes on the east side of the project site are zoned Industrial. As such, the 65-dBA noise standard is applicable to all of the Proposed Project site's adjacent property lines. In addition, Section 130.37(J)(6) of the Municipal Code exempts backup generators from the City noise standards.

4.13.2 Impact Analysis

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less than Significant. The Proposed Project consists of construction and operation of the proposed VCWD Headquarters. Both construction and operation of the Proposed Project would have the potential to generate noise in excess of standards and have been analyzed separately below.

Construction-Related Noise

Construction activities for the Proposed Project are anticipated to start in July 2020 and be completed by July 2021. The construction activities would include: (1) site preparation that consists of removing vegetation, stones and debris from the project site; (2) grading of the 2.4-acre Project site; (3) building construction of the proposed 6,915-square-foot Administrative Building, 4,572-square-foot Operations Building, and 3,635-square-foot warehouse building; (4) paving of the proposed 92-space parking lot; and (5) application of architectural coatings on the new structures and parking lot areas. The nearest sensitive receptors to the Proposed Project site are single-family homes located adjacent to the east side of the Proposed Project site; however, these homes are existing nonconforming uses, since they are located on land that is zoned Industrial.

The City's construction noise standards do not provide any restrictions for industrial properties that are located over 500 feet from residential zoned property, which includes almost the entirety of the Project site. However, the Project applicant has stated that they will require all contractors to adhere to the allowable construction times detailed in Section 130.37(E), as a courtesy to the adjacent residential uses. Even with adherence to the City standards, the resultant construction noise levels may result in a significant substantial temporary noise increase to the nearby school and homes. In order to determine if the proposed construction activities would create a significant substantial temporary noise increase, the FTA construction noise criteria thresholds (FTA 2018a, 2018b) have been utilized, which show that a significant construction noise impact would occur if construction noise exceeds 90 A-weighted decibels (dBA) during the daytime at the nearby homes.

The Federal Highway Administration (FHWA) compiled noise level data regarding the noise-generating characteristics of several different types of construction equipment used during the Central Artery/Tunnel project in Boston. Table 13 below provides a list of the construction equipment

measured, along with the associated measured noise emissions and measured percentage of typical equipment use per day. From this acquired data, FHWA developed the Roadway Construction Noise Model (RCNM) (FHWA 2006, 2008). The RCNM, which uses the Spec 721.560 L_{max} at 50 feet, has been used to calculate the construction equipment noise emissions (see Appendix E).

Table 13: Construction Equipment Emissions and Usage Factors

Equipment	Acoustical Use Factor ¹ (Percent)	Spec 721.560 L_{max} @ 50 Feet ² (dBA, slow ³)	Actual Measured L_{max} @ 50 feet ⁴ (dBA, slow)
Auger Drill Rig	20	85	N/A
Backhoe	40	80	78
Compressor (air)	40	80	78
Concrete Mixer Truck	40	85	79
Concrete Pump	20	82	81
Concrete Saw	20	90	90
Crane	16	85	81
Dozer	40	85	82
Dump Truck	40	84	76
Excavator	40	85	81
Flatbed Truck	40	84	74
Front End Loader	40	80	79
Generator	50	82	81
Gradall (Forklift)	40	85	83
Mounted Impact Hammer	20	90	90
Paver	50	85	77
Roller	20	85	80
Tractor	40	84	N/A
Welder/Torch	40	73	74

Notes:

- ¹ Acoustical use factor is the percentage of time each piece of equipment is operational during a typical workday.
- ² Spec 721.560 is the equipment noise level utilized by the Roadway Construction Noise Model program.
- ³ The “slow” response averages sound levels over 1-second increments. A “fast” response averages sound levels over 0.125-second increments.
- ⁴ Actual Measured is the average noise level measured of each piece of equipment during the Central Artery/Tunnel project in Boston, Massachusetts primarily during the 1990s.

dBA: The relative loudness of sounds in air as perceived by the human ear.

L_{eq} : The method to describe sound levels that vary over time, resulting in a single decibel value that takes into account the total sound energy over a period of time.

L_{max} : The maximum sounds level, during a measurement period or a noise event.

Source: Federal Highway Administration, 2006 (see Appendix E).

The anticipated construction equipment utilized for each phase of construction was obtained from the default equipment lists from the CalEEMod model utilized in Section 4.3.3, Air Quality (Appendix A). For each phase of construction the equipment was placed at the middle of the Project site, since

due to the small size of the Project site, it is anticipated that each piece of equipment would operate over the entire site during a typical workday. The results are shown below in Table 14.

