## PUBLIC REVIEW DRAFT | AUGUST 2020



# 414 South San Gabriel Boulevard Project Initial Study/Mitigated Negative Declaration

Prepared for: City of San Gabriel

Prepared by: Michael Baker International



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# PUBLIC REVIEW DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

# 414 South San Gabriel Boulevard Project

Lead Agency:



CITY OF SAN GABRIEL 425 South Mission Drive San Gabriel, California 91776 *Contact: Mr. Matt Chang* 626.308.2806

Prepared by:

### MICHAEL BAKER INTERNATIONAL

5 Hutton Centre Drive, Suite 500 Santa Ana, California 92707 **Contact: Ms. Alicia E. Gonzalez** 949.855.7069

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JN 177570

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# 1.0 INTRODUCTION

The 414 South San Gabriel Boulevard Project (herein referenced as the "project") proposes to construct a new 199,358square foot building with approximately 190,232 square feet of climate-controlled self-storage and approximately 9,126 square feet of executive artists space on an approximately 1.75-gross acre site located at 414 South San Gabriel Boulevard. The proposed project is discussed in detail in <u>Section 2.0</u>, <u>Project Description</u>. Following a preliminary review of the proposed project, the City of San Gabriel (City) has determined that it is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study/Mitigated Negative Declaration addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

### 1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA (Public Resources Code Sections 21000-21177) and pursuant to Section 15063 of Title 14 of the California Code of Regulations (CCR), the City of San Gabriel, acting in the capacity of Lead Agency, is required to undertake the preparation of an Initial Study to determine whether the proposed project would have a significant environmental impact. If the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration) for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Section 21080, Public Resources Code).

The environmental documentation, which is ultimately approved and/or certified by the City in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

### 1.2 PURPOSE

Section 15063 of the CEQA Guidelines identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

### 1.3 CONSULTATION

As soon as the Lead Agency (in this case, the City of San Gabriel) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee



Agencies that are responsible for resources affected by the project, in order to obtain the recommendations of those agencies on the environmental documentation to be prepared for the project. Following receipt of any written comments from those agencies, the City would consider their recommendations when formulating the preliminary findings. Following completion of this Initial Study, the City would initiate formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

### 1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. The documents are available for review by contacting Matt Chang, Senior Planner, at (626) 308-2806.

- Comprehensive General Plan of the City of San Gabriel, California (adopted May 18, 2004). The Comprehensive General Plan of the City of San Gabriel (General Plan) provides a general, comprehensive, and long-range guide for community decision-making. The General Plan is organized into 11 elements: Land Use; Housing and Demographics; Mobility; Economic Development; Public and Environmental Safety; Community Facilities; Open Space and Recreation; Environmental Resources; Noise; Community Design; and Cultural Resources. Each General Plan element presents an overview of its scope, summary of conditions and planning issues, goals, targets and actions. Goals, targets, and actions of the General Plan are applicable to all lands within the City's jurisdiction. The General Plan was utilized throughout this document as the fundamental planning document governing development at the project site. Background information and policy information from the General Plan is cited in several sections of this document.
- Environmental Evaluation for the Comprehensive General Plan of the City of San Gabriel, California (2004). The Environmental Evaluation for the Comprehensive General Plan of the City of San Gabriel, California (General Plan Environmental Evaluation) reviews the City's existing conditions and analyzes potential environmental impacts from implementation of the General Plan. The General Plan Environmental Evaluation consists of three parts: an Initial Study for evaluating potential environmental impacts of the General Plan Update; an environmental narrative to analyze the potential growth-inducing impacts of the General Plan Update; and an environmental review is needed. The General Plan Environmental Evaluation determined that because the General Plan Update would be within the boundaries and scope of analysis of the 1989 General Plan and EIR, and would impose stricter policies and standards, implementation of the General Plan Update would result in less than significant environmental impacts. Background information from the General Plan Environmental Evaluation is cited in several sections of this document.
- <u>San Gabriel Municipal Code (current through Ordinance 662, passed January 21, 2020)</u>. The San Gabriel Municipal Code (SGMC) consists of regulatory, penal, and administrative ordinances of the City. It is the method the City uses to implement control of land uses, in accordance with General Plan goals and policies. SGMC Title XV, Land Usage, includes the City's Zoning Code and is intended to provide the economic and social advantages resulting from an orderly planned use of land resources and to conserve and promote the public health, safety, and general welfare of the City. The Zoning Code also establishes zoning districts and regulations for the use of land and development for properties within the City.



# 2.0 **PROJECT DESCRIPTION**

### 2.1 **PROJECT LOCATION**

The City of San Gabriel (City) is located in the San Gabriel Valley of Los Angeles County, approximately 11 miles east of the Los Angeles Civic Center; refer to <u>Exhibit 2-1</u>, <u>Regional Vicinity</u>. The City consists of 4.09 square miles. Surrounding jurisdictions include the cities of San Marino and Temple City to the north, Temple City and unincorporated County of Los Angeles to the east, Rosemead to the east and south, and Alhambra to the west.

The proposed 414 South San Gabriel Boulevard Project (project) is approximately 1.75 gross acres and consists of eleven contiguous parcels generally located at 414-420 South San Gabriel Boulevard in the City of San Gabriel (Assessor's Parcel Numbers [APN] 5373-025-003 through -009 and -020, -021, -023, and -024); refer to <u>Exhibit 2-2</u>, <u>Site Vicinity</u>. Regional access to the project site is provided via the San Bernardino Freeway (Interstate 10) or the Foothill Freeway (Interstate 210). Local access to the project site is provided by South San Gabriel Boulevard and Commercial Avenue.

### 2.2 ENVIRONMENTAL SETTING

The L-shaped project site is currently developed with six single-story commercial buildings totaling approximately 11,691 square feet and surface parking; refer to <u>Table 2-1</u>, <u>Existing On-Site Development</u>.

On-site topography is relatively flat averaging at approximately 404 feet above mean sea level (msl) and gently slopes to the southeast. One ornamental tree, low-lying grasses, and scattered shrubs are distributed throughout the site.

Assessor's Parcel Number (Address)	Development	Approximate Building Size (square feet)
5373-025-003 (None Assigned)	Modular office on the east side of the vacant office building	993
5373-025-004 (815 Commercial Avenue)	Vacant office building	1,748
5373-025-005 (None Assigned)	Driveway on the west side of the vacant office building N/A	
5373-025-006 (423 South Gladys Avenue)	Bus parking lot (no structure; only concrete pads)	N/A
5373-025-007 (419 South Gladys Avenue)	Storage lot	N/A
5373-025-008 (417 South Gladys Avenue)	Storage lot	N/A
5373-025-009 (415 South Gladys Avenue)	Secured storage lot	N/A

#### Table 2-1 Existing On-Site Development



 Table 2-1

 Existing On-Site Development (continued)

Assessor's Parcel Number (Address)	Development	Approximate Building Size (square feet)		
5373-025-020 (None Assigned)	Covered Storage	0		
5373-025-021 (420 South San Gabriel Boulevard)	Window covering shop	5,400		
5373-025-023 (414 South San Gabriel Boulevard)	Vacant plumbing store	3,438		
5373-025-024 (827 Commercial Avenue)	Bus parking lot	N/A		
Existing On-Site Development (Square Feet) 11,579				

### GENERAL PLAN LAND USE DESIGNATION AND ZONING

Based on the General Plan, the project site is designated General Commercial. The General Commercial land use designation is intended to provide for all forms of retail, service, office, recreation/amusement, and other commercial businesses which provide goods and services for the local population and those businesses which are targeted towards visitors and commuters.

The project site is zoned Commercial and Limited Manufacturing (C-3) by the City's Zoning Code. The C-3 Zone is intended to provide for the continued use and expansion and new development of a wide variety of commercial enterprises, professional and medical offices, entertainment uses, and similar businesses located along major roadway corridors.

#### SURROUNDING USES

Surrounding land uses include a mixture of transportation, commercial, light industrial, and mixed-uses. Specifically, land uses surrounding the project site include:

- <u>North</u>: Two-story commercial uses are located to the north of the project site (i.e., Safety Travel Agency and Panda Home Healthcare). These uses are designated General Commercial and are zoned C-3. Areas further north of the project site include three-story commercial and residential mixed-uses (i.e., San Gabriel Skycourts) and are designated General Commercial and are zoned C-3.
- <u>East</u>: South Gladys Avenue bounds the project site to the east with single-story light industrial uses (i.e., Desai's Design Crafts, S&M Kustomz and Repairs, and California Interiors) designated Light Industrial and zoned Light Manufacturing (M-1) located east of South Gladys Avenue.
- <u>South</u>: Areas to the south of the project site include Commercial Avenue, single-story commercial uses (i.e., Success Printing & Signs), and single-story light industrial uses. Areas to the south of the project site (north of Commercial Avenue) are designated General Commercial and are zoned C-3. Areas to the south of Commercial Avenue are designated Light Industrial and are zoned M-1.
- <u>West</u>: South San Gabriel Boulevard bounds the project site to the west. Areas to the west of South San Gabriel Boulevard include single- and two-story commercial uses (CK Aquarium, SW Auto Repair and Body Shop, Eye Care Optometry of San Gabriel, T4U Café, For Hair Studio, Ameriderm, Inc., and Options for Youth). Areas to the west are designated General Commercial and are zoned Retail Commercial (C-1).



Not to Scale

Source: Michael Baker International

414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION **Regional Vicinity** 

Exhibit 2-1





Exhibit 2-2





### 2.3 BACKGROUND AND HISTORY

The project site has supported a variety of residential, commercial, warehousing, and office uses as early as 1923. The project site was originally developed with street-fronting residential dwellings and a single commercial building at 420 to 422 South San Gabriel Boulevard. A warehouse was added to the commercial building in 1939, and by 1947, the building was occupied by Roberts Hardware Company. In 1957, J&D Plumbing constructed the existing plumbing store at 414 South San Gabriel Boulevard. J&D Plumbing operated at this location until the business closed in 2017. By 1958, Mission Landscaping began operations at the project site. In 1962, Mission Landscaping constructed a new office building at 420 to 422 South San Gabriel Boulevard in 1968 and began leasing this building to other commercial building at 420 to 422 South San Gabriel Boulevard in 1968 and began leasing this building to other commercial tenants starting in 1980. All on-site residential dwellings have been demolished since this time.

### 2.4 **PROJECT CHARACTERISTICS**

The project proposes to demolish the existing on-site commercial structures and surface parking to construct a new 199,358-square foot building with approximately 190,232 square feet of climate-controlled self-storage and approximately 9,126 square feet of executive artists space; refer to Exhibit 2-3, Conceptual Site Plan. The climate-controlled self-storage facility would include a 1,000-square foot ground floor rental office. The executive artist space would include a 1,000-square foot community arts space fronting South San Gabriel Boulevard. The proposed structure would be four stories with one level of subterranean self-storage space along South San Gabriel Boulevard, while a partial fifth story with one level of subterranean self-storage space would be provided along Commercial Avenue and Gladys Avenue; refer to Exhibit 2-4a, Proposed South and West Elevations, and Exhibit 2-4b, Proposed North and East Elevations. Overall, the self-storage facility would include 1,524 individual units ranging in size between 25 to 300 square feet.

A total of 50 parking spaces, including four electric vehicle spaces and two ADA-accessible spaces, would be provided for employees and visitors in a surface parking lot located along the site's interior. The proposed self-storage use would be accessible from 5:00 a.m. to 10:00 p.m. for tenants, with the rental office operating from 8:00 a.m. to 6:00 p.m. daily. The proposed executive artist studios would be open 24 hours a day, seven days a week through secured access only.

### ZONE CHANGE/PLANNED DEVELOPMENT

The project would require approval of a Zone Change/Planned Development to modify the project site's existing zoning from C-3 to Planned Development (P-D) Overlay Zone to allow for a greater floor area ratio, reduced rear yard setback, and reduced parking requirements.

#### ARCHITECTURAL DESIGN

The proposed project would have a maximum building height of 61 feet and 6 inches and would be designed with various building elements and materials, which may include, but not limited to, concrete masonry unit (CMU) block, painted stucco, window glazing, parapet/trim, and awnings. The proposed structure would have a front yard setback of 10 feet along the western perimeter of the project site, and a minimum rear yard setback of 8 feet and 9 inches along the eastern perimeter of the project site. Illuminated identification signage would be provided on the building's south and west elevations, and may be installed at other locations subject to City review and approval; refer to Exhibit 2-4a. Heating, ventilation, and air conditioning (HVAC) equipment would be located along the northern and northeastern perimeters of the project site and would be screened from public view via 4-foot-high mechanical screen walls.



### LANDSCAPE DESIGN

Ornamental landscaping would be installed throughout the project site; refer to <u>Exhibit 2-5</u>, <u>Conceptual Landscape</u> <u>Plan</u>. Planting materials may include, but are not limited to, a mix of trees, shrubs, and accents including fruitless/pollenless olive, willow acacia, Texas mountain laurel, orange jubilee, red yucca, India Hawthorne, and day lily. Landscaping coverage would total approximately 8,851 square feet, or 13 percent of the project site. It is acknowledged that the proposed project would result in the removal of one existing on-site tree. However, the project's proposed installation of 29 trees would more than offset the removal of one privately owned tree; refer to <u>Exhibit 2-5</u>. In addition, a public art area would be incorporated into the project's frontage along South San Gabriel Boulevard.

#### ACCESS AND CIRCULATION

Roadway improvements are proposed to provide site access and circulation. Site access would be provided via three full access driveways along South San Gabriel Boulevard, Commercial Avenue, and South Gladys Avenue. The proposed driveways and interior vehicular circulation are designed to meet the San Gabriel Fire Department (SGFD) turning radius requirements. The project would also dedicate 25 feet of right-of-way on South Gladys Avenue for future public roadway improvements by the City, as well as improve the existing sidewalk, curb, and gutter along the project's frontage at South San Gabriel Boulevard.

#### UTILITIES

The following utilities would serve the project site:

- <u>Water</u>. The San Gabriel County Water District (SGCWD) would provide water services to the project site. The project would eliminate seven of the existing water laterals along South San Gabriel Boulevard, Commercial Avenue, and South Gladys Avenue and would install a new 2-inch potable water backflow preventer (BFP) and service line to connect to an existing SGCWD-owned water mainline aligned in South San Gabriel Boulevard. The project would also install a 1-inch irrigation water BFP to connect to an existing water mainline in South San Gabriel Boulevard and an 8-inch fire service line to connect to an existing water mainline within South Gladys Avenue.
- <u>Sewer</u>. The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing Districts-owned sewer mainline aligned in South San Gabriel Boulevard.
- <u>Drainage</u>. The project's proposed drainage pattern would sheet flow via v-gutters aligned within project's internal drive aisles to the project's low point, where a curb inlet would collect the low-flow and pipe it to a proposed infiltration drywell at the southwest corner of the Commercial Avenue project driveway. Flows in excess of the infiltration drywell's capacity would discharge via parkway drain to Commercial Drive, which functions as a tributary to Rubio Wash.
- <u>Dry Utilities</u>. The project would remove and replace Southern California Edison (SCE) aerial facilities along Commercial Avenue and South Gladys Avenue with new underground facilities. Existing SCE aerial service to adjacent properties impacted by this conversion are anticipated to be removed, with new facilities installed underground. Proposed electric service to the storage building is anticipated to extend from the new underground primary facilities at Commercial Avenue to a new pad mounted transformer located at South Gladys Avenue. Existing AT&T and Charter Spectrum aerial facilities along Commercial Avenue and South Gladys Avenue would be undergrounded to provide telecommunication services to the proposed project. Natural gas service would not be needed for this project.



Source: EAPC, Sheet SP-1, Preliminary Site Plan, July 15, 2020

(1)

NOT TO SCALE



07/2020 JN 177570

414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION Conceptual Site Plan





NOT TO SCALE



07/2020 JN 177570

414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

# **Proposed South and West Elevations**

Exhibit 2-4a





Source: RKAA Architects, Inc., Sheet EL-2, North and East Elevations, June 25, 2020

414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

# **Proposed North and East Elevations**

07/2020 JN 177570

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Michael Baker INTERNATIONAL

Exhibit 2-4b





Source: TJ McQueen & Associates, Inc., Sheet LA.01, Landscape Plan, June 23, 2020

NOT TO SCALE



07/2020 JN 177570

414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

# **Conceptual Landscape Plan**





### 2.5 PHASING AND CONSTRUCTION

Project construction would occur in a single phase over a duration of approximately 18 months, beginning in July 2021 and ending in December 2022. Construction of the project would include demolition, grading, building construction, paving, and architectural coating. The proposed earthwork would involve approximately 16,720 cubic yards of cut and approximately 2,000 cubic yards of fill. Approximately 15,300 cubic yards of exported soils would be required.

### 2.6 PERMITS AND APPROVALS

The City of San Gabriel is the Lead Agency for the project and has discretionary authority over the project proposal, which includes the following:

- Approval of the CEQA Clearance Document;
- Zone Change/Planned Development;
- Development Agreement;
- Tentative Parcel Map;
- Precise Plan of Design;
- Master Sign Plan; and
- Issuance of applicable Grading and Building Permits.

In addition, the following permits/approvals may be required of other agencies:

• National Pollutant Discharge Elimination System (NPDES) Construction General Permit – Los Angeles Regional Water Quality Control Board.







# 3.0 INITIAL STUDY CHECKLIST

### 3.1 BACKGROUND

### 1. Project Title:

414 South San Gabriel Boulevard Project

### 2. Lead Agency Name and Address:

City of San Gabriel, 425 South Mission Drive, San Gabriel, California 91776

### 3. Contact Person and Phone Number:

Mr. Matt Chang, Senior Planner, 626.308.2806

#### 4. Project Location:

The proposed 1.75-gross acre site is located at 414 South San Gabriel Boulevard in the City of San Gabriel (Assessor's Parcel Numbers [APN] 5373-025-003 through -009 and -020, -021, -023, and -024).

#### 5. Project Sponsor's Name and Address: San Gabriel Self Storage Partners, LLC, 8777 North Gainey Center Drive, Suite 191, Scottsdale, Arizona 85258

#### 6. General Plan Designation:

Based on the General Plan, the project site is designated General Commercial.

#### 7. Zoning:

The project site is zoned Commercial and Limited Manufacturing (C-3) by the City's Zoning Code.

#### 8. Description of Project:

The 414 South San Gabriel Project (herein referenced as the "project") proposes the construction of a climatecontrolled self-storage facility and executive artists space on an approximately 1.75-gross acre site. The proposed structure would be four stories with a partial fifth story, and would include rental office spaces, executive artists spaces, and community arts spaces totaling 199,358-square feet. Project approval would require a Zone Change/Planned Development, Development Agreement, Tentative Parcel Map, Precise Plan of Design, Master Sign Plan, Grading and Building Permits, and CEQA Clearance.

#### 9. Surrounding Land Uses and Setting:

Surrounding land uses include a mixture of transportation, commercial, light industrial, and mixed-uses; refer to <u>Section 2.2</u>, *Environmental Setting*.

#### 10. Other public agencies whose approval is required:

Other public agency approvals may include the National Pollutant Discharge Elimination System (NPDES) Construction General Permit with the Los Angeles Regional Water Quality Control Board.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In compliance with Assembly Bill 52 (AB 52), the City distributed letters to applicable Native American tribes informing them of the project on March 31, 2020. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation and the City consulted with the tribe on June 4, 2020. Based on consultation with the Gabrieleno



Band of Mission Indians – Kizh Nation, the project's proposed ground disturbance activities could uncover unknown tribal cultural resources. Refer to <u>Section 4.18</u>, <u>*Tribal Cultural Resources*</u>, for additional information.

### 3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

### 3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the CEQA Guidelines and used by the City of San Gabriel in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

• <u>No Impact</u>. The development would not have any measurable environmental impact on the environment.

- <u>Less Than Significant Impact</u>. The development would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.
- <u>Less Than Significant Impact With Mitigation Incorporated</u>. The development would have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- <u>Potentially Significant Impact</u>. The development would have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures would be required, so that impacts may be avoided or reduced to insignificant levels.





# 4.0 ENVIRONMENTAL ANALYSIS

### 4.1 **AESTHETICS**

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

The shade/shadow analysis contained herein is based in part on the 414 South San Gabriel Boulevard Project Shade/Shadow Study (Shade/Shadow Study), prepared by Michael Baker International (dated August 2020); refer to Appendix A, Shade/Shadow Study.

#### a) Have a substantial adverse effect on a scenic vista?

<u>No Impact</u>. According to the General Plan Environmental Evaluation, there are no designated scenic vistas in the City of San Gabriel. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

<u>No Impact</u>. There are no officially designated State scenic highways in the City of San Gabriel.<sup>1</sup> The closest officially designated, or eligible, State scenic highway is Interstate 210 (Foothill Freeway), located over five miles to the northwest of the project site. Views of the project site are not afforded from Interstate 210 due to intervening topography, structures, and vegetation. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

<sup>&</sup>lt;sup>1</sup> California Department of Transportation, *List of Eligible and Officially Designated State Scenic Highways*, updated July 2019.



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

<u>Less Than Significant Impact</u>. The project site is surrounded by urbanized uses; refer to <u>Exhibit 2-2</u>, <u>Site Vicinity</u>. Thus, for the purposes of this threshold, consideration of if the project would conflict with applicable zoning or other regulations governing scenic quality is made.

SGMC Chapter 153, *Zoning Code*, includes site development standards that aid in governing scenic quality. <u>Table</u> <u>4.1-1</u>, <u>SGMC Consistency Analysis Governing Scenic Quality</u>, provides a consistency analysis of the proposed project and these relevant development standards associated with the site's zoning. Refer to <u>Section 4.11</u>, <u>Land Use and</u> <u>Planning</u>, for a discussion concerning the project's consistency with other applicable zoning requirements.

Relevant Section	Consistency Analysis		
<ul> <li>153.154 PRECISE PLAN OF DESIGN REQUIRED.</li> <li>A precise plan of design (PPD) application, as described in §</li> <li>153.355, shall be required for any new commercial or industrial development or any addition to existing development as follows:</li> <li>(A) Any proposal to construct 3,000 square feet or more of new construction shall be subject to review as required</li> </ul>	<b>Consistent</b> . The project involves over 3,000 square feet of new construction and thus would be required to prepare a PPD application; refer to Section 2.6, Permits and Approvals. Pursuant to SGMC Section 153.355, Evaluation Criteria, upon consideration of the project's PPD application, the City of San Gabriel Planning Director, Design Review Commission, or City Council, on appeal, would ensure that the project site plan, architecture, and landscape design:		
<ul><li>(B) Any proposal to construct less than 3,000 square feet of new construction shall be subject to City staff-level review coordinated by the Planning Section.</li></ul>	<ul> <li>(1) Are consistent with the policies of the general plan, zoning ordinance, design guidelines, and other City ordinances and policies governing the quality and character of development.</li> </ul>		
(C) For any proposal to construct an addition or modification of over 2,500 square feet shall be subject to review by the City Design Review Commission.	(2) Are architecturally harmonious, consistent with the scale and impact of similarly sited properties in the same neighborhood and zoning classification, and carry out the intent of the City's design guidelines. Each building includes full architectural character on all building elevations demonstrating a quality of craftsmanship and design quality consistent with the City's guidelines.		
	(3) Provide a degree of amenity characterized by generous landscaping of the open spaces and parking lots consistent with City design guidelines; provision of pedestrian connections; provision of landscape transition zones between parcels; and preservation of native, historic, and specimen trees and vegetation on the site.		

# Table 4.1-1 SGMC Consistency Analysis Governing Scenic Quality


	Relevant Section		Consistency Analysis
			(4) Provide proper transition between the subject parcels and adjoining properties, including proper streetscape, architectural scale, massing, proportion and harmony; landscape palette, sound and vibration control, buffering, privacy protections; public improvements, and sign controls necessary to improve the quality of the streetscape.
			(5) Include, to the extent possible, passive solar design opportunities, new and sustainable technologies, water-efficient landscape techniques, elimination of nonconforming signs, and other building practices consistent with the provisions of state law and City design guidelines.
			Following approval of the project's PPD application, the project would not conflict with SGMC Section 153.154.
153.156 PERMIT AREAS.	TED PROJECTION	NS INTO SETBACK	<b>Consistent</b> . The project does not propose architectural adornments, balconies and stairways, bay windows, chimneys fire escapes or any other projections. No
No structure shall except as provided projections of any ki way.	be permitted within a for in the table belond nd shall be permitted	any required yard area ow. In any event, nc d into a public right-of-	projections are proposed which would impact public right-of- way. The project would not conflict with SGMC Section 153.156.
Feature	Rear Yard	Side Yard	
Architectural adornment such as cornices, eaves, sills, etc.	Not more than 5 inches for each 1 foot of required yards	Not more than 5 inches for each 1 foot of required yards	
Balconies and stairways (unenclosed)	Not permitted	Not permitted	
Bay window or similar feature which does not extend building foundation	36 inches	36 inches	
Chimneys	4 feet	4 feet	
Fire escapes	Not more than 5 inches for each 1 foot of required yard	Not more than 5 inches for each 1 foot of required yard	



	Relevant Section	Consistency Analysis
153.157	7 EXCEPTIONS TO HEIGHT LIMIT.	Consistent. The project does not anticipate antenna,
Throu structur limits es	ugh precise plan of design review, the following es may be authorized to be erected above the height stablished in this subchapter:	skylights, church spires, flagpoles, chimneys, smokestacks, or similar features which would exceed the height limitations established in the SGMC. The project would not conflict with SGMC Section 153.157 in this regard.
(A)	Antenna, provided, however, that satellite dish antenna meet the requirements contained in § 153.133.	
(B)	Skylights.	
(C)	Church spires.	
(D)	Flagpoles.	
(E)	Chimneys and smokestacks.	
(F)	Similar architectural features that do not provide any usable floor area.	
§ 153.1	59 OUTDOOR STORAGE AND DISPLAY.	Consistent. The project does not propose outdoor display
(A)	Purpose. The intent of this section is to provide standards for outdoor storage and display of merchandise connected to and operated with permanent commercial and manufacturing uses.	of goods or outdoor storage areas and would not conflict with SGMC Section 153.159.
(B)	Application procedure.	
(1	1) Any business in a commercial or manufacturing zone seeking outdoor storage or display of merchandise shall submit an application to the Community Development Director for an Outdoor Storage and Display Permit. The application shall be accompanied by a site plan, photos, and other exhibits as may be required to properly evaluate the request along with an application fee in an amount to be determined by resolution of the City Council. The application shall include the days of the week, hours, and number of weeks per year for which the application is requested.	
(2	2) The Community Development Director shall approve an application for the outdoor storage or display of merchandise if the application meets the development standards set forth in this section. The Community Development Director may place reasonable conditions on the issuance of the permit to ensure conformance with the City's development standards. In the event a permit is denied, the Director shall supply findings in writing to the applicant within 30 days of such denial.	
(3	3) The Community Development Director shall retain jurisdiction over the permit and may enforce its provisions as required to ensure compliance with this section.	
(C)	Outdoor storage.	
(1	1) Outdoor storage incidental to the primary use shall	



		Relevant Section	Consistency Analysis
	be a	llowed in the C-1 and C-3 zones only in rear	Consistency Analysis
	yard: yard:	s and in the M-1 zones only in the rear and side s. The outdoor storage must comply with the	
	deve	elopment standards of this section.	
(2)	Deve	elopment standards.	
	(a)	Stored materials shall not occupy any part of a required parking area;	
	(b)	Stored materials shall be prohibited at all times on public property;	
	(c)	Stored materials shall not exceed six feet in height;	
	(d)	Only goods and materials sold or used in the business may be stored.	
(D) C	Outdoo	or display.	
(1)	Outd be a outdo stand deale	loor display incidental to the primary use shall llowed in the C-1, C-3, and M-1 zones. The oor display must comply with the development dards of this section, with the exception of auto erships and automotive service stations.	
(2)	Deve meet	elopment standards. Outdoor displays shall the following requirements:	
	(a)	Be consistent with the City's General Plan, zoning ordinances, specific plan and other regulations;	
	(b)	Not create any condition that would be detrimental to the appearance of the premises or to any surrounding property, including but not limited to, being unsightly;	
	(c)	Not be detrimental to the public health, safety, or welfare;	
	(d)	Not create a public nuisance;	
	(e)	Maintain at least a six-foot width for clear pedestrian passage along the public sidewalk and at least a four-foot width within private property walkways and store entrances;	
	(f)	Not create a safety hazard or block access to disabled persons;	
	(g)	Not require construction of new doorways or other significant exterior changes to existing commercial and industrial buildings or surrounding development;	
	(h)	Not be located on public streets or within the public right-of-way, in designated parking areas, vehicular circulation areas, or within landscape planter areas;	



		Relevant Section	Consistency Analysis
	(i)	Not emit noise, odor, smoke, or other obnoxious substances;	
	(j)	Complement existing storefronts through the use of materials, finishes and color consistent with the approved architecture of the building;	
	(k)	Be limited to the area immediately in front or along the sides of the business selling the merchandise, or no more than 25 feet in length, whichever is less. The area shall not extend laterally beyond the store or building frontage or block access to the business or any other building/store entrance(s);	
	(I)	Merchandise may not be stacked above a height of four feet. Merchandise which exceeds four feet in height, but is not higher than 12 feet in height may be displayed provided that it does not cover or block more than 25% of the front or side of the business selling the merchandise. The display of trees for sale is not subject to any height limitation.	
	(m)	The items proposed for display and sale are the same as those sold inside the store or items that would typically be sold at the business and do not consist of unprepared, packaged merchandise. For purposes of this section UNPREPARED, PACKAGED MERCHANDISE means items that have been sealed, wrapped or packaged in protective materials not designed for profession merchandise displays.	
(3)	Opera displa	ational requirements. Once approved, outdoor ays shall meet the following requirements:	
	(a)	Support structures such as tables and racks used in conjunction with the outdoor display of merchandise shall be removed at the end of each business day; and	
	(b)	Merchandise shall be maintained in a neat and orderly manner at all times.	
(4)	Excer outdo requir	ptions. No application shall be required for oor displays that meet all of the following rements:	
	(a)	The displays are located more than 20 feet back from the nearest face of curb on any public street, alley or driveway; and	
	(b)	The displays are not visible from a public street, alley or other right-of-way.	
(E) S	idewal pecial	k and parking lots sales/special events. events such as sidewalk and parking lot sales	



	Relevant Section	Consistency Analysis
	shall require a temporary use permit.	
(F)	Appeals. Any decision made pursuant to this section shall be appealable pursuant to § 153.004.	
(G)	Revocation. The Community Development Director may revoke the Outdoor Storage and Display Permit if the permittee fails to comply with the requirements of this section or any conditions of approval. Prior to revoking the permit, the Director shall provide the permittee a written notice of non-compliance. The permittee shall have a right to appeal the notice of revocation pursuant to § 153.004.	
(ŀ	H) The regulations set forth in this section shall supersede conflicting conditions of any entitlement granted prior to the effective date, including conditions which prohibit the outdoor storage and display of merchandise.	
153.160	) LANDSCAPE.	Consistent. Ornamental landscaping would be installed
(A)	A minimum of 6% of the gross lot area shall be landscaped. The landscape shall be designed and installed such that much of the landscaping is visible from a public street or thoroughfare. Additional site landscaping may be required for conditionally permitted uses, as set forth in § 153.162.	throughout the project site; refer to <u>Exhibit 2-5</u> , <u>Conceptual</u> <u>Landscape Plan</u> . Planting materials may include, but would not be limited to, a mix of trees, shrubs, and accents including fruitless/pollenless olive, willow acacia, Texas mountain laurel, orange jubilee, red yucca, India Hawthorne, and day lily. Landscaping coverage would total approximately 8,851 square feet, or 13 percent of the project site. Thus. the
(B)	The City may require planting to be provided within a public right-of-way.	project would not conflict with SGMC Section 153.160.

