INITIAL STUDY

FOR THE

GREATER LOS ANGELES AREA COUNCIL OF BOY SCOUTS OF AMERICA TRASK SCOUT RESERVATION WATER SYSTEM REHABILITATION AND ENHANCEMENT PROJECT

Prepared for:

City of Monrovia

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LIST OF ABBREVIATIONS AND ACROYNMS

AAQS Ambient Air Quality Standards ACOE Army Corps of Engineers above mean sea level amsl APE Area of Potential Effect APN Assessor's Parcel Number AQMD Air Quality Management District **AQMP** Air Quality Management Plan AT&SF Atchison, Topeka & Santa Fe

bgs below ground surface

BMPs Best Management Practices

BRA Biological Resources Assessment

BSA Boy Scouts of America

CAA Clean Air Act

CAAQS California Ambient Air Quality Standards

CBA Condition Based Assessment
CBC California Building Code

CARB California Air Resources Board

CBC California Building Code

CCAR California Climate Action Registry

CDFW California Department of Fish and Wildlife

CESA California Endangered Species Act
CEQA California Environmental Quality Act
CNDDB California Natura Diversity Database
CNEL Community Noise Equivalent Level
CNPS California Native Plant Species

CWA Clean Water Act cy cubic yards dB decibel

dBA A-weighted decibel

DDW Division of Drinking Water
DOI Department of Interior

DTSC Department of Toxic Substance Control

EAP Energy Action Plan

EPA Environmental Protection Agency

ESA Endangered Species Act

FEMA Federal Emergency Management Agency

FGC Fish and Game Code

FHWA Federal Highway Administration FIRM Flood Insurance Rate Map

FMMP Farmland Mapping and Monitoring Program

FTA Federal Transit Authority
GCC Global Climate Change

GHG Greenhouse Gas

GLAAC Greater Los Angeles Area Council

gpcd gallons per capita per day

gpd gallons per day gpm gallons per minute

HCP Habitat Conservation Plan

IP Individual Permit

IS/MND Initial Study / Mitigated Negative Declaration

JD Jurisdictional Delineation

LACFCD Los Angeles County Flood Control District

LBVI Least Bell's Vireo

LF lineal feet

LRA Local Responsibility Area
LSA Lake or Streambed Alteration
LSTs Localized Significance Thresholds
LUST Leaking Underground Storage Tank

MBTA Migratory Bird Treaty Act
MCLs maximum contaminant levels

MGD million gallons per day

MND Mitigated Negative Declaration

MT metric ton

MUSD Monrovia Unified School District

mWh megawatts/hour

NAAQS National Ambient Air Quality Standards

NBP Nesting Bird Plan

NDPES National Discharge Pollution Elimination System

NEPA National Environmental Policy Act NHPA National Historic Preservation Act

NOI Notice of Intent

NWI National Wetlands Inventory

NWP Nationwide Permit
PFO Palustrine Forested

ROW right-of-way

RTP/SCS Regional Transportation Plan / Sustainable Communities Strategy

RWQCB Regional Water Quality Control Board

SCAB South Coast Air Basin

SCAG Southern California Association of Governments SCAQMD South Coast Air Quality Management District

SIP State Implementation Plan

SPOW Spotted Owl

SWPPP Storm Water Pollution Prevention Plan SWRCB State Water Resources Control Board

TOC Total Organic Carbon

Trask Scout Reservation

USACOE U.S. Army Corps of Engineers

USDA U.S. Department of Agriculture

USFS U.S. Forest Service

USFWS U.S. Fish and Wildlife Service

USGS U.S. Geological Survey

VdB Vibration decibel

VHFHSZ Very High Fire Hazard Severity Zone

VMT Vehicle Miles Traveled
WDR Waste Discharge Permit
WoUS Waters of the United States
WQMP Water Quality Management Plan

WTP Water Treatment Plant

ENVIRONMENTAL CHECKLIST

1. Project Title: Greater Los Angeles Area Council of Boy Scouts of America Trask Scout

Reservation Water System Rehabilitation and Enhancement Project

2. Lead Agency Name: City of Monrovia

Address: 415 South Ivy Avenue, Monrovia, CA 91016

3. Contact Person: Sheri Bermejo, Planning Division Manager

Phone Number: (626) 932-5539

4. Project Location: The project site is located at the Trask Scout Reservation at the

following address: 1100 N Canyon Boulevard, Monrovia, CA 91016. The project is located within the USGS Topo 7.5-minute maps for Azusa, and is located in Section 13, Township 1 North and Range 11 West, Sections 7 and 8, Township 1 North and Range 10 West. The approximate GPS coordinates of the project site are 34.178371, -117.978251. Refer to Figures 1 and 2 for the regional

and site location maps.

5. Project Sponsor Name: Greater Los Angeles Area Council of Boy Scouts of America

Address: 2333 Scout Way

Los Angeles, CA 90026

6. General Plan Designation: Angeles National Forest

7. **Zoning:** Hillside Reserve and Angeles National Forest

8. Project Description:

Project Background

The Boy Scouts of America (BSA) has become one of the largest scouting organizations within the United States since its inception in 1910. Operating nationwide, BSA currently have 2.4 million youth participants with about one million adult volunteers. The Greater Los Angeles Area Council of BSA (GLAAC-BSA or BSA) operates the Trask Scout Reservation (Trask), which is located in the City of Monrovia, within the Sawpit Canyons in the foothills south of the San Gabriel Mountains. The Assessor's Parcel Number (APN) for the Trask Scout Reservation, and the associated storage tank and related project area are: 8501-010-010 and 8689-005-906.

Trask is a campground that is also comprised of approximately 10 acres of national forest land within the foothills. The area is generally used as a recreational site for the general public. GLAAC-BSA also utilizes this site for one of its campgrounds for their participants. The GLAAC-BSA have facilities onsite consisting of an Administration Building, Warehouse, Fort Rotary, Kitchen, Bathrooms, and recreational amenities for its campers and visitors.

Trask has provided clean potable drinking water for over 40 years in accordance with State and local rules, meeting standards for maximum contaminant levels (MCLs) and water quality.

Effective on July 1, 2014, the regulatory oversight of surface water treatment at Trask was changed from the Los Angeles County Department of Public Health (County) to the State Water Resources Control Board, Division of Drinking Water (DDW) bringing additional regulations and standards. Since its transfer, Trask could not satisfy DDWs regulations with its existing surface water treatment system. As a result, on April 25, 2017, Trask was notified by DDW to stop production of potable water until improvements have been made to meet DDW treatment regulations and standards.

The City of Monrovia, as the lead agency for this project, will consider granting building permits to enable the GLAAC-BSA to rehabilitate the surface water treatment system to satisfy the current treatment regulations and standards, and to enhance the existing water distribution system at Trask.

Project Description

Trask Water Supply

Trask is located on the Sawpit Creek, within the Los Angeles River Watershed. Sawpit Creek ultimately flows south into the San Gabriel River, which ultimately flows into the Los Angeles River and into San Pedro Bay.

Trask draws raw water from Sawpit Creek (Photo 1). Sawpit Creek descends from San Gabriel Mountain and flows west into the Sawpit Wash. Flow observed at Trask is characterized as flash flows and at times large quantities of flow can occur for short periods of time following the initial rainfall. In order to control the occasional flash flows, the Los Angeles County Flood Control District (LACFCD) has constructed a debris basin and dam located off the intersection of N. Canyon Boulevard and Oakglade Drive. Trask is located a mile northeast from the LACFCD dam. The water level within the Creek varies depending on weather conditions and the season of the year.



Photo 1: Sawpit Creek and Existing Temporary Collection Point

Trask Water Demand

Trask utilizes the water supply from Sawpit Creek to provide potable water to its campers, GLAAC-BSA employees, and other visitors. Water usage at Trask is dependent on the number of visitors and campers at a given moment. Table 1, below, shows the number of individuals Trask serves based on GLAAC-BSA estimates.

Table 1
TRASK SCOUT RESERVATION VISITOR ESTIMATE

Role/Individual	Quantity	Note
Employee – Park Ranger	1	Park Ranger on site at all times
Campers (including Chaperones/Scout Leaders)	300	Weekend attendees
Total Occupants:	301	

The estimated volume of Trask water demand is based on the collected data from the Forest Service Handbook that tabulates water usage per person based on a variety of situations and other design parameters. Table 2 below summarizes the chosen values for the design volume based on the anticipated volume of water demanded at Trask.

Table 2
TRASK SCOUT RESERVATION VISITOR DEMAND ESTIMATES

Criteria	Quantity
(A) Total Occupants	301 Individuals
(B) Average Daily Water Demand per Person	25 GPCD (1)(2)
(C) Average Daily Demand (ADD) – ("A" x "B")	7,525 GPD ⁽³⁾
(D) Peak Factor	1.5 ⁽²⁾
(E) Maximum Daily Demand (MDD) – ("C" x "D")	11,288 GPD or 8 GPM (4)

- (1) GPCD = Gallons per Capita per Day
- (2) Value obtained from the Forest Service Handbook
- (3) GPD = Gallons per Day
- (4) GPM = Gallons per Minute

Based on the calculations estimated in Table 2 above, the water treatment plant will be designed to produce a minimum of 8 GPM of potable water for distribution and consumption.

Condition Based Assessment

A Condition Based Assessment (CBA) was performed by Consultant to GLAAC-BSA—SA Associates—to assess the existing water treatment plant (WTP) and water distribution at Trask. An overview of the existing treatment system is depicted on Figures 3 and 4, and is further described in Table 3 below. The CBA is based on visual and performance assessments of the various equipment, piping and treatment processes. A summary of the CBA is shown below on Table 3.

Table 3 SUMMARY OF THE CONDITION BASED ASSESSMENT

Facility	Notes/Analysis
Stream Pickup Collection	The original intake point was dug out and damaged. Currently, the system is utilizing a temporary system that pumps directly from the stream. The pump is a 3/4 horsepower Flotec Pump.
Transmission Line	The transmission line appears to be in fair condition with no signs of leaks, corrosion, or other observable defects observed.
Pre-Treatment	The pre-treatment system has been out of service since 2017. The system consisted of a strainer, cartridge filter, rapid sand filter, and a diatomaceous filter.
Slow Sand Filtration	The slow sand filtration have been out of service since 2017. The filtration does not meet DDW treatment requirements. The proposed WTP will replace this filtration.
Pump House, Pump Station, & Clearwell	The existing pump house is good condition. Floor plan is approximately 10.5-FT length x 10.5 - FT width and 7-FT height. Additional booster pump is needed for redundancy.
Distribution System	The distribution system appears to be in fair condition. Portions of pipe are shown on the surface traveling towards the storage reservoir. May consider adding additional coverage to protect the pipe. GLAAC-BSA requests additional fire hydrants within the project site.
Storage Tank	Existing 25,000-gallon steel tank is bolted on a concrete foundation. Portions of the tank show damage with rust and corrosion. GLAAC-BSA requires additional storage through the installation of a new and an additional tank for fire protection and maintenance.

Water Treatment Criteria and Selected WTP

Based on the provided raw water lab reports, site constraints, and budget, the Seccua Virex Pro was selected by GLAAC-BSA as the ideal WTP solution for Trask. The advantage of this WTP is that it has a small footprint. It is successful at removing Turbidity, which is a contaminant of importance to DDW for approval of this project, and produces small quantities of sludge.