Table 14: Proposed Project Construction Noise Levels at Adjacent Homes to East of Project Site

Construction Phase	Construction Noise Level (dBA L _{eq})
Site Preparation	79
Grading	79
Building Construction	80
Architectural Coating	68
Paving	77
Construction Noise Threshold¹	90
Exceed Threshold?	No

Notes:

¹ Construction Noise Thresholds from Federal Transit Administration, 2018.

dBA: The relative loudness of sounds in air as perceived by the human ear.

L_{eq}: The method to describe sound levels that vary over time, resulting in a single decibel value that takes into account the total sound energy over a period of time.

Source: RCNM Version 1.1 (see Appendix E).

Table 14 shows that the greatest construction noise impacts would occur during Building Construction activities with a noise level as high as 80 dBA L_{eq} at the nearest homes that are located on the east side of the Proposed Project site. Table 14 shows that construction noise impacts from the Proposed Project would be within the FTA's 90-dBA construction noise standard for all phases of construction at the nearby homes. Construction-related noise impacts would be less than significant, and no mitigation would be required.

Operation-Related Noise

The Proposed Project consists of development of a new District Headquarters that would include an Operations Building, an Administration Building, and an Operations warehouse. Operation of the Proposed Project would generate onsite noise from the backup diesel generator, rooftop mechanical equipment, parking lot activities, and truck deliveries. The Proposed Project would also generate offsite noise impacts from the generation of additional trips on the nearby roads.

Onsite Noise Impacts

Zoning Code Section 153.140.070 limits onsite noise sources from Industrial zoned property to 65 dBA at the property line. In addition, Section 130.37(J)(6) of the Municipal Code exempts backup generators from the City noise standards. As such, the potential sources of onsite noise that may exceed City noise standards include rooftop mechanical equipment, parking lot activities, and truck deliveries.

In order to determine potential noise impacts from the proposed rooftop mechanical equipment, parking lot activities, and truck deliveries, reference noise measurements were taken of these activities, which are shown in Table 15. Table 15 also shows the calculated noise levels at the nearest property line for each noise source, based on a standard attenuation rate of 6 dB per doubling of distance.

Table 15: Operational On-Site Noise Impacts at Nearest Property Line

Noise Source	Reference Noise Measurement		Project Impacts at Nearest Property Line	
	Distance from Receptor to Source (feet)	Noise Level (dBA Leq)	Distance from Receptor to Source (feet)	Noise Level ¹ (dBA Leq)
Rooftop HVAC	10	67	30	57
Parking Lot	5	63	5	63
Truck Delivery	30	55	30	55
City Noise Standard ²				65
Exceed City Standard?				No

Notes:

¹ Project noise impacts calculated based on typical noise propagation rates of 6 dB per doubling of distance. Noise levels do not account for the noise attenuation provided by the proposed 6-foot to 7-foot high wall around the majority of the perimeter of the Proposed Project site.

² From Zoning Code Section 153.140.070 for Industrial land uses.

The data provided in Table 15 shows that all onsite noise sources would be within the City's Industrial noise standard of 65 dBA at the property lines for the Project site. As such, operations-related onsite noise impacts would be less than significant for the Proposed Project. It should also be noted that the project applicant has committed to constructing a 6-foot to 7-foot-high wall around the majority of the perimeter of the Proposed Project site, which would result in lower noise levels than those shown in Table 15 at the adjacent properties. In addition, although the proposed backup diesel generator is exempt from the City noise standards and, other than for emergency situations, would be operated for only 30 minutes per week, the Project applicant will construct a second sound wall around the perimeter of the backup generator, which will further reduce any noise impacts created from the proposed generator. As such, implementation of the Proposed Project would result in a less than significant noise impact from onsite noise sources.

Offsite Roadway Noise Impacts

Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. The Proposed Project does not propose any uses that would require a substantial number of truck trips, and the Proposed Project would not alter the speed limit on any existing roadway, so the Proposed Project's potential offsite noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur with development of the Proposed Project.

Since neither the General Plan nor the Municipal Code define what is a significant increase in project-generated roadway noise, this impact analysis has utilized guidance from the FTA for a moderate impact and found that a project's contribution to the noise environment may result in a significant noise impact between an increase in noise of 0 and 7 dB, which is dependent on the existing noise levels.