Source: City of San Gabriel, San Gabriel Municipal Code, current through Ordinance 657, passed November 5, 2019.

As indicated in <u>Table 4.1-1</u>, the proposed project would be consistent with applicable SGMC requirements that govern scenic quality. Further, the project would be subject to special site plan and design review as required by the City's PPD process. This regulatory procedure would enforce the City's regulations governing scenic quality for the project site and surrounding area. As a result, implementation of the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant in this regard.

# SHADE/SHADOW ANALYSIS

Shading refers to the effect of shadows cast upon adjacent areas by proposed structures. Consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadow effects are dependent upon several factors, including the local topography, the height and bulk of the project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely usable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. Shadow-sensitive uses in the vicinity of the project site include residential outdoor activity areas (i.e., backyard areas where sunlight is important to its function or for physical comfort of this use).

In order to identify the proposed project's potential shadow-related impacts, existing and project-generated morning (9:00 a.m.), noon (12:00 p.m.), afternoon (3:00 p.m.), and evening (6:00 p.m.) shade patterns were compared for each



of the four seasons; refer to <u>Appendix A</u>. The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. Therefore, the following four dates were used for analysis purposes:

- Winter and summer solstices (December 21 and June 21), when the sun is at its lowest and highest point, respectively, and
- Spring and fall equinoxes (March 21 and September 21), when day and night are of approximately equal length.

A project would have a significant impact pertaining to the degradation of character/quality if it would substantially block sunlight for neighboring buildings. Since the City of San Gabriel does not have a specific adopted threshold to determine whether or not increased shade/shadow patterns are considered significant, this analysis considers the City of Los Angeles' adopted threshold. The urbanized character of the City is similar to that of Los Angeles (pertaining to potential shade/shadow concerns) and Los Angeles is one of the few cities in southern California with an adopted threshold of significance for shade/shadow impacts. Thus, for the purposes of this analysis, a project would have a significant impact if:

• Shadow-sensitive use areas (where sunlight is important to its function) would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October), compared to existing conditions.

# Existing Shade/Shadow Conditions

The existing on-site commercial buildings do not currently shade any sensitive uses for more than three hours between 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October); refer to Exhibit 4.1-1, Existing Shade/Shadow Patterns.

# Proposed Shade/Shadow Conditions

# Early April to Late October

<u>Summer Months</u>. As illustrated on <u>Exhibit 4.1-2</u>, <u>Proposed Shade/Shadow Patterns</u>, the proposed project would cast shadows onto South San Gabriel Boulevard, a small portion of Commercial Avenue to the southwest, and commercial uses to the south and west during the morning (9:00 a.m.) hour. During the mid-day (12:00 p.m.) hour, shadows cast by the proposed project would primarily be contained within the project's boundary. During the afternoon (3:00 p.m.) hour, shadows cast by the proposed project would nominally be cast onto South Gladys Avenue to the east. Shadows cast during the evening (6:00 p.m.) hour would spill onto South Gladys Avenue and light industrial uses to the east. As shown in <u>Exhibit 4.1-2</u>, the project would not result in the shading of any shadow-sensitive uses for more than four hours between 9:00 a.m. and 5:00 p.m. Thus, during the summer months, surrounding uses would not experience significant shadow impacts as a result of the proposed project.

<u>Fall Months</u>. As illustrated on <u>Exhibit 4.1-2</u>, the proposed project would cast shade to off-site uses for greater than four hours between the hours of 9:00 a.m. and 6:00 p.m. during the fall months. Commercial uses to the north would be shaded for more than four hours between 9:00 a.m. and 6:00 p.m. However, this area is not considered shadow-sensitive (as sunlight is not important to its function) and/or routinely useable outdoor space. Further, the commercial uses to the north already experience shading under existing conditions. Thus, during the fall months, surrounding uses would not experience significant shadow impacts as a result of the proposed project.

#### Late October to Early April





Winter Solstice

Vernal Equinox

#### Early April to Late October



#### **Summer Solstice**

#### LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
  - 6 p.m. Shadow Pattern



NOT TO SCALE

06/2020 JN 177570



#### **Autumnal Equinox**

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

> 414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

**Existing Shade/Shadow Patterns** 



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#### Late October to Early April





Winter Solstice

Vernal Equinox

#### Early April to Late October



#### **Summer Solstice**

#### LEGEND

- 9 a.m. Shadow Pattern
- 12 p.m. Shadow Pattern
- 3 p.m. Shadow Pattern
  - 6 p.m. Shadow Pattern





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#### **Autumnal Equinox**

Note: Based on the daytime lighting conditions throughout the year, the Summer Solstice and Autumnal Equinox shadow patterns are represented from 9:00 a.m. and 6:00 p.m. and the Winter Solstice and Vernal Equinox shadow patterns are represented from 9:00 a.m. to 3:00 p.m.

> 414 SOUTH SAN GABRIEL BOULEVARD PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

**Proposed Shade/Shadow Patterns** 



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## Late October to Early April

<u>Winter Months</u>. As illustrated on <u>Exhibit 4.1-2</u>, the proposed project would cast shade for greater than three hours between 9:00 a.m. and 3:00 p.m. at off-site areas in the winter months. These areas shaded for more than three hours include commercial and mixed-uses (commercial and residential) to the north of the project site. The commercial areas are not considered shadow-sensitive (as sunlight is not important to their function) and/or routinely usable outdoor spaces. The balcony areas associated with the mixed-uses to the north of the project site are considered shadow-sensitive. However, the balcony areas associated with the mixed-uses to the north experience shading under existing conditions as a result of the existing commercial uses (i.e., the existing building at 410 South San Gabriel Boulevard) to the north of the project site. Therefore, the project would not result in significant shade/shadow impacts during the winter months.

<u>Spring Months</u>. As illustrated on <u>Exhibit 4.1-2</u>, the proposed project would cast shadows onto commercial uses to north of the project site for greater than three hours between 9:00 a.m. and 3:00 p.m. during the spring months. However, this area is not considered shadow-sensitive (as sunlight is not important to its function) and/or routinely useable outdoor space. Therefore, the project would not result in significant shade/shadow impacts during the spring months.

Although the commercial and mixed-uses (commercial and residential uses) to the north would experience significant shading as a result of the project, these uses are not considered shadow-sensitive (as these areas are not dependent on sunlight for its function, and these areas are not routinely usable outdoor spaces). In addition, the areas associated with the mixed-uses to the north already experience shading under existing conditions. As such, the proposed project would not result in significant shading of the any shadow-sensitive uses for more than three hours between 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). A less than significant shade/shadow impact would occur with implementation of the proposed project.

Mitigation Measures: No mitigation measures are required.

# 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. A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

# CONSTRUCTION

Project construction could involve temporary glare impacts as a result of construction equipment and materials. However, based on the project's limited scope of activities, these sources of glare would not be substantial. The project would comply with SGMC Section 150.003, *Construction; Hours of Construction*, for allowable construction hours, which are limited to between 7:00 a.m. to 7:00 p.m. (Mondays through Friday), and 8:00 a.m. to 4:00 p.m. on Saturdays. No construction is allowed on Sundays. Thus, as no construction activities would be permitted after 7:00 p.m. on weekdays, after 4:00 p.m. on Saturdays, or on Sundays, short-term construction-related impacts to nighttime lighting would be less than significant.



## **OPERATIONS**

The proposed project would increase lighting at the project site compared to existing conditions. However, the project would be required to comply with the exterior lighting requirements included in SGMC Section 150.219, *Special Commercial Provisions*, which requires all luminaries be directed or shielded so as not to be directly visible from any dwelling unit or to cause off-site glare or nuisance.

The project's exterior building materials are anticipated to include CMU block, painted stucco, window glazing, parapet/trim, and awnings. If not properly treated, these materials could result in increased daytime glare. However, the project would be subject to special site plan and design review as required by the City's PPD process. This regulatory procedure would review the project's building materials to ensure neighboring uses are not exposed to substantial daytime glare. Impacts would be less than significant in this regard.



# 4.2 AGRICULTURE AND FORESTRY RESOURCES

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1

# 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 non-agricultural use?

<u>No Impact</u>. According to the California Department of Conservation, the project site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland).<sup>1</sup> No agricultural resources exist within or adjacent to the project site. Thus, project implementation would not convert Farmland to non-agricultural use. No impact would occur in this regard.

<sup>&</sup>lt;sup>1</sup> California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed June 10, 2020.

# b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

<u>No Impact</u>. The project site is zoned Commercial and Limited Manufacturing (C-3) and is not covered under a Williamson Act contract.<sup>2</sup> Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

## 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))?

<u>No Impact</u>. The project site is zoned C-3. Thus, project implementation would not conflict with existing zone for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

## d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Refer to Response 4.2(c). No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Refer to Responses 4.2(a) through 4.2(d). No impact would occur in this regard.

<sup>&</sup>lt;sup>2</sup> California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act FY 2015/2016, 2016.



# 4.3 AIR QUALITY

Wh app cor det	ere available, the significance criteria established by the blicable air quality management district or air pollution atrol district may be relied upon to make the following erminations. Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			~	
C.	Expose sensitive receptors to substantial pollutant concentrations?			✓	
d.	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			~	

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

Less Than Significant Impact. On March 3, 2017, the South Coast Air Quality Management (SCAQMD) Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, the Southern California Associations of Government (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies (2016-2040 RTP/SCS), and updated emission inventory methodologies for various source categories. According to the SCAQMD's CEQA Air Quality Handbook, two main criteria must be addressed.

# Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations associated with the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) is used as the basis for evaluating project consistency. As discussed under Responses 4.3(b) and 4.3(c), the project's short-term construction emissions, long-term operational emissions, and localized concentrations of carbon monoxide (CO), nitrogen oxides (NO<sub>X</sub>), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) would be less than significant during project construction and operations. Therefore, the project would not result in an increase in the frequency or severity of existing air quality violations. Because volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOC plays in ozone (O<sub>3</sub>) formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. As such, the project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the 2016 AQMP.



b) Would the project result in an increase in the frequency or severity of existing air quality violations?

As discussed in Response 4.3(b), construction and operations of the proposed project would result in emissions that would be below the SCAQMD construction and operational thresholds. Therefore, the proposed project meets this 2016 AQMP consistency criterion.

c) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As discussed in Responses 4.3(b) and 4.3(c), the proposed project would result in less than significant impacts with regard to localized concentrations during project operations. As such, the proposed project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

#### Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the South Coast Air Basin (Basin) focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

a) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the *Comprehensive General Plan of the City of San Gabriel, California* (General Plan), SCAG's *Growth Management* Chapter of the *Regional Comprehensive Plan* (RCP), and SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS also provides socioeconomic forecast projections of regional population growth. The project site is designated General Commercial by the General Plan and is zoned Commercial and Limited Manufacturing (C-3) by the City's Zoning Code. The project would be consistent with the site's current land use designation and would not require a General Plan Amendment. In addition, as discussed in <u>Section 4.14</u>, *Population and Housing*, the proposed project would not induce substantial unplanned population growth exceeding existing local conditions and/or regional population projections. Therefore, the proposed project would be consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the 2016-2040 RTP/SCS. Additionally, as the SCAQMD has incorporated these same projections included in the 2016 AQMP.

b) Would the project implement all feasible air quality mitigation measures?

The proposed project would not require mitigation and would result in less than significant air quality impacts; refer to Responses 4.3(b) and 4.3(c). In addition, the project would comply with all applicable SCAQMD rules and regulations, including Rule 403 that requires excessive fugitive dust emissions controlled by regular watering or other dust prevention measures and Rule 1113 that regulates the VOC content of paint. As such, the proposed project would meet this 2016 AQMP consistency criterion.



c) Would the project be consistent with the land use planning strategies set forth in the AQMP?

As discussed in <u>Section 4.8</u>, <u>Greenhouse Gas Emissions</u>, the project would implement various SCAG policies and is considered an infill development. Further, the project would be consistent with the goals of Senate Bill 375 in that it would be located within a half-mile of a Metro bus stop (Line 176) and would include on-site bicycle parking and electric vehicle (EV) charging, which would incentive residents to take alternative transportation methods and therefore lower criteria pollutant emissions. In addition, the project would be consistent with the General Plan Commercial land use designation for the site. As such, the proposed project would meet this 2016 AQMP consistency criterion.

In conclusion, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed project would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. Also, the proposed project would be consistent with the goals and policies of the 2016 AQMP for fugitive dust control. As discussed above, the proposed project's long-term influence would also be consistent with the SCAQMD and SCAG's goals and policies and is, therefore, considered consistent with the 2016 AQMP.

Mitigation Measures: No mitigation measures are required.

# 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?

Less Than Significant Impact.

# Criteria Pollutants

<u>Carbon Monoxide (CO)</u>. CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

<u>Ozone (O<sub>3</sub>)</u>. O<sub>3</sub> occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O<sub>3</sub>layer) extends upward from about 10 to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O<sub>3</sub> is a photochemical pollutant, and needs VOCs, NO<sub>x</sub>, and sunlight to form; therefore, VOCs and NO<sub>x</sub> are O<sub>3</sub> precursors. To reduce O<sub>3</sub> concentrations, it is necessary to control the emissions of these O<sub>3</sub> precursors. Significant O<sub>3</sub> formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O<sub>3</sub> concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While  $O_3$  in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level  $O_3$  (in the troposphere) can adversely affect the human respiratory system and other tissues.  $O_3$  is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of  $O_3$ . Short-term exposure (lasting for a few hours) to  $O_3$  at elevated levels can result in aggravated respiratory diseases such as



emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

<u>Nitrogen Dioxide (NO<sub>2</sub>)</u>. NO<sub>2</sub> (often used interchangeably with NO<sub>x</sub>) are a family of highly reactive gases that are a primary precursor to the formation of ground-level O<sub>3</sub> and react in the atmosphere to form acid rain. NO<sub>2</sub> is a reddishbrown gas that can cause breathing difficulties at elevated levels. Peak readings of NO<sub>2</sub> occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO<sub>2</sub> can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO<sub>2</sub> concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO<sub>2</sub> may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

<u>Coarse Particulate Matter ( $PM_{10}$ )</u>.  $PM_{10}$  refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter.  $PM_{10}$  arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms.  $PM_{10}$  scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

<u>Fine Particulate Matter (PM<sub>2.5</sub>)</u>. Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both State and Federal PM<sub>2.5</sub> standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new PM<sub>2.5</sub> standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a Final Rule in the Federal Register that designates the Basin as a nonattainment area for Federal PM<sub>2.5</sub> standards. These standards were revised/established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current State standards during some parts of the year, and the Statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

<u>Sulfur Dioxide (SO<sub>2</sub>)</u>. SO<sub>2</sub> is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. SO<sub>2</sub> is often used interchangeably with sulfur oxides (SO<sub>X</sub>) and lead. Exposure of a few minutes to low levels of SO<sub>2</sub> can result in airway constriction in some asthmatics.

<u>Volatile Organic Compounds (VOC)</u>. VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form  $O_3$  to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include: CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to  $O_3$ , which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.



# Short-Term Construction Emissions

Short-term air quality impacts are predicted to occur during grading and construction activities associated with implementation of the proposed project. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction; and
- Exhaust emissions from the construction equipment and the motor vehicles of the construction crew.

Construction activities would occur for approximately 18 months and would include demolition, grading, building construction, paving, and architectural coating. Site grading would disturb approximately two acres and require approximately 15,300 cubic yards of soil export. Due to the slope of the project site, grading would require approximately 16,720 cubic yards of cut and 2,000 cubic yards of fill. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) version 2016.3.2. Refer to <u>Appendix B</u>, <u>AQ/GHG/Energy Data</u>, for the CalEEMod outputs and results. <u>Table 4.3-1</u>, <u>Maximum Daily Construction Emissions</u>, presents the project's anticipated daily short-term construction emissions.

Emissiona Source	Pollutant (pounds/day) <sup>1</sup>						
Emissions Source	VOC	NOx	CO	SO <sub>2</sub>	<b>PM</b> <sub>10</sub>	PM <sub>2.5</sub>	
Year 1							
Construction Emissions <sup>2</sup>	7.29	84.74	52.32	0.14	9.12	5.41	
Year 2							
Construction Emissions <sup>2</sup>	46.30	30.10	36.02	0.07	2.90	1.73	
SCAQMD Thresholds	75	100	550	150	150	55	
Is Threshold Exceeded?	No	No	No	No	No	No	

# Table 4.3-1 Maximum Daily Construction Emissions

Notes:

1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.

2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stock piles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.

Refer to Appendix B, for assumptions used in this analysis.

# Fugitive Dust Emissions

Construction activities are a source of fugitive dust in the form of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, grading, and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of  $PM_{10}$  generated as a part of fugitive dust emissions.  $PM_{10}$  poses a serious health hazard alone or in combination with other pollutants.  $PM_{2.5}$  is mostly produced by mechanical



processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture.  $PM_{2.5}$  is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO<sub>X</sub> and SO<sub>X</sub> combining with ammonia.  $PM_{2.5}$  components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

Construction activities would comply with SCAQMD Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce  $PM_{10}$  and  $PM_{2.5}$  concentrations. It should be noted that these reductions were applied in CalEEMod. As depicted in <u>Table 4.3-1</u>, total  $PM_{10}$  and  $PM_{2.5}$  emissions would not exceed the SCAQMD thresholds during construction. Therefore, particulate matter impacts during construction would be less than significant.

# Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site. Standard SCAQMD regulations, such as maintaining all construction equipment in proper tune and shutting down equipment when not in use for extended periods of time would be implemented. As noted in <u>Table 4.3-1</u>, construction equipment exhaust would not exceed SCAQMD thresholds. Therefore, impacts are less than significant in this regard.

# ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are  $O_3$  precursors. In accordance with the methodology prescribed by the SCAQMD, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Regulation XI, Rule 1113 – *Architectural Coating,* all architectural coatings for the proposed structures would comply with specifications on painting practices as well as regulation on the ROG content of paint. ROG emissions associated with the proposed project would be less than significant; refer to <u>Table 4.3-1</u>.

# Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG,  $NO_X$ , CO,  $SO_X$ ,  $PM_{10}$ , and  $PM_{2.5}$ . As indicated in <u>Table 4.3-1</u>, criteria pollutant emissions during construction of the proposed project would not exceed the SCAQMD significance thresholds. Thus, total construction related air emissions would be less than significant.

#### Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially



harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report<sup>1</sup>, serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

### Long-Term Operational Emissions

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic, and emissions from stationary area and energy sources. Two CalEEMod models were conducted to calculate the long-term emissions from the operation of the existing commercial buildings (i.e., existing conditions) and the proposed project, respectively. The net increase of total emissions represents the project-generated emissions. Emissions from each source are discussed in more detail below.

#### Mobile Source

The project-generated vehicle emissions have been estimated using CalEEMod. According to the *Transportation Impact Study San Gabriel Self-Storage Project* prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020), the proposed project would generate a net increase of 334 daily trips. <u>Table 4.3-2</u>, *Long-Term Air Emissions*, presents the anticipated mobile source emissions.

#### Area Source Emissions

Area source emissions would be generated due to an increased demand for consumer products, area architectural coatings, and landscaping equipment associated with the development of the proposed project; refer to <u>Table 4.3-2</u>.

#### Energy Source Emissions

Operational energy source emissions are generated as a result of natural gas usage associated with a project. The proposed project would not connect or utilize a natural gas service. As such, the project would not have any energy source emissions (no on-site natural gas usage), as shown in <u>Table 4.3-2</u>, .

#### Total Operational Emissions

As shown in <u>Table 4.3-2</u>, the net increase of total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, impacts in this regard would be less than significant.

<sup>&</sup>lt;sup>1</sup> Department of Conservation Division of Mines and Geology, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr\_2000-019.pdf, accessed April 3, 2020.



Seenaria	Emissions (pounds per day) <sup>1</sup>						
Scenario	ROG	NOx	CO	SOx	<b>PM</b> <sub>10</sub>	PM <sub>2.5</sub>	
Existing Conditions Summer Emissions <sup>2</sup>							
Area Source	0.14	<0.01	<0.01	0.00	0.00	0.00	
Energy Source	<0.01	0.02	0.02	<0.01	<0.01	<0.01	
Mobile	0.07	0.37	1.02	<0.01	0.32	0.09	
Total Emissions <sup>2</sup>	0.22	0.39	1.04	<0.01	0.33	0.09	
Proposed Project Summer Emissions							
Area Source	4.21	<0.01	0.03	0.00	<0.01	<0.01	
Energy Source <sup>3</sup>	0.00	0.00	0.00	0.00	0.00	0.00	
Mobile	0.99	2.35	11.51	0.03	3.25	0.89	
Total Emissions <sup>2</sup>	5.20	2.35	11.54	0.03	3.25	0.89	
Net Increase of Total Emissions <sup>2</sup>	4.98	1.96	10.50	0.03	2.92	0.80	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	No	No	No	No	No	No	
Existing Conditions Winter Emissions <sup>2</sup>							
Area Source	0.14	<0.01	<0.01	0.00	0.00	0.00	
Energy Source	<0.01	0.02	0.02	<0.01	<0.01	<0.01	
Mobile	0.07	0.38	0.96	<0.01	0.32	0.09	
Total Emissions <sup>2</sup>	0.21	0.40	0.98	<0.01	0.33	0.09	
Proposed Project Winter Emissions							
Area Source	4.21	<0.01	0.03	0.00	<0.01	<0.01	
Energy Source <sup>3</sup>	0.00	0.00	0.00	0.00	0.00	0.00	
Mobile	1.00	2.48	10.85	0.03	3.25	0.89	
Total Emissions <sup>2</sup>	5.21	2.48	10.88	0.03	3.25	0.89	
Net Increase of Total Emissions <sup>2</sup>	5.00	2.08	9.90	0.03	2.92	0.80	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	No	No	No	No	No	No	

Table 4.3-2 Long-Term Air Emissions

Notes:

1. Emissions were calculated using CalEEMod version 2016.3.2, as recommended by the SCAQMD.

2. The numbers may be slightly off due to rounding.

3. Operational energy source emissions come from a project's usage of natural gas. The project would not be connected to a natural gas service and thus would not include any natural gas usage or operational energy source emissions.

Refer to <u>Appendix B</u> for assumptions used in this analysis.

#### Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular,  $O_3$  precursors, VOCs and NO<sub>x</sub>, affect air quality on a regional scale. Health effects related to  $O_3$  are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.



Further, as noted in the *Brief of Amicus Curiae* by the SCAQMD<sup>2</sup>, the SCAQMD acknowledges it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Furthermore, as noted in the *Brief of Amicus Curiae* by the San Joaquin Valley Air Pollution Control District (SJVAPCD)<sup>3</sup>, SJVAPCD acknowledges that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from O<sub>3</sub>, as an example, is correlated with the increases in ambient level of O<sub>3</sub> in the air (concentration) that an individual person breathes. SCAQMD's *Brief of Amicus Curiae* states that it would take a large amount of additional emissions to cause a modeled increase in ambient O<sub>3</sub> levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO<sub>x</sub> and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O<sub>3</sub> levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O<sub>3</sub>-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

# **Cumulative Construction Impacts**

With respect to the proposed project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to Federal Clean Air Act mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements and implement all feasible SCAQMD rules to reduce construction air emissions to the extent feasible. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the proposed project. In addition, the proposed project would comply with adopted AQMP emissions control measures. Pursuant to SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

As discussed above, the project's short-term construction emissions would be below the SCAQMD thresholds and would result in a less than significant impact. Thus, it can be reasonably inferred that the project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin. Thus, a less than significant impact would occur in this regard.

# Cumulative Operational Impacts

As discussed previously, the proposed project would not result in long-term air quality impacts, as emissions would not exceed SCAQMD-adopted operational thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed project would not

<sup>&</sup>lt;sup>2</sup> South Coast Air Quality Management District, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.

<sup>&</sup>lt;sup>3</sup> San Joaquin Valley Air Pollution Control District, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.



contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, cumulative operational impacts associated with implementation of the proposed project would be less than significant.

Mitigation Measures: No mitigation measures are required.

### c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The closest sensitive receptors near the project site are residences located approximately 210 feet to the east of the project site. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for construction and operations impacts (area sources only). The CO hotspot analysis following the LST analysis addresses localized mobile source impacts.

## Localized Significance Thresholds

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for one-, two-, and five-acre projects emitting CO, NO<sub>X</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub>. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The project is located within Source Receptor Area (SRA) 8, West San Gabriel Valley.

# Construction LST

The SCAQMD's guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day. SCAQMD provides LST thresholds for one-, two-, and five-acre site disturbance areas; SCAQMD does not provide LST thresholds for projects over five acres. Based on default information provided by CalEEMod, the project is anticipated to disturb up to 124 acres during the grading phase. The grading phase would take approximately 44 days to complete. As such, the project would actively disturb an average of approximately 2.8 acres per day (124 acres divided by 44 days). Therefore, the LST thresholds for two acres were conservatively utilized for the construction LST analysis. The closest sensitive receptors to the project site may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive uses are located approximately 210 feet, or 64 meters, to the project site, the LST values for 50 meters (164 feet) were conservatively used.

<u>Table 4.3-3</u>, <u>Localized Significance of Construction Emissions</u>, shows the localized construction-related emissions for NO<sub>X</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> compared to the LSTs for SRA 8. It is noted that the localized emissions presented in <u>Table 4.3-3</u> are less than those in <u>Table 4.3-1</u> because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in <u>Table 4.3-3</u>, the project's localized construction emissions would not exceed the LSTs for SRA 8. Therefore, localized significance impacts from construction emissions would be less than significant.



 Table 4.3-3

 Localized Significance of Construction Emissions

Dhaas		Emissions (pounds per day)						
Phase	NOx	CO	<b>PM</b> 10	PM <sub>2.5</sub>				
Maximum Daily Emissions (on-site) <sup>1, 2</sup>	73.35	48.22	2.82	2.48				
Localized Significance Threshold <sup>3</sup>	95	1,125	19	5				
Threshold Exceeded?	No	No	No	No				

Notes:

1. The grading phase emissions during year 1 present the worst-case scenario for NO<sub>x</sub>, and CO, and the demolition phase emissions during year 1 present the worst-case scenario for PM<sub>10</sub> and PM<sub>2.5</sub>.

2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stock piles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.

3. The Localized Significance Threshold was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately 2.8 acres per day; therefore, the threshold for two acres was used), a distance of 164 feet (50 meters) to the closest sensitive receptor, and Source Receptor Area 8.

Refer to Appendix B for assumptions used in this analysis.

#### **Operational LST**

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed project includes a self-storage facility component, therefore, occasional truck trips would occur at the project site. These truck activities would be intermittent and would not include extended periods of idling time; therefore, idling emissions from truck trips would be minimal. Additionally, potential emergency vehicle trips to and from the project site would be sporadic and would not idle on-site or along adjacent roadways for long periods of time. Thus, due to the lack of such emissions, no long-term LST analysis is necessary. Operational LST impacts would be less than significant in this regard.

#### Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, and the elderly).

The Basin is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased nationwide; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.<sup>4</sup> Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's 2003 Air Quality Management Plan, which is the most recent AQMP that addresses CO concentrations. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would

<sup>&</sup>lt;sup>4</sup> United States Environmental Protection Agency, *Carbon Monoxide Emissions*, https://cfpub.epa.gov/roe/indicator\_pdf.cfm?i=10, accessed April 6, 2020.



likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the proposed project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles County experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm one-hour CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in southern California with an average daily trip volume of approximately 100,000 vehicles per day. As CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections within the City of San Gabriel near the project site due to the comparatively low volume of traffic (a maximum of 334 average daily trips, including 24 trips during the a.m. peak hour and 36 trips during the p.m. peak hour) that would occur as a result of project implementation. Therefore, impacts would be less than significant in this regard.

# Localized Air Quality Health Impacts

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds, and CO hotpots would not occur as a result of the proposed project. Therefore, the project would not exceed the most stringent applicable Federal or State ambient air quality standards for emissions of CO, NO<sub>X</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (e.g., children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, an air quality health impact would be less than significant in this regard.

## Conclusion

In conclusion, the project would not expose sensitive receptors to substantial pollutant concentrations as the project would not exceed the SCAQMD LST thresholds, would not cause a CO hotspot, and would not create a localized air quality health impact. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The project would also comply with the SCAQMD Regulation XI, *Rule 1113 – Architectural Coating*, which would minimize odor impacts from VOC emissions during architectural coating. Any impacts to existing adjacent land uses would be short-term and are less than significant.