The quantities are so small that the sludge is stored within the system, which is then flushed out using backwash water (treated water) stored in a 400 gallon freestanding backwash tank (Refer to Exhibit 1). The used backwash water is then directed to a sump, where a submerged pump will convey it through a proposed sewer main to an existing septic well (next to the Admin Building), from there it will be finally spread through an existing leach field (Figure 5). Backwash is not considered to be brine because the WTP will remove organic contaminants, not salts or minerals; therefore, backwash can be discharged into the existing Trask sewer system. This treatment system meets the project's design criteria and treatment objectives. Table 4 below summarizes the treatment design criteria for the proposed WTP and Table 5 summarizes the California Surface Water Treatment Rule.

Table 4
SUMMARY OF TREATMENT DESIGN CRITERIA

Design Criteria	Value / Notes
Treatment Capacity	Minimum 11,288 GPD (8 GPM)
Microbial Removal Requirements	
➤ Giardia Lamblia	99.9% (3-Log Removal)
➤ Viruses	99.99% (4-Log Removal)
➤ Cryptosporidium	99% (2-Log Removal)
Seccua Virex Removal ➤ Giardia Lamblia ➤ Viruses ➤ Cryptosporidium	See Table 5 – California Surface Water Treatment Rule – Alternative Filtration Technology-Membrane Filtration, SWRCB- DDW Water Treatment committee-June 2018 99.99% (4-Log Removal) 90% (1-Log Removal) 99.99% (4-Log Removal)
Viruses Removal	99.99 (4-Log Removal) through disinfection using Chlorine and providing enough Contact Time (Serpentine Pipe)
Turbidity	Reduction to 0.1 NTU

The proposed WTP will also be capable of operating under a variety of common situations related to treating surface water such as, but not limited to:

- Removal of floating / Suspended material (leaves, branches, algae, etc.)
- Operate with a wide range of surface water qualities caused by seasonal changes or storm events (increased turbidity, temperature changes, pH, alkalinity, dissolved oxygen, hardness, etc.)
- Removal of anthropogenic contaminants
- Total Organic Carbon (TOC)

The selected treatment unit, the Seccua Virex Pro, will be able to accomplish a majority of the contaminant removal, along with further treatment from chlorine disinfection with sufficient contact time through a serpentine pipe prior to it reaching the clear well. The serpentine pipe length was calculated using the Guidance Manual for Compliance with the Filtration and Disinfection Requirements for Public Water Systems using Surface Water Sources, Table C-5, PG242, as well as Section 4.4.3 Baffling Factor, PG 31, LT1ESWTR Disinfection Profiling and Benchmarking Technical Guidance Manual. This serpentine pipe will provide sufficient contact time with the chlorine to achieve 4-log (99.99%) virus removal to the satisfaction of DDW requirements prior to storage.

Table 5
CALIFORNIA SURFACE WATER TREATMENT RULE
ALTERNATIVE FILTRATION TECHNOLOGY – MEMBRANE FILTRATION
SWRCB-DDW WATER TREATMENT COMMITTEE – JUNE 2018

		2000	Pathogen Removal Standards (log credit)		Turbidity Standards		Conditions During Demonstration		
Manufacturer	Model	Type	Virus	Giardía	Crypto	95% of time	Max	Max Flux Lph/m2 (gfd)	Max TMP (psi)
Aquasource	Advent	UF	4, *	4	4	0.1 NTU	0.5 NTU	136 (80)	29
BASF Inge	D5000	UF	3.5, *	4	4	0.1 NTU	0.5 NTU	156 (92)	29
Dow	UF SFX2860	UF	2.5, *	4	4	0.1 NTU	0.5 NTU	102 (60)	30
	Memcor PVdF (S10V, L10V, L20V)	UF	1.5, *	4	4	0.1 NTU	0.5 NTU	88 (52)	22
Evoqua (formerly	PVdF	MF	0.5, *	3,5	4	0.1 NTU	0.5 NTU	85 (50)	29
Siemens, who acquired US Filter)	L10N, L20N, S10N	UF	1, *	4	4	0.1 NTU	0.5 NTU	263 (155)	22 (L10N, L20N) 12.3 (\$10N)
	Polypropylene	MF	0.5, *	4	4	0.1 NTU	0.5 NTU	110 (66.9)	15
	(M10B, M10C, S10T)	MF	0, *	4	4	0.1 NTU	0.5 NTU	160 (93.6)	17
	Homespring UF211	UF	3.5, *	4	4	0.1 NTU	0.5 NTU	93.4 (55)	20
	ZeeWeed 500 series	UF	2,*	4	4	0.1 NTU	0.5 NTU	85 (49.8)	11.8
	ZeeWeed 1000 V2 & V3	UF	3.5, *	4	4	0.1 NTU	0.5 NTU	93.4 (55)	12 (vac)
GE Zenon	ZeeWeed 1000 V4	UF	1, *	4	4	0.1 NTU	0.5 NTU	102 (60)	13
	ZeeWeed 1500 ZeeWeed 1500-600 CPX	UF	1, *	4	4	0.1 NTU	0.5 NTU	170 (100)	45
Hydranautics	HYDRAcap	UF	4,*	4	4	0.1 NTU	0.5 NTU	119 (69.3)	18
Koch	PMPW	UF	4, *	4	4	0.1 NTU	0.5 NTU	173 (102)	35
METAWATER (NGK)	431011	UF	*	4	4	0.1 NTU	0.5 NTU	(175)	55
Norit X-Flow	\$ 225	UF		4	4	0.1 NTU	0.5 NTU	127.3 (75)	31
Nont X-Flow	SXL-225	UF		4	4	0.1 NTU	0.5 NTU	127.3 (75)	31
Pall	Microza USV 6203 Microza USV 5203 Microza UNA 620A	MF	0.5 *	4	4	0.1 NTU	0.5 NTU	203.7 (120)	43.5
	UNA 620A1	UF	4.*	4	4	0.1 NTU	0.5 NTU	102 (60)	51
Seccua	SeccuMem Pro 1000	UF	1, *	4	4	0.1 NTU	0.5 NTU	90 (53)	36
- J- 50	HFS-2020	UF	1.5, *	4	4	0.1 NTU	0.5 NTU	202 (120)	29
Toray (Torayfil)	LSU-1515	UF	1.5, *	4	4	0.1 NTU	0.5 NTU	83 (49)	10
Toyobo	Durasep (UPF0860, UPF0870)	UF	1.5, *	4	4	0,1 NTU	0.5 NTU	119 (70)	35
WesTech Polymem	12052	UF		4	4	0.1 NTU	0.5 NTU	45 (27)	21

Note *: Although virus removal may have been successfully demonstrated and accepted by DDW in the past, each plant is required to provide a minimum of 0.5-log Giardia and 4-log virus inactivation through disinfection. Credit for virus removal cannot be demonstrated on a daily basis currently via pressure decay testing per the USEPA Membrane Filtration Guidance manual.

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WTP Configuration

Raw water from the Sawpit Creek will be conveyed through an existing 4-inch transmission line to an existing sand box to be refurbished as an equalization tank. Raw water from the equalization tank then will be pumped at 50 psi to the pre-filtered system, Judo Profimat, to continue there after onto the selected treatment, Seccua Virex Pro.

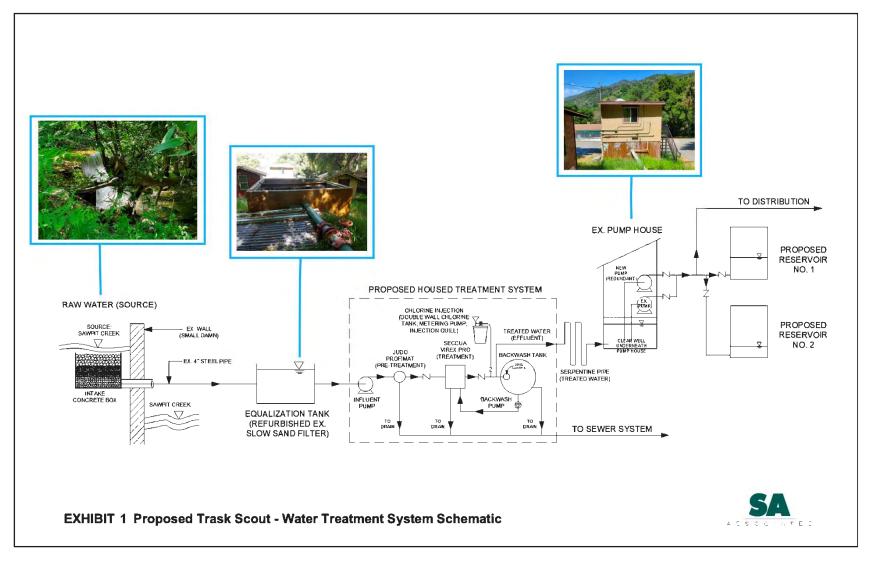
Effluent (treated water) from the Seccua Virex Pro will be chlorinated and conveyed through the serpentine pipe to the clear well where it will be pumped and stored in the steel tanks prior distribution. Treated water will be also used to keep the backwash tank full such as to provide backwash water to clean the water treatment system. See Exhibit 1, Proposed Trask Scout – Water Treatment System Schematic on the following page.

The small compact footprint of the proposed Seccua Virex Pro WTP Unit (14" width x 10.5" depth x 54" height), permits it to be housed in a proposed shed, as well as the pre-treatment filter, chlorine injection system, backwash tank, and other supplemental equipment, such as to protect them from potential external hazards. A majority of the existing 4-inch steel intake pipe from Sawpit Creek to the existing sand filter and outlet to the clear well will be protected and will remain in place with some minor modifications to provide connections in and out of the proposed WTP. See Photo 2, which depicts the general location of the proposed Seccua Virex Pro WTP Unit.



TOM DODSON & ASSOCIATES

Exhibit 1
PROPOSED TRASK SCOUT – WATER TREATMENT SYSTEM SCHEMATIC



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Also, as part of the project, the silt that has accumulated over time in the concrete box structure where the original raw water inlet is located (shown in Photo 3) will be cleaned out and new filter screens and gravel will be installed. The continued operation of this concrete box structure is crucial to provide sufficient pressure within the pipe leading into the proposed equalization tank.

Photo 3: Concrete Box Structure

Photo 4: Clearwell / Pump House





The existing clear well and pump house (shown in Photo 4) will remain in place and will have improvements to better monitor treatment, disinfection, storage, and distribution.

Water Distribution

In addition to the proposed WTP, improvements will be made to the existing water distribution system to ensure its effectiveness and to ease the operation of the overall water distribution system. Currently, within the clear well/pump house, there is only one 15-HP booster pump. This project will install an additional booster bump for redundancy, which will allow continuous operation of the pumps in the event that one pump fails to operate or is under maintenance.

The existing 25,000-gallon tank will be removed and replaced because it is both damaged and does not provide GLAAC-BSA with adequate storage capacity. As a result, due to the limited area at Trask, the existing storage tank will be replaced with two 50,000-gallon storage reservoirs. The expanded storage capacity will enable Trask to maintain adequate capacity for fire flow demands and will provide the convenience of continued operation in the event that one storage reservoir requires maintenance.