The potential offsite traffic noise impacts created by the ongoing operations of the Proposed Project have been analyzed through entering the traffic volumes provided in the Traffic Impact Study prepared for the Proposed Project (Appendix F) into the FHWA-RD-77-108 model. The FHWA model noise calculation spreadsheets that show the parameters utilized in the FHWA model are provided in Appendix F. The Proposed Project's potential offsite noise impacts have been calculated through a comparison of the Existing scenario with the Existing with Project scenario for the roadway segments where sensitive receptors are located adjacent to the roadway (no sensitive receptors are located along the portion of Arrow Highway analyzed in the Traffic Study). The results of this comparison are shown in Table 16.

Table 16: Project Traffic Noise Contributions to Nearby Roadways

Roadway	Segment	dBA CNEL at Nearest Receptor ¹			Increase Threshold ²
		Existing	Existing With Project	Project Contribution	
Lante Street	North of Project Driveway	48.6	49.1	0.5	+5 dBA
Lante Street	South of Project Driveway	48.6	49.7	1.1	+5 dBA

Notes:

¹ Distance to nearest residential uses are shown in Appendix F.

² Increase Threshold obtained from the FTA's allowable noise impact exposures (FTA, 2018).

Source: FHWA Noise Prediction Model FHWA-RD-77-108 (see Appendix F).

Table 16 shows that the Proposed Project's permanent noise increases to the nearby homes from the generation of additional vehicular traffic would not exceed the FTA's allowable increase thresholds detailed above. Therefore, the Proposed Project would not result in a substantial permanent increase in ambient noise levels for the existing conditions. Impacts would be less than significant.

Accordingly, the Proposed Project would not expose persons to noise levels in excess of standards established by the City, and impacts would be less than significant.

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

Less than Significant. The Proposed Project would consist of a new District Headquarters that would include an Operations Building, an Administration Building, and an Operations warehouse. Construction activities would require the operation of off-road equipment and trucks that are known sources of vibration. Construction activities may occur as near as 30 feet from the nearest residential structure, located on the east side of the Proposed Project site.

Section 153.140.090 of the City's Zoning Code prohibits the creation of ground vibration that is discernible without the aid of instruments to a person of normal sensitivity at any point on the adjacent properties. It should be noted that vibration is much more discernible in a sitting or lying down position, which typically only occurs inside a home. As such, this analysis is based on the vibration levels impacting the nearest homes. Since the City's Municipal Code does not provide a quantifiable vibration level, guidance from the California Department of Transportation (Caltrans) has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second peak particle velocity (PPV) (Caltrans 2004, 2013). Table 17 shows the typical PPV produced from some common construction equipment that would likely be utilized during construction of the Proposed Project.

Table 17: Typical Construction Equipment Vibration Emissions

Equipment	Peak Particle Velocity in inches per second at 25 feet	Vibration Level (L _v) at 25 feet
Vibratory roller	0.210	94
Hoe ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded truck (off road)	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Federal Transit Administration 2018.

From the list of equipment shown in Table 17, a vibratory roller with a vibration level of 0.210 inch-per-second PPV would be the source of the highest vibration levels of all equipment utilized during construction activities for the Proposed Project. Based on typical propagation rates at 5 feet, this would result in a vibration level of 0.17 inch-per-second PPV at the nearest offsite residential structure to construction activities. The construction-related vibration levels would be below the 0.25 inch-per-second PPV threshold detailed above. Therefore, a less than significant vibration impact is anticipated from construction of the Proposed Project.

The ongoing operation of the Proposed Project would not result in the creation of any known vibration sources. Therefore, a less than significant vibration impact is anticipated from the operation of the Proposed Project.

Accordingly, the Proposed Project would not expose persons to excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

Less than significant impact. The Proposed Project site is not located within 2 miles of a public airport and is not in the vicinity of a private airstrip. The nearest airport is El Monte Airport, which is located

as near as 5 miles west of the Proposed Project site. The Project site is located outside the 65-dBA CNEL noise contours of El Monte Airport. The Proposed Project would not expose people residing or working in the surrounding area to excessive levels of airport-generated noise. As such, airport and airstrip noise impacts to the Proposed Project would be less than significant.

4.14 POPULATION AND HOUSING

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

4.14.1 Impact Analysis

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

No Impact. The Proposed Project does not provide housing or include operations that could result in unplanned growth such as extension or roadways or expansion of existing infrastructures. The Proposed Project would not induce population growth, as it would be a workplace for an existing workforce. No impacts would occur.