# 4.4 **BIOLOGICAL RESOURCES**

Wa	ould the project:	Potentially Significant Impact	Less Than Significant Impact 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?				*
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?				*
C.	Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				*
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			~	
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				~
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				~

# 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?

<u>No Impact</u>. The project site is located within a developed, urbanized area and is developed with several single-story commercial buildings and surface parking lots. The project site supports minimal vegetation, with one ornamental tree located along Commercial Avenue and some small shrubs scattered throughout the site. The Los Angeles County Flood Control District-owned Rubio Wash flows in a northwest to southeast direction approximately 140 feet from the project site's northeastern corner.

Based on the project site's disturbed condition, project construction would not adversely impact candidate, sensitive, or special status biological resources. Project construction and operation would not impact the Rubio Wash, which is located approximately 140 feet from the proposed limits of disturbance. Further, no listed or sensitive habitat that could support such species are present on-site. Thus, no impact would occur in this regard.



# 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?

<u>No Impact</u>. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. The Rubio Wash is located approximately 140 feet northeast of the project site and is identified as an environmental resource on General Plan Figure 8-1, *Environmental Resources*. The Rubio Wash is a concrete-lined channel and no riparian habitat exists within the channel; however, it is the City's goal to restore the lost environmental value of this facility (General Plan Goal 8.5). The Rubio Wash is located outside of the project boundary and project construction and operation would not impact the Rubio Wash; thus, project implementation would not prohibit the City from achieving General Plan Goal 8.5.

The project site has been heavily disturbed by existing development and no riparian habitat or other sensitive natural community exists the project site boundaries, or within 140 feet of the project site. Additionally, the project area is not included in local or regional plans, policies, or regulations that identify riparian habitat or other sensitive natural communities. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# 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?

<u>No Impact</u>. No State or Federally protected wetlands are located within the project site.<sup>1</sup> Further, the Rubio Wash is located outside of the project boundary and the project does not propose any changes to the channel. As discussed, the project site is heavily disturbed and consists mostly of developed and disturbed habitat. The project would not involve direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# 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?

Less Than Significant Impact. The project site consists entirely of developed or disturbed habitat and is surrounded on all sides by other urban uses. There are no areas within the project vicinity which could function as wildlife corridors or nursery sites for native and migratory wildlife. Further, the minimal on-site vegetation and landscaping do not provide suitable nesting habitat for migratory birds. However, the existing ornamental tree on-site has the potential to provide nesting opportunities for birds. The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, or nests. Mandatory compliance with the MBTA would reduce the project's potential construction-related impacts to migratory birds. Impacts would be less than significant in this regard.

<sup>&</sup>lt;sup>1</sup> U.S. Fish and Wildlife Service, *National Wetlands Inventory*, https://www.fws.gov/wetlands/data/Mapper.html, accessed June 10, 2020.



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

<u>No Impact</u>. Landmark, historically significant, and mature trees located within Multiple Family, Commercial, and Industrial zones are protected under SGMC Title IX Chapter 95.35, *Tree Protection and Preservation Regulations; Multiple Family, Commercial and Industrial Zones.* Landmark or historically significant trees include any trees (excluding palm trees) that meet the following criteria: 1) A tree or stand of trees which have taken on an aura of historical value by virtue of age or location; and/or 2) a tree which has a trunk with a 40-inch circumference (12.75-inch diameter) if located in the front yard or 60 inches in circumference (19-inch diameter) if located in the rear and side yards. Mature trees are defined as any variety of a tree (except fruit trees) that is more than 12.5 inches in circumference (4-inch diameter) when measured at a point four feet above the natural grade.

As discuss in Response 4.4(a), above, the project site supports minimal vegetation, with one ornamental tree located along Commercial Avenue and some shrubs scattered throughout the site. The on-site tree does not qualify as landmark, historically significant, or mature tree. Thus, no impacts would occur in this regard.

Street trees are protected under SGMC Title IX Chapter 95, *Trees and Shrubs; Weeds*, which stipulates that street trees and shrubs may only be removed after obtaining a tree removal permit from the Community Development Director. Project implementation would not require the removal of street trees. Thus, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# 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?

<u>No Impact</u>. According to the California Department of Fish and Wildlife, the proposed project is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan.<sup>2</sup> No other approved local, regional, or State habitat conversation plans apply to the site. Thus, development of the proposed project would not conflict with any approved habitat conservation plan. No impact would occur in this regard.

<sup>&</sup>lt;sup>2</sup> California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, April 2019.



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# 4.5 CULTURAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?				~
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		~		
C.	Disturb any human remains, including those interred outside of dedicated cemeteries?			~	

This section is primarily based upon the *Cultural Resources Survey for the 414 South San Gabriel Project, City of San Gabriel, Los Angeles County, California* (Cultural Resources Survey), prepared by Anza Resources Consultants (dated June 2020); refer to <u>Appendix C, *Cultural Resources Survey*</u>.

# a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?

<u>No Impact</u>. A historic overview of the project area during the Spanish Period (1769-1822), Mexican Period (1822-1848), and American Period (1848-Present) is provided in the Cultural Resources Survey; refer to <u>Appendix C</u>. In addition, a records search of the California Historical Resources Information System (CHRIS) was provided by the South Central Coastal Information Center (SCCIC) on May 26, 2020. The search was conducted to identify previously recorded cultural resources and previously conducted cultural resources studies within a 0.5-mile radius of the project site. The CHRIS search also included a review of the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of all available historic United States Geological Survey (USGS) 7.5-, 15-, and 30-minute quadrangle maps.

The records search identified 16 previously conducted cultural resources studies within a 0.5-mile radius of the project site, three of which included a portion of the project site. The records search also identified 47 previously recorded cultural resources in the 0.5-mile search radius of the project site; refer to Cultural Resources Survey <u>Table 2</u>, <u>Previously Recorded Cultural Resources within 0.5 Mile of the Project Site</u>. All 47 resources are historic built environment resources, the large majority of which are buildings or are associated with the railroad. One previously recorded resource (P-19-188622) includes five historic-period ornamental street lights along South San Gabriel Boulevard between Commercial Avenue and Agostino Road. As discussed in the Cultural Resources Survey, one of the historic-period ornamental street lights is located along the project's frontage at 420 South San Gabriel Boulevard. The resource was determined to be ineligible for NRHP and CRHR designation in 2009. As such, P-19-188622 is not considered a historical resource under CEQA and development of the proposed project would not result in impacts to previously recorded historic resources.

Other background research conducted for the Cultural Resources Survey included a review of the General Plan, Historic Sanborn Maps and aerial photographs, and a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC).



On April 14, 2020, an intensive historic resources field survey was conducted on the project site. The field survey consisted of a visual inspection of all historic-period built environment features on the property, to assess their overall condition and integrity, and to identify and document any potential character-defining features or alterations.

As a result of the records search, background research, and historic resources field survey, three commercial buildings over 45 years of age were identified within the project site: 414 South San Gabriel Boulevard, 420 South San Gabriel Boulevard, and 815 Commercial Avenue. According to CEQA, a resource shall be considered historically significant if it meets any of the following criteria:

- 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- 2. Is associated with the lives of persons important in our past;
- 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4. Has yielded, or may be likely to yield, information important in prehistory or history.

<u>414 South San Gabriel Boulevard Building</u>. This Utilitarian commercial/industrial building was constructed in 1959. The Senteno family has owned the property since 1943 and J&D Plumbing occupied the building from approximately 1961 through 2017. It has been used for storage purposes only since 2017.

The property was constructed as a simple commercial or light industrial building. Given the lack of major alterations, it retains adequate integrity to be recognizable to its original appearance. It is an ordinary example of a common type. It is a typical Utilitarian building for its period that has no direct identifiable association with important events in California history and did not influence patterns in our past (CRHR Criterion 1). It was not directly associated with persons significant in our past (CRHR Criterion 2), does not embody the distinctive characteristics of a type, period, or method of construction, nor represent the work of a master (CRHR Criterion 3). There is no reason to believe that the property may yield important information about prehistory or history (Criterion 4). Thus, the 414 South San Gabriel Boulevard building is recommended ineligible for CRHR listing and is not considered a historical resource under CEQA.

<u>420 South San Gabriel Boulevard Building</u>. This Utilitarian commercial/industrial building was constructed in 1921 with large additions in 1939 and 1959. The property has been owned by numerous individuals since its construction and occupied by a variety of businesses from cycle salvage to slot machines to window coverings.

The property was constructed as a simple commercial building and altered with light industrial warehouse additions. It is an ordinary example of a common type with banal additions. It has no direct identifiable association with important events in California history and did not influence patterns in our past (CRHR Criterion 1). It was not directly associated with persons significant in our past (CRHR Criterion 2), does not embody the distinctive characteristics of a type, period, or method of construction, nor represent the work of a master (CRHR Criterion 3). There is no reason to believe that the property may yield important information about prehistory or history (CRHR Criterion 4). Thus, the 420 South San Gabriel Boulevard building is recommended ineligible for CRHR listing and is not considered a historical resource under CEQA.

<u>815 Commercial Avenue Building</u>. This Utilitarian commercial building was constructed in 1962 with large additions in 1967 and 1987. Building permit records indicate the property was owned by Mission Landscaping and Paving or its agents Andrew Andrews and Dick Calvi from its construction into the 1990s.



The property was constructed as a tiny simple commercial building and altered with two commercial additions. It is an ordinary example of a common type with banal additions. It has no direct identifiable association with important events in California history and did not influence patterns in our past (CRHR Criterion 1). It was not directly associated with persons significant in our past (CRHR Criterion 2), does not embody the distinctive characteristics of a type, period, or method of construction, nor represent the work of a master (CRHR Criterion 3). There is no reason to believe that the property may yield important information about prehistory or history (CRHR Criterion 4). Thus, the 815 Commercial Avenue building is recommended ineligible for CRHR listing and is not considered a historical resource under CEQA.

As such, the three existing commercial buildings over 45 years of age are not considered a historical resource under CEQA and development of the proposed project would not result in impacts to historic resources. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

<u>Less Than Significant Impact With Mitigation Incorporated.</u> Prehistoric background on the project area from Early Man Horizon (circa 10,000 – 6,000 BC), Milling Stone Horizon (6,000 – 3,000 BC), Intermediate Horizon (3,000 BC – AD 500), and Late Prehistoric Horizon (AD 500 – Historic Contact) is provided in the Cultural Resources Survey; refer to <u>Appendix C</u>.

As detailed above, a records search of the CHRIS was provided by the SCCIC on May 26, 2020. The search was conducted to identify previously recorded cultural resources and previously conducted cultural resources studies within a 0.5-mile radius of the project site. According to the Cultural Resources Survey, a total 16 cultural resources studies have been conducted within a 0.5-mile radius of the project site, three of which included a portion of the project site.

In addition, a pedestrian field survey of the project site and surrounding areas was also conducted on April 14, 2020. The survey was conducted by walking a series of transects at approximately 10-meter intervals, with variations around extant buildings. During the survey, areas of exposed ground surface were examined for artifacts (e.g., flaked stone tools and tool-manufacture debris, ground stone tools, ceramic sherds, or fire-affected rock), ecofacts (marine shell and bone), soil discolorations indicative of the presence of cultural midden, soil depressions, and features indicative of the former presence of structures of buildings (e.g., standing exterior walls, postholes, or foundations) or historic debris (e.g., metal, glass, ceramic shards, cut bone). Ground disturbances, such as burrows and drainages, were visually inspected.

No archaeological resources were identified during the records search and pedestrian field survey. Notwithstanding, should the project excavation encounter archaeological resources on the project site during earthwork, Mitigation Measure CUL-1 would require all construction work to halt until a qualified archaeologist can evaluate the find. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be reduced to less than significant levels.

# Mitigation Measures:

CUL-1 If previously unidentified cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate any significant impacts. In the event that



an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project owner and City of San Gabriel to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.

### c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Due to the level of disturbance on the project site and in the site vicinity, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, if human remains are found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Section 7050.5 through 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission and consultation with the individual identified by the Native American Heritage Commission to be the most likely descendant. If human remains are found during excavation, excavation must stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains are less than significant.



# 4.6 ENERGY

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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?			~	
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

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.

# California Building Energy Efficiency Standards (Title 24)

The 2019 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings will use about 30 percent less energy, mainly due to lighting upgrades, when compared to those constructed under 2016 Title 24 standards.<sup>1</sup> The 2019 Title 24 standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

# California Green Building Standards (CALGreen)

The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2020. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g. lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> California Energy Commission, 2019 Building Energy Efficiency Standards, Frequently Asked Questions, https://www.energy.ca.gov/sites/default/files/2020-03/Title\_24\_2019\_Building\_Standards\_FAQ\_ada.pdf, accessed June 4, 2020.

<sup>&</sup>lt;sup>2</sup> US Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed June 4, 2020.



# Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), California Air Resources Board (CARB), and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

# City of San Gabriel Energy Action Plan

The San Gabriel City Council adopted the City's first *Energy Action Plan* (EAP) on November 20, 2012. The EAP was developed in partnership with the San Gabriel Valley Council of Governments (SGVCOG) and Southern California Edison (SCE). The intent of the EAP is to:

- 1. Make it easier for residents and businesses to finance energy efficient improvements and save money on energy bills;
- 2. Provide a roadmap for reducing the City's energy bills;
- 3. Reduce the City and community's impact on the environment;
- 4. Provide the City with critical baseline data that the State requires for cities to address greenhouse gas emissions;
- 5. Enable the City to receive additional grants; and
- 6. Serve as a foundation for future planning efforts such as general plan updates, climate action plans, housing element updates, and zoning code updates, among others.

# Project-Related Sources of Energy Consumption

This analysis focuses on the two sources of energy that are relevant to the proposed project: electricity and transportation fuel for vehicle trips associated with project construction and operations. The project would not be connected to a natural gas service and as such would not include any natural gas consumption. The analysis of operational electricity is based on the California Emissions Estimator Model version 2016.3.2 (CalEEMod) modeling results for the project, which quantifies energy use for occupancy. The project's estimated electricity consumption is based primarily on CalEEMod's default settings for Los Angeles County (County), and consumption factors provided by SCE (the electricity provider for the City, including the project site). Two CalEEMod models were conducted to calculate the energy usage from the operation of the existing commercial buildings (i.e., existing conditions) and the proposed project, respectively. The net increase of total energy usage represents the project-generated energy usage. It should be noted that while the proposed project would not include natural gas consumption, it is assumed that the existing on-site uses do use natural gas. The results of the CalEEMod modeling and energy usage calculations are included in Appendix B, AQ/GHG/Energy Data. The amount of operational fuel consumption was estimated using CARB's EMissions FACtor 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel usage in the County, and the project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on the project's construction equipment list, timing/phasing, and duration of use.
The project's estimated energy consumption is summarized in <u>Table 4.6-1</u>, <u>Energy Consumption</u>. As shown in <u>Table 4.6-1</u>, the project's electricity usage would constitute an approximate 0.0016 percent increase over the County's typical annual electricity, and would decrease the County's typical annual natural gas consumption by approximate 0.00005 percent. Additionally, the project's construction and operational vehicle fuel consumption would increase the County's consumption by 0.0230 percent and 0.0022 percent, respectively.

#### Table 4.6-1 Energy Consumption

Energy Type	Project Annual Energy Consumption <sup>1</sup>	Los Angeles County Annual Nonresidential Energy Consumption <sup>2</sup>	Percentage Increase Countywide <sup>2</sup>
Net Project Increase <sup>4</sup>			
Electricity Consumption	743 MWh	47,441,210 MWh	0.0016%
Natural Gas Consumption	-894 therms	1,813,660,000 therms	-0.00005%
Fuel Consumption			
<ul> <li>Construction (Heavy-Duty Diesel Vehicle) Fuel Consumption<sup>3</sup></li> </ul>	122,429 gallons	531,821,752 gallons	0.0230%
<ul> <li>Operational Automotive Fuel Consumption<sup>3</sup></li> </ul>	81,243 gallons	3,773,361,064 gallons	0.0022%
Notes:			

1. As modeled in CalEEMod version 2016.3.2.

2. The net project changes in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2018. The net project increases in automotive fuel consumption are compared with the projected Countywide fuel consumption in 2022.

Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed June 4, 2020.

Los Angeles County natural gas consumption data source: California Energy Commission, Gas Consumption by County, http://www.ecdms.energy.ca.gov/gasbycounty.aspx, accessed June 4, 2020.

- 3. Project energy consumption is calculated based on CalEEMod results for the existing and proposed project conditions. Countywide fuel consumption is from the California Air Resources Board's EMFAC2017 model.
- 4. The net project increase was analyzed by subtracting the existing conditions energy usage from the proposed project energy usage. The existing conditions would include natural gas usage, while the proposed project would not; resulting in a decrease in natural gas consumption within Los Angeles County; refer to <u>Appendix B</u>.

Refer to Appendix B for assumptions used in this analysis.

#### Construction-Related Energy Consumption

Project construction would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and developers have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-savings potential in green building practices and materials.



Reductions in energy inputs for construction materials can be achieved by selecting green building materials composed of recycled materials that require less energy to produce than non-recycled materials.<sup>3</sup> The integration of green building materials can help reduce environmental impacts associated with the extraction, transport, processing, fabrication, installation, reuse, recycling, and disposal of these building industry source materials.<sup>4</sup> The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. As indicated in <u>Table 4.6-1</u>, the project's fuel consumption from construction would be approximately 122,429 gallons, which would increase fuel use in the County by 0.0230 percent. As such, construction would have a nominal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, a less than significant impact would occur in this regard.

#### **Operational Energy Consumption**

#### Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. <u>Table 4.6-1</u> provides an estimate of the daily fuel consumed by vehicles traveling to and from the site. As indicated in <u>Table 4.6-1</u>, project operations are estimated to consume approximately 81,243 gallons of fuel per year, which would increase the County's automotive fuel consumption by 0.0022 percent. The project would not result in any unusual characteristics that would result in excessive operational fuel consumption. Fuel consumption associated with project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. As such, a less than significant impact would occur in this regard.

#### Electricity Demand

The project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other common household features. The project would be required to comply with 2019 Title 24 standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2019 Title 24 standards would significantly reduce project-related energy usage. Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. As indicated in <u>Table 4.6-1</u>, operational energy consumption would represent an approximate 0.0016 percent increase in electricity consumption over the current Countywide usage. Therefore, the project would not result in the inefficient, wasteful, or unnecessary consumption of building energy, and impacts in this regard would be less than significant.

<sup>&</sup>lt;sup>3</sup> California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials#Material, accessed June 4, 2020.

<sup>&</sup>lt;sup>4</sup> Ibid.



As indicated in <u>Table 4.6-1</u>, operational energy consumption would represent an approximate 0.0016 percent increase in electricity consumption and would decrease the County's typical annual natural gas consumption by approximate 0.00005 percent. The project would adhere to all Federal, State, and local requirements for energy efficiency, including the 2019 Title 24 standards. Additionally, the project would not result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. The project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The City has adopted an EAP as part of a regional partnership between the City, SCE, and the SGVCOG. Past and current collaborative efforts between these partners have focused on improving energy efficiency by providing local governments with funding, technical support, and a forum for sharing information through the San Gabriel Valley Energy Wise Partnership. The EAP meets the requirements of the Energy Leader Partnership Model and is part of a larger regional effort to develop GHG emissions inventories and energy efficiency climate action plans for 27 participating cities in the SGVCOG. The purpose of the EAP is to identify the City's long-term vision and commitment to achieve energy efficiency in San Gabriel. The EAP notes that it could also serve as the foundation for future climate action planning projects.

The EAP identifies key energy efficiency targets and separate associated goals, policies, and actions for community and municipal activities. The project proposes to incorporate several energy efficiency design features that are consistent with the EAP efficiency measures. <u>Table 4.6-2</u>, <u>Energy Action Plan Consistency</u>, discusses the project's consistency with the applicable EAP policies.



# Table 4.6-2Energy Action Plan Consistency

EAP Measure	Project Consistency
<b>Policy 3.1</b> : The City would maximize the energy efficiency of new buildings.	<b>Consistent</b> . The project would comply with the most current version of the Title 24 standards and CALGreen and would use water conserving plumbing fixtures and fittings and outdoor potable water use in landscape areas. The project would also recycle and/or salvage for reuse a minimum of 65 percent of nonhazardous construction and demolition waste.
<b>Policy 3.2</b> : Encourage the use of smart grid and energy star appliances in new development.	<b>Consistent</b> . Per the 2019 Title 24 standards, the project would install energy- efficient appliances and lighting throughout the project site, which would be 30 percent more efficient than nonresidential buildings constructed under the 2016 Title 24 standards. Additionally, the project would receive its electricity from SCE, which is required to comply with the RPS procurement goal of 50 percent renewable energy in 2030. Furthermore, the project would not include natural gas consumption and would help decrease the County's typical annual natural gas consumption by approximate 0.00005 percent.
<b>Policy 5.1</b> : Maximize the cooling of buildings through tree planting and shading to reduce building electricity demands.	<b>Consistent</b> . The project would include a mix of trees and shrubs, including fruitless/pollenless olive, willow acacia, Texas mountain laurel, orange jubilee, red yucca, India Hawthorne, and day lily. Landscaping coverage would total approximately 8,851 square feet, or 13 percent of the project site.
<b>Policy 6.2</b> : Encourage the use of energy- and water-efficient water fixtures for indoor water use to reduce electricity use for water pumping.	<b>Consistent</b> . Energy- and water-efficient fixtures would be installed throughout the project site and would meet the current CALGreen energy efficiency requirements.
<b>Policy 6.3</b> : Support water-efficient landscaping to reduce the electricity demand for water transport and treatment.	<b>Consistent</b> . Water-efficient landscaping (i.e., water-efficient irrigation systems and devices) would be implemented in the project's landscaped areas.

Source: City of San Gabriel, Energy Action Plan, November 20, 2012.

As noted above, the proposed project would adhere to 2019 Title 24 and CALGreen standards and would implement several project design features consistent with the EAP. Therefore, the proposed project would help implement the EAP and would not conflict with an adopted plan, policy, or regulation pertaining to energy efficiency. A less than significant impact would occur.



### 4.7 GEOLOGY AND SOILS

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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:				
	<ol> <li>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.</li> </ol>				✓
	2) Strong seismic ground shaking?			✓	
	3) Seismic-related ground failure, including liquefaction?				✓
h	4) Lanosides?				•
С.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
е.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				~
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	

This section is primarily based upon the project's *Geotechnical Engineering Investigation for Proposed Self Storage Facility at 414-420 South San Gabriel Boulevard, 815-827 Commercial Avenue, and 415-423 Gladys Avenue, San Gabriel, California,* prepared by Coast Geotechnical, Inc. (dated January 16, 2019) and the *Response to Outside Geotechnical Review Sheet for Proposed Self Storage Facility at 414-420 South San Gabriel Boulevard, 815-827 Commercial Avenue, and 415-423 Gladys Avenue, San Gabriel, California* (Response to Outside Geotechnical Review), prepared by Coast Geotechnical, Inc. (dated May 5, 2020) (collectively referred to as "Geotechnical Investigation"); refer to <u>Appendix D, *Geotechnical Investigation*</u>.

## a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

#### 1) 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.

<u>No Impact</u>. Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Earthquake Fault Zone.



According to the Geotechnical Investigation, the project site is not underlain by an Alquist-Priolo Earthquake Fault Zone, and no known active faults are located within the project site vicinity. Thus, project implementation would not involve rupture of a known earthquake fault. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### 2) Strong seismic ground shaking?

Less Than Significant Impact. Southern California has numerous active seismic faults subjecting people to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for people and structures, categorized either as primary or secondary hazards. Primary hazards are caused by the direct interaction of seismic energy with the ground; examples include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Secondary hazards are consequences of the shaking; examples include ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires.

According to the Geotechnical Investigation, the project would likely be subjected to strong seismic ground shaking associated with several regional faults including the Northridge Fault, the Santa Monica Fault, the Hollywood Fault, the San Gabriel Fault, and the Raymond Fault. According to the California Geological Survey, *Fault Activity Map of California*, the closest active fault is the Raymond Fault, located approximately 2.1 miles northwest of the project site.<sup>1</sup> According to the Geotechnical Investigation, the project site would be subject to a peak ground acceleration (PGA<sub>M</sub>) of 0.344g based on its proximity to known active faults.

In accordance with the California Building Standards Code and SGMC Section 150.001, Adoption of the California Building Standards Code, the project would be required to demonstrate compliance with the site-specific design recommendations identified in the Geotechnical Investigation to minimize the potential for damage and major injury during a seismic event; refer to specifications under Foundation Design section in <u>Appendix D</u>. Following compliance with the California Building Standards Code, SGMC, and site-specific design requirements identified in the Geotechnical Investigation, impacts related to strong seismic ground shaking would be reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

#### 3) Seismic-related ground failure, including liquefaction?

<u>No Impact</u>. Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid. According to the Geotechnical Investigation, the project site is not mapped by the State of California as being in an area subject to potential liquefaction hazards. As a result, the Geotechnical Investigation concludes that liquefaction-induced damage is not considered probable at the project site. Further, the Geotechnical Investigation concluded that risks pertaining to seismic-induced settlement is considered to be negligible based on project site conditions and the physical characteristics of site earth material. Therefore, seismic-related ground failure, including liquefaction, is not anticipated at the project site. No impact would occur in this regard.

<sup>&</sup>lt;sup>1</sup> California Geological Survey, *Fault Activity Map of California*, https://maps.conservation.ca.gov/cgs/fam/, accessed May 26, 2020.



#### 4) Landslides?

<u>No Impact</u>. Seismically induced landslides can overrun structures, people or property, sever utility lines, and block roads. The project site and surrounding areas are generally flat, and are void of topographical features capable of producing a landslide. Further, the Geotechnical Investigation concluded that the potential for seismic-induced landslide is considered remote. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

#### CONSTRUCTION

Grading, earthwork, and landscape/hardscape installation activities associated with project construction could expose soils to potential short-term erosion by wind and water. According to the Geotechnical Investigation, the project site is "generally level"; thus, significant erosion by water is unlikely. All demolition and construction activities associated with the project would be required to implement Best Management Practices (BMPs) to reduce urban runoff; refer to <u>Section 4.10</u>, <u>Hydrology and Water Quality</u>. These BMPs would be included in a Stormwater Pollution Prevention Plan (SWPPP) as part of the required National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Compliance with the General Construction Permit would minimize the potential of erosion and loss of topsoil at the project site during construction activities to a less than significant level.

#### OPERATIONS

According to <u>Section 4.10</u>, <u>Hydrology and Water Quality</u>, operations of the proposed project would not result in substantial soil erosion or the loss of topsoil, as the majority of the project site would be improved. Any unpaved area would be improved with landscaping to minimize the potential for erosion or siltation on- or off-site; refer to <u>Exhibit 2-5</u>, <u>Conceptual Site Plan</u>. In addition, the proposed project would include operational BMPs in conformance with the County's 2014 Low Impact Development (LID) Standards Manual and SGMC Section 53.07, Control of Pollutants From Commercial Facilities</u>. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges (including sediment). SGMC Section 53.07 requires commercial facilities to implement BMPs prescribed by the California Regional Water Quality Control Board, Los Angeles Region, through programs or actions made pursuant to the NPDES permit, in order to enhance and protect the water quality of receiving waters in a manner that is consistent with the Clean Water Act. Compliance with the County's LID requirements and SGMC Section 53.07 would reduce long-term water quality impacts (including sediment) to less than significant levels.

Mitigation Measures: No mitigation measures are required.

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?

<u>No Impact</u>. Refer to Responses 4.7(a)(3), 4.7(a)(4), and 4.7(d) for a discussion concerning liquefaction, landslides, and collapse (from expansive soils), respectively.



#### LATERAL SPREADING

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along sloping ground. According to the Geotechnical Investigation, the project site and surrounding areas do not exhibit characteristics common to areas subject to seismic-induced lateral spread. As a result, the Geotechnical Investigation concludes that the project site is not subject to lateral spread. No impact would occur in this regard.

#### SUBSIDENCE

According to the U.S. Geological Survey, land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of rocks, such as fine-grained sediments. The rock compacts because the water is partly responsible for holding the ground up. When the water is withdrawn, the rocks falls in on itself. Events, other than the removal of groundwater, that can cause land subsidence include aquifer-system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost. According to the Geotechnical Investigation, based on the nature of existing on-site soils, subsidence at the project site is anticipated to be negligible. No impacts are anticipated in this regard.

Mitigation Measures: No mitigation measures are required.

## 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?

Less Than Significant Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. According to the Geotechnical Investigation, near-surface soils are considered to have a "very low" expansion potential. Further, the Geotechnical Investigation includes recommendations for existing artificial fills on-site as well as import soils pertaining to expansion potential. With compliance with the recommendations presented in the Geotechnical Investigation (as required by California Building Standards Code and SGMC Section 150.001), impacts would be less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

## 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?

<u>No Impact</u>. No septic tanks or alternative wastewater systems would be constructed as part of the project. According to the Geotechnical Investigation, the project is located in an area where usage of septic systems was common. The Geotechnical Investigation includes removal and backfill recommendations for any on-site septic tanks and/or leach fields. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

<u>Less Than Significant Impact</u>. According to the Geotechnical Investigation, the project area is underlain by alluvial soils (Qae) derived from materials eroded from the adjacent San Gabriel Mountain range. The alluvial soils deposition occurs as interlayered episodes of stream erosion and subsequent alluvial deposition. Based on available boring logs, sand deposits are present the first 30 feet below ground surface. Alluvial sand deposit would be expected to have low



paleontological sensitivity. Notwithstanding, should the project excavation encounter paleontological resources on the project site during earthwork, SGMC Section 153.630, *Identification, Documentation, and Management of Archaeological, Native American, and Paleontological Resources* would ensure that a qualified paleontologist submits a report including a statement on the significance of the discovery and recommended a course of action. Based on the project's low paleontological sensitivity and following compliance with the recommended actions included in SGMC Section 153.630, impacts to paleontological resources would be less than significant.