Summary of Project Improvements

The overall Trask Scout Reservation Water System Rehabilitation and Enhancement Project will require the following improvements as part of project implementation (refer to Figure 7, Trask Areas of Disturbance):

- Removal of silt behind the inlet structure, including cleanup of the raw water collector;
- Stream restoration, including improvement of the environmental health of Sawpit Creek;
- Modification to the existing sand filter box into an equalization tank with a pump station;

- Removal/abandonment of the existing valve, pipe work, and other appurtenances that may be in conflict with the proposed new facilities;
- Re-grading the area in which the Seccua Virex Pro WTP unit and storage reservoirs will be installed;
- Installation of new Seccua Virex Pro WTP unit, two new reservoirs, and auxiliary equipment;
- Installation of a storage shed—anticipated to be 16 feet by 12 feet—to house the Seccua Virex Pro WTP unit, which will require installation of reinforced concrete slab foundation and auxiliary electrical/mechanical equipment;
- Installation of a booster pump to be housed within the existing clear well / pump house for backup distribution;
- Installation of a new backup generator for continued operations during a power outage outside of the proposed pump house;
- Removal of the existing 25,000 gallon steel reservoir tank and associated pipe work, and installation of two 50,000 gallon steel reservoir tank. Each tank will be around 18.5 feet wide and 32 feet tall.
- Installation of at least 6 fire hydrants;
- Installation of additional water fountains at the ranger's station;
- Trail/landscape restoration (shown on Figure 6); and,
- The existing electrical system will require upgrading to provide additional capacity to meet the needs of the project.

The anticipated area of disturbance for the whole of the project is less than 0.2 acre.

In the process of working with the City of Monrovia and the United States Forest Service (USFS), it was determined that GLAAC-BSA did not have a current permit with the USFS to operate Trask. As such, GLAAC-BSA is in the process of updating their permit with the USFS.

Construction Scenario

The Trask Scout Reservation Water System Rehabilitation and Enhancement Project is anticipated to be constructed in the third or fourth quarter of 2021, with the treatment facility and reservoir development proposed to begin first, while the modifications to the inlet structure, stream restoration, modification to the existing sand filter, and other stream-related activities are anticipated to occur in first or second quarter of 2022 when the water is at the lowest point, which will minimize impacts to the environment. It is anticipated that construction would occur over a period of between 3 and 6 months, though this schedule is dependent on the project and permit approvals.

During construction, it is assumed that the number of employees onsite required to complete the project is between about 5 and 15 persons at any given time. Construction is anticipated to require the following list of equipment, including, but not limited to: backhoe, excavators, shovels, weed removal tools, brooms, hammers, crow bars, electrical cutters, jack hammers, dumpers, vibratory compactors, tractors, water hoses, wheelbarrow, levels, drilling tools, spatulas, pliers, etc.

The effort required to clear and grub the site may occur around the proposed treatment system, storage tanks, as part of creek rehabilitation (at the stream inlet), at trails, around fire hydrants, etc. The methods of clearing and grubbing include pushover, and cut & grind for cutting down trees, bushes, removal and disposal of all vegetation, rubbish, boulders, etc. The equipment anticipated to be utilized includes backhoes, excavators, shovels, weed removal tools, etc.

The project will require installation of foundations for the treatment facility and proposed storage tanks, which will require excavation, loosening and compaction of the original ground/subgrade, addition of approved borrow area material. The equipment anticipated to be utilized includes excavators, jack hammers, dumpers, vibratory compactors, tractors, water hoses, etc.

It is anticipated that grading will be required by standard equipment around the storage tank and water treatment sites and proposed trails, and in order to remove silt accumulated at the raw water collection point. The amount of cut and fill is assumed to balance, though conservatively, the amount of fill overage is anticipated to not exceed about 5,000 cubic yards (CY) of material. At these same locations, final grade to prepare for the proposed surface improvements is anticipated to be completed using standard equipment.

No new structures are proposed as the treatment system will be housed in a pre-fabricated shed.

The effort to restore old and install new hiking trails, and to develop additional landscaping throughout the project site will include smoothing out surfaces, installation of stone or wood steps, installation of proper drainage to minimize erosion, installation of boardwalks to avoid damage from winter storms, erosion, and other natural events. The equipment utilized is standard and is not specialized beyond the aforementioned types of construction equipment.

9. Surrounding land uses and setting: (Briefly describe the project's surroundings)

The project site is located within the Sawpit Canyons in the foothills south of the San Gabriel Mountains. The general land use surrounding the project site in all directions is Angeles National Forest. No other development surrounds the project site or project area.

10. Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

The proposed WTP for Trask must adhere to the various water treatment regulations set forth by State and Federal agencies. These regulations include:

- Safe Drinking Water Act
- Surface Water Treatment Rule & Enhanced Surface Water Treatment Rule
- Disinfection Byproduct Rule

The project will require silt removal from within Sawpit Creek. As such, any proposed permanent or temporary impacts to Sawpit Creek will likely require a Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW), and Clean Water Act (CWA) Sections 401/404 permits from the Los Angeles Regional Water Quality Control Board (RWQCB) and United State Army Corps of Engineers (USACE), respectively.

The project will require grading and building permits from the City of Monrovia. However, the project does not require a General Construction National Pollutant Discharge Elimination System (NPDES) permit or a Storm Water Pollution Prevention Plan (SWPPP) because the project is less than one acre in size. No other permits are known to be required.

The City/GLAAC-BSA will circulate the Initial Study/Mitigated Negative Declaration at the State Clearinghouse during a 30-day public review period. GLAAC-BSA must also update their permit with the USFS to operate Trask on the portion of the camp that lies on USFS owned land.

11. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Yes, AB 52 letters were sent out to tribes who requested consultation on future projects within the City of Monrovia. Only two tribes responded: the Fernandeño Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians – Kizh Nation. The Fernandeño Tataviam Band of Mission Indians deferred consultation to the Gabrieleño Band of Mission Indians – Kizh Nation. The Gabrieleño Band of Mission Indians – Kizh Nation requested several materials related to the project, and requested that mitigation be included as part of the project in order for consultation to conclude.

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" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	Air Quality
⊠ Biological Resources	☑ Cultural Resources	☑ Energy
☑ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
Recreation		
Utilities / Service Systems	Wildfire Wildfire	Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initia	l evaluation, the	following	finding is	made:
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The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
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.
The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
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.
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.

Tom Dodson & Associates	June 29, 2
Prepared by	Date
Shori Berneis	7/1/2

Lead Agency (signature)

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
I. AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			\boxtimes	
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 or 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?				×

I. AESTHETICS

SUBSTANTIATION

- a. Less Than Significant Impact Trask is a campground comprised of approximately 10 acres of National Forest land tucked within the Sawpit Canyons in the foothills south of the San Gabriel Mountains. The proposed Water System Rehabilitation and Enhancement Project would:
 - repair the existing raw water collector and inlet structure,
 - restore Sawpit Creek,
 - grade the pad for and install a pre-made WTP unit
 - remove/abandon existing appurtenances that would interfere with the new facilities
 - · install a prefabricated storage shed to house the new WTP
 - install a new booster pump within the existing clear well / pump house
 - install a new backup generator
 - remove the existing reservoir and install two new 50,000 gallon steel reservoirs
 - install fire hydrants, water fountains, trail restoration, and upgrades to the electrical system.

The proposed project would occur mainly within a small area adjacent to the main camp area, where the existing clear well and treatment plant are located, but the trail clean-up will occur in the area between the main camp area and the location of the existing reservoir (shown on Figure 1).

Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. The project site is currently located within an existing Scout Reservation/Camp within the Angeles National Forest. The majority of the proposed project would be located at sites within Trask that are already developed or contain existing facilities that would be modified by the proposed project. While the Trask Scout Reservation is located within a site that could be considered scenic, it presently contains a camp and associated facilities (refer to the photos provided as Appendix 2). As such, development of the proposed improvements would not substantially alter internal scenic vista setting. Furthermore, the stream, trail and landscape restoration would enhance the scenic qualities of the site and surrounding area.

A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. Based on the location of the proposed project, which is tucked within the Sawpit Canyons in the foothills south of the San Gabriel Mountains, and based on the tree coverage of the site and surrounding area, development at this site would not impact scenic vistas to or of the project area. The Trask Scout Reservation is set back at an angle into the foothills, and as a result, no communities have views to the Camp. Therefore, the development of the proposed improvements at this site would not substantially impact scenic vistas to residents within the project area. Furthermore, construction of the proposed improvements would introduce similar structures and facilities to those that currently exist at the site, and would therefore be similar to that which exists at present. Therefore, implementation of the proposed project is not expected to cause any substantial adverse effects on any important scenic vistas. Impacts are considered a less than significant adverse aesthetic impact. No mitigation is required.

b. Less Than Significant Impact – The nearest officially designated State Scenic Highway is State Highway 22 located approximately 8 miles north of the project site. The proposed project is located on a local, private roadway within the Angeles National Forest that does not experience a high volume of traffic. The project site would not be visible from Highway 22 and no impacts to the State Scenic Highway are anticipated.

The project site is located within the Sawpit Canyons in the foothills south of the San Gabriel Mountains, and contains existing facilities in support of the Trask Scout Reservation. The proposed project is located within the Angeles National Forest, though no rock outcroppings are known to exist within the project footprint, and therefore, none would be impacted by the proposed improvements as described above under issue I(a).

No historic buildings exist onsite and the large number of trees that are located within the project footprint are not anticipated to be altered as a result of project implementation. The proposed project would remove any fallen tree(s) within the project footprint, but the proposed project is not anticipated to require removal of any healthy trees. Based on the lack of any intrinsic onsite scenic resources that would be altered by the proposed project, the proposed project would have a less than significant potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. No mitigation is required.

- c. Less Than Significant Impact Please refer to the discussion under issue I(a), above. The proposed project is located in a non-urbanized area within the northern portion of the City of Monrovia and the Angeles National Forest. As stated under issue I(a), the proposed project cannot easily be viewed from public vantage points due to its location set back into Sawpit Canyon. Furthermore, the majority of the proposed project consists of improvements consistent with that which already exist within the project footprint. Therefore, the proposed project would have a less than significant potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings. No mitigation is required.
- d. No Impact The Trask Scout Reservation contains existing night lighting to serve visitors and the Park Ranger who lives onsite. It is assumed that the proposed improvements would not require additional exterior lighting in order to operate. Because the proposed project is set back into Sawpit Canyon, the existing setting contains minimal light pollution beyond that which is generated at the dam located about one-half mile south of Trask. Facilities onsite consist of an Administration Building, Warehouse, Fort Rotary, Kitchen, Bathrooms, and recreational amenities for its campers and visitors, most of which contain lighting, though existing sources of light may not be consistently in use except when the camp is in use.

The construction activities are limited to daylight hours unless an emergency occurs, and the amount of security lighting needed during construction would be limited. Therefore, given that the proposed project would not require additional lighting during operation, the proposed project is not anticipated

to introduce a new source of light and glare into the project area over previous uses. No impacts are anticipated to occur and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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?				\boxtimes
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?				\boxtimes
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))?			×	
d) Result in the loss of forest land or conversion of forest land to non-forest use?			\boxtimes	
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?				

II. AGRICULTURE AND FORESTRY RESOURCES

SUBSTANTIATION

a&b. No Impact – The proposed project would not convert prime farmland, unique farmland, or farmland of statewide importance, as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use. As shown in Figure II-1, the project site is not on or near any Prime Farmland, Unique Farmland or Farmland of Statewide Importance as the area falls outside of the Farmland Mapping and Monitoring Program (FMMP) area of concern due to a lack of agricultural land at this location. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use or conflict with existing zoning for agricultural use or a Williamson Act contract as no such land uses exist within the project site or project area. No

adverse impact to any agricultural resources would occur from implementing the proposed project. No mitigation is required.