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

No Impact. The Proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The Proposed Project site is currently vacant. Tenants and residents within the vicinity of the site would not be displaced as part of the construction and operation of the Proposed Project. No impact would occur.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.1 Impact Analysis

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

No Impact. The Proposed Project includes the construction of a headquarters for the District and does not involve the expansion of service as it would not induce additional permanent population growth. In addition, the City of Baldwin Park Fire Department Station is located within a 2-mile distance of the Proposed Project site. The Proposed Project would not increase the demand for fire protection or require new facilities. No impacts are expected.

- b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

No Impact. The Proposed Project includes the construction of a new headquarters for the District and does not involve the expansion of service. The Proposed Project site is 3.3 miles north of the Los Angeles County Sheriff Station. The Proposed Project would not induce growth requiring the extension of existing services or creation of new services. The Proposed Project would not increase the demand for police protection or require new facilities. The area is currently being serviced by the Baldwin Park Police Department and would continue to receive the same services as nearby businesses. The Proposed Project will include security during and after construction. No impacts would occur.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

No Impact. The Proposed Project includes the construction of a new headquarters for the District but does not involve the expansion of service. The Proposed Project site is 0.4 mile northeast of Pleasant View Elementary School. The Proposed Project would not induce growth requiring the extension of existing educational services or creation of new services. The Proposed Project would not increase the demand for schools in the City. No impacts would occur.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

No Impact. The Proposed Project includes the construction of new administrative facilities for the District but would not induce growth requiring the extension of existing or creation of new park services. The Proposed Project would not increase the demand for parks. No impacts are expected.

- e) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

No Impact. The Proposed Project would not induce growth requiring the extension of existing or creation of new services. While the District would have new operations and administration buildings, it would not induce expansion of new pipelines or service areas. The Proposed Project would not increase the demand for other public facilities. No impacts would occur.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.16.1 Impact Analysis

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

No Impact. The Proposed Project does not include features that would contribute to the increased use of existing neighborhood and regional parks or other recreational facilities or would cause substantial deterioration of the facility. The San Gabriel River Trail is located immediately north of the Proposed Project across Arrow Highway. However, the trail is gated and can only be accessed through the Santa Fe Dam Recreation Area. The Proposed Project does not involve the addition of a substantial number of new jobs. The Proposed Project would not result in the increased use of the San Gabriel River Trail that would result in its deterioration. The Proposed Project would not induce population growth as it would be a workplace for an existing workforce. No impacts are expected.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The Proposed Project does not involve the addition of a substantial number of new jobs that may result in increased population and increased demands on recreational resources. The Proposed Project would not result in the increased use of the San Gabriel River Trail that would result in its deterioration. The Proposed Project would not induce population growth as it would be a workplace for an existing workforce. No impacts are anticipated.

4.17 TRANSPORTATION

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

4.17.1 Environmental Setting

A Traffic Impact Study/Traffic Impact Analysis (TIA) was prepared by David Evans and Associates Inc. on January 2020 for the Proposed Project. The report examines the traffic impacts specifically for the Proposed Project and presents recommended traffic improvements. The report also evaluates the impacts of overall growth within the area to address cumulative traffic impacts and mitigations. The outlined traffic mitigations comply with CEQA requirements. The report has been prepared in coordination with the City of Baldwin Park Engineering Department requirements (Appendix F).

Analysis Scenarios

The TIA evaluates impacts under the following scenarios to address project-specific mitigations:

- Existing Conditions
- Existing plus Project Conditions
- Future Baseline (2020) Cumulative Conditions (Ambient Growth plus Planned Development)
- Future Baseline plus Project Conditions (Future Baseline Cumulative Conditions plus Planned Development plus Project)

The Existing Conditions scenario is based on existing traffic counts collected in December 2019 and reflects the current conditions of the project area.

The Existing plus Project Conditions scenario addresses potential impacts if the project were completed today. This scenario compares project conditions against existing conditions and identifies project-specific impacts.

The Future Baseline (2020) Cumulative Conditions scenario establishes future baseline conditions composed of ambient growth up to the project's opening year of 2020 and planned development that has not been built. The ambient growth assumes an annual 2-percent growth rate applied to existing traffic volumes. Known development projects are provided by the City of Baldwin Park.

The Future Baseline plus Project Conditions scenario addresses the potential impacts of the project under cumulative conditions. This scenario identifies impacts that the project contributes to but does not solely cause.