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### 4.8 **GREENHOUSE GAS EMISSIONS**

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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?			~	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			~	

#### Global Climate Change

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 420 million metric tons of carbon dioxide equivalent ( $MTCO_2e$ ) per year.<sup>1</sup> Methane ( $CH_4$ ) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which increases the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of carbon dioxide ( $CO_2$ ), methane ( $CH_4$ ), and nitrous oxide ( $N_2O$ ) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that  $CO_2$  concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global  $CO_2$  concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of May 2020, the highest monthly average concentration of  $CO_2$  in the atmosphere was recorded at 417 ppm.<sup>2</sup>

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent  $(CO_2e)^3$  concentration is required to keep global mean warming below two degrees Celsius (°C), which in turn is assumed to be necessary to avoid dangerous climate change.

<sup>&</sup>lt;sup>1</sup> California Air Resources Board, *California Greenhouse Gas Emissions for 2000 to 2017,* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000\_2017/ghg\_inventory\_trends\_00-17.pdf, accessed May 6, 2020.

<sup>&</sup>lt;sup>2</sup> Scripps Institution of Oceanography, Carbon Dioxide Concentration at Mauna Loa Observatory, https://scripps.ucsd.edu/programs/keelingcurve/, accessed May 6, 2020.

<sup>&</sup>lt;sup>3</sup> Carbon Dioxide Equivalent (CO<sub>2</sub>e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.



#### Greenhouse Gas Emissions Thresholds

In 2008, South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds.<sup>4</sup> Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO<sub>2</sub>e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO<sub>2</sub>e per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO<sub>2</sub>e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for application by local lead agencies in their review of land use development projects (e.g., residential/commercial projects).

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, the SCAQMD, California Air Resources Board (CARB), or any other State or regional agency has yet to adopt a numerical significance threshold for assessing GHG emissions that is applicable to the project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the project using recommended air quality models, as described below. The primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the project.

## a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

#### Project Greenhouse Gas Emissions

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO2, N2O, and CH4, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation.

The most recent version of the California Emissions Estimator Model (CalEEMod), version 2016.3.2, as well as the CARB's EMission FACtor Model (EMFAC2017), was used to calculate direct and indirect project-related GHG emissions. Two CalEEMod models were conducted to calculate the long-term emissions from the operation of the existing commercial buildings (i.e., existing conditions) and the proposed project, respectively. The project would not be connected to a natural gas service and as such would not include any natural gas consumption. The net increase of total emissions represents the project-generated emissions. CalEEMod relies upon trip data from the *Transportation* 

<sup>&</sup>lt;sup>4</sup> South Coast Air Quality Management District, *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008.



*Impact Study San Gabriel Self-Storage Project* (Traffic Impact Study) prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020), *San Gabriel Self-Storage Project Vehicle Miles Travelled (VMT) Assessment* prepared by Ganddini Group (dated April 20, 2020), and project-specific land use data to calculate emissions. <u>Table 4.8-1</u>, *Projected Annual Greenhouse Gas Emissions*, presents the estimated net increase in CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> emissions from the proposed project. CalEEMod outputs are contained within <u>Appendix B</u>, <u>AQ/GHG/Energy Data</u>.

	CO <sub>2</sub>		CH₄	N <sub>2</sub> O		Total
Source	Metric Tons/yr¹	Metric Tons/yr¹	Metric Tons of CO <sub>2</sub> e <sup>1</sup>	Metric Tons/yr¹	Metric Tons of CO₂e¹	Metric Tons of CO <sub>2</sub> e <sup>2,3</sup>
Existing Conditions						
Direct Emissions <sup>4</sup>						
Area Source	<0.01	0.00	0.00	0.00	0.00	<0.01
Mobile Source	62.28	<0.01	0.08	0.00	0.00	62.36
Total Direct Emissions <sup>2</sup>	62.28	<0.01	0.08	0.00	0.00	62.36
Indirect Emissions						
Energy	28.51	<0.01	0.11	0.00	0.00	28.62
Water Demand	6.86	0.04	1.00	<0.01	0.34	8.20
Solid Waste	1.37	0.08	2.01	0.00	0.00	3.38
Total Indirect Emissions <sup>2</sup>	36.74	0.01	3.12	<0.01	0.34	40.20
Total Existing-Related Emissions <sup>2</sup>	99.02	0.01	3.20	<0.01	0.34	102.56
Proposed Project						
Direct Emissions						
Construction (amortized over 30 years)	42.52	0.01	0.19	0.00	0.00	42.71
Area Source	<0.01	<0.01	<0.01	0.00	0.00	<0.01
Mobile Source	572.49	0.04	30.87	0.00	0.00	573.36
Project Total Direct Emissions <sup>2</sup>	615.01	0.05	31.06	0.00	0.00	616.07
Indirect Emissions						
Energy <sup>6</sup>	190.29	0.00	0.00	0.00	0.00	190.29
Water Demand	124.55	1.19	29.73	0.03	8.37	162.65
Solid Waste	9.51	0.56	14.04	0.00	0.00	23.55
Total Indirect Emissions <sup>2</sup>	324.35	1.75	43.77	0.03	8.37	376.49
Total Project-Related Emissions <sup>2</sup>	939.36	1.80	74.83	0.03	8.37	992.56
Net Project-Related Emissions <sup>2,5</sup>	840.34	1.79	71.63	0.03	8.03	890.00

#### Table 4.8-1 Projected Annual Greenhouse Gas Emissions

Notes: MTCO<sub>2</sub>e/yr = metric tons of carbon dioxide equivalent per year

1. Emissions calculated using the CalEEMod version 2016.3.2. and the California Air Resources Board EMission FACtor model (EMFAC 2017).

2. Totals may be slightly off due to rounding.

3. Carbon dioxide equivalent values calculated using the United States Environmental Protection Agency Website, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed June 4, 2020.

4. Existing construction emissions were not included as the existing conditions would not involve construction activities.

5. The net project emissions are the existing conditions emissions minus the proposed project emissions.

 Exceeding Title 24 by 30 percent was applied in CalEEMod to account for the latest 2019 Title 24 Standards. CalEEMod default energy efficiency are based on 2016 Title 24 Standards, and 2019 Title 24 Standards are 30 percent more efficient for nonresidential buildings.

Refer to <u>Appendix B</u> for assumptions used in this analysis.



#### Reduced Greenhouse Gas Emissions

The proposed project includes design features that would reduce project-related GHG emissions. The project would install water-efficient irrigation systems and landscaping, as well as incorporate water-reducing features and fixtures into the proposed buildings per *San Gabriel Municipal Code* (SGMC) Sections 153.530 through 153.539, *Landscape Requirements*. The proposed project would include recycling and composting services per Assembly Bill 341, which would reduce GHG emissions from solid waste by 75 percent. Furthermore, the project would comply with the 2019 Title 24 standards, which requires installation of high-efficiency lighting, and would reduce energy usage by approximately 30 percent compared to nonresidential buildings constructed under the 2016 Title 24 standards.<sup>5</sup>

#### Direct Project-Related Sources of Greenhouse Gases

- <u>Construction Emissions</u>. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.<sup>6</sup> As shown in <u>Table 4.8-1</u>, the proposed project would result in construction emissions of approximately 1,281.30 MTCO2e/yr, which represents 42.71 MTCO2e/yr when amortized over 30 years.
- <u>Area Source</u>. Area source emissions were calculated using CalEEMod and project-specific land use data. As noted in <u>Table 4.8-1</u>, the proposed project would result in less than 0.01 MTCO2e/yr of net area source GHG emissions.
- <u>Mobile Source</u>. CalEEMod relies upon trip data within the Traffic Impact Study and project-specific land use data to calculate mobile source emissions. The project would directly result in 511.00 MTCO2e/yr of net mobile source-generated GHG emissions; refer to <u>Table 4.8-1</u>.

#### Indirect Project-Related Sources of Greenhouse Gases

- <u>Energy Consumption</u>. Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity would be provided to the project site by Southern California Edison (SCE). In addition, the project would not connect to a natural gas service and thus would not include any natural gas consumption. The project would indirectly result in an additional 161.67 MTCO2e/yr due to energy consumption; refer to <u>Table 4.8-1</u>.
- <u>Water Demand</u>. The project operations would result in an increased demand of approximately 45 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in an additional 154.45 MTCO2e/yr; refer to <u>Table 4.8-1</u>.
- <u>Solid Waste</u>. Solid waste associated with operations of the proposed project would result in an additional 20.17 MTCO2e/yr; refer to <u>Table 4.8-1</u>.

As shown in <u>Table 4.8-1</u>, the total net amount of proposed project-related GHG emissions from direct and indirect sources combined would total 890.00 MTCO<sub>2</sub>e/yr.

#### Consistency with Applicable GHG Plans, Policies, or Regulations

The City has not adopted a Climate Action Plan (CAP) or any other plan for the purpose of reducing GHG emissions. Thus, the GHG plan consistency for this project is based off the project's consistency with the 2016-2040 RTP/SCS and the CARB's *2017 Scoping* Plan (2017 Scoping Plan). The 2016-2040 RTP/SCS is a regional growth-management

<sup>&</sup>lt;sup>5</sup> California Energy Commission, 2019 Building Energy Efficiency Standards Fact Sheet, March 2018.

<sup>&</sup>lt;sup>6</sup> The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghgmeeting-13/ghg-meeting-13-minutes.pdf?sfvrsn=2).



strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the southern California region. The 2016-2040 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2017 Scoping Plan describes the approach California would take to reduce GHG emissions by 40 percent below 1990 levels by the year 2030.

#### Project Consistency with the 2016-2040 RTP/SCS

The 2016-2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.<sup>7</sup> Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016-2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.<sup>8</sup> The 2016-2040 RTP/SCS would result in an estimated 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 19 percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the Senate Bill (SB) 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

The project would also be consistent with the following key GHG reduction strategies in the 2016-2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The project is an infill development within an urbanized area slated for development and already supported by existing transportation systems. Further, the project would be located within a HQTA, which is defined under the 2016-2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Three bus lines currently serve the project site: Los Angeles County Metropolitan Transportation Authority (Metro) bus lines 78, 176, and 487.

At the regional level, the 2016-2040 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions. In order to assess the project's potential to conflict with the 2016-2040 RTP/SCS, this section also analyzes the project's land use assumptions for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. <u>Table 4.8-2</u>, <u>Consistency with the 2016-2040 RTP/SCS</u>, demonstrates the project's consistency with the actions and strategies set forth in the 2016-2040 RTP/SCS.<sup>9</sup>

<sup>&</sup>lt;sup>7</sup> California Air Resources Board, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.

<sup>&</sup>lt;sup>8</sup> Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, p. 153, April 2016.

<sup>&</sup>lt;sup>9</sup> The actions and strategies included in the 2016-2040 RTP/SCS remain unchanged from those adopted in the 2012-2035 RTP/SCS.



Table 4.8-2 Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood-oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, Council of Government (COGs), SCAG, County Transportation Commission (CTCs)	<b>Consistent.</b> The project would not impair the City or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs. Specifically, the project would be required to comply with the California Green Building Standards Code (CALGreen) Nonresidential Mandatory Measure 5.106.5.3 <i>Electric Vehicle (EV) Charging.</i> This measure requires the project to incorporate four EV charging spaces. Further, the project would be required to comply with the CALGreen Code Nonresidential Mandatory Measure 5.106.4.1 <i>Bicycle Parking,</i> which requires that secure bicycle parking for five percent of the tenant-occupant vehicular parking spaces.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions, SCAG	<b>Consistent.</b> The project would construct a new 199,358- square foot building with approximately 190,232 square feet of climate-controlled self-storage and approximately 9,126 square feet of executive artists space. As a result, the project would provide diverse jobs for a variety of skills and education. In addition, the project site is near existing housing, school, and commercial uses.
Transportation Network Actions and Strate	gies	
Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network.	SCAG, CTCs, Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not directly applicable, and while the project would not impair the ability of SCAG, the CTCs, or the City to cooperate with stakeholders to identify new funding sources and/or increase funding levels, the project would support this action/strategy by connecting to the existing transportation network and improving sidewalk access, with appropriate design considerations to ensure travel safety and reliability.
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	SCAG, CTCs, Local Jurisdictions	<b>Consistent.</b> The project is located within a half mile of the Metro 176 bus stop and is surrounded by residential, commercial, and education uses. The project would provide bicycle parking spaces and four EV charging spaces. As described in <u>Section 4.17</u> , <i>Transportation</i> , the self-storage component of the proposed project is presumed to result in a less than significant vehicle miles traveled (VMT) impact based on State guidance because it would reduce VMT by shortening trips, similar to local-serving retail developments. Similarly, the artist studio/office and gallery space component of the proposed project can be presumed to result in a less than significant VMT impact based on State guidance because it is forecast to generate fewer than 110 average daily trips. Therefore, the project would not conflict with SCAG's Action to reduce vehicle trips and thus VMT, thereby contributing to a reduction in air pollutant and GHG emissions.



Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Collaborate with local jurisdictions to provide a network of local community circulators that serve new Transit Oriented Development (TOD), HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG, CTCs, Local Jurisdictions	<b>Consistent.</b> The project would not impair the ability of SCAG, the CTCs, or the City to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options.	CTCs, Local Jurisdictions	<b>Consistent.</b> The project would not impair the CTCs', or the City's, ability to develop first-mile/last-mile strategies. In support of this action/ strategy, the project would be located within walking distance of local and regional transit.
Transportation Demand Management (TDM	) Actions and St	rategies
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	<b>Consistent.</b> As previously discussed, the project is located within a half mile of the Metro 176 bus stop and is surrounded by residential, commercial, and education uses. The project would also provide bicycle parking spaces and four EV charging spaces on-site. As described in <u>Section 4.17</u> , the self-storage component of the proposed project is presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trips, similar to local-serving retail developments. Similarly, the artist studio/office and gallery space component of the proposed project can be presumed to result in a less than significant VMT impact based on State guidance because it is forecast to generate fewer than 110 average daily trips. Therefore, the project would not conflict with SCAG's action to reduce vehicle trips and thus VMT, thereby contributing to a reduction in air pollutant and GHG emissions.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	<b>Consistent.</b> The project would not impair the City's, or CTCs', ability to encourage the development of telecommuting programs by employers.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State, SCAG, Local Jurisdictions	<b>Consistent.</b> The project would not impair the City's ability to develop infrastructure plans and education programs to promote active transportation options and other alternative fueled vehicles.
Transportation System Management (TSM)	Actions and Stra	ategies
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG, Local Jurisdictions, State	<b>Consistent.</b> The project would not impair the ability of SCAG, the City, or the State to work with relevant transportation authorities to increase the efficiency of the existing transportation system. Moreover, all sidewalks and internal driveways would be designed to conform to the City requirements. In addition, the project site is located within a half mile of the Metro 78, 176, and 487 bus stops and is surrounded by residential, commercial, and educational uses

Source: Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.

In summary, the project is the type of land use development that is encouraged by the 2016-2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the



land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

#### Consistency with the 2017 Scoping Plan

The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan in 2013. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve Statewide GHG emissions targets. Provided in <u>Table 4.8-3</u>, <u>Consistency with the 2017 Scoping</u> <u>Plan</u>, is an evaluation of applicable reduction actions/strategies by emissions source category to determine whether the project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan.

Actions and Strategies	Project Consistency Analysis		
Senate Bill 350			
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	The project would not be an electrical provider nor would it delay the goals of SB 350. The project would utilize electricity from SCE, which is required to comply with SB 350. As such, it can be reasonably inferred that the project would be in compliance with SB 350.		
Low Carbon Fuel Standard (LCFS)			
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	Motor vehicles driven by the proposed project's tenants and customers would be required to use LCFS compliant fuels, thus the project would be in compliance with this strategy.		
Mobile Source Strategy (Cleaner Technology and F	uels Scenario)		
Maintain existing GHG standards of light and heavy- duty vehicles while adding an addition 4.2 million zero- emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	The project would include light duty truck trips that would be required to comply with the applicable Mobile Source Strategy, including all CARB and SCAQMD regulations. Furthermore, the project would be required to comply with CALGreen and would include EV parking and charging stations. As such, the project would not conflict with the goals of the Mobile Source Strategy.		
Sustainable Freight Action Plan			
Improve the freight system efficiency and maximize the use of near zero emission vehicles and equipment powered by renewable energy. Deploy over 100,000 zero-emission trucks and equipment by 2030.	The project would not include any freight systems. Therefore, the project would not conflict with the Sustainable Freight Action Plan.		
Short-Lived Climate Pollutant (SLCP) Reduction St	rategy		
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	The project does not involve sources that would emit large amounts of CH <sub>4</sub> (refer to <u>Table 4.8-1</u> ). Furthermore, the project would comply with all CARB and SCAQMD hydrofluorocarbon regulations. As such, the project would not conflict with the SLCP reduction strategy.		
SB 375 Sustainable Communities Strategies			
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	As shown in <u>Table 4.8-2</u> , the project would be consistent with the 2016-2040 RTP/SCS and would not conflict with the goals of SB 375.		

Table 4.8-3Consistency with the 2017 Scoping Plan



Actions and Strategies	Project Consistency Analysis
Post-2020 Cap and Trade Programs	
The Cap-and-Trade Program would reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	The project would not be a gross emitter of CO <sub>2</sub> e emissions (25,000 metric tons per year), and thus would be exempt from the Cap and Trade Program and would not conflict with this goal.

Source: California Air Resources Board, 2017 Scoping Plan, November 2017.

#### Conclusion

In summary, the plan consistency analysis provided above demonstrates that the project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2016-2040 RTP/SCS and 2017 Scoping Plan. Thus, the project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, project-specific impacts with regard to climate change would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Refer to Response 4.8(a).



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### 4.9 HAZARDS AND HAZARDOUS MATERIALS

Wa	ould the project:	Potentially Significant Impact	Less Than Significant Impact 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?			~	
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one- quarter mile of an existing or proposed school?		~		
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		✓		
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				*
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		~		
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

This section is primarily based upon the following technical studies (refer to <u>Appendix E</u>, <u>Hazardous Materials</u> <u>Documentation</u>):

- Phase I Environmental Site Assessment of 414-420 South San Gabriel Boulevard; 415, 417, 419, and 423 South Gladys Avenue; and 815 and 827 Commercial Avenue, San Gabriel, California 91776 (Phase I ESA), prepared by Fulcrum Resources Environmental, dated April 10, 2018;
- Phase II Subsurface Investigation Report 414-420 South San Gabriel Boulevard; 415, 417, 419, and 423 South Gladys Avenue; 815 & 827 Commercial Avenue, San Gabriel, California (Phase II Subsurface Investigation), prepared by Roux Associates, Inc., dated June 24, 2019; and
- Excavation and Disposal of Petroleum Hydrocarbon Impacted Soil, Former Mission Paving & Sealing, 815 Commercial Avenue, San Gabriel, California (Excavation and Disposal Report), prepared by FREY Environmental, Inc. (Frey), dated December 2019.

### a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials can occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a



transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

#### Construction

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction equipment and/or materials (i.e., oil, diesel fuel, and transmission fluids). These activities would be short-term in nature, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Therefore, impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

#### Operations

Hazardous materials are not typically associated with storage or office uses. Anticipated hazardous materials use may include minor cleaning products and the occasional use of pesticides and herbicides for landscape maintenance. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner, and would minimize the potential for safety impacts to occur. As such, impacts concerning the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

#### 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?

Less Than Significant Impact With Mitigation Incorporated. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. Human exposure of contaminated soil, soil vapor, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

#### Construction

During project construction, there is a possibility of accidental release of hazardous substances such as petroleumbased fuels or hydraulic fluids used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and Federal law.

Construction activities could also result in accidental conditions involving existing on-site contamination. The following analysis considers current and past uses of the project site and its vicinity, which may have resulted in existing on-site soil, soil vapor, and/or groundwater contamination, of which could cause accidental conditions during site disturbance activities.



#### Mission Paving Company

According to the Phase I ESA, Mission Paving Company (815 Commercial Avenue) operated on-site gasoline and diesel underground storage tanks (USTs) and associated fueling dispensers for vehicle equipment. The two documented USTs (1,000 gallons and 10,000 gallons) were removed in April 1999. During the UST removal/excavation, soils were field screened for volatile organic compounds (VOCs) and the tanks were rinsed and transported off-site for disposal. Results of the soils investigation indicated the presence of fuel-related VOCs and total petroleum hydrocarbons (TPH) (including diesel [TPH-d]; gasoline [TPH-g]; benzene, toluene, ethylbenzene, and xylene [BTEX], and methyl tertiary-butyl ether [MTBE]).

Although this release was reported on-site, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a no further action (NFA) letter for the release on May 30, 2019, based on the State Water Resources Control Board's (SWRCB's) Low Threat Underground Storage Tank Closure Policy. Notwithstanding, subsequent subsurface investigation reported elevated TPH concentrations greater than the regulatory screening level of 1,000 milligram per kilogram at the former northern extent of the former gasoline dispenser island and the northern end of former gas UST pit. As a result, excavation and removal of soils to depths of 27 feet below ground surface (bgs) and 17 feet bgs at these locations were conducted in November 2019; refer to <u>Appendix E</u>. According to the Excavation and Disposal Report, the contaminated soils were excavated and disposed of and backfilled with imported fill under the direction of a State of California Professional Geologist. Thus, the TPH-contaminated soils on-site were removed from the project site.

In addition to the two documented USTs discussed above, the Phase I ESA reported two potential undocumented USTs at this property; one 1,000-gallon gasoline UST and one 500-gallon diesel UST (noted in 1979). No evidence of removal of these USTs was noted. Thus, there is a potential for grading activities to uncover these two undocumented USTs (if still present). The project would be required to comply with Mitigation Measure HAZ-1, which would require the project Applicant to implement a Soil Management Plan (SMP) during grading and excavation activities. Prior to issuance of a grading permit, a qualified environmental professional with Phase II/Site Characterization experience would be required to prepare a SMP. The SMP would include guidelines for safety measures and soil management in the event that soils are to be disturbed, and for handling soil during any planned earthwork activities. The SMP would also include a decision framework and specific risk management measures for managing soil, including any soil import/export activities, in a manner protective of human health and consistent with applicable regulatory requirements. As such, if evidence of possible USTs is discovered during construction, the project Applicant, or his designee, would be required to contact the Los Angeles County Public Works Environmental Program Division (LACDPW) for further guidance and possible oversight per the SMP. With implementation of Mitigation Measure HAZ-1, impacts pertaining to potential contamination from USTs would be reduced to less than significant levels.

#### J&D Plumbing

According to the Phase I ESA, J&D Plumbing occupied the northwestern portion of the project site from approximately 1961 through 2017 for use as a retail plumbing store and for parts and equipment storage. The business has since closed and is vacant, although inventory and other related items currently remain on-site. The J&D Plumbing facility includes a plumbing parts store situated at the northwest corner of the project site, with frontage along South San Gabriel Boulevard. The structure is approximately 2,100 square feet in size and was constructed in 1959. A small storage shed is located on the east side of the store building and a larger metal storage shed is located on the southeast side. The area between the two sheds is used as an outdoor storage yard for vehicles.

The Phase I ESA identified an approximately 550-gallon UST and associated dispenser was once located on the south side of the store building, west of the larger metal shed. The UST was removed on June 20, 2002 under regulatory oversight by the LACDPW. Sampling was conducted during removal and all soil samples were non-detect for



contaminates of concern. The LACDPW issued a closure letter on October 30, 2002. As such, impacts from the former UST located at the J&D Plumbing property would be less than significant.

#### Elevated Arsenic Soil Contamination

According to the Phase I ESA, both the J&D Plumbing facility and Mission Paving Company maintained sumps on-site. Both sump locations were filled with murky water, included oily water with sheen, and/or evidence of dumping and stressed vegetation was noted. In order to identify if hazardous materials contamination is present in on-site soils, a multi-depth soil and soil vapor investigation (Phase II Subsurface Investigation) was conducted in November 2018. Results of the Phase II Subsurface Investigation indicated that shallow soils at the southwestern portion of the project site contain elevated arsenic concentrations. Thus, grading activities could result in the upset of contaminated soils involving arsenic particularly at the southwest portion of the project site. The project Applicant would be required to remove the arsenic-impacted shallow soils at the southwestern portion of the site after demolition, but prior to site grading activities, as identified in the Phase II Subsurface Investigation (Mitigation Measure HAZ-2). Such materials would then be required to be disposed of at a licensed facility with confirmation sampling to show that all remaining soil arsenic concentrations are below the U.S. Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) and/or Department of Toxic Substances Control modified Screening Levels (DTSC-SLs), as applicable. With compliance with Mitigation Measure HAZ-2, impacts in this regard would be reduced to less than significant levels.

#### Regional Contaminated Groundwater

According to the Phase I ESA, the project site is located within Area 3 of the San Gabriel Valley Superfund Site. Superfund sites are uncontrolled or abandoned sites or properties where hazardous waste or other contamination is located. A contaminated site is generally considered a Superfund site if the Federal government is, or plans to be, involved in cleanup efforts.<sup>1</sup>

In 1984, the discovery of widespread groundwater contamination prompted the EPA to add four areas in the San Gabriel Valley (Areas 1 through 4) to the National Priorities List of the hazardous waste sites that are eligible for cleanup under the Superfund process. The four San Gabriel Valley Superfund sites include areas of groundwater contamination underlying approximately 30 square miles of the 170-square mile San Gabriel Valley area. Regional groundwater contamination is a result of decades of improper handling and disposal practices that released industrial solvents and VOCs into the soil and groundwater.

The EPA has collected data in Area 3 continually since 1999. Area 3 consists of a large area (19 square miles) of contaminated groundwater that contains many potential contaminant sources. As a result of the superfund action investigation, eight groundwater monitoring wells were installed and are sampled annually. Groundwater analytical results detected tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2,3-trichloropropane (1,2,3-TCP), carbon tetrachloride, and perchlorate, which exceeded the EPA's Maximum Contaminant Levels. Based on the Phase II Subsurface Investigation, depth to groundwater in the site vicinity ranges from approximately 215 to 240 feet bgs. The proposed underground parking garage would require excavation to a depth of approximately 27 feet bgs. As such, based on the lack of human health risks due to the depth to groundwater and the nature of the San Gabriel Valley (Area 3) contaminant plume, the Phase I ESA and Phase II Subsurface Investigation, determined that this regional groundwater plume does not present a significant vapor encroachment condition to the project site and impacts in this regard would be less than significant.

<sup>&</sup>lt;sup>1</sup> United States Environmental Protection Agency, *What is Superfund*?, https://www.epa.gov/superfund/what-superfund, accessed April 13, 2020.



#### **Demolition of Existing Structures**

As discussed above, the project site is currently developed with commercial/industrial buildings and equipment storage yards. Due to the age of these buildings (constructed as early as 1923), there is the potential for asbestos-containing materials (ACMs) and lead-based paints (LBPs), as well as other potential hazardous materials to be present in association with the building materials. In the last 25 years, LBPs has been phased out of use due to concerns over the health effects associated with lead. Additionally, prior to the 1940s and up until the early 1970s, ACMs were used in many building materials and can result in serious health problems if inhaled. Demolition of the structures could expose construction personnel and the public to ACMs or LBPs.

Prior to modification or demolition of existing structures (including piping materials), the project Applicant shall complete and submit a survey of all ACMs and LBPs, conducted by a certified environmental professional, to the San Gabriel Fire Department (SGFD) for review and comment and to the City engineer for approval (Mitigation Measure HAZ-3). After receiving approval and prior to demolition, all asbestos removal is required to be performed by a State-certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403, and LBP removal and disposal is required to comply with California Code of Regulation (CCR) Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead.

Compliance with Mitigation Measures HAZ-1 through HAZ-3, as well as compliance to all applicable regulations including SCAQMD Rule 1403 and CCR Title 8, Section 1532.1, would reduce potential impacts involving accidental conditions during construction to less than significant levels.

#### Operations

Refer to Response 4.9(a) for a description of impacts related to proposed operations at the project site. Upon adherence to existing regulations related to hazards and hazardous materials safety, impacts pertaining to the potential for accidental conditions during project operations would be less than significant.

#### Mitigation Measures:

HAZ-1 Soil Management Plan. Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified environmental professional with Phase II/Site Characterization experience. The SMP shall be made available to the contractor and the City Engineer for use during grading activities. The SMP shall include guidelines for safety measures and soil management in the event that soils are to be disturbed, and for handling soil during any planned earthwork activities. The SMP shall also include a decision framework and specific risk management measures for managing soil, including any soil import/export activities, in a manner protective of human health and consistent with applicable regulatory requirements.

As part of this SMP, all excavation activities shall be documented daily using digital photography. In addition, the sides and the bottom of the excavation areas of concern shall be appropriately logged on scaled paper. Observed materials, including an estimate of the quantity observed, and PID and dust monitor readings shall be recorded on the Daily Field Record and/or the Direct Reading Log.

The SMP shall include measures should evidence of possible USTs be discovered during grading activities. If during grading activities evidence of a possible UST is discovered, the SMP shall require the project Applicant, or his designee, to contact the Los Angeles County Public Works Environmental Program Division (LACDPW) for further guidance and oversight, if deemed necessary by the LACDPW.



If the results of the stockpile samples show no contamination, or detected concentrations of chemicals within acceptable regulatory limits for commercial uses, then the soil may be redistributed within the excavation. If soil is deemed contaminated, then it shall be disposed of off-site at an approved landfill facility. Should any soils be imported or exported at an off-site location, a Phase II/Site Characterization Specialist shall verify that all imported/exported soils are not contaminated with hazardous materials above regulatory thresholds. If import/export soils are determined to be contaminated above regulatory thresholds, the Phase II/Site Characterization Specialist would recommend proper handling, use, and/or disposal of these soils.

- HAZ-2 Removal of Contaminated Arsenic Soils. Prior to site grading activities, the project Applicant shall submit documentation as proof, to the City Engineer, that the arsenic-impacted shallow soils at the southwestern portion of the project site have been excavated disposed of at a licensed facility with confirmation sampling to show that all remaining soil arsenic concentrations are below the U.S. Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) and/or Department of Toxic Substances Control modified Screening Levels (DTSC-SLs), as applicable. In no event shall the project Applicant proceed with site grading activities at any location on the site, where arsenic contamination are found to be present above regulatory thresholds for commercial use.
- HAZ-3 <u>Asbestos and Lead-Containing Materials</u>. Prior to modification or demolition of existing structures (including piping materials), the project Applicant shall complete and submit a survey of all asbestos containingmaterials (ACMs) and lead-based paints (LBP) to the San Gabriel Fire Department (SGFD) for review and comment and to the City Engineer for approval. Should ACMs be identified, removal shall be performed by a State-certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403. Should LBPs be identified, LBPs shall be removed and disposed of in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. The project Applicant shall inform the project Engineer, via the monthly compliance report, of the date when all ACMs and LBPs are properly removed from the project site.