- c. Less Than Significant Impact The project site is located within the City of Monrovia and in the Angeles National Forest. The project site is zoned for Hillside Reserve and Angeles National Forest, which does support forest land uses. The area surrounding the project site is zoned for similar use. The proposed project would not introduce facilities that would conflict with that which presently exists at the Trask Scout Reservation. Furthermore, the proposed project would not result in any loss of timberland or forest land because the development footprint would remain within the area designated for the Trask Scout Reservation. Trees are found in abundance in the project area; however, no designated timberland resources would be further disturbed as a result of project implementation. Therefore, the proposed project would not 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)). Impacts are considered less than significant. No mitigation is required.
- d. Less Than Significant Impact The project site is located within the City of Monrovia and in the Angeles National Forest. The proposed project would not introduce facilities that would conflict with that which presently exists at the Trask Scout Reservation. Though the project site is located within forest land, it would not convert any portion of the Trask Scout Reservation to non-forest use, as the project footprint currently contains facilities in support of the Trask operations including the following: administration building, warehouse, fort rotary, kitchen, bathrooms, and recreational amenities for its campers and visitors. The proposed project would not result in the loss of forestry resources as no trees, other than those that have fallen within the project footprint, would be removed as part of the proposed project. Thus, the proposed project would have a less than significant potential to result in the loss of forest land or conversion of forest land to non-forest use. No mitigation is required.
- e. Less Than Significant Impact The project site and surrounding area do not support agricultural land, furthermore, because the project site and environs are not designated for such uses, implementation of the proposed project would not cause or result in the conversion of farmland to alternative use. No adverse impact would occur. As stated above, the proposed project is located within the Angeles National Forest, and therefore does contain forestry resources; however, the proposed project would develop improvements within an existing camp facility and would not involve expansion into adjacent forest land. Therefore, the proposed project would have a less than significant potential to cause or result in the conversion of forest land to alternative use. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
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?		\boxtimes		
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?			×	

III. AIR QUALITY

The following information utilized in this section was obtained from the technical study "Air Quality and GHG Impact Analyses, Trask Scout Reservation Water System Rehabilitation and Enhancement Project, Monrovia, California" prepared by Giroux & Associates dated August 16, 2020, and provided as Appendix 3 to this document.

Background

Climate

The climate of Monrovia, as with all of Southern California, is governed largely by the strength and location of the semi-permanent high-pressure center over the Pacific Ocean and the moderating effects of the nearby vast oceanic heat reservoir. Local climatic conditions are characterized by very warm summers, mild winters, infrequent rainfall, moderate daytime on-shore breezes, and comfortable humidities. Unfortunately, the same climatic conditions that create such a desirable living climate combine to severely restrict the ability of the local atmosphere to disperse the large volumes of air pollution generated by the population and industry attracted in part by the climate.

Monrovia is situated in an area where the pollutants generated in coastal portions of the Los Angeles basin undergo photochemical reactions and then move inland across the project site during the daily sea breeze cycle. The resulting smog at times gives the western San Gabriel Valley some of the worst air quality in all of California. The worst air quality, however, has gradually been moving eastward. Elevated smog levels nevertheless persist during the warmer months of the year. Despite dramatic improvement in air quality in the local area throughout the last several decades, the project site is expected to continue to experience some unhealthful air quality until beyond 2020.

Temperatures in the project vicinity average 62 degrees Fahrenheit annually with summer afternoons in the low 90s and winter mornings in the low 40s. Temperatures much above 100 or below 30 degrees occur infrequently only under unusual weather conditions and even then, these limits are not far exceeded. In contrast to the slow annual variation of temperature, precipitation is highly variable seasonally. Rainfall in the San Gabriel Valley averages 14 inches annually and falls almost exclusively from late October to early April. Summers are very dry with frequent periods of 4-5 months of no rain at all.

Air Quality Standards

Existing air quality is measured at established Southern California Air Quality Management District (SCAQMD) air quality monitoring stations. Monitored air quality is evaluated and in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table III-1. Because the State of California had established Ambient Air Quality Standards (AAQS) several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table III-1. Sources and health effects of various pollutants are shown in Table III-2.

Table III-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	A Time	California Standards ¹			National Stand	ards ²	
Pollutant	Average Time	Concentration ³	Method ⁴	Primary 3,5	Secondary 3,6	Method ⁷	
Ozone (O3)8	1 Hour		Ultraviolet	-	Same as Primary	Ultraviolet	
020110 (00)	8 Hour	0.070 ppm (137 μg/m³)	Photometry	0.070 ppm (137 μg/m³)	Standard	Photometry	
Respirable	24 Hour	50 μg/m³		150 μg/m³	Same as	Inertial Separation	
Particulate Matter (PM10) ⁹	Annual Arithmetic Mean	20 μg/m³	Gravimetric or Beta Attenuation	-	Primary Standard	and Gravimetric Analysis	
Fine Particulate	24 Hour	-	-	35 μg/m³	Same as Primary Standard	Inertial Separation	
Matter (PM2.5) ⁹	Annual Arithmetic Mean	12 μg/m³	Gravimetric or Beta Attenuation	12.0 μg/m³	15.0 μg/m³	and Gravimetric Analysis	
Carbon	1 Hour	20 ppm (23 mg/m³)	Non-Dispersive	35 ppm (40 mg/m ³)	-	Non-Dispersive	
Monoxide (CO)	8 Hour	9 ppm (10 mg/m³)	Infrared Photometry	9 ppm (10 mg/m ³)	-	Infrared Photometry	
(00)	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	(NDIIV)	_	-	(NDIR)	
Nitrogen	1 Hour	0.18 ppm (339 μg/m³)	Gas Phase	100 ppb (188 µg/m³)	-	Gas Phase	
Dioxide (NO2) ¹⁰	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	Chemiluminescence	0.053 ppm (100 μg/m³)	Same as Primary Standard	Chemiluminescence	
	1 Hour	0.25 ppm (655 μg/m³)		75 ppb (196 µg/m³)	_		
	3 Hour	-		_	0.5 ppm (1300 μg/m³)	Ultraviolet Fluorescence;	
Sulfur Dioxide (SO2) ¹¹	24 Hour	0.04 ppm (105 μg/m³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas) ¹¹	_	Spectrophotometry (Paraosaniline	
	Annual Arithmetic Mean	-	_	0.030 ppm (for certain areas) ¹¹	-	Method)	
	30-Day Average	1.5 μg/m³		_	-	_	
Lead 8 ^{12,13}	Calendar Quarter	-	Atomic Absorption	1.5 µg/m³ (for certain areas) ¹²	Same as Primary	High Volume Sampler and Atomic	
	Rolling 3-Month Avg	-		0.15 μg/m ³	Standard	Absorption	

Pollutant	Average Times	California Standards ¹			National Standa	ards ²
Pollutant	Average Time	Concentration ³	Method ⁴	Method ⁴ Primary ^{3,5} Secondary ^{3,6} Meth		Method 7
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape		No	
Sulfates	24 Hour	25 μg/m³	Ion Chromatography	Federal		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Ultraviolet Fluorescence	Standards		3
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 μg/m³)	Gas Chromatography			

Source: California Air Resources Board 5/4/16

Footnotes:

- 1 California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- 2 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year, with a 24-hour average concentration above 150 µg/m³, is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
- 3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- 5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- 8 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- 9 On December 14, 2012, the national PM2.5 primary standard was lowered from 15 μg/m³ to 12.0 μg/m³. The existing national 24-hour PM2.5 standards (primarily and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM10 standards (primarily and secondary) of 150 μg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- 11 On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
 - Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- 12 The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- 13 The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 j.tg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- 14 In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Sources and health effects of various pollutants are shown in Table III-2.

Table III-2
HEALTH EFFECTS OF MAJOR CRITERIA POLLUTANTS

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	 Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. Natural events, such as decomposition of organic matter. 	 Reduced tolerance for exercise. Impairment of mental function. Impairment of fetal development. Death at high levels of exposure. Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	 Motor vehicle exhaust. High temperature stationary combustion. Atmospheric reactions. Atmospheric reaction of organic gases with nitrogen oxides in sunlight. 	 Aggravation of respiratory illness. Reduced visibility. Reduced plant growth. Formation of acid rain. Aggravation of respiratory and cardiovascular diseases.
Lead (Pb)	Contaminated soil.	 Irritation of eyes. Impairment of cardiopulmonary function. Plant leaf injury. Impairment of blood function and nerve construction.
Fine Particulate Matter (PM-10)	 Stationary combustion of solid fuels. Construction activities. Industrial processes. Atmospheric chemical reactions. 	 Behavioral and hearing problems in children. Reduced lung function. Aggravation of the effects of gaseous pollutants. Aggravation of respiratory and cardio respiratory diseases. Increased cough and chest discomfort. Soiling. Reduced visibility.
Fine Particulate Matter (PM-2.5)	 Fuel combustion in motor vehicles, equipment, and industrial sources. Residential and agricultural burning. Industrial processes. Also, formed from photochemical reactions of other pollutants, including NOx, sulfur oxides, and organics. 	 Increases respiratory disease. Lung damage. Cancer and premature death. Reduces visibility and results in surface soiling.
Sulfur Dioxide (SO ₂)	Combustion of sulfur-containing fossil fuels. Smelting of sulfur-bearing metal ores. Industrial processes.	 Aggravation of respiratory diseases (asthma, emphysema). Reduced lung function. Irritation of eyes. Reduced visibility. Plant injury. Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board, 2002.

Baseline Air Quality

Existing levels of ambient air quality and historical trends in the project area are best documented by measurements made by the SCAQMD at its Azusa Monitoring Station. This station measures both regional

pollution levels such as dust (particulates) and smog, as well as levels of primary vehicular pollutants such as carbon monoxide. Table III-3 is a 5-year summary of monitoring data for the major air pollutants compiled from this air monitoring station.

- a. Photochemical smog (ozone) levels occasionally exceed standards. The 8-hour state ozone standard was exceeded on 12 percent of all measured days and the 1-hour state standard has been exceeded on approximately eight percent of all days in the past five years. The 8-hour federal standard has been exceeded on seven percent of days for the same period. While ozone levels are still high, they are much lower than 10 to 20 years ago. Attainment of all clean air standards in the project vicinity is not likely to occur soon, but the severity and frequency of violations is expected to continue to slowly decline during the current decade.
- b. Measurements of carbon monoxide have shown very low baseline levels in comparison to the most stringent eight-hour standards.
- c. Respirable dust (PM-10) levels exceed the state standard on approximately 15 percent of measurement days, but the less stringent federal PM-10 standard has not been violated for the same period. Year to year fluctuations of overall maximum 24-hour PM-10 levels follow no discernable trend, though 2016 had the lowest maximum 24-hour concentration in recent history.
- d. A substantial fraction of PM-10 is comprised of ultra-small diameter particulates capable of being inhaled into deep lung tissue (PM-2.5). There have been no violations of the current national 24hour standard of 35 μg/m³ in all measurement days for the last five years.

Although complete attainment of every clean air standard is not yet imminent, extrapolation of the steady improvement trend suggests that such attainment could occur within the reasonably near future.