Regional and Local Access

Regional access to the project site is provided by Arrow Highway, an east-west, primarily four-lane, divided road with two lanes in each direction, turn pockets at key intersections, and a raised curbed median. Arrow Highway provides regional access between State Route (SR-) 57 freeway, Interstate (I-) 605 freeway, and the project site. The posted speed limit within the Project area is 45 miles per hour (mph). Within the study area, Arrow Highway forms the boundary between the cities of Baldwin Park and Irwindale.

Local access to the Project site is provided by Lante Street—a north-south, two-lane street connecting Arrow Highway and Olive Street. The land use fronting the southern half of Lante Street (from Nubia Street to Olive Street) is exclusively single-family residential, while the land use fronting the northern half (from Nubia Street to Arrow Highway) is predominantly industrial with some single-family residences on the west side of the street. The posted speed limit on Lante Street is 25 mph. Primary visitor access to the project is from a driveway on Lante Street that leads directly into the visitor parking lot. Secondary access and truck access is from a driveway located on Arrow Highway.

Study Intersections

The project would potentially impact the following five intersections and two driveways within the City of Baldwin Park and the City of Irwindale:

1. Live Oak Avenue at Baldwin Park Boulevard (Baldwin Park / Irwindale)

2. Arrow Highway/Live Oak Avenue at Arrow Highway (Irwindale)
3. Arrow Highway at Maine Avenue (Baldwin Park / Irwindale)
4. Arrow Highway at Lante Street (Irwindale)
5. Arrow Highway at Azusa Canyon Road (Irwindale)
6. Lante Street at Project Driveway "A" (future intersection) (Baldwin Park)
7. Arrow Highway at Project Driveway "B" (future intersection) (Baldwin Park)

Some of the study intersections are shared between both cities as identified above. The intersections of Live Oak Avenue at Baldwin Park Boulevard, Arrow Highway/Live Oak Avenue at Arrow Highway, Arrow Highway at Maine Avenue, and Arrow Highway at Azusa Canyon Road are signal controlled. The intersections of Arrow Highway at Lante Street and the proposed driveways are stop controlled.

4.17.2 Impact Analysis

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

Less than Significant Impact. The TIA analyzed the study intersections and roadway segments to identify impacts to capacity and Level of Service (LOS). Since the study area encompasses intersections within (or shared by) the cities of Baldwin Park and Irwindale, the TIA measured intersection performance and thresholds for determining significant impacts using the appropriate jurisdiction criteria.

Intersection Capacity Analysis Methodology

The Intersection Capacity Utilization (ICU) methodology is used to calculate the volume to capacity ratio (V/C) and level of service for signalized intersections. For stop-controlled intersections, the analysis in this study utilizes the Highway Capacity Manual, 6th Edition (HCM 6) (TRB 2017) methodology that identifies operational performance in terms of vehicle delay.

Intersection Capacity Utilization (ICU)

The Intersection Capacity Utilization (ICU) methodology expresses the LOS of an intersection in terms of the remaining capacity at an intersection (or lack thereof). The ICU methodology compares the volume-to-capacity (V/C) ratios of conflicting turn movements at an intersection, sums the critical conflicting V/C ratios for each intersection approach, and determines the intersection's overall capacity utilization. Level of Service (LOS) is used to qualitatively describe the performance of an intersection, ranging from LOS A (free-flow conditions) to LOS F (extreme congestion).

Performance Criteria and Thresholds of Significance

The City of Baldwin Park's policy on LOS for peak-hour intersection operations outside the downtown area is LOS D or better. To determine whether the addition of project-generated trips at a signalized study intersection results in a significant impact, the City of Baldwin Park utilizes the following criteria:

- A significant traffic impact occurs at a signalized study intersection when a proposed project increases traffic demand by 1 percent or more of the intersection's capacity ($V/C > 0.01$), causing or worsening a LOS E or F.

The City of Baldwin Park does not have a significance threshold for stop-controlled intersections. The City of Irwindale policy on LOS for peak-hour intersection operations is LOS D or better. To determine whether the addition of project-generated trips at a signalized study intersection results in a significant impact, the City of Irwindale utilizes signalized intersection criteria that is discussed in Appendix F. Based on the thresholds of significance established by the City of Baldwin Park and the City of Irwindale, the Proposed Project will have no significant impacts under either Existing Plus Project or Future Baseline Plus Project conditions; and, therefore, no offsite mitigation measures are required.