# c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact With Mitigation Incorporated. Roosevelt Elementary School is located approximately 0.2mile to the east of the project site at 401 Walnut Grove Avenue. The proposed project would involve the demolition of existing structures and potential soil remediation activities that may require the handling of hazardous materials at the project site and the transport of contaminated materials off-site to an approved landfill facility during project construction. These activities would be required to comply with Federal, State, and local laws and regulations regarding the handling and transport of hazardous materials. During project operations, the proposed self-storage and creative space uses do not typically involve the handling of hazardous materials or hazardous emissions in reportable quantities. Additionally, Mitigation Measures HAZ-1 through HAZ-3 would include removal of contaminated soils, precautionary measures involving soil management during grading, as well as survey and removal, if applicable, of ACMs and LBPs.

With compliance with Federal, State, and local laws and regulations as well as implementation of Mitigation Measures HAZ-1 through HAZ-3, project construction and operations are not anticipated to result in adverse impacts involving the handling of hazardous materials, substances, or waste within the vicinity of Roosevelt Elementary School. As such, impacts in this regard would be reduced to less than significant levels.

**Mitigation Measures:** Refer to Mitigation Measures HAZ-1 through HAZ-3.



# 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?

Less Than Significant Impact With Mitigation Incorporated. Government Code Section 65962.5 requires the DTSC and SWRCB to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

Based on the CalEPA's Cortese listing, the project site (Mission Paving and Sealing located at 815 Commercial Avenue) is listed pursuant to Government Code Section 65962.5.<sup>2</sup> As discussed in Response 4.9(b), with implementation of recommended Mitigation Measure HAZ-1 pertaining to implementation of a SMP during grading, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measure HAZ-1.

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

<u>No Impact</u>. The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue in the City of El Monte, approximately 3.2 miles to the southeast. Therefore, project implementation would not introduce a safety hazard for people residing or working in the project area. No impact would occur.

Mitigation Measures: No mitigation measures are required.

### f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

<u>Less Than Significant Impact With Mitigation Incorporated</u>. According to the General Plan, a multi-hazard function plan was developed by the City to establish tactics for local and regional hazards mitigation.<sup>3</sup> The *City of San Gabriel Natural Hazards Mitigation Plan* was therefore developed to promote sound public policy designed to protect citizens, critical facilities, infrastructure, private property, and the environment form natural hazards.<sup>4</sup> Further, the City operates an emergency operation center at 1303 South Del Mar Avenue to function as the central command post in the event of a major disaster.

As indicated in <u>Section 4.17</u>, <u>*Transportation*</u>, the project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways. The project site would have three full access driveways along South San Gabriel Boulevard, Commercial Avenue, and South Gladys Avenue. The proposed driveways and interior vehicular circulation network are subject to SGFD

<sup>&</sup>lt;sup>2</sup> California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed June 12, 2020.

<sup>&</sup>lt;sup>3</sup> City of San Gabriel, *Fire Prevention and Emergency Preparedness*, https://www.sangabrielcity.com/440/Fire-Prevention-and-Emergency-Preparedne, accessed April 10, 2020.

<sup>&</sup>lt;sup>4</sup> City of San Gabriel, *Natural Hazard Mitigation Plan – Goals & Action Items*, Page 4-1, accessed June 11, 2020.



requirements, related to fire access and turning radius requirements and would also be subject to the City's site access and circulation requirements pursuant to SGMC Chapter 100, *Streets, Sidewalks and Public Places*. The project also proposes to maintain and replace, if needed, a dedicated 25-foot right-of-way on South Gladys Avenue, and improve the existing sidewalk, curb, and gutter along the project's frontage along South San Gabriel Boulevard. Further, should partial or full lane closures be required as part of project construction activities, implementation of a TMP would minimize congestion and ensure safe travel, including emergency access in the project vicinity; refer to Mitigation Measure TRA-1. As such, project implementation would not interfere with the implementation of the *Multi-Hazard Functional Plan*. With implementation of Mitigation Measure TRA-1, impacts would be less than significant.

Mitigation Measures: Refer to Mitigation Measure TRA-1.

## g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

<u>No Impact</u>. According to the General Plan Public and Environmental Safety Element, there are no areas subject to wildland fires within San Gabriel.<sup>5</sup> The project site consists of, and is surrounded by, urban/developed land and no areas of wildland are present in the project vicinity. Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impacts would occur in this regard.

<sup>&</sup>lt;sup>5</sup> City of San Gabriel, The Comprehensive General Plan of the City of San Gabriel, Figure 5-1, Safety Issues Analysis, 2004.



### 4.10 HYDROLOGY AND WATER QUALITY

Wa	ould the project:	Potentially Significant Impact	Less Than Significant Impact 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?			~	
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				~
C.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	1) Result in substantial erosion or siltation on- or off-site?			✓	
	2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			*	
	3) 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?			✓	
	4) Impede or redirect flood flows?				✓
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				1

This section is primarily based on the following hydrology and water quality documentation (refer to <u>Appendix F</u>, <u>Hydrology Analysis and LID Plan</u>):

- Preliminary Hydrology Analysis, Proposed Self Storage NEC San Gabriel Blvd and Commercial Ave., San Gabriel, CA (Hydrology Analysis), prepared by Blue Peak Engineering, Inc., dated June 4, 2020.
- Preliminary Low Impact Development Plan (LID) Self Storage NEC San Gabriel Blvd and Commercial Ave., San Gabriel, CA (LID Plan), prepared by Blue Peak Engineering, Inc., dated June 8, 2020.

## a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Los Angeles RWQCB.



Impacts related to water quality typically range over three different periods: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

#### Construction

Project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. These potential pollutants could damage downstream waterbodies. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (General Construction Permit). The General Construction Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality. Upon completion of the project, the project Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

Pursuant to SGMC Section 53.10, *Control of Pollutants from State Permitted Construction Activities*, the project applicant would be required to make available to the City: (1) a copy of the Notice of Intent to comply with the terms of the General Construction Permit; (2) a waste discharge identification number issued by the SWRCB; (3) a SWPPP and Monitoring Program Plan; and (4) records of all inspections, compliance and non-compliance reports, and evidence of self-inspection and good housekeeping practices.

To further minimize the potential for accidental release of pollutant during project construction, the routine transport, use, and disposal of construction materials would be required to adhere to applicable State and local standards and regulations for handling, storage, and disposal of hazardous substances; refer to <u>Section 4.9</u>, <u>Hazards and Hazardous</u> <u>Materials</u>. Compliance with such measures would prevent such substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality. Following conformance with the Construction General Permit, SWPPP, and implementation of BMPs, the project's short-term impacts to water quality and waste discharge requirements would be less than significant.

#### Operations

The proposed project is subject to the Los Angeles County Department of Public Works (LACDPW) requirements in the 2014 Low Impact Development (LID) Standards Manual. As detailed in the LID Standards Manual, the proposed project would include a range of permanent BMPs to control the off-site discharge of pollutants in accordance with NPDES requirements. The following materials are anticipated to be used in activities at the project site, which would potentially contribute to pollutants to stormwater runoff:

- Grease and oil;
- Sediment; and
- General trash debris and litter.

The project would be required to implement 1) LID structural and non-structural BMPs; 2) source control BMPs, and 3) general structural and nonstructural BMPs to minimize operational impacts to water quality. According to the LID Plan, the project would implement the following non-structural BMPs: property owner, tenants, and occupants education;



activity restrictions (i.e., only professionals under contract would be allowed to perform landscape maintenance); common area landscape and litter management; BMP maintenance and drainage facility inspection; local water quality permit compliance; employee training; housekeeping of loading docks, and private street and parking lot street sweeping. Structural BMPs would include landscape planning methodologies that maximize water storage and infiltration; efficient irrigation design; stenciling of storm drain systems to prevent waste dumping at inlets; incorporation of pervious pavements; locating trash storage areas away from drainage; and routine maintenance of building and ground, parking and storage, and drainage systems. As noted in Section 2.0, Project Description, the project site is designed to sheet flow via v-gutters aligned within project's internal drive aisles to the project's low point, where a curb inlet would collect the low-flow and pipe it to a proposed infiltration drywell at the southwest corner of the Commercial Avenue project driveway. Flows in excess of the infiltration drywell's capacity would discharge via parkway drain to Commercial Drive, which functions as a tributary to Rubio Wash. As a result of the BMPs, drainage pattern and runoff rate of the proposed project are estimated to remain the same as the existing drainage pattern and runoff rate as well as improve water guality compared to the existing condition. Additionally, as a self-storage facility with executive office spaces, it is not anticipated that the project would become a point source generator of water pollutants. Therefore, implementation of the aforementioned BMPs would reduce the project's operational water quality impacts to less than significant levels.

Mitigation Measures: No mitigation measures are required.

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

<u>No Impact</u>. The project site is currently developed with six on-site commercial structures and surface parking. As detailed in the Hydrology Analysis, development of the project would not result in an increase in impervious surfaces compared to existing conditions; refer to <u>Table 4.10-1</u>, <u>Existing and Proposed Drainage Conditions</u>. Rather, the proposed project would decrease impervious areas by approximately 3 percent. As such, development of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management.

	Total Gross Area	Impervious Area	Pervious Area	Peak Flow <sup>1</sup>
Existing Condition	1.75 ac	1.55 ac	0.20 ac	5.15 cfs
Proposed Project Condition	1.75 ac	1.50 ac	0.25 ac	5.14 cfs
Changes	0%	- 3%	+ 25 %	- 0.2 %

# Table 4.10-1 Existing and Proposed Drainage Conditions

Note: ac = acres; cfs = cubic feet per second; values are approximate.

<sup>1</sup> Peak flow rate is calculated for 25-year storm event.

Source: Blue Peak Engineering, Inc., Preliminary Hydrology Analysis, Proposed Self Storage NEC San Gabriel Blvd and Commercial Ave., San Gabriel, CA, dated June 4, 2020; refer to <u>Appendix F</u>.

Additionally, the project site is not currently used for groundwater extraction or groundwater recharge purposes. Further, as detailed in Response 4.19(b), the San Gabriel County Water District (SGCWD) would have adequate supply from its groundwater sources in an average, single-dry, and multiple dry year sequence. Thus, project implementation would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge. No impacts would occur in this regard.



# 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:

#### 1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The proposed project would not substantially alter the existing drainage pattern of the site or project area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces. As indicated in <u>Table 4.10-1</u>, the drainage pattern and peak runoff rate of the proposed project are estimated to equal existing conditions. As discussed above, the project would include an infiltration drywell to retain and infiltrate stormwater runoff into the underlying native soils and groundwater table, which would provide erosion control during project operation. Further, as discussed in Response 4.10(a), the project would comply with the requirements of the Construction General Permit under the NPDES program, which would result in preparation of a SWPPP that outlines necessary BMPs to minimize erosion and water quality impacts during construction. Following conformance with the Construction General Permit and implementation of the SWPPP and associated BMPs, impacts pertaining to erosion or siltation would be less than significant.

Mitigation Measures: No mitigation measures are required.

### 2) 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 detailed in Response 4.10(c)(1), the proposed project would not substantially alter the existing drainage pattern of the site or project area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces. As indicated in <u>Table 4.10-1</u>, the project would not increase impervious surface areas or runoff volume compared to pre-project (existing) conditions. According to the Hydrology Analysis, the runoff would be adequately accommodated by existing downstream storm drains at Commercial Avenue, tributary to the concrete-lined Rubio Wash. Further, the proposed on-site infiltration drywell is sized to accommodate a 25-year 24-hour storm event. As such, project implementation would not result in on- or off-site flooding and impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

## 3) 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?

<u>Less Than Significant Impact</u>. Refer to Responses 4.10(a) and 4.10(c)(2). Project implementation would result in similar drainage patterns as existing conditions. As detailed in <u>Table 4.10-1</u>, the project would not increase impervious surface areas or runoff volume compared to pre-project (existing) conditions. As such, stormwater runoff from the project site would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### 4) Impede or redirect flood flows?

No Impact. Refer to Responses 4.10(c)(2) and 4.10(d).



#### d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

#### No Impact.

#### Flood Hazard

According to the Federal Emergency Management Agency's *National Flood Hazard Layer Viewer*, the project site is not located within a 100-year flood hazard area.<sup>1</sup> No impacts would occur in this regard.

#### Tsunami

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over 20 miles inland from the Pacific Ocean and is located at a sufficient distance so as not to be subject to tsunami impacts. No impacts would occur in this regard.

#### Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project site is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

### e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

<u>No Impact</u>. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) establishes water quality standards for ground and surface waters within the Los Angeles region, which includes the City, and is the basis for the Los Angeles RWQCB's regulatory programs.

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a groundwater sustainability plan. The project is located within the San Gabriel Valley groundwater basin, which is designated as a Very Low priority basin.<sup>2</sup> Therefore, there is no groundwater sustainability plan established for the basin. However, Chapter 8, *Groundwater Quality Management*, of the Basin Plan focuses on basin/sub-basin groundwater quality management and includes salt and nutrient management plans (SNMPs) specific to each basin within the Los Angeles region. The SNMP management strategies developed by local water entities in the San Gabriel Valley Basin are voluntary measures that are designed to maintain water quality that is protective of beneficial uses, while increasing recycled water use and supporting the sustainable use of groundwater basin area. Implementation of the proposed project would not conflict with the SNMP for the San Gabriel Valley Basin and as indicated in Response 4.10(b), the project would not substantially deplete groundwater supplies or interfere with groundwater recharge. As a result, the proposed project is not anticipated to conflict with the supplication of the proposed project would not substantially deplete groundwater supplies or interfere with the groundwater recharge.

<sup>&</sup>lt;sup>1</sup> Federal Emergency Management Agency, *National Flood Hazard Layer Viewer*, https://www.fema.gov/national-flood-hazard-layer-nfhl, accessed June 8, 2020.

<sup>&</sup>lt;sup>2</sup> California Department of Water Resources, SGMA Basin Prioritization Dashboard, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed June 8, 2020.



groundwater basin and SNMP management strategies identified in the Basin Plan. No impact would occur in this regard.



### 4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			~	

#### a) Physically divide an established community?

<u>No Impact</u>. Factors that could physically divide a community include, but are not limited to the:

- Construction of major highways or roadways;
- Construction of storm channels;
- Closing bridges or roadways; and
- Construction of utility transmission lines.

The key factor with respect to this threshold is the potential to create physical barriers that change the connectivity between areas of a community to the extent that persons are separated from other areas of the community. The site is currently surrounded predominantly by commercial and light industrial uses is separated from adjacent uses by existing roadways (South Gladys Avenue to the east, Commercial Avenue to the south, and South San Gabriel Boulevard to the west). The proposed project would not physically divide the established community, as the project would construct a commercial development on-site similar to the existing community. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

## 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?

#### Less Than Significant Impact.

#### GENERAL PLAN CONSISTENCY

Based on the General Plan, the project site is designated General Commercial. The General Commercial land use designation is intended to provide for all forms of retail, service, office, recreation/amusement, and other commercial businesses which provide goods and services for the local population and those businesses which are targeted towards visitors and commuters. The proposed self-storage facility and executive artists space are consistent with the allowed uses under the General Commercial designation.

<u>Table 4.11-1</u>, <u>General Plan Land Use and Economic Development Consistency Analysis</u>, provides a consistency analysis of the proposed project and relevant General Plan Land Use Element and Economic Development Element goals. As indicated in <u>Table 4.11-1</u>, the proposed project would be consistent with applicable General Plan Land Use Element and Economic Development Element goals. Impacts would be less than significant.



 Table 4.11-1

 General Plan Land Use and Economic Development Consistency Analysis

Relevant Goals	Consistency Analysis	
Land Use Goal 1.6: Ensure that new development is appropriately and sensitively buffered from its neighbors.	<b>Consistent.</b> Surrounding land uses include commercial uses to the north, industrial uses to the east, commercial and industrial uses to the south, and commercial uses to the west. The proposed project is an infill development of an existing commercial site and would be compatible with adjacent commercial and industrial uses. As shown on <u>Exhibit 2-5</u> , <u>Conceptual Landscape Plan</u> , ornamental landscaping would be installed along the site perimeter along South Gladys Avenue, Commercial Avenue, and South San Gabriel Boulevard. Planting materials may include but would not be limited to a mix of trees, shrubs, and accents, including fruitless/pollenless olive, willow acacia, Texas mountain laurel, orange jubilee, red yucca, India Hawthorne, and day lily. The site is also physically separated from adjacent uses by South Gladys Avenue to the east, Commercial Avenue to the south, and South San Gabriel Boulevard to SGMC Section 153.355, <i>Evaluation Criteria</i> , upon consideration of the project's Precise Plan of Design (PPD) application, the City of San Gabriel Planning Director, Design Review Commission, or City Council, on appeal, would ensure that the project site plan, architecture, and landscape design provide proper transition between the project site and adjoining properties, including proper streetscape, architectural scale, massing, proportion and harmony; landscape palette, sound and vibration control, buffering, privacy protections; public improvements, and sign controls necessary to improve the quality of the streetscape. As a result, project implementation would be appropriately and sensitively buffered from its neighbors and the project would be consistent with Land Use Goal 1.6.	
Land Use Goal 1.9: Use redevelopment judiciously to promote economic growth, eliminate blight, and build affordable housing.	<b>Consistent.</b> As detailed in <u>Table 2-1</u> , <u>Existing On-Site Development</u> , the project site is currently fenced off and occupied by vacant office buildings, a storage building, a window covering shop, vacant plumbing store, bus parking lot, and several storage lots. Almost all of the existing on-site buildings are non-operational and thus, create a blighted façade along South San Gabriel Boulevard. The proposed project would demolish the existing buildings on-site and redevelop the site into one 199,358-square foot building with a self-storage facility and executive artists space. The proposed building would be designed with various building elements and materials, which may include, but are not limited to, concrete masonry unit (CMU) block, painted stucco, window glazing, parapet/trim, and awnings. Landscaping is also proposed along the site perimeter and interior; refer to <u>Exhibit 2-5</u> . Further, the project proposes to improve existing curb cuts along South San Gabriel Boulevard to meet San Gabriel Fire Department and City code requirements and maintain new curb, gutter, and landscaping along a 25-foot dedicated right-of-way along South Gladys Avenue. Thus, the proposed redevelopment would promote economic growth and eliminate blight and, thus, would be consistent with Land Use Goal 1.9.	
Economic Development Goal 4.1: Create a vibrant business community.	<b>Consistent.</b> According to the General Plan, San Gabriel is built out and has limited commercial land. To that end, it is the City's goal to enhance and maximize existing commercial areas and revitalization efforts. As noted for Goal 1.9, almost all of the existing on-site buildings are non-operational. The proposed project would demolish the existing on-site buildings and surface parking to create a self-storage facility and executive artists space, providing jobs for up to 38 employees. As a result, the project would contribute to the City's goal of creating a vibrant business community and would be consistent with Economic Development Goal 4.1.	


Relevant Goals	Consistency Analysis
<b>Economic Development Goal 4.4:</b> Develop underutilized properties with national and regional retailers.	<b>Consistent.</b> As described, the project site is currently occupied by vacant office buildings, a storage building, a window covering shop, vacant plumbing store, bus parking lot, and several storage lots. Almost all of the existing on-site buildings are non-operational and do not support national and regional retailers. The proposed project would demolish the existing on-site buildings and surface parking to create a self-storage facility and executive artists space. As a result, the project would contribute to the City's goal of developing underutilized properties with national and regional retailers and would be consistent with Economic Development Goal 4.4

Source: City of San Gabriel, Comprehensive General Plan of the City of San Gabriel, California, Chapter 1 – Land Use, May 18, 2004.

#### ZONING CODE CONSISTENCY

According to the City's Zoning Code, the project site is zoned Commercial and Limited Manufacturing (C-3). The C-3 zone is intended to provide for the continued use and expansion and new development of a wide variety of commercial enterprises, professional and medical offices, entertainment uses, and similar businesses located along major roadway corridors to encourage uses that serve the local and regional markets. As stated, the project is proposing a Zone Change to create a Planned Development (P-D) Overlay Zone to allow for a greater floor area ratio, reduced rear yard setback, and reduced parking requirements. SGMC Section 153.282, *Purpose*, states that a P-D zone may be established where a proposal for a large-scale development (one acre or larger) makes it desirable to apply regulations more flexible than those applicable to other zones in the City's Zoning Code. <u>Table 4.11-2</u>, <u>C-3 Zone Consistency Analysis</u>, details the project's consistency with applicable development regulations.

Development Standard	C-3 Zone Requirement	Proposed Project	Project Consistent?
Minimum Lot Width	50 feet	The project site is L-shaped; however, the minimum width of the site is 150 feet along South San Gabriel Boulevard.	Yes
Maximum Building Height	5 stories or 70 feet, whichever is lower	The proposed building is four stories with a partial 5th floor, approximately 61.5 feet in height.	Yes
Maximum Floor Area Ratio	0.7	The project site is approximately 68,000 square feet and the proposed building area is approximately 199,358 square feet. Thus, the project's floor area ratio is approximately 2.93 and exceeds the maximum floor area ratio.	No, Zone Change/ Planned Development Overlay Zone is proposed.
Front Yard Setback	0 feet	The project would have a 10-foot setback from South San Gabriel Boulevard.	Yes
Side Yard Setback	0 feet if abutting C-1, C-3, or M-1 zone; 10 feet if abutting any other zone	Adjacent uses to the project's side yards to the north and south of the project boundary are zoned C-3. The project's northern side yard setback is approximately 10 feet and the project's southern side yard setback adjacent to Commercial Avenue is approximately five feet.	Yes

#### Table 4.11-2 C-3 Zone Consistency Analysis



Development Standard	C-3 Zone Requirement	Proposed Project	Project Consistent?
Rear Yard Setback	10 feet if abutting C-1, C-3, or M-1 zone; 15 feet if abutting any other zone	The project would have an approximately 9.8-foot rear yard setback from South Gladys Avenue.	No, Zone Change/ Planned Development Overlay Zone is proposed.
Minimum Landscaping	6 percent of gross lot area; Landscape shall be designed and installed such that much of the landscaping is visible from a public street or thoroughfare	The project would provide approximately 13 percent, or 8,851 square feet, of landscaping on-site; refer to Exhibit 2-5.	Yes
Minimum Off- Street Parking	Self-Storage: 1 space per 2,500 square feet; Professional Office/Artist Suites: 1 space per 300 square feet	Based on the parking requirements, the project is required to provide 77 parking spaces for the 190,232-square foot self-storage space and 31 parking spaces for the 9,126-square foot artists space for a total of 108 parking spaces. The project provides 50 on-site surface parking spaces.	No, Zone Change/ Planned Development Overlay Zone is proposed.
Trash/Recycling Facility	Provide a trash enclosure area for the collection and loading of recyclable materials	As shown on <u>Exhibit 2-3</u> , <u>Conceptual Site</u> <u>Plan</u> , a trash enclosure area is provided near the rear of the project site.	Yes
Building Transparency/ Required Openings	Exterior walls facing and within 20 feet of a front or street side lot line shall include windows, doors, or other openings for at least 50 percent of the building wall area located between 2.5 and 7 feet above the level of the sidewalk	As shown on Exhibit 2-4a and Exhibit 2-4b, <u>Proposed North and East Elevations</u> , street-facing exterior walls on the eastern, southern, and western project boundaries would include driveway openings, windows, and display doors in excess of the 50 percent wall area requirement.	Yes
Building Articulation	Buildings shall provide adequate architectural articulation and detail to avoid a bulky and "box-like" appearance and to create a pedestrian-friendly environment	The proposed building would be designed with various building elements and materials, which may include, but are not limited to, concrete masonry unit (CMU) block, painted stucco, window glazing, parapet/trim, and awnings. Additionally, building facades would include building projections, recesses, doorway and window trims, and other architectural articulations; refer to <u>Exhibits 2-4a</u> and <u>2- 4b</u> . The building would be four stories along South San Gabriel Boulevard with a partial fifth story along Commercial Avenue and Gladys Avenue, creating varied building depths and open spaces on-site to avoid a bulky "box-like" appearance	Yes



Development Standard	C-3 Zone Requirement	Proposed Project	Project Consistent?
Pedestrian Access	A system of pedestrian walkways shall connect all buildings on a site to each other, to on-site automobile and bicycle parking areas, and to any on-site open space areas or pedestrian amenities	The project proposes one building on the project site with pedestrian walkways along the building perimeter adjacent to the onsite vehicular and bicycle parking areas; refer to Exhibit 2-3. As shown, the internal pedestrian walkways connect to the proposed community arts space fronting South Gabriel Boulevard and existing sidewalks along South San Gabriel Boulevard and Commercial Avenue.	Yes
Limitations on Location of Parking	Parking shall be located behind or to the side of buildings	As shown on <u>Exhibit 2-3</u> , surface parking spaces are located along the sides of the proposed building.	Yes
Limitations on Curb Cuts	Curb cuts shall be minimized and placed in the location least likely to impede pedestrian circulation; Curb cuts shall be located at least ten feet from an intersection curb or pedestrian cross walk	The project would utilize two existing curb cuts along South San Gabriel Boulevard and Commercial Avenue, and convert an informal rear entry (currently gated) along South Gladys Avenue into a third entry point. No new curb cuts are proposed as part of the project.	Yes
Source: City of San	Gabriel, San Gabriel Municipal Code, current thro	bugh Ordinance 662, passed January 21, 2020.	

As shown in <u>Table 4.11-2</u>, the project would be consistent with all applicable C-3 zone development standards with the exception of the maximum floor area ratio, rear yard setback requirement, and required parking requirements. The proposed 2.93 floor area ratio would not result in a change of character of the surrounding area nor would it introduce massing that is inconsistent with neighboring buildings. The project would place one level below grade, thereby making the proposed building consistent in scale with adjacent uses. In addition, in lieu of the 77 required parking spaces for the self-storage use (one space per 2,500 square feet), the applicant is proposing 19 spaces (one space per 10,000 square feet), which is consistent with other parking standards established by other agencies in surrounding communities and parking demand characteristics at other existing self-storage facilities similar to the proposed Zone Change to create the P-D Overlay Zone, the project would be consistent with all C-3 zone development standards. Thus, impacts in this regard would be less than significant.

<sup>&</sup>lt;sup>1</sup> Linscott, Law & Greenspan Engineers, Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California, May 6, 2020



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### 4.12 MINERAL RESOURCES

Wa	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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?				~
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				~

# a) 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?

<u>No Impact</u>. According to the State Division of Mines and Geology, no areas within the project vicinity are mapped containing significant aggregate resources.<sup>1,2</sup> In addition, according to the General Plan Environmental Evaluation, no active mining operations exist within the City. No impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

# 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?

No Impact. Refer to Response 4.12(a).

<sup>&</sup>lt;sup>1</sup> California Department of Conservation, Updated Designation of Regionally Significant Aggregate Resources in the San Gabriel Valley Production-Consumption Region, Los Angeles County, April 2014.

<sup>&</sup>lt;sup>2</sup> California Department of Conservation, Special Report 143 Part IV, Classification of Sand and Gravel Resource Areas, San Gabriel Valley Production-Consumption Region, Plate 4.11, El Monte Quadrangle, 1982.



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### 4.13 NOISE

Wo	uld the project result in:	Potentially Significant Impact	Less Than Significant Impact 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?			~	
b.	Generation of excessive groundborne vibration or groundborne noise levels?			✓	
C.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

#### DESCRIPTION OF NOISE METRICS

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately three dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between three dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of three dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level ( $L_{eq}$ ), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level ( $L_{dn}$ ). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical  $L_{dn}$  noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 p.m. and 7:



#### **REGULATORY FRAMEWORK**

#### State Level

The State Office of Planning and Research Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of CNEL.

#### Local Level

#### City of San Gabriel General Plan

The General Plan Noise Element identifies noise-sensitive land uses and noise sources, defines areas of noise impact, and establishes goals, policies, and programs to ensure that City residents are protected from excessive noise. The following lists applicable noise goals and targets obtained from the General Plan:

- Goal 9.2: Minimize the impact of traffic noise for those who live and work on our major roadways.
  - Target 9.2.1: Commit to using innovative noise reducing asphalt products when resurfacing or repaving major arterial streets.
- Goal 9.4: Protect residents from the harmful effects of noise from mechanical equipment and trucks.
  - Target 9.4.1: Adopt a comprehensive noise ordinance by 2006, including allowable decibel levels in commercial/industrial areas and residential areas adjacent to them.
- Goal 9.6: Promote the health of our community by protecting it from the harmful effects of noise.

<u>Table 4.13-1</u>, <u>Exterior Noise Standards</u>, provides noise standards for designated land uses within the City, and <u>Table 4.13-2</u>, <u>Interior Noise Standards</u>, provides the City's interior noise standards.



Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)	Standard 1 (dB) <sup>1</sup>	Standard 2 (dB) <sup>2</sup>	Standard 3 (dB) <sup>3</sup>	Standard 4 (dB) <sup>4</sup>	Standard 5 (dB) <sup>5</sup>
I	Noise-sensitive Area	Anytime	45	45	50	55	60	65
II Residential Properties	10:00 p.m. – 7:00 a.m. (Nighttime)	45	45	50	55	60	65	
	7:00 a.m. – 10:00 p.m. (Daytime)	50	50	55	60	65	70	
ш	III Commercial Properties	10:00 p.m. – 7:00 a.m. (Nighttime)	55	55	60	65	70	75
111		7:00 a.m. – 10:00 p.m. (Daytime)	60	60	65	70	75	80
IV	Industrial Properties	Anytime	70	70	75	80	85	90

Table 4.13-1 Exterior Noise Standards

Notes: dB = decibels

1. Standard No. 1 is the exterior noise level that may not be exceeded for more than a total of 30 minutes in any hour.

2. Standard No. 2 is the exterior noise level that may not be exceeded for more than a total of 15 minutes in any hour.

3. Standard No. 3 is the exterior noise level that may not be exceeded for more than a total of 5 minutes in any hour.

4. Standard No. 4 is the exterior noise level that may not be exceeded for more than a total of 1 minute in any hour.

5. Standard No. 5 is the exterior noise level that may not be exceeded for any period of time.

Source: City of San Gabriel, Comprehensive General Plan of the City of San Gabriel, May 18, 2004.