Table III-3

AIR QUALITY MONITORING SUMMARY (2015-2018)

(NUMBER OF DAYS STANDARDS WERE EXCEEDED, AND MAXIMUM LEVELS DURING SUCH VIOLATIONS)

(ENTRIES SHOWN AS RATIOS = SAMPLES EXCEEDING STANDARD/SAMPLES TAKEN)

Pollutant/Standard	2015	2016	2017	2018	2019
Ozone					
1-Hour > 0.09 ppm (S)	21	30	38	24	34
8-Hour > 0.07 ppm (S)	28	40	62	42	39
8- Hour > 0.075 ppm (F)	17	25	43	23	21
Max. 1-Hour Conc. (ppm)	0.122	0.146	0.152	0.139	0.123
Max. 8-Hour Conc. (ppm)	0.096	0.106	0.114	0.099	0.094
Carbon Monoxide					
8- Hour > 9. ppm (S,F)	0	0	0	0	0
Max 8-hour Conc. (ppm)	0	0	0	0	0
Max 8-Hour Conc. (ppm)	1.3	1.2	0.9	1.0	1.1
Nitrogen Dioxide					
1-Hour > 0.18 ppm (S)	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.071	0.074	0.066	0.071	0.060
Inhalable Particulates (PM-10)					
24-Hour > 50 μg/m³ (S)	12/59	12/60	6/55	10/60	4/61
24-Hour > 150 μg/m³ (F)	0/59	0/60	0/55	0/60	0/61
Max. 24-Hr. Conc. (μg/m³)	101.	74.	83.	78.	82.
Ultra-Fine Particulates (PM-2.5)					
24-Hour > 35 μg/m³ (F)	1/119	0/122	0/115	0/119	0/120
Max. 24-Hr. Conc. (μg/m³)	44.3	32.2	24.9	30.2	28.3

S=State Standard F=Federal Standard

Source: South Coast Air Quality Management District – Azusa Monitoring Station

data: www.arb.ca.gov/adam/

Air Quality Planning

The United State Environmental Protection Agency (U.S. EPA) is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for O3, CO, NOx, SO2, PM10, PM2.5, and lead. The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the California Air Resources Board (CARB).

The Federal Clean Air Act (CAA) was first enacted in 1955, and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. Substantial reductions in emissions of ROG, NOx and CO are forecast to continue throughout the next several decades. Unless new particulate control programs are implemented, PM-10 and PM-2.5 are forecast to slightly increase.

Air pollution contributes to a wide variety of adverse health effects. The U.S. EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O₃, particulate matter (PM₁₀ and PM_{2.5}), NO₂, and SO₂ which are known as criteria pollutants. The South Coast Air Quality Management District (SCAQMD) monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district. On February 21, 2019, CARB posted the 2018 amendments to the state and national area designations. See Table III-4 for attainment designations for the South Coast Air Basin (SCAB).

Table III-4
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
со	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb ¹	Attainment	Unclassifiable/Attainment

The project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAB emissions forecasts are shown on Table III-5 below. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California

¹ The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Table III-5
SOUTH COAST AIR BASIN EMISSIONS FORECASTS (EMISSIONS IN TONS/DAY)

Pollutant	2020	2025	2030
NOx	289	266	257
VOC	393	393	391
PM-10	165	170	172
PM-2.5	68	70	71

With current emissions reduction programs and adopted growth forecasts. Source: California Air Resources Board, 2013 Almanac of Air Quality

Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plan (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly to reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy more effectively.

In March 2017, the SCAQMD released the Final 2016 AQMP (2016 AQMP). The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal Clean Air Act requirements. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook.

The 2016 AQMP acknowledges that motor vehicle emissions have been effectively controlled and that reductions in NOx, the continuing ozone problem pollutant, may need to come from major stationary sources (power plants, refineries, landfill flares, etc.). The current attainment deadlines for all federal non-attainment pollutants are now as follows:

8-hour ozone (70 ppb)	2032
Annual PM-2.5 (12 μg/m³)	2025

8-hour ozone (75 ppb) 2024 (old standard)

1-hour ozone (120 ppb) 2023 (rescinded standard)

The key challenge is that NOx emission levels, as a critical ozone precursor pollutant, are forecast to continue to exceed the levels that would allow the above deadlines to be met. Unless additional stringent NOx control measures are adopted and implemented, ozone attainment goals may not be met.

Impact Thresholds

Appendix G of the California CEQA Guidelines offers the following four tests of air quality impact significance. A Project would have a potentially significant impact if it:

- a. Conflicts with or obstructs implementation of the applicable air quality plan.
- b. Results in a cumulatively considerable net increase of any criteria pollutants for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- c. Exposes sensitive receptors to substantial pollutant concentrations.
- d. Creates objectionable odors affecting a substantial number of people.

Primary Pollutants

Air quality impacts generally occur on two scales of motion. Near an individual source of emissions or a collection of sources such as a crowded intersection or parking lot, levels of those pollutants that are emitted in their already unhealthful form will be highest. Carbon monoxide (CO) is an example of such a pollutant. Primary pollutant impacts can generally be evaluated directly in comparison to appropriate clean air standards. Violations of these standards where they are currently met, or a measurable worsening of an existing or future violation, would be considered a significant impact. Many particulates, especially fugitive dust emissions, are also primary pollutants. Because of the non-attainment status of the South Coast Air Basin (SCAB) for PM-10, an aggressive dust control program is required to control fugitive dust during project construction.

Secondary Pollutants

Many pollutants, however, require time to transform from a more benign form to a more unhealthful contaminant. Their impact occurs regionally far from the source. Their incremental regional impact is minute on an individual basis and cannot be quantified except through complex photochemical computer models. Analysis of significance of such emissions is based upon a specified amount of emissions (pounds, tons, etc.) even though there is no way to translate those emissions directly into a corresponding ambient air quality impact.

Because of the chemical complexity of primary versus secondary pollutants, the SCAQMD has designated significant emissions levels as surrogates for evaluating regional air quality impact significance independent of chemical transformation processes. Projects with daily emissions that exceed any of the following emission thresholds are recommended by the SCAQMD to be considered significant under CEQA guidelines.

Table III-6
DAILY EMISSIONS THRESHOLDS

Pollutant	Construction	Operations
ROG	75	55
NOx	100	55
CO	550	550
PM-10	150	150
PM-2.5	55	55
SOx	150	150
Lead	3	3

Source: SCAQMD CEQA Air Quality Handbook, November, 1993 Rev.

Additional Indicators

In its CEQA Handbook, the SCAQMD also states that additional indicators should be used as screening criteria to determine the need for further analysis with respect to air quality. The additional indicators are as follows:

- Project could interfere with the attainment of the federal or state ambient air quality standards by either violating or contributing to an existing or projected air quality violation
- Project could result in population increases within the regional statistical area which would be in excess of that projected in the AQMP and in other than planned locations for the project's build-out year.
- Project could generate vehicle trips that cause a CO hot spot.

SUBSTANTIATION

a. Less Than Significant Impact – The proposed project does not directly relate to the AQMP in that there are no specific air quality programs or regulations governing development projects. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less than significant just because the proposed development is consistent with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis.

The City requires compliance with the Development Code for projects such as this, and the GLAAC-BSA intends to meet these standards. Additionally, the proposed project would otherwise be consistent with the City's General Plan and Zoning Code, because the improvements would be developed within the existing Trask Scout Reservation site, with the intention of improving the site for future recreational use by visitors, including ensuring the availability of safe drinking water. The proposed project is forecast to be consistent with regional planning forecasts maintained by the SCAG regional plans. Air quality impact significance for the proposed project has been analyzed on a project-specific basis. As the analysis of project-related emissions provided below in issues III(b) and III(c) indicate, the proposed project would not cause or be exposed to significant air pollution, and is, therefore, consistent with the applicable air quality plan. No mitigation is required.

b. Less Than Significant Impact With Mitigation Incorporated – Air pollution emissions associated with the proposed project would occur over both a short- and long-term time period. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading, and exhaust emission) at the any of the proposed project sites. Long-term emissions generated by operation of the proposed project primarily include energy consumption generated by the improved development.

Construction Emissions

CalEEMod was developed by the SCAQMD to provide a computer model by which to calculate both construction emissions and operational emissions from a variety of land use projects. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. Estimated construction emissions were modeled using CalEEMod2016.3.2 to identify maximum daily emissions for each pollutant during project construction for the indicated project activities and durations. Much of the project work would be accomplished using hand tools. Only diesel equipment is modeled in CalEEMod. Therefore, hand tools are not included in this analysis as they would not emit exhaust emissions. The following construction fleet and schedule was modeled in CalEEMod as shown in Table III-7.

Table III-7
CONSTRUCTION ACTIVITY EQUIPMENT FLEET

Phase Name and Duration	Equipment		
Clear and Grub	2 Tractor/Loader/Backhoes		
2 months	1 Excavator		
	1 Excavator		
<u></u>	1 Jackhammer		
Install Foundations 2 months	2 Dumpers		
	1 Mixer		
	1 Compactor		
	1 Excavator		
Grading 2 months	1 Tractor/Loader/Backhoe		
2 menane	2 Compactors		
Improve Hiking Trails	1 Tractor/Loader/Backhoe		
2 months	2 Compactors		

Utilizing this indicated equipment fleet and durations shown in Table III-7 the following worst case daily construction emissions are calculated by CalEEMod and are listed in Table III-8.

Table III-8
CONSTRUCTION ACTIVITY EMISSIONS
MAXIMUM DAILY EMISSIONS (POUNDS/DAY)

Maximal Construction Emissions	ROG	NOx	СО	SO ₂	PM-10	PM-2.5
2021						
Clear and Grub	0.5	4.5	6.4	0.0	0.4	0.3
Foundation Install	0.5	3.6	4.3	0.0	0.3	0.2
Grading	0.3	2.8	3.9	0.0	1.0	0.6
Trail Improvements	0.2	2.0	2.9	0.0	0.3	0.2
Total Project	1.5	12.9	17.5	0.0	2.0	1.3
SCAQMD Thresholds	75	100	550	150	150	55

Peak daily construction activity emissions are estimated be below SCAQMD CEQA thresholds without the need for added mitigation. However, construction activities are not anticipated to cause dust emissions to exceed SCAQMD CEQA thresholds. Nevertheless, emissions minimization through an enhanced dust control mitigation measure is recommended for use because of the non-attainment status of the air basin.

- AQ-1 <u>Fugitive Dust Control</u>. The following measures shall be incorporated into project plans and specifications for implementation during construction:
 - Apply soil stabilizers to inactive areas.
 - Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.
 - Stabilize previously disturbed areas if subsequent construction is delayed.
 - Apply water to disturbed surfaces and haul roads 3 times/day.
 - Replace ground cover in disturbed areas quickly.
 - Reduce speeds on unpaved roads to less than 15 mph.

- Trenches shall be left exposed for as short a time as possible.
- Identify proper compaction for backfilled soils in construction specifications.

This measure shall be implemented during construction, and shall be included in the construction contract as a contract specification.

Similarly, ozone precursor emissions (ROG and NOx) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of a reasonably available exhaust emission control mitigation measure for diesel exhaust is recommended.

AQ-2 <u>Exhaust Emissions Control</u>. The following measures shall be incorporated into Project plans and specifications for implementation:

- Utilize off-road construction equipment that has met or exceeded the maker's recommendations for vehicle/equipment maintenance schedule.
- Contactors shall utilize Tier 4 or better heavy equipment.
- Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

With implementation of mitigation measures (MMs) AQ-1 and AQ-2, any impacts related to construction emissions are considered less than significant.