The Proposed Project involves the construction of a new headquarters for the District. The Proposed Project would not create a substantial number of new jobs. Thus, implementation of the Proposed Project would not result in a substantial increase in traffic that would have an adverse effect on roadways, affect roadway capacity or level of service, or contribute to a cumulative impact as indicated in the TIA (Appendix F).

Traffic-generating construction activities include a minor amount of construction and delivery vehicles traveling to the Proposed Project site. During construction, these vehicles would be staged within the existing Proposed Project site boundary. A temporary increase in traffic would occur during the construction phase due to materials being moved to and from the site, and flagging for construction vehicles entering/leaving the property would be provided. The increase in traffic due to the presence of construction equipment would result in a less than significant impact because the traffic would be short-term and flagging/traffic control would assist with traffic flow in the project area. As discussed in the TIA, the District's trips to its headquarters are generated primarily by VCWD employees and visitors, as represented in the general project trip distribution rates shown in the TIA trip distribution exhibits (Appendix F) and the approximately 30 employees to be employed after the completion of the Proposed Project. The Proposed Project would not alter or prevent the residents and tenants within the site from accessing nearby transit stops. Impacts would be less than significant.

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

Less than Significant Impact. The Proposed Project does not involve revisions of land use designation or zoning amendments. The Proposed Project site would operate as a new headquarters for the District, which would provide the existing District workforce with a new headquarters facility. The Proposed Project would not add a substantial amount of new jobs or cause an expansion of service. The City of Baldwin Park does not have established vehicle miles traveled (VMT) thresholds for the purpose of analyzing a project under Senate Bill 743 (SB 743) guidelines. However, the goal of SB 743 is to reduce VMT by increasing access to common goods. The Proposed Project would not have a significant impact on VMT. While the Proposed Project would introduce commuters to the area, it does not include development of residential units or retail that would significantly increase vehicle travel to and from the area. Two transit stops are located approximately 400 and 600 feet from the northern boundary of the Proposed Project which provide the workforce with alternative transportation to the Proposed Project. A less than significant impact would occur.

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

Less than Significant Impact. A Sight Design Analysis and Truck Design Analysis were included in the TIA.

Sight Design Analysis

According to the Caltrans Highway Design Manual, unsignalized intersections should have a substantially clear line of sight maintained between the driver of a vehicle, bicyclist, or pedestrian stopped on the minor road and the driver of an approaching vehicle on the major road that has no stop. This line of sight should be included in the right-of-way to preserve the required visibility. Caltrans does not apply their “corner” or “decision” sight distance standards to urban driveways, however, and instead recommends the use of red curb no parking zones on either side of driveways to maintain visibility.

Regardless, it is prudent to maintain a sight distance equal to the minimum stopping distance for the street’s posted speed limit as much as practicable. For the Lante Street driveway (which allows left and right turns) the stopping sight distance of 150 feet (based on a 25-mph speed limit) is applied in both directions. For the Arrow Highway driveway (which permits right turns only when egressing the site) the stopping sight distance of 360 feet (based on a 45-mph speed limit) applies only to the left side of the driveway. The stopping sight distance triangles for the project driveways are presented in Appendix F.

Truck Movement Analysis

A truck movement analysis was conducted to determine if the largest design vehicle that accesses the project site regularly can safely ingress and egress the Proposed Project site driveways. According to VCWD the largest design vehicle that regularly accesses the site is a 30-foot long, single-unit, three-axle truck (SU-30). The truck turning movement analysis in and out of the project driveways is presented in Appendix F.

The Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. The Proposed Project involves the construction of a new headquarters for the District within the Proposed Project site. The main ingress and egress for the Proposed Project site would be from Lante Street; a secondary access to the Proposed Project site would be from Arrow Highway. The County Fire Department would need to approve the site plan and Proposed Project ingress/egress points to make sure they are applicable with emergency access and safety requirements.

Based on the sight distance analysis, the Proposed Project should maintain appropriate sight triangles at the Project driveways on Arrow Highway and Lante Street. The following Applicant Proposed Measures (APMs) will be established to maintain appropriate sight triangles to provide a clear line of sight between the driver, bicyclist, or pedestrian.

APM – 1: Establish and maintain red curb no parking zones and post no parking signs along the entire project frontage on Arrow Highway (an already established no parking zone) and Lante Street (a partially established no parking zone).

APM – 2: The Proposed Project's frontage improvements between the back of curb and the property line should be composed of sidewalk and/or hardscape and avoid moderate height landscaping that might affect the sight distance of drivers egressing the project's driveways.