#### Table 4.13-2 Interior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Allowable Interior Noise level (dB)	Standard 1 (dB) <sup>1</sup>	Standard 2 (dB) <sup>2</sup>	Standard 3 (dB) <sup>3</sup>
A 11	Posidential	10:00 p.m. – 7:00 a.m.	40	45	50	55
All	Residentia	7:00 a.m. – 10:00 p.m.	45	45	50	55

Notes: dB = decibels

1. Standard No. 1 is the interior noise level that may not be exceeded for more than a total of 5 minutes in any hour.

2. Standard No. 2 is the interior noise level that may not be exceeded for more than a total of 1 minute in any hour.

3. Standard No. 3 is the interior noise level that may not be exceeded for any period of time.

Source: City of San Gabriel, Comprehensive General Plan of the City of San Gabriel, May 18, 2004.

#### San Gabriel Municipal Code

Although the City's noise standards are contained within the General Plan, the San Gabriel Municipal Code (SGMC) includes several references to noise control. The following sections of the SGMC are applicable to the proposed project:

Section 98.02 MAINTENANCE OF PREMISES; NUISANCES.



It shall be unlawful and hereby declared a public nuisance for any person or persons either owning, leasing, occupying or having charge or possession of any real property within the city to cause, permit or allow any of the following conditions to exist thereon:

(T) To maintain or operate, between the hours of 10:00 p.m. and 7:00 a.m., any device, instrument, vehicle or machinery in such a manner as to create noise or cause vibrations which cause discomfort or annoyance to reasonable persons of normal sensitivity, or which endangers the comfort, repose, health or peace of the public or of any person using or occupying other property in the vicinity;

Title XIII: General Offenses

Section 130.09 NOISE CAUSED BY MACHINERY.

It shall be unlawful for any person to run or operate, or permit to be run or operated, any mechanical, electrical, electronic, hydraulic, or wind-driven equipment, fan, pump, compressor, blower, motor, engine, machine, or other similar apparatus, whether as owner, agent, employee, lessee, or other person having the charge thereof, which causes, or is likely to cause, any loud, excessive, unnecessary, or unusual continued or intermittent noise, or any noise which annoys, disturbs, injures, or endangers the comfort, repose, health, peace, or safety of others within the city unless such noise is muffled effectually and the apparatus is either equipped with a muffler device in constant operation and properly maintained to deaden such noise, or the apparatus is enclosed in a room, building, or other enclosure sufficiently insulated to deaden such noise.

Title XV: Land Usage

Section 150.003 Construction; Hours of Construction

No construction shall take place within the city except between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday and between the hours of 8:00 a.m. and 4:00 p.m. on Saturday. Construction shall be prohibited on Sundays and such holidays as may be designated by Council resolution. The Community Development Director may extend the hours of operation for special circumstances by providing written notice to surrounding residents in advance. The restriction on construction hours shall not apply to emergency repairs required to protect the public health, safety, ad welfare, whether performed by a public agency, utility, company, or private owner. Said restrictions also shall not apply to a residential property owner and or members of his immediate family, performing work on his personal property.

#### **EXISTING CONDITIONS**

#### **Noise Sensitive Receptors**

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in healthrelated risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. The nearest sensitive receptors are the residences located approximately 210 feet to the east of the project site.



#### Stationary Sources

The project area is located in a highly urbanized area. The primary sources of stationary noise in the project vicinity are urban-related activities, including parking areas, people talking, truck deliveries, dogs barking, etc. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

#### Mobile Sources

Vehicle-related mobile noise is the most common source of noise in the site vicinity. In addition, commercial uses to the north and west contribute to infrequent mobile noise sources in the site vicinity.

#### Existing Ambient Noise Levels

On March 19, 2020, California Governor Gavin Newsom passed Executive Order N-33-20 in response to the growing spread of COVID-19.1 Executive Order N-33-30 requires that all individuals living in the State stay at home or at their place of residence, except as needed to maintain continuity of the operations of the Federal critical infrastructure. As such, on-site noise measurements while Executive Order N-33-20 is active would not correctly reflect the typical ambient noise level near the project site. Thus, in order to assess ambient noise levels, existing ambient noise levels from mobile sources were modeled using the Federal Highway Administration's Highway Noise Prediction Model (FHWA RD-77-108). The RD-77-108 model calculates the average noise level at specific locations based on traffic volumes, average speeds represented by the posted speed limit, roadway geometry, and site environmental conditions. The majority of vehicular traffic near the project site are along San Gabriel Boulevard, East Broadway, Commercial Avenue, and East El Monte Street. These roadways generate the majority of existing noise in the immediate project vicinity. Noise projections are based on modeled vehicular traffic as derived from the Transportation Impact Study San Gabriel Self-Storage Project (Traffic Impact Study) prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020); refer to Appendix H, Transportation Impact Study and VMT Assessment, for modeling assumptions and vehicle speeds along the roadway segments. As shown in Table 4.13-3, Existing Ambient Noise Levels, existing ambient noise levels from mobile sources in the vicinity of the site range from 44.4 to 63.2 dBA CNEL at 100 feet from roadway centerline.

<sup>&</sup>lt;sup>1</sup> COVID-19 stands for Coronavirus Disease 2019, a quickly spreading global viral infection that causes mild upper respiratory tract illnesses and in some cases death.



Table 4.13-3 Existing Ambient Noise Levels

	Existing Conditions						
		dBA @ 100	Distance from Roadway Centerline to: (Feet)				
Koadway Segment	ADT	Roadway Centerline	70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour		
San Gabriel Boulevard							
North of East Broadway	22,480	62.5	-	69	148		
East Broadway and Commercial Avenue	25,140	63.0	-	74	159		
Commercial Avenue and East El Monte Street	26,240	63.2	-	76	164		
South of El Monte Street	25,640	63.1	-	75	161		
East Broadway							
West of San Gabriel Boulevard	7,290	56.5	-	-	59		
East of San Gabriel Boulevard	9,560	57.7	-	-	70		
Commercial Avenue							
East of San Gabriel Boulevard	640	44.4	-	-	-		
East El Monte Street							
West of San Gabriel Boulevard	1,630	48.5	-	-	-		
East of San Gabriel Boulevard	1,010	46.4	-	-	-		

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level, - = contour is located within the roadway right-of-way

Source: Noise modeling is based on traffic data from the *Transportation Impact Study San Gabriel Self-Storage Project* prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020); refer to <u>Appendix H</u>.

# 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?

Less Than Significant Impact.

#### CONSTRUCTION

Construction of the proposed project would occur over approximately 18 months and would include demolition, grading, building construction, paving, and architectural coating phases. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities of the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in <u>Table 4.13-4</u>, <u>Maximum Noise Levels Generated by Typical Construction Equipment</u>. It should be noted that the noise levels identified in <u>Table 4.13-4</u> are maximum sound levels ( $L_{max}$ ), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Type of Equipment	Acoustical Use Factor <sup>1</sup>	L <sub>max</sub> at 50 Feet (dBA)
Concrete Saw	20	90
Crane	16	81
Concrete Mixer Truck	40	79
Backhoe	40	78
Dozer	40	82
Excavator	40	81
Forklift	40	78
Paver	50	77
Roller	20	80
Tractor	40	84
Water Truck	40	80
Grader	40	85
General Industrial Equipment	50	85

 Table 4.13-4

 Maximum Noise Levels Generated by Typical Construction Equipment

Note: L<sub>max</sub> = maximum noise levels; dBA = A-weighted decibel

1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, Roadway Construction Noise Model (FHWA-HEP-05-054), January 2006.

The potential for construction-related noise to affect nearby sensitive receptors would depend on the location and proximity of construction activities to these receptors. The closest sensitive receptors are the residences located approximately 210 feet to the east of the project site. Construction would occur throughout the project site and would not be concentrated or confined in the area directly adjacent to sensitive receptors. Therefore, construction noise would be acoustically dispersed throughout the project site and not concentrated in one area near adjacent sensitive uses. It should also be noted that the noise levels depicted in Table 4.13-4 are  $L_{max}$ , or maximum noise levels, which would occur sporadically when construction equipment is operated in proximity to sensitive receptors.

Pursuant to SGMC Section 150.003, construction activities may occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 4:00 p.m. Saturdays; however, is prohibited on Sundays or legal holidays. These permitted hours of construction are included in the SGMC in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption. Given the sporadic and variable nature of proposed project construction and the implementation of time limits specified in the SGMC, short-term construction noise impacts would be less than significant.

#### **OPERATIONS**

#### **Mobile Noise**

According to the *Highway Traffic Noise Analysis and Abatement Policy and Guidance*, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear. Based on the Traffic Impact Study, the proposed project is projected to generate a net increase of 334 daily trips, which includes 24 a.m. peak hour trips and 36 p.m. peak hour trips. The traffic noise levels under "Existing Without Project" and "Existing With Project" scenarios are compared in <u>Table 4.13-5</u>, <u>Modeled Existing and Existing Plus Project Traffic Noise Levels</u>. As shown under the "Existing Without Project" scenario, noise levels would range from approximately 44.4 dBA to 63.2 dBA at 100 feet from roadway centerline, with the highest noise levels occurring along San Gabriel Boulevard between Commercial Avenue and East El Monte Street. The "Existing With Project" scenario noise levels would range from



approximately 46.2 dBA to 63.3 dBA at 100 feet from roadway centerline, with the highest noise levels also occurring along San Gabriel Boulevard between Commercial Avenue and East El Monte Street.

	Existing Without Project					Existing With Project					
	ADT	dBA @	Distance fr	om Roadway to: (Feet)	Centerline		dBA @	Distance from Roadway Centerline to: (Feet)			Difference In dBA @
Roadway Segment		from from Roadway Centerline	70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour	ADT	from Roadway Centerline	70 CNEL Noise Contour	65 CNEL Noise Contour	60 CNEL Noise Contour	from Roadway Centerline
San Gabriel Boulevard											
North of East Broadway	22,480	62.5	-	69	148	22,620	62.6	-	69	148	0.1
East Broadway and Commercial Avenue	25,140	63.0	-	74	159	25,380	63.1	-	74	160	0.1
Commercial Avenue and East El Monte Street	26,240	63.2	-	76	164	26,940	63.3	-	77	167	0.1
South of El Monte Street	25,640	63.1	-	75	161	26,320	63.2	-	76	164	0.1
East Broadway							•				
West of San Gabriel Boulevard	7,290	56.5	-	-	59	7,310	56.5	-	-	59	0.0
East of San Gabriel Boulevard	9,560	57.7	-	-	70	9,600	57.7	-	-	70	0.0
Commercial Avenue							•				
East of San Gabriel Boulevard	640	44.4	-	-	-	960	46.2	-	-	-	1.8
East El Monte Street											
West of San Gabriel Boulevard	1,630	48.5	-	-	-	1,650	48.6	-	-	-	0.1
East of San Gabriel Boulevard	1,010	46.4	-	-	-	1,010	46.4	-	-	-	0.0

# Table 4.13-5 Modeled Existing and Existing Plus Project Traffic Noise Levels

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level; - = Contour is located within the roadway right-of-way. Source: Noise modeling is based on traffic data within *Transportation Impact Study San Gabriel Self-Storage Project* prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020); refer to <u>Appendix H</u>.

<u>Table 4.13-5</u> also shows the traffic noise level differences between the "Existing Without Project" scenario and the "Existing With Project" scenario. The proposed project would result in a maximum noise level increase of 1.8 dBA along Commercial Avenue east of San Gabriel Boulevard. However, there are not any noise sensitive receptors along this roadway segment. In addition, noise levels along adjacent roadways would not exceed the City's exterior noise standard of 70 dBA for industrial uses. Therefore, the proposed project would not significantly increase noise levels along the roadway segments analyzed (i.e., noise increase would be less than 3.0 dBA) and the impact would be less than significant.

#### Cumulative Mobile Source Impacts

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the proposed project and other projects in the vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of project area buildout to the future cumulative base traffic volumes in the project area and the vicinity.

The combined effect compares the "Cumulative (2021) With Project" condition to existing conditions. This comparison accounts for the traffic noise increase generated by a project combined with the traffic noise increase generated by



cumulative projects. The following criteria have been utilized to evaluate the combined effect of cumulative noise increase.

- Combined Effect. The cumulative with project noise level ("Cumulative (2021) With Project" condition) would
  cause a significant cumulative impact if a 3 dBA increase over existing conditions occurs and the resulting
  noise level exceeds the applicable exterior standard at a sensitive use. Although there may be a significant
  noise increase due to the proposed project in combination with other related projects, it must also be
  demonstrated that the project has an incremental effect. In other words, a significant portion of the noise
  increase must be due to the proposed project. The following criteria have been utilized to evaluate the
  incremental effect of the cumulative noise increase.
- Incremental Effects. The "Cumulative (2021) With Project" condition causes a 1 dBA increase in noise above the "Cumulative (2021) Without Project" condition noise level.

A significant impact would result only if both the combined (including an exceedance of the applicable exterior standard at a sensitive use) and incremental effects criteria have been exceeded. Noise, by definition, is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed project and growth due to occur in the site vicinity would contribute to cumulative noise impacts. <u>Table 4.13-6</u>, <u>Cumulative Traffic Noise</u> <u>Levels</u>, lists the traffic noise effects along roadway segments in the project vicinity for existing, "Cumulative (2021) Without Project," and "Cumulative (2021) With Project" conditions, including combined and incremental impacts. As indicated in <u>Table 4.13-6</u>, an "Incremental Effects" criterion of 1 dBA would only be exceeded along Commercial Avenue east of San Gabriel Boulevard, but the "Combined Effects" criterion of 3 dBA would not be exceeded along any of the study area roadways. Therefore, the proposed project would result in less than significant impacts in this regard.

	dBA @ 100 F	Feet from Roadw	ay Centerline	Combined Effects	Incremental Effects		
Roadway Segment	Existing	Cumulative (2021) Without Project	Cumulative (2021) With Project	Difference in dBA Between Cumulative With Project and Existing	Difference in dBA Between Cumulative With Project and Cumulative Without Project	Cumulatively Significant Impact?1	
San Gabriel Boulevard							
North of East Broadway	62.5	63.1	63.1	0.6	0.0	No	
East Broadway and Commercial Avenue	63.0	63.7	63.7	0.7	0.0	No	
Commercial Avenue and East El Monte Street	63.2	63.9	63.9	0.7	0.0	No	
South of El Monte Street	63.1	63.8	63.9	0.8	0.1	No	
East Broadway							
West of San Gabriel Boulevard	56.5	57.4	57.4	0.9	0.0	No	
East of San Gabriel Boulevard	57.7	58.4	58.4	0.7	0.0	No	
Commercial Avenue							
East of San Gabriel Boulevard	44.4	44.4	46.2	1.8	1.8	No	
East El Monte Street							
West of San Gabriel Boulevard	48.5	48.8	48.8	0.3	0.0	No	
East of San Gabriel Boulevard	46.4	47.7	47.7	0.3	0.0	No	

# Table 4.13-6Cumulative Traffic Noise Levels

Notes: dBA = A-weighted decibel

1. A cumulative impact would occur if the "Combined Effects" and "Incremental Effects" criterion are exceeded, and the modeled noise level exceeds the City's exterior noise standard shown in <u>Table 4.13-1</u>.

Source: Noise modeling is based on traffic data within *Transportation Impact Study San Gabriel Self-Storage Project* prepared by Linscott, Law and Greenspan Engineers (dated May 6, 2020); refer to <u>Appendix H</u>.



#### **Stationary Noise Impacts**

#### **Mechanical Equipment**

Heating, ventilation, and air conditioning (HVAC) units would be installed on the roof and exterior sides of the proposed buildings. Typically, mechanical equipment noise is 55 dBA at 50 feet from the source. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. HVAC units would be located approximately 210 feet from the nearest sensitive receptor (i.e. residences to the east of the project site). As such, noise levels from the HVAC units could reach approximately 43 dBA at the nearest residences to the east without an enclosure or noise attenuation features. However, the HVAC units would be shielded by a mechanical screen wall in compliance with SGMC Section 130.09, *Noise Caused by Machinery*, and a parapet wall which would further attenuate operational noise from the HVAC units. Therefore, the City's exterior daytime (50 dB) and nighttime (45 dB) noise standards would not be exceeded as a result of HVAC units at the project site. Thus, a less than significant impact would occur in this regard.

#### Parking Areas

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking lot activities are presented in <u>Table 4.13-7</u>, <u>Typical Noise Levels Generated by Parking Lots</u>. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 48 feet for normal speech to 50 dBA at 50 feet for very loud speech.

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L <sub>eq</sub>
Car starting	60 dBA L <sub>eq</sub>
Car idling	53 dBA L <sub>eq</sub>

## Table 4.13-7 Typical Noise Levels Generated by Parking Lots

Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

The project would provide 50 parking spaces in a surface parking lot. As shown in <u>Table 4.13-7</u>, parking lot noise levels could range between 53 dBA and 61 dBA at 50 feet. Since the parking lot noise levels would be instantaneous compared to the land use compatibility noise standards in the CNEL scale, which are averaged over time, actual noise levels over time resulting from parking lot activities would be far lower. In addition, parking lot noise currently occurs in the project vicinity under existing conditions. Therefore, the proposed parking would not result in substantially greater noise levels than currently exist at the project site. Noise associated with parking lot activities is not anticipated to exceed the City's Noise Standards during operation. Therefore, noise impacts from parking lots would be less than significant.



#### b) Generation of excessive groundborne vibration or groundborne noise levels?

#### Less Than Significant Impact.

#### CONSTRUCTION

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. For most commercial and industrial structures that are engineered concrete and masonry buildings, the FTA architectural damage criterion for continuous vibrations is 0.3 inches per second (in/sec). Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The vibration produced by construction equipment is illustrated in Table 4.13-8, Typical Vibration Levels for Construction Equipment.

Equipment	Approximate peak particle velocity at 15 feet (inches/second) <sup>1</sup>	Approximate peak particle velocity at 25 feet (inches/second)
Large bulldozer	0.192	0.089
Loaded trucks	0.164	0.076
Small bulldozer	0.007	0.003
Jackhammer	0.075	0.035

 Table 4.13-8

 Typical Vibration Levels for Construction Equipment

Notes:

1. Calculated using the following formula:

```
PPV equip = PPVref x (25/D)<sup>1.5</sup>
```

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance

PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA Transit Noise and Vibration Impact Assessment Manual

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Groundborne vibration decreases rapidly with distance. As indicated in <u>Table 4.13-8</u>, based on the FTA data, vibration velocities from typical heavy construction equipment operation that would be used during project construction range from 0.007 to 0.192 in/sec peak particle velocity (PPV) at 15 feet from the source of activity. The nearest structures are commercial buildings adjoining the project site to the north and southwest. However, the project would not require



pile driving activities and would not utilize heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, large bulldozers, and jackhammers) near off-site uses or nearby structures. Furthermore, hauling truck routes would be directed away from northern and southwestern boundaries of the project site where the nearest off-site structures are located. Therefore, construction activities would not be capable of exceeding the 0.3 in/sec PPV significance threshold for vibration and a less than significant impact would occur in this regard.

#### **OPERATIONS**

The project proposes to build a self-storage facility with executive artists space, which would not generate groundborne vibration that could be felt at surrounding uses. The proposed project would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. No impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

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

<u>No Impact</u>. The project is not located within an airport land use plan and there are no public or private airports or airstrips within two miles of the project site. The nearest airport to the project site is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue in the City of El Monte, approximately 3.2 miles to the southeast. Therefore, project implementation would not introduce a safety hazard for people residing or working in the project area. No impact would occur.



## 4.14 **POPULATION AND HOUSING**

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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)?			1	
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				~

# 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)?

Less Than Significant Impact. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. Although an uncertainty exists regarding the number of new employees and tenants who may choose to relocate to the City as a result of the project, a conservative analysis of impacts associated with direct population growth can be provided. Upon project buildout, the proposed self-storage and executive artist spaces would generate approximately 38 employees and tenants. For analysis purposes, it is conservatively assumed that 100 percent of the project's new employees and tenants would relocate to the City of San Gabriel. Based on 38 new employees and tenants relocating to the City and an average household size of 3.14<sup>1</sup>, project implementation would result in a potential population increase of approximately 120 persons. The potential population growth generated by the project would increase the City's estimated 2020 population from 40,104 persons to 40,224 persons, an increase of approximately 0.3 percent.<sup>2</sup> It should be noted that due to the nature of the proposed uses (self-storage and executive artists space), it is not likely that project-generated employees and tenants would relocate to the City, but rather the new jobs and artist tenant space associated with the project would provide employment opportunities for people already residing within San Gabriel.

Potential population growth impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. The Southern California Association of Governments (SCAG) growth forecasts estimate the City's population to reach 46,900 persons by 2040, representing a total increase of 6,800 persons between 2012 and 2040.<sup>3</sup> SCAG's regional growth projections are based upon long-range development assumptions (i.e., General Plans) of the relevant jurisdiction. The project's anticipated population increase (120 persons) would represent 0.3 percent of the 2040 population anticipated for the City.

Although the project may result in direct population growth from employees and tenants relocating to the City, the proposed project would not induce substantial unplanned population growth exceeding existing local conditions (0.3 percent increase) and/or regional population projections (0.3 percent of the City's projected 2040 population). Further,

<sup>&</sup>lt;sup>1</sup> California Department of Finance Demographic Research Unit, *Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2020, with 2010 Benchmark, May 1, 2020.* 

<sup>&</sup>lt;sup>2</sup> Ibid.

<sup>&</sup>lt;sup>3</sup> Southern California Association of Governments, 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction, https://www.scag.ca.gov/Documents/2016\_2040RTPSCS\_FinalGrowthForecastbyJurisdiction.pdf, accessed March 30, 2020.



buildout of the project site under the existing General Commercial land use designation was already contemplated in the General Plan and SCAG regional growth forecasts. As a result, the project would result in less than significant impacts to unplanned population growth.

Mitigation Measures: No mitigation measures are required.

# b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

<u>No Impact</u>. The project site is currently developed with single-story commercial buildings and associated surface parking areas. There are no existing residents or housing on-site. Thus, project implementation would not displace existing people or housing or necessitate the construction of replacement housing elsewhere. No impact would occur in this regard.



## 4.15 **PUBLIC SERVICES**

Would th	he project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Res with facil facil envi serv obje	ult in substantial adverse physical impacts associated the provision of new or physically altered governmental ities, need for new or physically altered governmental ities, the construction of which could cause significant ironmental impacts, in order to maintain acceptable vice ratios, response times or other performance actives for any of the public services:				
1)	Fire protection?			✓	
2)	Police protection?			✓	
3)	Schools?			✓	
4)	Parks?			$\checkmark$	
5)	Other public facilities?			$\checkmark$	

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:

#### 1) Fire protection?

Less Than Significant Impact. The San Gabriel Fire Department (SGFD) provides fire protection and paramedic services for the City. Two SGFD fire stations serve the City of San Gabriel: Fire Station 51 at 1303 South Del Mar Avenue and Fire Station 52 at 115 North Del Mar Avenue. Fire Station 51 includes divisions of administration, emergency management services, fire prevention, and training, and is equipped with a battalion vehicle, paramedic engine, rescue ambulance, and an urban search and rescue; Fire Station 52 is housed with a paramedic engine.<sup>1</sup> The closest fire station to the project site is Fire Station 52, located approximately 0.6-mile to the northwest.

The proposed project would create an increased demand for fire protection services. However, as a self-storage facility with executive artist space, the project would be consistent with land uses anticipated for the area; refer to <u>Section 4.11</u>, <u>Land Use and Planning</u>. The project would not induce significant or unplanned population growth through employment generation, and would not result in the need for new or physically altered fire protection facilities; refer to <u>Section 4.14</u>, <u>Population and Housing</u>. Further, the proposed project would be required to comply with SGFD requirements for emergency access, fire flow, fire protection standards, fire lanes, and other site design/building standards. The proposed driveways and interior vehicular circulation are designed to meet the SGFD turning radius requirements. Several fire hydrants are located around the proposed building perimeter with one located on-site, and an 8-inch fire water lateral would be installed to connect to the existing utilities in South Gladys Avenue. The project is subject to the project design requirements set forth in the 2019 California Fire Code and the 2019 California Building Standards Code. Pursuant to General Plan Action 5.2.2.1, the City would only approve development with site design features, fire retardant building materials, and egress systems designed to reduce the risk of fire. The City would

<sup>&</sup>lt;sup>1</sup> City of San Gabriel Website, *Fire Stations 51 and 52*, https://www.sangabrielcity.com/177/Stations, accessed June 11, 2020.



collect a one-time development impact fee in accordance with SGMC Section 154.004, *Fire Facility Impact Fees*, which is imposed on all new development to help pay fair share of costs in upgrading the City's fire facilities, as needed. Payment of these fees would offset the project's impacts to the acquisition, design, and construction of new fire facilities. Following collection of development impact fees and compliance with SGMC and SGFD requirements, the project's operational impacts to fire protection services would be less than significant.

Mitigation Measures: No mitigation measures are required.

#### 2) Police protection?

Less Than Significant Impact. The San Gabriel Police Department (SGPD) provides police protection services to the City of San Gabriel and operates approximately 0.5-mile southwest of the project site at 625 South Del Mar Avenue. The City is served by 54 sworn officers and 17 civilian employees.<sup>2</sup> Police services are funded through the City's General Fund, whose revenues are collected from property and sales tax as well as through the collection of development impact fees.

As discussed in Response 4.15 (a)(1) above, the proposed project is consistent with land uses anticipated for the area and would not induce substantial unplanned population growth. Project construction and operation would be subject to compliance with SGMC Chapter 150, *Building Regulations*, which includes emergency access requirements that would minimize site safety hazards and potential construction-related impacts to police services. Ongoing property and sales taxes generated during project operations would contribute to the City's General Fund to offset impacts to police protection services. In addition, the City would collect a one-time development impact fee in accordance with SGMC Section 154.003, *Police Facility Impact Fees*, which would offset the project's fair share of costs to fund future acquisitions, design, construction, and financing of new police facilities. The project would be subject to site plan review by the City prior to project approval to ensure that it meets City requirements in regard to safety (e.g., nighttime security lighting). As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.

#### 3) Schools?

Less Than Significant Impact. The project site is served by San Gabriel Unified School District (SGUSD), which operates five elementary schools, one middle school, and two high schools, providing educational services for 5,679 students in grades kindergarten through 12.<sup>3</sup> The closest SGUSD schools include Roosevelt Elementary School (located approximately 0.2-mile to the east at 401 Walnut Grove Avenue), Jefferson Middle School (located approximate 0.6-mile to the northeast at 1372 East Las Tunas Drive), and Del Mar High School (located approximately 0.5-mile to the west at 312 South Del Mar Avenue).

The project includes the development of a self-storage facility and executive artist space, which could generate additional students in the project area as a result of employee generation; refer to <u>Section 4.14</u>. However, the proposed project would not significantly increase the need for school facilities, as the project is consistent with land uses anticipated and would not result in substantial unplanned population growth. Furthermore, the project would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new projects, including commercial construction. According to Section 65997 of the California Government Code, payment of statutory fees is the exclusive method of mitigating environmental effects related to the

<sup>&</sup>lt;sup>2</sup> City of San Gabriel, San Gabriel Police Department, https://www.sangabrielcity.com/679/San-Gabriel-Police-Department, accessed March 30, 2020.

<sup>&</sup>lt;sup>3</sup> California Department of Education, 2018-19 Enrollment by Ethnicity and Grade San Gabriel Unified District Report (19-75291), https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthGrd.aspx?cds=1975291&agglevel=district&year=2018-19, accessed March 30, 2020.



adequacy of school facilities when considering the approval or the establishment of conditions for the approval of a development project. Thus, upon payment of required fees by the project Applicant consistent with existing State requirements, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

#### 4) Parks?

<u>Less Than Significant Impact</u>. The City of San Gabriel Community Services Department operates and maintains six parks within the City, for a total of 19 acres of parks and park facilities.<sup>4</sup> The nearest park to the project site is Roosevelt Park, located approximately 0.2-mile to the east at 5410 North Delta Street.

The project does not propose new or physically altered parks or recreational facilities. As discussed above, the proposed project is consistent with land uses anticipated for the area and would not result in unplanned population growth. The project proposes a self-storage facility and executive artist space; as such, implementation of the project would not increase the demand for, or use of, existing local or regional park facilities. Moreover, the City would collect a one-time open space and recreation development impact fee in accordance with SGMC Section 154.001, *Open Space and Recreation Impact Fees*, which would offset the project's fair share of costs to fund future acquisitions, design, construction, and financing of parks, recreation, and open space facilities, as needed. Payment of development impact fees would ensure the project's impacts related to parks and recreational services are reduced to less than significant levels.

Mitigation Measures: No mitigation measures are required.

#### 5) Other public facilities?

<u>Less Than Significant Impact</u>. The San Gabriel Library, located approximately 0.5-mile southwest of the project site at 500 South Del Mar Avenue, is part of the larger County of Los Angeles Public Library system. The 13,718-square foot library has a children's area, teen space, 16 public-use computers, and a meeting room.<sup>5</sup>

As discussed above, the proposed project is consistent with land uses in the area and would not result in substantial unplanned population growth. As such, the project would not increase demand for other public facilities, such as libraries; refer to Responses 4.15(a)(1) through 4.15(a)(4). In addition, the proposed executive artist space would help alleviate existing pressure on public facilities and result in beneficial impacts in regard to arts and culture in the community. Less than significant impacts would occur in this regard.