Operational Emissions

The proposed project would not generate any additional trips over existing conditions. Also, the proposed project would provide potable water to campers, GLAAC-BSA employees, and visitors, staff, and would have minimal operational impacts. There is currently only one 15-HP booster pump. The project proposes an additional similar booster bump for redundancy, which would allow continuous operation of the pumps in the event that one pump fails to operate or is undergoing maintenance. Therefore, because the new pump would only operate in the event the old pump is not working there would be no pumping operational emissions. Minimal electricity would be required to operate the small new Seccua Virex Pro WTP unit. Therefore, operational emissions are anticipated to be less than significant. No mitigation is required.

Conclusion

With the incorporation of MMs AQ-1 and AQ-2, the development of the proposed project would have a less than significant potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c. Less Than Significant Impact – The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to Governing Board's Environmental Justice Enhancement Initiative 1-4 and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be during construction. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours such as a residence, hospital or convalescent facility.

LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NOx), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

LST screening tables are available for 25, 50, 100, 200 and 500 meter source-receptor distances. For the proposed project, the worst case conditions for 25 meters was used.

The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites for varying distances. For this project, the most stringent thresholds for a 1 acre site were applied.

The following thresholds and emissions in Table III-9 are therefore determined (pounds per day):

Table III-9
LST AND PROJECT EMISSIONS (POUNDS/DAY)

LST 1 acre/25 meters East San Gabriel Valley	со	NOx	PM-10	PM-2.5
LST Thresholds	623	89	5	3
Max On-site Emissions				
Clear and Grub	6.4	4.5	0.4	0.3
Foundation Install	4.3	3.6	0.3	0.2
Grading	3.9	2.8	1.0	0.6
Trail Improvements	2.9	2.0	0.3	0.2
Total	17.5	12.9	2.0	1.3
Significant?	No	No	No	No

CalEEMod Output in Appendix

LSTs were compared to the maximum daily construction activities. As seen in Table III-9, even if all activities were performed simultaneously, emissions meet the LST for construction thresholds. LST impacts are less than significant.

Construction equipment exhaust contains carcinogenic compounds within the diesel exhaust particulates. The toxicity of diesel exhaust is evaluated relative to a 24-hour per day, 365 days per year, 70-year lifetime exposure. The SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-, or 70-year timeframe and not over a relatively brief construction period due to the lack of health risk associated with such a brief exposure. No analysis was required for the proposed project.

Given that the proposed project does not exceed LST thresholds, the development of the proposed project would have a less than significant potential to expose sensitive receptors to substantial pollutant concentrations. No mitigation is required.

- d. Less Than Significant Impact Heavy-duty equipment in the project area during construction would emit odors; however, the construction activity would cease to occur after a short period of time. Land uses generally associated with odor complaints include:
 - Agricultural uses (livestock and farming)
 - Wastewater treatment plants

- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The proposed project envisions replacing an existing small water treatment plant at the Trask Scout Reservation. The proposed Seccua Virex Pro WTP system and overall project operations (conveyance and treatment) are essentially a closed system with negligible odor potential. No greater use of the site is anticipated as a result of the proposed improvements beyond those presently allowed. Therefore, consistent with City requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse onsite. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances, and the proposed project would be required to comply with this rule. No other sources of objectionable odors have been identified for the proposed project. Therefore, the proposed project would have a less than significant potential to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		\boxtimes		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		\boxtimes		
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?		\boxtimes		
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?				\boxtimes

IV. BIOLOGICAL RESOURCES

The following information is provided based on a Biological Resources Assessment (BRA) and Jurisdictional Delineation (JD) of the project site. The assessment was conducted by Jacobs Engineering Group, Inc. (Jacobs) dated January 2021, and is titled "Biological Resources Assessment and Jurisdictional Delineation for the Trask Scout Reservation Water Treatment System Improvement Project." The following information is abstracted from the Biological Resources Assessment provided as Appendix 4.

General Site Conditions

The project area is in the southern foothills of the San Gabriel Mountains, within the northern portion of the City of Monrovia. The topography of the project area ranges from steeply-sloped and hilly to valley (Sawpit Wash). Elevation within the proposed project area ranges from approximately 1,540 feet above mean sea level (amsl) to 1,790 feet amsl.

Hydrologically, the project area is situated within the Pasadena Hydrologic Sub-Area (HSA 412.31). The Pasadena HSA comprises a 73,439-acre drainage area, within the larger Los Angeles Watershed (HUC 18070105). The Los Angeles River is the major hydrogeomorphic feature within the Los Angeles

Watershed. One of several major tributaries to the Los Angeles River is Rio Hondo. Sawpit Wash is tributary to Rio Hondo.

Soils within the project area are comprised primarily of Trigo family, granitic substratum, 60 to 90 percent slopes and Olete-Kilburn-Etsel families complex, 50 to 80 percent slopes. Trigo family soil consists of loam, to gravelly sandy loam to bedrock comprised of residuum weathered from granodiorite. Olete family soil consists of very gravelly loam, to extremely cobbly sandy loam to bedrock comprised of colluvium derived from granodiorite. Etsel family soil consists of gravelly loam, to extremely gravelly sandy loam to bedrock derived from residuum weathered from granodiorite. These soil types are all somewhat excessively drained with a very high runoff class and do not have a hydric soil rating.

Habitat within the undeveloped portions of the project area consists of *Alnus rhombifolia* Forest and Woodland Alliance (white alder groves), or southern sycamore-alder riparian woodland (Holland 62400), along Sawpit Wash and *Quercus agrifolia* Forest and Woodland Alliance (coast live oak woodland and forest) in the adjacent upland areas.

SUBSTANTIATION

a. Less Than Significant With Mitigation Incorporated

Sensitive Biological Resources

A BRA survey was conducted by Jacobs in April 2020 to identify potential habitat for special status wildlife and habitats within the project area. No State- and/or Federally-listed threatened or endangered species or other special status species were observed within the project area during the reconnaissance-level assessment survey. The project site is located within a developed campground/retreat that consists of camp sites, trails, paved and unpaved roads, parking areas, buildings and other facilities and installations, surrounded by white alder groves and coast live oak woodland and forest.

There is potentially suitable habitat for the State- and Federally-listed endangered Least Bell's Vireo (LBVI) and the California Species of Special Concern California Spotted Owl (SPOW) within the project area. Additionally, Sawpit Wash supports Southern Sycamore Alder Riparian Woodland habitat, which is considered a sensitive habitat by the California Fish and Wildlife (CDFW).

There is also suitable habitat for the federally-listed endangered Braunton's milk-vetch within the project area. However, Jacobs conducted a floristic botanical field survey in April 2020 to determine whether this species was present within the project area. The result of the floristic botanical field survey was that the federally listed as endangered Braunton's milk-vetch was not found within the project area. Therefore, Braunton's milk-vetch is considered absent from the project site at the time of survey and there would be no project-related effect this species. No other special status plant species were detected within the project site.

Least Bell's Vireo

There is some suitable riparian habitat for LBVI along Sawpit Wash where the project proposes to remove accumulated silt from behind the existing inlet structure and replace the damaged raw water collector, as well as hand-removal of a fallen tree from over the existing intake pipe on the downstream side of the existing concrete wall. However, it is unknown whether LBVI occur within the project area. Therefore, MM **BIO-1** is recommended to ensure avoidance of any potential project-related impacts to LBVI.

Other Nesting Birds

There is vegetation throughout the project area that is suitable to support nesting birds, including SPOW. Most native bird species are protected from unlawful take by the Migratory Bird Treaty Act (MBTA). In December 2017, the Department of the Interior (DOI) issued a memorandum concluding that the MBTA's prohibitions on take apply "[...] only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs" (DOI 2017). Then in April 2018, the USFWS issued a guidance memorandum that further clarified that the take of migratory birds or their active nests (i.e., with eggs or young) that is incidental to, and not the purpose of, an otherwise lawful activity does not constitute a violation of the MBTA. However, the State of California provides additional protection for native bird species and their nests in the California Fish and Game Code (FGC).

In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season, which is generally February 1st through August 31st. However, if all work cannot be conducted outside of nesting season, MM **BIO-1** is needed.

Southern Sycamore Alder Riparian Woodland

There is Southern Sycamore Alder Riparian Woodland habitat along Sawpit Wash, where the project proposes to remove accumulated silt from behind the existing inlet structure and replace the damaged raw water collector, as well as hand-remove of a fallen tree from over the existing intake pipe on the downstream side of the existing concrete wall. However, the work would be temporary and only minor vegetation removal (no large trees) is anticipated. Therefore, the proposed project would not result in any loss or adverse modification of Southern Sycamore Alder Riparian Woodland habitat.

Impact Conclusion

Implementation of the proposed project may have a potential for an adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service (USFWS).

The project area lies within the range of several sensitive species including several that have been documented in the project vicinity (approximately 3 miles), namely: State- and Federally-listed endangered LBVI, and Southern Sycamore Alder Riparian Woodland habitat, which is considered a sensitive habitat by the CDFW. Though it is unknown whether LBVI occur within the project area, suitable habitat exists for LBVI within the project site. Thus, mitigation measure is recommended to ensure avoidance of any potential project-related impacts to LBVI.

BIO-1 Commencement of any project-related disturbance shall either be restricted to outside the LBVI nesting season, which is typically from April 1st through July 31st, to avoid any potential adverse effects on this species or where commencement of project-related disturbance cannot be restricted outside the LBVI nesting season, protocol LBVI presence/absence surveys shall be required to determine whether this species occurs in the project area and whether the project is likely to adversely affect this species. Per the USFWS LBVI survey guidelines, all riparian areas and any other potential vireo habitats shall be surveyed at least eight (8) times during the period from April 10 to July 31. Presence/absence surveys shall be conducted by a qualified biologist who is familiar with the various LBVI vocalizations and the eight survey visits shall be spaced at least 10 days apart.

With the implementation of MM **BIO-1**, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

There is Southern Sycamore Alder Riparian Woodland habitat along the Sawpit Wash, where the project proposes to remove accumulated silt from behind the existing inlet structure and replace the damaged raw water collector, as well as hand-removal of a fallen tree from over the existing intake pipe on the downstream side of the existing concrete wall. However, the work would be temporary and only minor vegetation removal with no large trees is anticipated. Therefore, the proposed project would not result in any loss or adverse modification of Southern Sycamore Alder Riparian Woodland habitat. No mitigation is required.

b. Less Than Significant With Mitigation Incorporated – Sawpit Wash is a jurisdictional perennial stream that is subject to the Clean Water Act (CWA) and FGC under the jurisdictions of United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW, respectively. The proposed project would result in temporary impacts to jurisdictional waters consisting of temporary excavation to remove accumulated silt from behind the existing inlet structure and replace the damaged raw water collector on the upstream side of the existing concrete wall within Sawpit Wash. Temporary impacts to Sawpit Wash would likely be minimal and would be restricted to the area where the existing inlet structure and concrete wall are located.

The project area of potential effects (APE) is not located within or immediately adjacent any USFWS designated Critical Habitat. As stated above, Sawpit Wash is a jurisdictional perennial stream that is subject to the CWA and FGC under the jurisdictions of USACE, RWQCB, and CDFW, respectively. Therefore, any proposed permanent or temporary impacts to this feature would require a Streambed Alteration Agreement from the CDFW, as well as CWA Sections 401/404 permits from the RWQCB and USACE, respectively.