The Proposed Project would result in less than significant impacts.

d) *Would the project result in inadequate emergency access?*

Less than Significant Impact. The main ingress and egress for the Proposed Project site would be from Lante Street; a secondary access point to the Proposed Project site would be from Arrow Highway. The Proposed Project would not create or alter roadways in a manner that would increase hazards or result in an incompatible use. The County Fire Department would approve the site plan including ingress/egress points to make sure the Proposed Project complies with emergency access and safety requirements. The Proposed Project would not result in inadequate emergency access. Impacts would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18.					
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.18.1 Impact Analysis

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

California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

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

a and b) **Less than Significant with Mitigation Incorporated.** As part of the Assembly Bill (AB) 52 consultation process required by State law, on July 2019, the District sent tribal scoping letters electronically to the Soboba Band of Luiseño Indians and Gabrieleño Band of Mission Indians-Kizh Nation. The letter provided the location of the Proposed Project, the proposed development that will occur, and request to provide comments of the Proposed Project. The District made attempts via email and phone call to follow up with the tribes to discuss the Proposed Project and no response was received. At the time that this IS/MND was prepared, a response had not been received from the tribes that were notified. Although no responses were received, out of an abundance of caution, the following mitigation measure will be implemented to allow monitors from the Native American tribes that were contacted during the consultation period to be on-site during ground disturbing activities to protect tribal cultural resources that may be encountered.

TCR-1: Native American Monitoring. Prior to ground-disturbing activities or application of grading permits, should representatives from the Soboba Band of Luiseño Indians and Gabrieleño Band of Mission Indians-Kizh Nation respond to the District and request involvement on the Proposed Project, they shall be notified at minimum 2 weeks in advanced and be allowed to monitor ground-disturbing activities for previously undisturbed soils.

As discussed in Section 4.5, the Proposed Project site is located on a vacant property in an urbanized area with land uses consisting primarily of industrial and commercial businesses, with some residential properties at the southern boundary of the Proposed Project site. The area is highly urbanized and any proposed ground disturbing activities would not reach 10 feet below existing grade that may uncover native soils. Due to the developed nature of the area, it is unlikely that resources could be unearthed. Implementation of **CUL-1** and **TCR-1** would result in less than significant impacts.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.19.1 Impact Analysis

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

Less than Significant Impact. The Proposed Project involves the construction of a new headquarters for the District. The Proposed Project would not require or result in the relocation or construction of new or expanded wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. The Proposed Project site is an undeveloped piece of land in an industrialized area along the northern boundary of the City of Baldwin Park and would tie in to the existing utilities that are provided in the Proposed Project area. The nearest wastewater treatment facility is the Gann Water Design Sewage Treatment Plant 2.4 miles southeast of the Proposed Project site. The nearest electrical power facility is Southern California Edison (SCE) Substation on Vincent Avenue, 2 miles southeast of the Proposed Project site. The nearest SoCalGas natural gas facility is 3.35 miles east of the Proposed Project site.

While relocation or construction of new utilities is not proposed, the Proposed Project would result in the increased use of existing utilities. It is not expected that the increased uses would be significantly greater than the uses of the adjacent businesses because the Proposed Project uses are consistent with the area. Impacts would be less than significant.

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

Less than Significant Impact. The Proposed Project would involve the construction of a new headquarters for the District. The new facility would serve the existing workforce of the District and will provide support in ensuring a reliable potable water supply to the San Gabriel Valley, encompassing portions of the City of Baldwin Park, the City of Irwindale, the City of West Covina, and the City of Azusa. The Proposed Project would result in the increased use of water supplies due to the presence of a commercial facility. However, the Proposed Project does not include activities that would demand significant water usage such as agricultural, medical (hospital), manufacturing, or other industrial processes. Prior to construction, the District shall obtain letters of service from the utility providers to ensure that the Proposed Project will have adequate utility services. Impacts would be less than significant.