<sup>&</sup>lt;sup>4</sup> GreenPlay, LLC, *Dream Your Park – San Gabriel Parks and Open Space Master Plan*, https://www.sangabrielcity.com/DocumentCenter/View/9201/San-Gabriel---Master-Plan-Draft-2818?bidld=, February 2018.

<sup>&</sup>lt;sup>5</sup> County of Los Angeles Public Library, San Gabriel Library, http://www.colapublib.org/libs/sangabriel/, accessed March 30, 2020.



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## 4.16 RECREATION

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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?			✓	
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			~	

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

Less Than Significant Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation measures are required.

## 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?

Less Than Significant Impact. Refer to Response 4.15(a)(4).



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## 4.17 TRANSPORTATION

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			~	
b.	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	
C.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		~		
d.	Result in inadequate emergency access?		✓		

This section is primarily based upon the following technical studies (refer to <u>Appendix H</u>, <u>*Transportation Impact Study*</u> <u>and VMT Assessment</u>):

- Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California (TIS), prepared by Linscott, Law & Greenspan Engineers, dated May 6, 2020; and
- San Gabriel Self-Storage Project Vehicle Miles Travelled (VMT) Assessment (VMT Assessment), prepared by Ganddini Group, Inc., dated April 20, 2020.

# a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

#### Less Than Significant Impact.

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, which initiated a process to change transportation impact analyses completed in support of CEQA documentation. SB 743 eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, vehicle miles travelled (VMT). A VMT-based analysis is thus provided below, in Response 4.17(b). However, the City's *Traffic Study Guidelines for Development Projects in the City of San Gabriel*, dated September 26, 2006, identifies LOS as the basis for determining significant transportation impacts within the City and the City of San Gabriel General Plan has established a minimum acceptable performance standard of LOS D for designated intersections. Thus, the following analysis evaluates the project's potential to conflict with adopted LOS performance standards near the project site. The following analysis scenarios are evaluated in this section:

- Existing Conditions (2019);
- Existing (2019) Plus Project Conditions;
- Opening Year (2021) Plus Ambient, Plus Cumulative Without Project; and
- Opening Year (2021) Plus Ambient, Plus Cumulative With Project.

The TIS is based on the City of San Gabriel's traffic study requirements and is consistent with the Congestion Management Program for Los Angeles County.



#### STUDY AREA

The TIS identified the following three key intersections to analyze the performance of the project area's circulation system under existing and future traffic conditions with and without the project; refer to <u>Exhibit 4.17-1</u>, <u>Study Area</u> <u>Intersections</u>.

- 1. South San Gabriel Boulevard and Broadway (signalized);
- 2. South San Gabriel Boulevard and Commercial Avenue (stop-controlled); and
- 3. South San Gabriel Boulevard and El Monte Street (signalized).

The South San Gabriel Boulevard and Commercial Avenue intersection is currently stop-sign controlled with the stop sign facing the minor street approach on Commercial Avenue. Based on coordination with City staff, a traffic signal installation at this intersection is currently under construction and is planned to be fully operational prior to project buildout and occupancy in 2021. As such, the future opening year without project and opening year with project conditions include analysis of this intersection as a signalized intersection. Existing lane configurations at the study intersections are illustrated on TIS Figure 5-1, *Existing Lane Configurations*.

Manual traffic counts of vehicular turning movements were conducted at the study intersections during the weekday a.m. and p.m. commuter periods to determine the peak hour traffic volumes. The manual traffic counts at the study intersections were conducted in May 2019 from 7:00 a.m. to 9:00 a.m. to determine the weekday morning peak hour and from 4:00 p.m. to 6:00 p.m. to determine the weekday evening peak hour. Traffic volumes at the study intersections show the typical weekday peak periods from 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m. generally associated with the peak morning and afternoon commuter time periods, respectively.

The weekday a.m. and p.m. peak hour manual counts at the study intersections are summarized in TIS Table 6-1, *Existing Traffic Volumes Weekday AM and PM Peak Hours*. The existing peak hour traffic volumes at the study intersections are shown on TIS Figures 6-1, *Existing Traffic Volumes Weekday AM Peak Hour*, and 6-2, *Existing Traffic Volumes Weekday PM Peak Hour*, respectively.



INTERNATIONAL Source: Linscott, Law & Greenspan Engineers, 2020.

Exhibit 4.17-1



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#### INTERSECTION ANALYSIS METHODOLOGY

#### **Signalized Intersections**

Pursuant to the City's transportation study guidelines, the TIS utilizes the Intersection Capacity Utilization (ICU) method of analysis to evaluate signalized study intersections. The ICU method determines the volume-to-capacity (V/C) ratios on a critical lane basis (i.e., based on the individual V/C ratios for key conflicting traffic movements). The ICU numerical value represents the percent signal (green) time, and thus, capacity required by existing and/or future traffic volumes. The overall intersection V/C ratio is subsequently assigned a LOS value to describe intersection operations. LOS varies from LOS A (free flow) to LOS F (jammed condition). The six qualitative categories of LOS have been defined along with each corresponding ICU value range as detailed in <u>Table 4.17-1</u>, <u>Level of Service Criteria</u>.

Level of Service	Signalized Intersection V/C Ratio	Unsignalized Intersection Control Delay (seconds)
А	≤ 0.600	≤ 10.0
В	0.601 – 0.700	> 10.0 and ≤ 15.0
С	0.701 – 0.800	> 15.0 and ≤ 25.0
D	0.801 - 0.900	> 25.0 and ≤ 35.0
Ē	0.901 – 1.000	> 35.0 and ≤ 50.0
F	> 1.000	> 50.0

#### Table 4.17-1 Level of Service Criteria

Notes: V/C = volume-to-capacity ratio

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California,* May 6, 2020; refer to <u>Appendix H</u>.

#### **Unsignalized Intersections**

The methodology outlined in the *Highway Capacity Manual* (HCM) 6th edition was utilized to evaluate unsignalized study area intersections (i.e., South San Gabriel Boulevard and Commercial Avenue intersection). The HCM methodology estimates the average control delay (in seconds per vehicle) for each minor-street movement (or shared movement) as well as major-street left-turns and determines the LOS for each constrained movement; refer to Table 4.17-1.

#### INTERSECTION IMPACT CRITERIA AND THRESHOLDS

In accordance with the City's *Traffic Study Guidelines for Development Projects in the City of San Gabriel*, dated September 26, 2006, a proposed project would have a "significant impact" on intersection capacity if the project traffic causes an increase in the V/C ratio at an intersection as detailed in <u>Table 4.17-2</u>, <u>Intersection Impact Threshold Criteria</u>.

Level of Service	Final V/C Ratio	Project-Related Increase in V/C Ratio
A, B	0.600 - 0.700	≥ 0.06
С	> 7.000 – 0.800	≥ 0.04
D	> 8.000 – 0.900	≥ 0.02
E, F	> 0.900	≥ 0.01

Table 4.17-2 Intersection Impact Threshold Criteria

Notes: V/C = volume-to-capacity ratio

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California*, May 6, 2020; refer to <u>Appendix H</u>.



#### **EXISTING CONDITIONS**

#### Existing Intersections Level of Service

Existing intersection LOS calculations are based upon morning and evening peak hour turning movement counts on a typical weekday. <u>Table 4.17-3</u>, <u>Existing Conditions (2019) Level of Service</u>, presents existing LOS conditions during a typical weekday. As indicated, South San Gabriel Boulevard/Commercial Avenue is currently operating at LOS F during the weekday a.m. peak hour and LOS E during the p.m. peak hour. As previously stated, this intersection is already planned for signalization prior to the proposed project's completion and occupancy in 2021, which would improve its LOS.

Intersection		Existing Conditions			
Intersection	Hour	LOS <sup>2</sup>	Average Delay	V/C	
1 South San Cabriel Boulovard/Breadway		D		0.856	
1. South San Gabrier Boulevalu/Broadway	AM D PM D Ie <sup>1</sup> AM F	D		0.808	
2. Couth Con Cohriel Doulouard/Commercial Augmunt		F	58.8	0.573	
	PM	E	38.5	0.517	
2. Couth Con Cohrist Doulouard/El Manta Chaot		В		0.610	
	PM	А		0.577	

## Table 4.17-3Existing Conditions (2019) Level of Service

Notes: V/C = volume-to-capacity ratio; LOS = level of service

1. The South San Gabriel Boulevard/Commercial Avenue intersection is currently an unsignalized intersection. Reported delay values represent the delays associated with the most constrained approach of the intersection. It should be noted that the City has approved a traffic signal installation at this location which is planned to be fully operational prior to project buildout and occupancy year in 2021.

2. Level of Service (LOS) is based on the reported intersection capacity utilization value for signalized intersections and the delay value for unsignalized intersections.

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California*, May 6, 2020; refer to <u>Appendix H</u>.

#### Project Trip Generation

In order to accurately assess traffic conditions with the proposed project, trip generation estimates were developed for the project. Trip generation rates for the project are based on nationally recognized recommendations contained within the Institution of Transportation Engineers (ITE) *Trip Generation Manual*, 10th Edition. Traffic volumes expected to be generated by the proposed project were based upon rates per thousand square feet of gross floor area. ITE Land Use Code 151 (Mini-Warehouse) trip generation rates were used to forecast the traffic volumes expected to be generated by the proposed self-storage component of the project, and ITE Land Use Code 710 (General Office Building) trip generation rates were used to forecast the traffic volumes expected by the proposed artist studios/office and gallery space. The artist tenants would have access to their studios 24 hours a day, seven days a week. Thus, the application of the General Office Building trip generation rate is conservative since the artists would not all arrive/depart during typical weekday a.m. and p.m. peak periods.

Traffic volumes expected to be generated by the existing uses on-site were also estimated using rates published in the ITE's *Trip Generation Manual*. ITE Land Use Code 140 (Manufacturing) and Land Use Code 710 (General Office Building) trip generation rates were utilized to forecast traffic volumes expected to be generated by the existing on-site uses.



The trip generation rates and forecast of project-generated trips are presented in <u>Table 4.17-4</u>, <u>Project Trip Generation</u>. As summarized in <u>Table 4.17-4</u>, the proposed project is expected to generate a net increase of 24 vehicle trips (15 inbound trips and 9 outbound trips) during the weekday a.m. peak hour and a net increase of 36 vehicle trips (15 inbound trips and 21 outbound trips) during the weekday p.m. peak hour. In total, the project is anticipated to generate a net increase of 334 average daily trips during a typical weekday (approximately 167 inbound trips and 167 outbound trips).

Land Llas	Size	Average	AM Peak Hour			PM Peak Hour		
Land Use Size		Daily Trips	In	Out	Total	In	Out	Total
Proposed Uses								
Mini-Warehouse	100 232 CSE	288	11	Q	10	15	17	30
(ITE Land Use Code 151)	190,232 03F	200		0	19	15	17	52
Professional Office	0.126.055	88	0	2	11	2	Q	10
(ITE Land Use Code 710)	9,120 00F	00	9	2	11	2	0	10
Subtotal –	376	20	10	30	17	25	42	
Existing Uses								
Manufacturing	3 100 CSE	(12)	(2)	(0)	(2)	(1)	(1)	(2)
(ITE Land Use Code 140)	3,100 GSF	(12)	(2)	(0)	(2)	(1)	(1)	(2)
Office	3 000 CSE	(30	(2)	(1)	(4)	(1)	(2)	(1)
(ITE Land Use Code 710)	3,099 036	(50	(3)	(1)	(4)	(1)	(3)	(4)
Subtotal – Existing Uses		(42)	(5)	(1)	(6)	(2)	(4)	(6)
NET TOTAL PROJECT TR	PS	344	15	9	24	15	21	36

#### Table 4.17-4 Project Trip Generation

Notes: GSF = gross square feet

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California*, May 6, 2020; refer to <u>Appendix H</u>.

Arrival and departure distribution patterns for project-generated traffic were derived based on the site's proximity to major corridors (e.g., South San Gabriel Boulevard, Las Tunas Drive, and Mission Road); expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals; existing intersection traffic volumes; proposed site ingress/egress circulation; and input from City staff.

For intersections located outside of the traffic analysis study area, the project traffic distribution is expected to continue to disperse the greater the distance from the project site. The general, directional traffic distribution patterns for the proposed project is presented in TIS Figure 8-1, *Project Trip Distribution*. The net new forecast project weekday a.m. and p.m. peak hour traffic volumes at the study intersections are presented in TIS Figures 8-2, *Net Total Project Traffic Volumes Weekday AM Peak Hour*, and 8-3, *Net Total Project Traffic Volumes Weekday PM Peak Hour*, respectively.

#### Existing (2019) Plus Project Conditions

As shown in <u>Table 4.17-5</u>, <u>Existing (2019) Plus Project Level of Service</u>, existing plus project conditions were forecast based on the addition of project-generated average daily trips to existing traffic volumes.



Interpretion	Peak Existing Conditions (2019)			Existing (2019) Plus Project		
Intersection	Hour	V/C or Delay	LOS <sup>2</sup>	V/C or Delay	LOS <sup>2</sup>	
1. South San Gabriel	AM	0.856	D	0.859	D	
Boulevard/Broadway	PM	0.808	D	0.813	D	
2. South San Gabriel	AM	0.573		0.586		
	PM	0.517		0.534		
Boulevard/Commercial Avenue <sup>1</sup>	AM	58.8 seconds	F	88.5 seconds	F	
	PM	38.5 seconds	E	67.8 seconds	F	
3. South San Gabriel Boulevard/El	AM	0.610	В	0.612	В	
Monte Street	PM	0.577	A	0.580	A	

 Table 4.17-5

 Existing (2019) Plus Project Level of Service

Notes: V/C = volume-to-capacity ratio; LOS = level of service

1. The South San Gabriel Boulevard/Commercial Avenue intersection is currently an unsignalized intersection. Reported delay values represent the delays associated with the most constrained approach of the intersection. It should be noted that the City has approved a traffic signal installation at this location which is planned to be fully operational prior to project buildout and occupancy year in 2021.

2. LOS is based on the reported intersection capacity utilization value for signalized intersections and the delay value for unsignalized intersections.

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California*, May 6, 2020; refer to <u>Appendix H</u>.

As presented, the following study intersection is anticipated to operate at LOS F under existing plus project conditions:

• Intersection No. 2: South San Gabriel Boulevard/Commercial Avenue (a.m. and p.m. peak hours)

However, as previously stated, this intersection will be improved with a traffic signal prior to project buildout, which would improve overall delay and LOS. Thus, based on established performance standards for LOS, the project would not conflict with an adopted plans or policies since it would not result in a significant traffic impact at the study intersections under existing plus project conditions.

#### Future Traffic Conditions

#### Ambient Growth

In order to account for area-wide regional ambient growth, existing traffic volumes were increased at an annual rate of 0.82 percent to the project's buildout year of 2021. The ambient growth factor is based on general traffic growth factors provided in the Los Angeles County Metropolitan Transportation Authority (Metro) 2010 Congestion Management Program for Los Angeles County (2010 CMP).

#### Cumulative Projects

A forecast of future traffic conditions without the project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. With this information, the potential impact of the proposed project can be evaluated within the context of the cumulative impact of all ongoing development. The list of related projects was based on information provided by the City of San Gabriel Community Development Planning Division and the Los Angeles County Department of Regional Planning. The related projects included in this analysis are presented in TIS Table 7-1, *Related Projects List and Trip Generation*, and shown on Figure 7-1, *Location of Related Projects*.



Traffic volumes expected to be generated by the related projects were calculated using rates provided in the ITE *Trip Generation Manual*. The related projects' respective trip generation for the weekday a.m. and p.m. peak hours, as well as total average daily trips for a typical weekday, is also summarized in TIS Table 7-1, *Related Projects List and Trip Generation*. The anticipated distribution of the related projects traffic volumes to the study intersections during the weekday a.m. and p.m. peak hours are displayed in TIS Figures 7-2, *Related Projects Traffic Volumes Weekday AM Peak Hour*, and 7-3, *Related Projects Traffic Volumes Weekday PM Peak Hour*, respectively.

#### Opening Year (2021) Without Project Conditions

The opening year (2021) without project conditions were forecast based on the addition of traffic expected to be generated by related projects and ambient growth in traffic due to the combined effects of continuing development, intensification of existing developments, and other factors, to existing traffic volumes; refer to <u>Table 4.17-6</u>, <u>Opening</u> <u>Year (2021) Without and With Project Level of Service</u>.

Interportion	Peak	Opening Year (2021) Without Project		Opening Y With P	ear (2021) roject	V/C or	Significant	
mersection	Hour	V/C or Delay	LOS <sup>2</sup>	DS <sup>2</sup> V/C or Delay LOS <sup>2</sup>		Change	Impact?3	
1. South San Gabriel Boulevard/	AM	0.944	E	0.948	E	0.004	No	
Broadway	PM	0.942	E	0.947	E	0.005	No	
2. South San Gabriel Boulevard/	AM	0.614	В	0.624	В	0.010	No	
Commercial Avenue <sup>1</sup>	PM	0.573	А	0.586	А	0.013	No	
3. South San Gabriel Boulevard/	AM	0.660	В	0.663	В	0.003	No	
El Monte Street	PM	0.641	В	0.645	В	0.004	No	

 Table 4.17-6

 Opening Year (2021) Without and With Project Level of Service

Notes: V/C = volume-to-capacity ratio; LOS = level of service

1. The South San Gabriel Boulevard/Commercial Avenue intersection is currently an unsignalized intersection. Reported delay values represent the delays associated with the most constrained approach of the intersection. It should be noted that the City has approved a traffic signal installation at this location which is planned to be fully operational prior to project buildout and occupancy year in 2021.

2. LOS is based on the reported intersection capacity utilization value for signalized intersections and the delay value for unsignalized intersections.

3. The City of San Gabriel's intersection impact threshold criteria is as follows:

Final V/C	LOS	Project-Related Increase in V/C
≥ 0.600 – 0.700	A, B	≥ 0.06
≥ 0.700 – 0.800	С	≥ 0.04
≥ 0.800 – 0.900	D	≥ 0.02
> 0.900	E, F	≥ 0.01

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California,* May 6, 2020; refer to <u>Appendix H</u>.

As presented, the following study intersection is expected to operate at LOS E under opening year (2021) without project conditions:

• Intersection No. 1: South San Gabriel Boulevard/Broadway (a.m. and p.m. peak hours)



#### Opening Year (2021) With Project Conditions

Anticipated project-generated trips were added to the opening year 2021 without project conditions. As shown in <u>Table 4.17-6</u>, application of the City's thresholds of significance indicates that the proposed project would not result in any significant impacts at the three study area intersections. Incremental, but less than significant, impacts are noted at each intersection. Opening year 2021 with project traffic volumes at the study intersections during the weekday a.m. and p.m. peak hours are illustrated on TIS Figures 10-5, *Future With Project Traffic Volumes Weekday AM Peak Hour*, and 10-6, *Future With Project Traffic Volumes Weekday PM Peak Hour*, respectively. Overall, impacts in this regard would be less than significant.

#### CMP Analysis

According to the 2010 CMP, the criteria for determining a significant transportation impact is when the proposed project increases traffic demand on a CMP facility by two percent of capacity (V/C > 0.02), causing or worsening LOS F (V/C > 1.00). The CMP impact criteria apply for both intersection and freeway monitoring locations.

#### Intersections

Based on the TIS, the following CMP intersection monitoring locations are located in the project vicinity:

- No. 131: Rosemead Boulevard/Valley Boulevard; and
- No. 146: Rosemead Boulevard/Las Tunas Drive.

The 2010 CMP requires that intersection monitoring locations be examined if the proposed project would add 50 or more trips during either the a.m. or p.m. weekday peak hours. As detailed in <u>Table 4.17-4</u>, the proposed project would not add 50 or more trips during either the weekday a.m. or p.m. peak hours at either of the two CMP monitoring intersections in the project vicinity. The project is forecast to result in the addition of, at most, 24 net new trips during the weekday a.m. peak hour, which is below the CMP trip threshold of 50 peak hour trips. Therefore, the project would result in less than significant impacts to CMP intersections in the project vicinity.

#### Freeways

The following CMP freeway monitoring locations are located in the project vicinity:

- No. 1015: I-10 at Atlantic Boulevard; and
- No. 1016: I-10 at Rosemead Boulevard.

The 2010 CMP requires that freeway monitoring locations be examined if the proposed project would add 150 or more trips (in either direction) during either the a.m. or p.m. weekday peak hours. As summarized in <u>Table 4.17-4</u>, the project is anticipated to generate, at most, 24 net new trips during the weekday a.m. peak hour and 36 net new trips during the weekday p.m. peak hour, which is below the 150 peak hour trips threshold. As such, impacts in this regard would be less than significant.

#### Transit Facilities

Public bus transit services within the project study area are currently provided by Metro and the City of Montebello bus lines. The nearest bus stops to the project site are located approximately 0.5-mile north and south of the project site near the intersections of South San Gabriel Boulevard/Las Tunas Drive and South San Gabriel Boulevard/Mission


Road. A summary of the existing transit services, including the transit routes, destinations, and peak hour headways is presented in TIS Table 5-2, *Existing Transit Routes*, and illustrated on TIS Figure 5-2, *Existing Transit Routes*.

As required by the 2010 CMP, the TIS evaluated the project's potential impacts on existing transit service in the project area. The estimated project trip generation detailed in <u>Table 4.17-4</u> was adjusted by values set forth in the 2010 CMP to estimate transit trip generation (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips). Based on these guidelines, the proposed project is forecast to generate demand for approximately two net new transit trips during the weekday a.m. peak hour and two net new transit trips during the weekday period, the proposed project is forecast to generate demand for approximately 17 net new average daily transit trips.

As shown in TIS Table 5-2, three bus transit lines are provided adjacent to or in close proximity to the project site. These transit lines provide services for an average of approximately 15 buses during the a.m. peak hour and 17 buses during the p.m. peak hour. Therefore, based on the project's calculated weekday a.m. and p.m. peak hour transit trips, this would correspond to no more than one additional transit rider per bus. As such, it is anticipated that existing transit service in the project area would be able to adequately accommodate the increase in project-generated transit trips. Thus, project impacts on existing and future transit services in the project area are expected to be less than significant.

# **Bicycle Facilities**

Bicycle access to the project site is facilitated by the City's bicycle roadway network. Walk Score calculates a Bike Score for a specific area based on the topography and number and proximity of bicycle lanes, among others. Based on these criteria, the project site has a Bike Score of approximately 58 (Bikeable) out of 100. Existing and proposed bicycle facilities (e.g., Class I Bicycle Path, Class II Bicycle Lanes, Class III Bicycle Routes, and Enhanced Class III Bicycle Boulevard) are identified in the *San Gabriel Valley Regional Bicycle Master Plan*, which was established to guide the development and maintenance of the bicycle network within the City and other cities within the San Gabriel Valley. The location of existing and proposed bicycle facilities in the site vicinity are illustrated on TIS Figure 3-1, *Existing and Proposed Bikeway Facilities*. As shown, South San Gabriel Boulevard is identified as a proposed Class III bicycle route.

Use of bicycles as a transportation mode to and from the project site is encouraged by the project's provision of ample and safe bicycle parking. One long-term and two short-term bicycle spaces would be provided in a readily accessible location on-site adjacent to the proposed building. Appropriate lighting would also be installed to increase safety and provide theft deterrent during night-time parking. Overall, development of the project would not conflict with existing and planned bicycle facilities within San Gabriel and would provide long- and short-term bicycle spaces on-site. As such, the project would not conflict with a program plan, ordinance, or policy addressing the City's bicycle network.

## **Pedestrian Facilities**

The project has been designed to encourage pedestrian activity and walking as a transportation mode. Walkability is defined as the extent to which walking is readily available as a safe, connected, accessible, and pleasant mode of transport. There are several criteria that are widely accepted as key aspects of the walkability of urban areas that should be satisfied. The underlying principle is that pedestrians should not be delayed, diverted, or placed in danger. The widely-accepted primary characteristics of walkability include:

- Connectivity: People can walk from one place to another without encountering major obstacles, obstructions, or loss of connectivity.
- Convivial: Pedestrian routes are friendly and attractive, and are perceived as such by pedestrians.

- Conspicuous: There are suitable levels of lighting, visibility, and surveillance over the entire length of the route, with high-quality delineation and signage.
- Comfortable: High-quality and well-maintained footpaths of suitable widths, attractive landscaping and architecture, shelter and rest spaces, and a suitable allocation of road space to pedestrians.
- Convenient: Walking is a realistic travel choice, partly because of the impact of the other criteria set forth above, but also because walking routes are of a suitable length as a result of land use planning with minimal delays.

A review of the project's pedestrian walkway network indicates that these five primary characteristics are accommodated. The interior of the project is planned to provide a combination of landscape and hardscape that facilitates internal accessibility as well as external connectivity to a broad range of uses beyond its boundaries. The project is situated adjacent and accessible to nearby commercial uses (e.g., retail, cafes, and restaurants) and other amenities along South San Gabriel Boulevard, as well as nearby transit stops and adjacent sidewalks on South San Gabriel Boulevard. Additionally, the project proposes a 25-foot roadway dedication for sidewalk installation along the west side of Gladys Avenue along the eastern project frontage. As such, development of the project would not conflict with a program plan, ordinance, or policy addressing the City's pedestrian network.

Mitigation Measures: No mitigation measures are required.

# b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. As discussed, SB 743 eliminates LOS as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, VMT. As a result, the State is shifting from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation.

The VMT Analysis follows the CEQA guidance for determining transportation impacts in accordance with SB 743. The City adopted VMT as a metric to evaluate transportation impacts on July 7, 2020. The City's VMT metric and thresholds are generally consistent with the approach provided in the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), dated December 2018. The Technical Advisory provides the following potential screening criteria for certain land development projects that may be presumed to result in a less than significant VMT impact:

- Local-serving retail less than 50,000 square feet, schools, daycare, student housing, etc.;
- Small projects generating less than 110 trips per day;
- Residential and office projects located in areas with low VMT;
- Projects near transit stations or major transit stop; and
- Residential projects with a high percentage of affordable housing.

For mixed-use projects, the Technical Advisory recommends that lead agencies can evaluate each component of a mixed-use project independently and apply the thresholds of significance for each land use. Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, a project should take credit for internal capture.

<u>Table 4.17-7</u>, <u>Trip Generation Comparison with State-Recommended VMT Screening Criteria</u>, shows the trip generation comparison of the two project components (i.e., Mini Warehouse/Self-Storage and General Office Building)



with the following two land uses that may be presumed to result in a less than significant VMT impact. An analysis of the two screening criteria are provided below.

- Local-serving retail less than 50,000 square feet; and
- Small projects generating less than 110 trips per day.

## Table 4.17-7 Trip Generation Comparison with State-Recommended VMT Screening Criteria

		/	AM Peak Ho	ur	PM Peak Hour			Average
Land Use	Size	In	Out	Total	In	Out	Total	Daily Trips
Local-Serving Retail Less That	n 50,000 Squar	e Feet						
Mini-Warehouse <sup>1</sup> (ITE Land Use Code 151)	190,232 SF	11	8	19	15	17	32	287
Shopping Center/Retail (ITE Land Use Code 820)	50,000 SF	29	18	47	92	99	191	1,888
Trip Difference		-18	-10	-28	-77	-82	-159	-1,601
Small Projects Generating Less Than 110 Trips Per Day								
Professional Office <sup>1</sup> (ITE Land Use Code 710)	9,126 SF	9	1	10	2	9	11	89
Small Project Generating Less Than 110 Daily Trips			110					
Trip Difference								-21

Notes: SF = square feet

1. The a.m. and p.m. peak hour trips and average daily trips detailed in this table compared to <u>Table 4.17-4</u> are slightly different due to rounding.

Source: Ganddini Group, Inc., San Gabriel Self-Storage Project Vehicle Miles Travelled (VMT) Assessment, April 20, 2020; refer to Appendix H.

# Local-Serving Retail Less Than 50,000 Square Feet

As noted in the Technical Advisory, new retail development typically redistributes shopping trips rather than creating new trips. By adding retail opportunities into the urban fabric and thereby improving proximity, local-serving retail tends to shorten trips and reduce VMT. Similarly, the proposed project would improve the proximity of self-storage facilities within the community, thereby shortening travel distances and reducing VMT.

VMT Assessment Figure 1, *Location of Existing Self Storage Facilities*, shows a map of existing self-storage facilities in the project vicinity. As shown, the majority of existing self-storage facilities are located south of the project site closer to Interstate 10. The proposed project is located further north and would improve proximity of self-storage facilities for the areas of northern San Gabriel, San Marino, Temple City, and Arcadia. Therefore, the proposed self-storage facility is anticipated to shorten trips and would have VMT characteristics similar to a local-serving retail use.

Although the proposed self-storage component of the project is greater than 50,000 square feet, much of the area would be utilized for passive storage of personal items and the project generates much fewer trips than 50,000 square feet of typical retail use. As shown in <u>Table 4.17-7</u>, the proposed self-storage component of the proposed project is forecast to generate approximately 1,601 fewer daily vehicle trips than a typical 50,000-square foot local-serving retail development. Therefore, the self-storage component of the proposed project can be presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trips, similar to local-serving retail developments.



# Small Projects Generating Less Than 110 Trips Per Day

As noted in the Technical Advisory, CEQA Guidelines Section 15301(e)(2) provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110 to 124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips can be considered a less than significant impact.

Additionally, early adopters of the VMT metric are using similar or slightly higher thresholds for small projects. The cities of Santa Ana and San Jose, for example, have adopted a screening threshold for small infill projects based on 110 average daily trips. The City of Los Angeles has established a screening threshold for projects that generate fewer than 250 net average daily trips. The San Diego Section of the ITE recommends a screening threshold as high as 1,000 average daily trips for projects that are consistent with a General Plan or Community Plan, or 500 average daily trips for projects that are inconsistent with a General Plan or Community Plan.

As shown in <u>Table 4.17-7</u>, the office component of the proposed project (i.e., artist studio/office and gallery space) is forecast to generate 89 average daily trips. Therefore, this component of the proposed project can be presumed to result in a less than significant VMT impact based on State guidance, since it would generate fewer than 110 average daily trips.