USACE 404 Permit

The two most common types of permits issued by USACE under Section 404 of the CWA to authorize the discharge of dredged or fill material into Waters of the United States (WoUS) are: a nation-wide permit (NWP) or an individual permit (IP). NWPs are general permits for specific categories of activities that result in minimal impacts to aquatic resources. The discharge must not cause the loss of greater than ½ acre to WoUS, including the loss of no more than 300 linear feet of streambed. Projects that would exceed these limits would likely require an IP. The temporary construction impacts associated with the accumulated silt removal and replacement of the damaged raw water collector would likely be covered under Nationwide Permit No. 3 (NWP 3) involving Maintenance. NWP 3 has an upper threshold limit of no more than 200 feet in any direction from existing the structure for sediment removal and authorizes the repair, rehabilitation, or replacement of existing structures, with only minor deviations in the structure's configuration or filled area.

Regional Water Quality Control Board 401 Certification

The project area is within the jurisdiction of the Los Angeles RWQCB (Regional Board 4). Under Section 401 of the CWA, the RWQCB must certify that the discharge of dredged or fill material into WoUS does not violate state water quality standards. The RWQCB also regulates impacts to Waters of the State of California under the Porter Cologne Water Quality Control Act through issuance of a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending upon the level of impact and the waterway. In addition to the formal application materials and fee (based on area of impact), a copy of the appropriate California Environmental Quality Act (CEQA) documentation must be included with the application.

FGC Section 1602 Lake or Streambed Alteration Agreement

An FGC Section 1602 Lake or Streambed Alteration (LSA) Agreement is required for all activities that alter streams and lakes and their associated riparian habitat. In addition to the formal application materials and fee (based on cost of the project), a copy of the appropriate CEQA documentation must be included with the application. The project will temporarily impact CDFW jurisdictional streambed, where the project proposes to remove accumulated silt from behind the existing inlet structure and replace the damaged raw water collector on the upstream side of the existing concrete wall within Sawpit Wash. No permanent impacts to CDFW jurisdictional streambed will result from the project. However, temporary excavation within Sawpit Wash would occur. Additionally, some minor temporary impacts to riparian habitat (i.e. white alder groves) consisting of minimal vegetation clearing/trimming will likely be necessary to access the channel, remove the accumulated sediment and remove/replace the damaged raw water collector. Therefore, the proposed project would require a Section 1602 LSA Agreement.

The following mitigation measure shall ensure that the above permits are obtained by the Applicant to minimize impacts to jurisdictional waters:

BIO-2 The Applicant shall prepare and submit a Regional Water Quality Control Board 401 Certification, United States Army Corps of Engineers 404 Permit, and Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement. No ground disturbance within jurisdictional waters shall occur until the Applicant obtains the above permits and provides the City verification of permit acquisition. Note that the final compensation package contained in the permit shall be implemented by the Applicant. If the permit conditions are different than the mitigation listed in this document to protect biological resources, the City shall implement the mitigation identified in the permits, which must be equivalent or more effective in mitigating or avoiding potential significant effects and the substitution of any mitigation measure will not cause any potentially significant effect on the environment.

No other riparian habitat or sensitive natural communities have been identified within the project area. As such, with implementation of the MM **BIO-2**, the proposed project would have a less than significant potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

c. Less Than Significant With Mitigation Incorporated – According to the BRA, areas meeting all three wetland parameters (i.e. hydrophitic vegetation, hydric soils and wetland hydrology) that area also are adjacent to WoUS would be designated as wetland WoUS. According to the USFWS National Wetlands Inventory (NWI) online mapper, the project area supports Palustrine Forested (PFO) wetlands along Sawpit Wash. Although soils were not sampled within the project site, hydrophytic vegetation (i.e Alnus rhombifolia, Platanus racemosa, Toxicodendron diversilobum, Umbellularia californica and Urtica dioica) dominates the riparian habitat along Sawpit Wash and wetland hydrology is present. Therefore, hydric soils are assumed to be present.

The project area does contain PFO wetlands and would result in temporary impacts to jurisdictional wetlands subject to regulation by the USACE and RWQCB under Sections 404/401 of the CWA. With implementation of MM **BIO-2**, above, the proposed project would comply with USACE and RWQCB under Sections 404/401 of the CWA and therefore less than significant impacts to state or federally protected wetlands are anticipated to occur.

d. Less Than Significant With Mitigation Incorporated – Based on the field survey of the project site, the proposed project would not substantially interfere with the movement of any native resident or migratory species or with established native or migratory wildlife corridors, or impede the use of native

nursery sites. Once constructed, much of the project area would be enhanced, but would remain similar to that which exists at present, which allows for relatively unimpeded wildlife movement. However, the State does protect all migratory and nesting native birds. Several bird species were identified as potentially occurring in the project area, including the California Species of Special Concern SPOW. Thus, the project area may include areas that function as nesting locations for native birds. The project does not propose removal of mature, healthy trees in order to implement the proposed project. However, to avoid impacting nesting birds as required by the MBTA and California FGC, the following mitigation measure shall be implemented:

- BIO-3 The State of California prohibits the "take" of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the State identified nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1). Alternatively, the following measures shall be taken:
 - To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist shall conduct pre-construction nesting bird surveys prior to any project-related disturbance to suitable nesting areas to identify any active nests or roosts. The nesting bird surveys shall include both daytime and nighttime survey visits to determine the presence/absence of both diurnal and nocturnal species within the project area, including SPOW. The nighttime component to address the potential for presence of nocturnal species shall be conducted by a qualified avian biologist, who will conduct 3 consecutive nights of survey in accordance with the CDFW's recommended protocol for SPOW survey.
 - If no active nests or roosts are found, no further action would be required.
 - If an active nest is found, the qualified Avian Biologist shall set appropriate no-work buffers around the nest which would be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nest(s) and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Thus, with implementation of MM **BIO-3**, any effects on wildlife movement or the use of wildlife nursery sites can be reduced to a less than significant impact.

- e. Less Than Significant Impact Development of the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources. Impacts to biological resources have been addressed above under issues IV(a-d). The proposed project would remove any fallen tree(s) within the project footprint, but the proposed project is not anticipated to require removal of any rooted trees. Therefore, the potential for the proposed project to conflict with local policies or ordinances pertaining to biological resources would be considered a less than significant impact. No mitigation is required.
- f. No Impact The BRA provided as Appendix 4 concluded that the project site is not located in an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the proposed project would therefore not result in a significant impact to any such plans. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?		\boxtimes		
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 formal cemeteries?			\boxtimes	

V. CULTURAL RESOURCES

A cultural resources report has been prepared to evaluate the potential for cultural resources to occur within the project area of potential effect titled "Identification and Evaluation of Historic Properties Tallman H. Trask Scout Reservation Water System Rehabilitation And Enhancement Project" prepared by CRM TECH dated May 7, 2021 (Appendix 5). The following summary information has been abstracted from this report. It provides an overview and findings regarding the cultural resources found within the project area.

SUBSTANTIATION

a&b. Less Than Significant With Mitigation Incorporated – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Summary of Findings

CRM TECH prepared an Identification and Evaluation of Historic Properties report for the proposed project. The City of Monrovia, as the lead agency for the project, required the study pursuant to the CEQA. As the APE lies on public land under the jurisdiction of the United States Forest Service (USFS), the project qualifies as a federal "undertaking," which necessitates compliance with Section 106 of the National Historic Preservation Act (NHPA) as well. The purpose of this study, conducted under the provisions of both CEQA and NHPA Section 106, is to provide the City of Monrovia and the USFS with the necessary information and analysis to determine whether the undertaking would have an effect on any "historic properties," as defined by 36 CFR 800.16(I), or "historical resources" as defined by Calif. PRC §5020.1(j), that may exist in or near the APE.

In order to accomplish this objective, CRM TECH conducted a cultural resources records search, historical and geoarchaeological background research, consulted with Native American representatives, and performed a systematic field survey of the APE. The results of these research procedures indicate that four historic-period sites were previously recorded as lying partially within or in close proximity to the APE, namely the Angeles National Forest (19-186535), the Rincon-Red Box-Sawpit Roads Complex (19-186917), the Ben Overturff Trail (19-187818), and the Cogswell Dam Telecommunication Line (19-192340). During the course of this study, the Trask Scout Reservation compound itself, founded during the late historic period (1966-1972), was also recorded into the California Historical Resources Inventory as a site.

As the result of the field inspection and other subsequent research, three of these five sites, 19-186535, 19-187818, and 19-192340, are determined to be outside the horizontal and vertical extents

of the APE, while the other two, 19-186917 and the Trask Scout Reservation, were found not to meet the definition of "historic properties" or "historical resources." Meanwhile, the subsurface sediments within the vertical extent of the APE appear to be relatively low in archaeological sensitivity.

Based on these findings, and pursuant to 36 CFR 800.4(d)(1) and Calif. PRC §21084.1, it is recommended that the City of Monrovia and the USFS make a conclusion that *no "historic properties"* or "historical resources" will be affected by the proposed undertaking. No further cultural resources investigation is recommended for the undertaking unless project plans undergo such changes as to include areas not covered by this study. However, if buried cultural materials are discovered during earth-moving operations associated with the undertaking, all work in the immediate area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the find.

Impact Analysis

Per the summary provided above, five historic-period sites lay partially within or in close proximity to the APE, namely the Angeles National Forest (19-186535), the Rincon-Red Box-Sawpit Roads Complex (19-186917), the Ben Overturff Trail (19-187818), the Cogswell Dam Telecommunication Line (19-192340), and the Trask Scout Reservation compound itself, founded during the late historic period (1966-1972), was also recorded into the California Historical Resources Inventory as a site. However, either these sites are located outside of the APE or they were found not to meet the definition of "historic properties" or "historical resources."

Per the above discussion and definition, no archaeological sites or isolates were recorded within the project boundaries; thus, none of them requires further consideration during this study. In light of this information and pursuant to PRC §21084.1, the following conclusions have been reached for the proposed project:

- No historical resources within or adjacent to the project area have any potential to be disturbed
 as they are not within the proposed area in which the facilities will be constructed and developed,
 and thus, the project as it is currently proposed will not cause a substantial adverse change to
 any known historical resources.
- No further cultural resources investigation is necessary for the proposed project unless construction plans undergo such changes as to include areas not covered by this study.

However, if any earth moving activities are required, the following mitigation measure ensures that impacts to any buried cultural materials that may be discovered during earth moving activities are appropriately reviewed and assessed:

CUL-1 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

With the incorporation of MM **CUL-1**, as well as the mitigation identified under Tribal Cultural Resources in Section XVIII, the potential for impacts to cultural resources will be reduced to a less than significant level.

c. Less Than Significant Impact – As noted in the discussion above, no available information suggests that human remains may occur within the APE and the potential for such an occurrence is considered low. Human remains discovered during the construction or operation of the proposed project would need to be treated in accordance with the provisions of HSC §7050.5 and PRC §5097.98, which is

INITIAL STUDY

mandatory. State law (Section 7050.5 of the Health and Safety Code) as well as local laws requires that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation and ensure less than significant impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No impact or Does Not Apply
VI. ENERGY: Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?		\boxtimes		
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				

VI. ENERGY

SUBSTANTIATION

a&b. Less Than Significant With Mitigation Incorporated – During construction, the proposed project would utilize construction equipment that is CARB approved, minimizing emissions generated and electricity required to the extent feasible (as outlined previously under Section III, Air Quality, and implemented through MM AQ-2). As stated in Section III, Air Quality, the construction of the proposed project would require mitigation measures to minimize emissions impacts from construction equipment use. MM AQ-2 applies to energy resources as they require equipment not in use for 5 minutes to be turned off, and for electrical construction equipment to be used where available. These measures would prevent a significant impact during construction due to wasteful, inefficient, or unnecessary consumption of energy resources, and would also conform to the CARB regulations regarding energy efficiency.