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

Less than Significant Impact. Per the City's General Plan Health and Sustainability Element, wastewater treatment requirements are established by the Los Angeles Regional Water Quality Control Board (City of Baldwin Park 2014, 2015b). According to the U.S. Energy Information Administration, inpatient healthcare facilities are the most intensive users of water among large commercial buildings which range around 200,000 square feet and up (EIA 2016). The Proposed Project would generate wastewater during construction and operation of the administration building. However, the Proposed Project is significantly less than 200,000 square feet, and it is not anticipated that it would generate significant amounts of wastewater. The average water use for offices and non-refrigerated warehouses range from 5 gallons per square foot to 15 gallons per square foot in comparison to healthcare facilities which average at 45 to 55 gallons per square foot. Prior to construction, the District shall obtain letters of service from the utility providers to ensure that the Proposed Project will have adequate utility services. Impacts would be less than significant.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. All solid waste generated during construction would be disposed of by the construction contractor according to the Los Angeles County standard construction practices. The Proposed Project would involve the construction of a new headquarters for the District, which would not result in addition of a substantial number of new jobs. Thus, minimal additional solid waste would be generated during operation as comparable to current conditions. The California Integrated Waste Management Act (also known as AB 939), requires each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling, or other means. The State law, introduced in 1989, established an integrated waste management hierarchy to guide

local agencies in implementation, in order of priority: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. The Proposed Project would comply with AB 939 requirements for the diversion of solid waste from landfills. A less than significant impact would occur.

- e) *Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?*

No Impact. The Proposed Project would not negatively impact the provision of solid waste services, as development would occur on an undeveloped piece of land. The Proposed Project would comply with AB 939/SB 1066 requirements for the diversion of solid waste from landfills. Where feasible, any construction and operational wastes would be sorted for recycle and reuse. No significant impact would occur.

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

No Impact. The Proposed Project would comply with all relevant federal, State, and local statutes and regulations related to solid waste. Any construction and solid wastes would be sorted and diverted for reuse and recycle. The Proposed Project would not involve any manufacturing practices that could impact local solid waste statutes and regulations. No significant impact would occur.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.20.1 Impact Analysis

- a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. The Proposed Project site is not located within a very high fire hazard severity zone of state responsibility (County of Los Angeles Open Data 2019). No actions would interfere with an evacuation or emergency plan. No impact would occur.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No Impact. The Proposed Project site is not located within an area identified as a very high fire hazard severity zone (County of Los Angeles Open Data 2019). Additionally, the Proposed Project site is not located within or adjacent to any open spaces which are identified as a very high fire hazard severity zone. The lack of wildland-urban interface in or near the Proposed Project site reduces any risk associated with exacerbation of wildfire risks. No impact would occur.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

No Impact. As described above, the Proposed Project site is not in an area at risk of wildfire. The Proposed Project would not require infrastructure that would exacerbate fire risk. No impact would occur.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

No impact. The Proposed Project site is not in an area prone to wildfire. Even though the Proposed Project site is in close proximity to the Santa Fe Reservoir, the topography of the area is relatively flat and does not pose a risk of downstream flooding. No impact would occur.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.21.1 Impact Analysis

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Less than Significant with Mitigation Incorporated. As discussed in Section 4.4.1 Biological Resources, the City is predominantly suburban with limited to no natural habitats. The Proposed Project would not have the potential to substantially degrade the quality of the environment because the quality of the area is not suitable to sustain special status or sensitive species. Furthermore, the Proposed Project is located in a heavily disturbed industrial area, and is not listed as a Significant Ecological Area (Los Angeles County 2015). However, the BIO-1 have been incorporated in to minimize any potential impacts to nesting birds during construction due to their potential presence in vacant and urban environments.

The Proposed Project site does not contain any structures of historic significance; and, due to the urban and disturbed nature of the area, resources of significant archaeological and paleontological value are unlikely to be discovered. However, ground-disturbing activities could uncover significant resources. In the event that buried resources are discovered that were not previously identified, implementation of CUL-1 and TCR-1 would result in impacts to less than significant for archaeological, paleontological, and tribal cultural resources.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)*

Less than Significant Impact. The Proposed Project would not involve any changes to the land use designations and is therefore consistent with the General Plan. Based on the level of impact to other resource areas within the Proposed Project, impacts are found to be less than significant. The

Proposed Project site is fully built and is not expected to include additional development projects. The Proposed Project would not result in cumulative impacts in addition to other development within the area as there are no planned developments.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less than Significant Impact. The Proposed Project could result in potential impacts to human beings directly or indirectly during construction such as air quality and greenhouse gas, noise, and traffic. As discussed in the previous environmental resources areas, the Proposed Project would not result in the significant impacts to human beings because the Proposed Project would not result in significant impacts to air quality, greenhouse gas and noise. Implementation of **APM-1** and **APM-2** would provide a clear line of site between drivers, bicyclists, and pedestrians to maintain transportation safety. Impacts would be less than significant.

SECTION 5.0 – REFERENCES

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