## Conclusion

The trip generation forecasts for the proposed project are conservative in that they do not take into account potential internal capture between the self-storage and the artist studio/office components of the proposed project. The estimated project trip generation could be even lower if any artist studio/office space tenants also rent an on-site self-storage unit for storing extra supplies or equipment.

Overall, the self-storage component of the proposed project is presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trips, similar to local-serving retail developments. Similarly, the artist studio/office and gallery space component of the proposed project can be presumed to result in a less than significant VMT impact based on State guidance because it is forecast to generate fewer than 110 average daily trips. As such, impacts in this regard would result in less than significant impacts.

Mitigation Measures: No mitigation measures are required.

# c) 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 with Mitigation Incorporated.

## Construction

The project has the potential to result in safety hazards during the short-term construction process. Partial and full lane closures may be required for a limited period of time during materials delivery and water connection, respectively. During periods when partial or full lane closures are required, the applicant would be required to implement a temporary Traffic Management Plan (TMP) to minimize congestion and safety impacts during the construction process; refer to Mitigation Measure TRA-1. The TMP would include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and use of construction flagperson(s) to direct traffic during



heavy equipment use, among others. The TMP would provide congestion relief during short-term construction activities and ensure safe travel. Thus, with implementation of Mitigation Measure TRA-1, construction-related impacts in this regard would be less than significant.

# Operations

Existing vehicular access to the site is provided along a number of existing curb cuts on the north side of Commercial Avenue and the east side of South San Gabriel Boulevard along the project frontages. These driveways provide access to the existing commercial uses and surface parking lot.

The project proposes to combine a number of the curb cuts along South San Gabriel Boulevard and Commercial Boulevard. Overall, vehicular access to the site would be accommodated via three driveways constructed to meet City design standards. The planned site access points are described below:

- <u>South San Gabriel Boulevard Driveway</u>. The South San Gabriel Boulevard driveway would be located along the east side of San Gabriel Boulevard along the western project frontage. This 25-foot wide driveway would accommodate full access (i.e., left-turn and right-turn ingress and egress movements).
- <u>Commercial Avenue Driveway</u>. The Commercial Avenue driveway is proposed along the north side of Commercial Avenue along the project's southern frontage. This 30-foot wide driveway is planned to accommodate full access (i.e., left-turn and right-turn ingress and egress movements).
- <u>Gladys Avenue Driveway</u>. The Gladys Avenue driveway would be located along the west side of Gladys Avenue approximately mid-way along the project's eastern frontage. This 25-foot wide driveway is planned to accommodate full access (i.e., left-turn and right-turn ingress and egress movements). Additionally, based on coordination with the City of San Gabriel Department of Public Works – Engineering Division, a 25-foot roadway dedication along the west side of Gladys Avenue along the eastern project frontage is also proposed for sidewalk installation.

## Intersection Sight Distance Analysis

A sight distance analysis was conducted to evaluate the adequacy of sight distance at the project driveway intersections with South San Gabriel Boulevard and Commercial Avenue, which are planned to serve as the project's primary access points. The critical sight distance was determined to be between exiting vehicles and vehicles traveling on South San Gabriel Boulevard and Commercial Avenue. Specifically, the sight distance analysis determines the adequacy of motorists' lines of sight and focuses on the northbound and southbound approaching vehicles on South San Gabriel Boulevard and the eastbound and westbound approaching vehicles on Commercial Avenue as well as the exiting left-turn and right-turn vehicles at these two driveways (i.e., intersection sight distance).

The sight distance analysis is based on the criteria set forth in the American Association of State Highway and Transportation Officials' (AASHTO) *A Policy on Geometric Design of Highways and Streets*. Stopping sight distance is the distance that a driver of a vehicle, traveling at a certain speed, is able to bring the vehicle to a stop after an object on the road becomes visible. Sight distance is also provided for intersections (including private streets and driveways) to allow the drivers of stopped vehicles a sufficient view of the intersecting roadway to decide when to enter the intersecting roadway or to cross it. If available sight distance for an entering or crossing vehicle is at least equal to the appropriate stopping sight distance for the major roadway, then drivers have sufficient sight distance to anticipate and avoid collisions.

According to the AASHTO, a design speed of 30 mph would require a minimum stopping sight distance of 200 feet and an intersection sight distance of 335 feet for passenger vehicles. Additionally, a design speed of 40 mph would require a minimum stopping sight distance of 305 feet and an intersection sight distance of 445 feet for passenger vehicles. It



is noted that the sight distance values summarized in the AASHTO document are for a stopped vehicle to turn left onto a two-lane highway without a median.

South San Gabriel Boulevard provides two travel lanes in each direction along with a left-turn lane along the project's frontage and is posted for a speed limit of 35 miles per hour (mph) in the area. Therefore, adjustments were made to account for the additional lane and the left-turn lane for this portion of San Gabriel Boulevard. No adjustments were necessary for Commercial Avenue. As such, the minimum intersection sight distances of 500 feet and 335 feet for passenger vehicles were utilized for the sight distance analyses for South San Gabriel Boulevard and Commercial Avenue, respectively.

Exhibit 4.17-2, Intersection Sight Distance at Project Driveways, provides a conceptual plan of the proposed primary driveways with the adjacent street system and displays the minimum required intersection sight distances. As shown, when an exiting vehicle (i.e., front bumper) is set back such that 15 feet exists between the edge of the travel way to the motorists' eye at the project driveway, a line of sight meeting the minimum intersection sight distance currently exists for the most critical scenario (i.e., a left-turn from stop). The line of sight should be clear of any tall landscaping, signage, or objects greater than 36 inches in height so as to maintain a clear line of sight between exiting vehicles and oncoming vehicles. As shown on Exhibit 4.17-2, an adequate line is sight is provided for northbound and southbound vehicles approaching the South San Gabriel Boulevard project driveway.

Based on a design speed of 30 mph, the existing intersection sight distance along Commercial Avenue also currently meets the minimum intersection sight distance for exiting vehicles and oncoming westbound (approaching) vehicles on Commercial Avenue. While the intersection sight distance of less than 335 feet is provided for the oncoming eastbound (approaching) vehicles on Commercial Avenue, these vehicles would be controlled by the new traffic signal installation at the intersection of South San Gabriel Boulevard and Commercial Avenue and thus, would not be traveling at posted speeds just east of South San Gabriel Boulevard.

In order to maintain the clear lines of sight at the project driveways, Mitigation Measure TRA-2 would require the line of sight at the two primary driveway intersections are cleared of any tall landscaping, signage, or objects greater than 36 inches in height. Additionally, Mitigation Measure TRA-2 would require the installation of red curb markings and signage along the following roadway segments to remove on-street parking: 1) along the north side of Commercial Avenue between the adjacent property's driveway and the project driveway, and 2) along the east side of South San Gabriel Boulevard between Commercial Avenue and the northern project boundary. With the maintenance of line of sight and removal of on-street parking along these portions, adequate intersection sight distances would be provided between exiting vehicles at the project driveways and oncoming (approaching) vehicles on South San Gabriel Boulevard and Commercial Avenue.



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Intersection Sight Distance at Project Driveways

Source: Linscott, Law & Greenspan Engineers, 2020.

Exhibit 4.17-2



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## Vehicle Queuing Analysis

A vehicle queuing analysis was also prepared to evaluate the project's potential queuing impacts on adjacent roadways, specifically, the southbound left-turn movement on South San Gabriel Boulevard into the site and the eastbound left-turn movement on Commercial Avenue into the site. Due to the potential conflict with the existing southbound left-turn lane extending along the project frontage from the South San Gabriel Boulevard/Commercial Avenue intersection, no project trips are assigned to the southbound left-turn movement at the South San Gabriel Boulevard project driveway. As such, this analysis focuses on the evaluation of the eastbound left-turn movement at the Project Driveway/Commercial Avenue intersection.

In forecasting future vehicle queues, the queuing analysis software considers traffic volume data, lane configurations, and available vehicle storage lengths for the respective traffic movements. For purposes of this analysis, it is assumed that the Project Driveway/Commercial Avenue intersection would operate as a two-way stop-controlled intersection, with a stop sign facing the minor street approach (i.e., project driveway).

The analysis uses the opening year 2021 with project traffic volume forecasts to determine the 95th percentile vehicle queue. The 95th percentile queue is defined as the maximum back of vehicle queue with 95th percentile traffic volumes. <u>Table 4.17-8</u>, <u>Project Driveways Vehicle Queuing Analysis</u>, provides a summary of vehicle queuing anticipated at the project's driveway during the weekday a.m. and p.m. peak hours. Based on this analysis, vehicle queuing is expected to be fully accommodated at each of the project's main driveways.

	Dook	Available	Opening Year (2021) With Project		
Location	Hour Storage <sup>1</sup> (feet)		95th Percentile Queue <sup>2</sup> (feet)	Exceeds Storage?	
Project Driveway/South San Gabriel Boulevard	AM		0	No	
(southbound left-turn) <sup>3</sup>	PM		0	No	
Project Driveway/Commercial Avenue	AM	160	25	No	
(eastbound left-turn)	PM	160	25	No	

Table 4.17-8Project Driveways Vehicle Queuing Analysis

Notes:

1. Available storage measured via Google Earth aerial imagery dated March 2018.

2. The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. An average vehicle length of 25 feet (including vehicle separation) was assumed for analysis purposes. A minimum of 25 feet (i.e., one vehicle) was reported for queues of less than 25 feet.

3. Due to the conflict with the existing southbound left-turn lane extending along the project frontage from the South San Gabriel Boulevard/Commercial Avenue intersection, no project trips are assigned to the southbound left-turn ingress movement at the project driveway on South San Gabriel Boulevard.

Source: Linscott, Law & Greenspan Engineers, *Transportation Impact Study San Gabriel Self-Storage Project, City of San Gabriel, California*, May 6, 2020; refer to <u>Appendix H</u>.

## **Conclusion**

Based on the intersection sight distance and vehicle queuing analyses, long-term operational project activities would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections). The project also would not introduce any incompatible uses to the project area. Upon implementation of Mitigation Measure TRA-2, operational impacts in this regard would be reduced to less than significant levels.



# Mitigation Measures:

- TRA-1 Prior to project construction initiation, the project applicant shall prepare a Traffic Management Plan (TMP) for approval by the City of San Gabriel Traffic Engineer. The TMP shall include measures to minimize potential safety impacts during the short-term construction process if partial or full lane closures are be required. The TMP shall specify that one direction of travel in each direction on adjacent roadways (i.e., South San Gabriel Boulevard and Commercial Avenue) must always be maintained during project construction activities. If full lane closures are required and one direction of travel in each direction cannot be maintained, the TMP shall identify planned detours. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and use of construction flagperson(s) to direct traffic during heavy equipment use. The TMP shall be incorporated into project specifications for verification prior to final plan approval.
- TRA-2 Prior to issuance of a building permit, the project Applicant shall include on final project design plans the installation of red curb markings and signage along the following segments: 1) along the north side of Commercial Avenue between the adjacent property's driveway and the project driveway, and 2) along the east side of South San Gabriel Boulevard between Commercial Avenue and the northern project boundary, to remove on-street parking and maintain clear lines of sight at the project's primary driveways. The entrances to the South San Gabriel Boulevard and Commercial Avenue driveways shall also be cleared of any tall landscaping, signage, or objects greater than 36 inches in height so as to maintain a clear line of sight between exiting vehicles and oncoming vehicles. The design plans shall be verified by the City of San Gabriel Traffic Engineer during final plan check review.

## d) Result in inadequate emergency access?

Less Than Significant Impact With Mitigation Incorporated. According to the General Plan, the City's *Multi-Hazard Functional Plan* establishes tactics to address local and regional hazards. Since 1989, the City has operated an Emergency Operation Center (EOC) located at 1303 South Del Mar Avenue to function as the central command post in the event of a disaster.

As stated, the project site would have a total of three driveways, one driveway each along South San Gabriel Boulevard, Commercial Avenue, and Gladys Avenue. All ingress/egress points would comply with City design standards and would provide adequate site distance and vehicle queuing storage. Further, should partial or full lane closures be required as part of project construction activities, implementation of a TMP would minimize congestion and ensure safe travel, including emergency access in the project vicinity; refer to Mitigation Measure TRA-1. As a result, project implementation would not interfere with the circulation of nearby roadways or implementation of the *Multi-Hazard Functional Plan*. Impacts would be less than significant in this regard.

Mitigation Measures: Refer to Mitigation Measure TRA-1.



# 4.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
<ol> <li>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</li> </ol>				~
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		1		

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this Initial Study.



- 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:
- 1) 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)?

<u>No Impact</u>. As detailed in Response 4.5(a), no historic resources listed or eligible for listing in a State or local register of historical resources are located on the project site. Therefore, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. In compliance with AB 52, the City of San Gabriel distributed letters notifying each tribe that requested to be on the City's list for the purposes of AB 52 of the opportunity to consult with the City regarding the proposed project. The letters were distributed by certified mail on March 31, 2020. The tribes had 30 days to respond to the City's request for consultation. The Gabrieleño Band of Mission Indians-Kizh Nation tribal representative replied within the 30 days requesting consultation and the City consulted with the tribe on June 4, 2020.

The Gabrieleño Band of Mission Indians – Kizh Nation indicated that the project site is located within the vicinity of known tribal cultural resources. However, no specific known tribal cultural resources were identified at the project site. As such, the project site is sensitive for unknown tribal cultural resources. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities, Mitigation Measure TCR-1 would ensure a qualified Native American Monitor is present during site disturbance activities. If evidence of potential subsurface tribal cultural resources is found during ground disturbing activities, Mitigation Measure TCR-1 would ensure that activities in the vicinity of the find are halted, appropriate parties are notified, and appropriate evaluation and treatment of said resource(s). With implementation of Mitigation Measure TCR-1, impacts would be reduced to less than significant levels.

# Mitigation Measures:

TCR-1 Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians-Kizh Nation (the "Tribe" or the "Consulting Tribe"). Within 3 to 5 days of commencement of ground disturbing activities, the project applicant, or designee, shall provide a letter from the Native American Monitor, stating that they have been retained for the purposes of this mitigation measure, to the City of San Gabriel Planning and Building Department. The Tribal monitor shall be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor will complete daily monitoring logs, to be submitted to the City of San Gabriel Planning and Building Department, that include descriptions of the day's activities (i.e., construction activities, locations, soil, and any cultural materials identified). The on-site monitoring shall end when all ground-disturbing



activities for the project are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the Native American Monitor and the qualified archaeologist (defined in Mitigation Measure CUL-1). If the resources are Native American in origin, the Native American Monitor shall identify the appropriate Consulting Tribe and such Tribe will retain the resource(s) in the form and/or manner the Tribe deems appropriate (e.g., for educational, cultural, and/or historic purposes).

Upon discovery of human remains, the Native American Monitor and/or qualified archaeologist (Mitigation Measure CUL-1) shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The Native American Monitor shall then notify the Tribe, the qualified lead archaeologist, and the construction manager who shall notify the County coroner per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the Native American Heritage Commission (NAHC) as mandated by State law who shall then appoint a Most Likely Descendent (MLD).



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# 4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			~	
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
C.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			~	
e.	Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?			✓	

# a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

## Water

The project site is served by the San Gabriel County Water District (SGCWD). The project would eliminate seven of the existing water laterals along South San Gabriel Boulevard, Commercial Avenue, and South Gladys Avenue and would install a new 2-inch potable water backflow preventer (BFP) and service line to connect to an existing SGCWD-owned water mainline aligned in South San Gabriel Boulevard. The project would also install a 1-inch irrigation water BFP and an 8-inch fire service line to connect to existing water mainlines within South San Gabriel Boulevard and South Gladys Avenue, respectively. Payment of standard SGCWD water connection fees and ongoing user fees would ensure the project's impacts on existing water facilities are adequately offset. The proposed project is consistent with with land uses anticipated for the area and would not induce substantial unplanned population growth; refer to <u>Section 4.11</u>, <u>Land Use and Planning</u>, and <u>Section 4.14</u>, <u>Population and Housing</u>. Thus, it is not anticipated that project implementation would require construction of new or the expansion of existing water facilities. Less than significant impacts would occur in this regard.



# Wastewater Treatment

The Sanitation Districts of Los Angeles County (Districts) would provide sewer services to the project site. The project would install a 6-inch sewer line to connect to an existing Districts-owned sewer mainline aligned in South San Gabriel Boulevard. Wastewater generated in the City of San Gabriel is treated by either the Districts' Whittier Narrows Water Reclamation Plant (WRP) located near the City of South El Monte, the Los Coyotes WRP located in the City of Cerritos, or the San Jose Creek WRP located adjacent to the City of Industry. The Whittier Narrows WRP has a capacity of 15 million gallons per day (mgd); the Los Coyotes WRP has a capacity of 37.5 mgd; and the San Jose Creek WRP has a capacity of 100 mgd. All three WRPs belong to the Districts' integrated network of facilities known as the Joint Outfall System.<sup>1</sup> Biosolids and wastewater flows that exceed the capacity of the these upstream WRPs are diverted to and treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 mgd.

As a self-storage facility with executive artist space, the project is not anticipated to generate substantial sources of additional wastewater above existing conditions. Nonetheless, the proposed project would be required to pay sewer connection fees and ongoing user fees. In addition, SGMC Section 154.002, *Sanitary Sewer Impact Fee*, imposes a development impact fee on all new development in the City to fund a project's fair share of costs to upgrade the City's sewer system. As the project is consistent with the land use designation for the area, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities. Payment of development impact fee, standard sewer connection fees, and ongoing user fees would ensure the project's impacts on existing wastewater facilities are adequately offset.

# Stormwater

The project's proposed drainage pattern would sheet flow via v-gutters aligned within project's internal drive aisles to the project's low point, where a curb inlet would collect the low-flow and pipe it to a proposed infiltration drywell at the southwest corner of the Commercial Avenue project driveway. Flows in excess of the infiltration drywell's capacity would discharge via parkway drain to Commercial Drive, which functions as a tributary to Rubio Wash; refer to <u>Section</u> <u>4.10</u>, <u>Hydrology and Water Quality</u>.

The project's potential environmental impacts for construction of the abovementioned stormwater drainage improvements are analyzed in this Initial Study. Construction of the new storm drain improvements would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures in this Initial Study. Compliance with the relevant laws, ordinances, and regulations, as well as the specified mitigation measures, would ensure the project's construction-related environmental impacts associated with the proposed storm drain improvements are considered less than significant.

# **Dry Utilities**

The project would result in the construction of new private on-site dry utilities associated with electricity and telecommunications; however, payment of standard utility connection fees and ongoing user fees would ensure impacts to these utility services are adequately offset. Additionally, the project's potential environmental effects for construction are analyzed throughout this Initial Study. Construction of the project's dry utilities would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures

<sup>&</sup>lt;sup>1</sup> Los Angeles County Sanitation Districts, *Joint Outfall System Water Reclamation Plants*, https://www.lacsd.org/services/wastewater/wwfacilities/joint\_outfall\_system\_wrp/default.asp, accessed March 31, 2020.



throughout this Initial Study. Compliance with the relevant laws, ordinances, and regulations would ensure the project's construction-related environmental impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

# b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As stated in Response 4.19(a), the project site is served by SGCWD. According to SGCWD's 2015 Urban Water Management Plan (UMWP), the SGCWD depends primarily on groundwater supplies from the Main San Gabriel Basin (approximately 90 percent) and Raymond Basin (approximately 10 percent) as its existing and planned source of water supply.<sup>2</sup> According to the UWMP, SGCWD would be capable of providing adequate water supply to its service area under a normal supply and demand scenario, single dry-year supply and demand scenario, and multiple dry-year supply and demand scenarios through 2040. The UWMP water supply predictions is based on existing General Plan designations and accounts for increased demand as growth within the City occurs. Based on the General Plan, the project site is designated General Commercial. The General Commercial land use designation is intended to provide for all forms of retail, service, office, recreation/amusement, and other commercial businesses which provide goods and services for the local population and those businesses which are targeted towards visitors and commuters. The proposed self-storage facility and executive artists space are consistent with the allowed uses under the General Commercial designation; refer to Section 4.11, Land Use and Planning. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation measures are required.

# 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?

Less Than Significant Impact. As a self-storage facility with executive artist space, the project is not anticipated to generate substantial sources of additional wastewater above existing conditions; refer to Response 4.19(a) above. However, there is substantial remaining capacity for wastewater treatment at the Districts' various treatment plants to serve the project's anticipated demand in addition to existing commitments. As the project is consistent with the land use designation for the area, payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. As such, the project's potential impacts on wastewater treatment provider would be fully mitigated via payment of fees and Districts' service commitment.

Mitigation Measures: No mitigation measures are required.

# 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. Athens Services (Athens) provides solid waste collection for the City, including the project site.<sup>3</sup> In 2018, a total of 36,862 tons of solid waste were disposed in 11 permitted landfills serving the City.<sup>4</sup>

<sup>&</sup>lt;sup>2</sup> Stetson Engineers Inc., San Gabriel County Water District 2015 Urban Water Management Plan, May 2016.

<sup>&</sup>lt;sup>3</sup> City of San Gabriel, *Solid Waste & Recycling*, http://www.sangabrielcity.com/329/Solid-Waste-Recycling, accessed March 31, 2020.

<sup>&</sup>lt;sup>4</sup> California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2018 for San Gabriel*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed March 31, 2020.



Among the 11 sites serving the City, Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, and Olinda Alpha Landfill admitted the majority of City's waste.

## Construction

All construction activities would be subject to conformance with relevant Federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included as SGMC Chapter 54, *Diversion of Construction and Demolition Waste*. The project would also be required to demonstrate compliance with the 2016 (or most recent) Green Building Code, which includes design and construction related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

## Operation

Based on the project's air quality and greenhouse gas modeling, project operations are expected to generate approximately 180.59 tons of waste per year, or approximately 0.49 tons per day (tpd); refer to <u>Appendix B</u>, <u>AQ/GHG/Energy Data</u>. This represents less than 0.01 percent of any landfill's maximum daily permitted throughput capacity identified in Table <u>4.19-1</u>, <u>Landfills Serving the City</u>. As such, the project is not anticipated to 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. Impacts in this regard would be less than significant.

Landfill/Location	Amount Disposed by City in 2018 (tons/day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Mid-Valley Sanitary Landfill 2390 North Alder Avenue Rialto, CA 92377	17,874	7,500	61,219,377	04/01/2045
San Timoteo Sanitary Landfill San Timoteo Canyon Road Redlands, CA 92373	6,614	2,000	12,360,396	01/01/2039
Olinda Alpha Landfill 1942 North Valencia Avenue, Brea, CA 92823	3,980	8,000	34,200,000	12/31/2021
El Sobrante Landfill 10910 Dawson Canyon Road Corona, CA 91719	3,670	16,054	143,977,170	01/01/2051
Azusa Land Reclamation Co. Landfill 1211 West Gladstone Street, Azusa, CA 91702	2,102	8,000	51,512,201	01/01/2045
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Access Road Irvine, CA 92618	890	11,500	205,000,000	12/31/2053

## Table 4.19-1 Landfills Serving the City



Landfill/Location	Amount Disposed by City in 2018 (tons/day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Chiquita Canyon Sanitary Landfill 29201 Henry Mayo Drive Castaic, CA 91384	699	12,000	60,408,000	01/01/2047
Victorville Sanitary Landfill 18600 Stoddard Wells Road, Victorville, CA 92307	508	3,000	81,510,000	10/01/2047

Notes:

 Antelope Valley Public Landfill, Lancaster Landfill and Recycling Center, Prima Deshecha Landfill, Simi Valley Landfill & Recycling Center, and Sunshine Canyon City/County Landfill are excluded from <u>Table 4.19-1</u> as these facilities accepted less than one percent of the City's solid waste in 2018 (the last available reporting year).

Sources:

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2. California Department of Resources Recycling and Recovery, *Jurisdiction Disposal By Facility, Disposal during 2018 for San Gabriel*, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed March 31, 2020

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Mitigation Measures: No mitigation measures are required.

# e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to Response 4.19(d) above. The proposed project would comply with all Federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act of 1989 and City recycling programs. Specifically, pursuant to SGMC Chapter 54, *Diversion of Construction and Demolition Waste*, at least 50 percent of construction and demolition waste generated shall be diverted from landfilling by using recycling, reuse, or other diversion programs. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation measures are required.



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# 4.20 WILDFIRE

lf l cla pro	ocated in or near State responsibility areas or lands ssified as very high fire hazard severity zones, would the ject:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				~
C.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				~
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

## a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

<u>No Impact</u>. According to the California Department of Forestry and Fire Protection *Los Angeles County Very High Fire Hazard Severity Zones in LRA Map*, the City of San Gabriel is not located within or near a State responsibility area nor is the City classified as a very high fire hazard severity zone.<sup>1</sup> As such, project implementation would have no impact in this regard.

Mitigation Measures: No mitigation measures are required.

# 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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.

<sup>&</sup>lt;sup>1</sup> California Department of Forestry and Fire Protection, *Los Angeles County Very High Fire Hazard Severity Zones in LRA Map*, https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf, September 2011.



# 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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation measures are required.



# 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Wo	uld the project:	Potentially Significant Impact	Less Than Significant Impact 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?		*		
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)?		1		
C.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		~		

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

Less Than Significant Impact With Mitigation Incorporated. As concluded in Section 4.4, Biological Resources, the project site is heavily disturbed and is located within an urbanized area of the City. Based on the site's condition, no sensitive plant or animal species would be present. Thus, the project would have no impacts on sensitive plant or animal species. Project implementation is not anticipated to result in impacts to known cultural or tribal cultural resources; refer to Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources. However, in the unlikely event that buried archaeological resources are encountered during ground disturbance activities, Mitigation Measure CUL-1 would require all project construction efforts to halt would require all construction work to halt until a qualified archaeologist can evaluate the find. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities, Mitigation Measure TCR-1 would ensure a gualified Native American Monitor is present during site disturbance activities. If evidence of potential subsurface tribal cultural resources is found during ground disturbing activities, Mitigation Measure TCR-1 would ensure that activities in the vicinity of the find are halted, appropriate parties are notified, and appropriate evaluation and treatment of said resource(s). In the unlikely event that paleontological resources are encountered during project construction, SGMC Section 153.630, Identification, Documentation, and Management of Archaeological, Native American, and Paleontological Resources would ensure that a qualified paleontologist submits a report including a statement on the significance of the discovery and recommended a course of action. Therefore, the proposed project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major



periods of California history or prehistory. Impacts would be less than significant with mitigation incorporated in this regard.

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 With Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in <u>Section 4.1</u> through <u>Section 4.20</u>, the proposed project would not result in any significant impacts in any environmental categories with implementation of project mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects. Impacts would be less than significant with mitigation incorporated in this regard.

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

Less Than Significant Impact With Mitigation Incorporated. Previous sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and implementation of project mitigation measures. Impacts would be less than significant with mitigation incorporated in this regard.



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# 4.23 REPORT PREPARATION PERSONNEL

## City of San Gabriel (Lead Agency)

425 South Mission Drive San Gabriel, California 91776 626.308.2806

> Matt Chang, Senior Planner Samantha Tewasart, Planning Manager

## Michael Baker International (CEQA Consultant)

5 Hutton Centre Drive, Suite 500 Santa Ana, California 92707 949.472.3505

> Eddie Torres, Project Director Alicia E. Gonzalez, Project Manager Kristen Bogue, Senior Environmental Analyst Frances Yau, Environmental Analyst Winnie Woo, Environmental Analyst Danielle Regimbal, Air Quality/GHG/Noise Specialist Pierre Glaize, Air Quality/GHG/Noise Specialist Zhe Chen, Air Quality/GHG/Noise Specialist Faye Stroud, Graphic Artist Linda Broberg, Word Processor

#### Anza Resource Consultants (Cultural Resources Survey Consultant)

603 Seagaze Drive, Suite 1018 Oceanside, California 92054 760.207.9736

Kevin Hunt, Principal

Blue Peak Engineering, Inc. (Hydrology Analysis Consultant) 18543 Yorba Linda Boulevard, Suite 235 Yorba Linda, California 92886 562.537.6038

Kimberly Johnson, P.E.

Coast Geotechnical, Inc. (Geotechnical Engineering Investigation Consultant) 1200 West Commonwealth Avenue Fullerton, California 92833 714.870.1211

Ming-Tarng Chen, PE Todd D. Houseal, CEG



FREY Environmental, Inc. (Excavation and Disposal Report Consultant) 2817 A Lafayette Avenue Newport Beach, California 92663 949.723.1645

Evan Privett, Senior Project Geologist, P.G.

Fulcrum Resources Environmental (Phase I Environmental Site Assessment Consultant) 415 West Chestnut Avenue Monrovia, California 91016 800.385.7105

Heather N. Conner, Senior Project Manager Wendy R. Moore, Senior Project Manager Don Kellar, P.G., Senior Project Manager, Hydro-geologist

Ganddini Group, Inc. (Vehicle Miles Travelled Assessment Consultant) 550 Parkcenter Drive, Suite 202 Santa Ana, California 92705 714.795.3100

Tom Huang, T.E. Giancarlo Ganddini, T.E., PTP

# Linscott, Law & Greenspan, Engineers (Transportation Impact Study Consultant)

600 South Lake Avenue, Suite 500 Pasadena, California 91106 626.796.2322

> Chin S. Taing, PTP, Transportation Planner III Clare M. Look-Jaegar, P.E., Principal

# Roux Associates, Inc.

(Phase II Subsurface Investigation Consultant) 5150 East Pacific Coast Highway, Suite 450 Long Beach, California 90804 800.322.7689

Paige Farrell Mauricio H. Escobar, P.G., Principal Geologist



# 5.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, we recommend that the City of San Gabriel prepare a Mitigated Negative Declaration for the 414 South San Gabriel Boulevard Project. We find that the proposed project could have a significant effect on a number of environmental issues, but that mitigation measures have been identified that reduce such impacts to a less than significant level. We recommend that the second category be selected for the City of San Gabriel's determination (see Section 6.0, Lead Agency Determination).

August 5, 2020

Date

20

Alicia Gonzalez, Project Manager Michael Baker International



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# 6.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

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

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

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

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all 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:	- Maly
Title:	Senior Planner
Printed Name:	Matt Chang
Agency:	City of San Gabriel
Date:	8/1/2020

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