The development of the proposed project would be required to comply with Title 24, Part 6, of the California Code of Regulations (the CalGreen Code), which would help to ensure that energy efficient equipment is utilized. The proposed project does not involve substantial new facilities at Trask that would require energy, but instead proposes to install replacement and improved facilities that would not result in a significant net increase in operational energy requirements. There is currently only one 15-HP booster pump. The project proposes an additional similar booster bump for redundancy, which would allow continuous operation of the pumps in the event that one pump fails to operate or is undergoing maintenance. Therefore, because the new pump would only operate in the event the old pump is not working there would be no pumping operational energy increase resulting from the proposed project.

Furthermore, it is anticipated that any new equipment installed would be more energy efficient than the existing equipment. Therefore, the proposed project is not anticipated to require additional energy or substantial additional energy beyond that which the site currently requires to operate. No natural gas would be required to operate the proposed project, and no increased operational trips to the project site are anticipated to occur as the proposed project would not expand the capacity of the Trask Scout Reservation. As such, petroleum consumption associated with implementation of the proposed project would not be considered unnecessary, inefficient, or wasteful. Impacts are considered less than significant with the incorporation of MM AQ-2.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VII. GEOLOGY AND S	OILS: Would the project:				
	cause potential substantial ng the risk of loss, injury, or				
delineated on the Earthquake Fault Geologist for the a substantial evider	vn earthquake fault, as most recent Alquist-Priolo Zoning Map issued by the State area or based on other ace of a known fault? Refer to and Geology Special		×		
(ii) Strong seismic gr	ound shaking?		\boxtimes		
(iii) Seismic-related g liquefaction?	round failure, including				
(iv) Landslides?			\boxtimes		
b) Result in substantial topsoil?	soil erosion or the loss of		\boxtimes		
or that would become uproject, and potentially	ogic unit or soil that is unstable, nstable as a result of the result in onsite or offsite land- subsidence, liquefaction or		×		
18-1-B of the Uniform E	sive soil, as defined in Table Building Code (1994), creating irect risks to life or property?				
use of septic tanks or a	of adequately supporting the Iternative wastewater disposal are not available for the ?				
f) Directly or indirectly of paleontological resource feature?	destroy a unique e or site or unique geologic		×		

VII. GEOLOGY AND SOILS

SUBSTANTIATION

a. i. Ground Rupture

Less Than Significant With Mitigation Incorporated – The project site is located in the City of Monrovia, which is situated within several active fault zones. The most prominent faults in close proximity to the City of Monrovia are the Sierra Madre Fault Zone (includes the Duarte Fault), the San Andreas Fault, and the Raymond Hill fault. The former is located in the San Gabriel Mountains, while the Raymond Hill Fault is situated in the foothills in the northern portion of the City of Monrovia. The San Andreas Fault is located twenty miles to the north of the City.

According to the Department of Conservation California Geologic Survey Map provided as Figure VII-1, the Sawpit Canyon Fault is delineated as an Alquist Priolo Fault Zone. This fault zone is located north of the proposed project footprint, and does not overlap with the project footprint. Therefore, the potential for ground rupture within the project footprint is low.

The proposed project does not propose any new human occupancy structures or other structures that would place people on the site for long periods of time or pose a significant threat to people or property from ground rupture. All structures would be built to meet earthquake building standards, particularly for water storage reservoirs. However, to protect future structures from severe damage from ground shaking the following mitigation measure would be implemented by the GLAAC-BSA for construction of the reservoir to prevent a catastrophic failure of this facility during a future regional seismic event:

GEO-1 The GLAAC-BSA shall retain a qualified engineering geologist to investigate the site proposed for water storage reservoirs. The recommendations of the engineering geologist relative to mitigating the potential for ground rupture, ground shaking, landslide, expansive soils and other geological constraints shall be incorporated in the design and construction of these facilities. Design of such facilities shall follow the following design performance criteria. Comprehensive geotechnical investigation shall be required prior to engineering and design development or structural and/or substantial rehabilitation of structures identified under Risk Class I & II, e.g., public facilities, as identified below:

Risk Class I & II, Structures Critically Needed after Disaster: Structures which are critically needed after a disaster include important utility centers, fire stations, police stations, emergency communication facilities, hospitals, and critical infrastructure elements such as bridges and overpasses, water storage reservoirs, and smaller dams.

Acceptable Damage: Minor non-structural; facility should remain operational and safe, or be suitable for quick restoration of service.

Risk Class III: High occupancy structures; uses are required after disasters, i.e., places of assembly such as schools and churches.

Acceptable Damage: Some impairment of function acceptable; structure needs to remain operational.

Risk Class IV, Ordinary Risk Tolerance: The vast majority of structures in urban areas; most commercial and industrial buildings, small hotels and apartment buildings, and single family residences.

Acceptable Damage: An "ordinary" degree of risk should be acceptable. The criteria envisioned by the Structural Engineers Association of California provide the best definition of the "ordinary" level of acceptable risk. These criteria require that structures be able to:

- a. Resist minor earthquakes without damage;
- b. Resist moderate earthquakes without structural damage, but with some non-structural damage; or
- c. Resist major earthquakes, of the intensity or severity of the strongest experienced in California, without collapse, but with some structural, as well as non-structural damage.

Risk Class V, moderate to High Tolerance: Open space uses, such as farms, ranches and parks without high occupancy structures; warehouses with low intensity employment; and the storing of non-hazardous materials.

Acceptable Damage: Not applicable.

With the implementation of the MM **GEO-1**, the proposed project would have a less than significant potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

a. ii. Strong Seismic Ground Shaking

Less Than Significant With Mitigation Incorporated – As stated in the discussion above, several faults run through or in the vicinity of the City, and as with much of southern California, the proposed structures would be subject to strong seismic ground shaking impacts should any major earthquakes occur in the future, particularly due to the site's location in close proximity to the Sawpit Canyon Fault, which is a branch of the Sierra Madre Fault Zone (shown on Figure VII-2). As a result, and like all other development projects in the City and throughout the southern California region, the proposed project would be required to comply with all applicable seismic design standards contained in the 2019 California Building Code (CBC). Compliance with the CBC and the use of best management design practices ensures that structural integrity would be maintained in the event of an earthquake.

Even though the proposed project would be subject to strong seismic ground shaking, with the incorporation of these design recommendations into future structures, the exposure of people or structures to potential substantial adverse effects (including the risk of loss, injury, or death), would be greatly minimized. The potential for significant impacts to occur due to strong seismic shaking can be reduced to a less than significant level with implementation of standard seismic design requirements appropriate for the expected level of seismic shaking as summarized in the text above. In addition, MM GEO-1 ensures that the proposed project is constructed in a manner that would prevent a catastrophic failure of the facility during a future regional seismic event and that requirements are enforced for the proposed project, which ensure that impacts associated with strong ground shaking would be less than significant.

a. iii. Seismic-Related Ground Failure Including Liquefaction

Less Than Significant Impact – The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. Liquefaction of saturated cohesionless soils can be caused by strong ground motion resulting from earthquakes. Soil liquefaction is a phenomenon in which saturated, cohesionless soils lose their strength due to the build-up of excess pore water pressure during cyclic loading such as that induced by earthquakes. According to the Department of Conservation California Geologic Survey Map provided as Figure VII-3, the project site is not located within an area known to be susceptible to liquefaction. The proposed project would construct facilities and other features in accordance with the 2019 CBC, which would minimize the potential for seismic-related ground failure, including liquefaction to adversely impact persons working at, or visiting the project site. Therefore, the proposed project would have a less than significant potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. No mitigation is required.

a. iv. Landslide

Less Than Significant With Mitigation Incorporated – According to the Department of Conservation California Geologic Survey Map provided as Figure VII-3, the project site is located in an area that may be susceptible to landslides. The proposed project would only introduce structures within areas containing existing facilities on developed or compacted land; grading is necessary to accommodate

the two new reservoirs. The main area of the Trask Scout Reservation contains various slopes, but these slopes are mostly developed with asphalt in support of the ongoing use of Trask. The areas that would be developed with structures are not located on steep slopes or adjacent to steep slopes that would be susceptible to landslide. For instance, the area that contains the existing reservoir that will be replaced with two new reservoirs is already located on a compacted pad.

Additionally, the proposed project does not propose any new human occupancy structures or other structures that would place people on the site for long periods of time or pose a significant threat to people or property from landslide. All structures would be built to meet seismic-related building standards, particularly for water storage reservoirs. Therefore, through compliance with the 2019 CBC and MM **GEO-1**, the development of the proposed project would have a less than significant potential to expose people or structures to potential substantial adverse landslide effects, including the risk of loss, injury, or death involving landslides.

b. Less Than Significant With Mitigation Incorporated – During construction and operation, the proposed project has a potential for soil erosion. Due to the area of disturbance associated with site clearing and grading, there is a potential for soil erosion to occur. City grading standards and best management practices are required to control the potential significant erosion hazards; however, the proposed project does not require a General Construction National Pollutant Discharge Elimination System (NPDES) permit or a Storm Water Pollution Prevention Plan (SWPPP) because the proposed project would impact an area that is less than one acre in size. Furthermore, adequate drainage facilities exist to accommodate existing drainage flows within the project site, and given that the proposed project would not install any substantial new facilities that would impact site drainage such that substantial erosion or loss of top soil would occur.

Project grading would be managed through implementation of best management practices to achieve concurrent water quality controls after construction is completed and the new water treatment, reservoirs, and associated improvements are in operation. Furthermore, the proposed project would enhance Sawpit Creek, which would ensure normal flows within the stream, thereby minimizing erosion potential within the stream. The proposed project would also enhance the surrounding trails, which would assist in minimizing the potential for trail erosion during a large storm event and would enhance areas that may have previously experienced erosion that needs to be rehabilitated. Additionally, the following mitigation measures shall be implemented.

- GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.
- GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the project is being constructed.
- GEO-4 Excavated areas shall be backfilled and compacted such that erosion does not occur. Paved areas disturbed by this project shall be repaved in such a manner that roadways and other disturbed areas are returned to the preproject conditions or better.

With implementation of the MMs **GEO-2** through **GEO-4**, as well as MM **GEO-1**, and the mandatory erosion control measures incorporated in the site design, the proposed project would not result in substantial soil erosion or the loss of topsoil.

C. Less Than Significant With Mitigation Incorporated – Refer to the discussion under issue VII(a) above. Potential instability associated with slope stability related to the proposed project was determined to be less than significant with the implementation of MM GEO-1, as outlined under issue a(iv) above. Additionally, the proposed project is not located in an area known to contain potential for liquefaction. Subsidence of the ground surface can occur under static conditions (i.e., due to consolidation settlement from overlying load or long-term groundwater extraction) but can also be accelerated and accentuated by earthquakes and tectonic activity. The potential for shrinkage or subsidence at the site was determined to be limited due to the minimal potential for liquefaction at the site as indicated in the Monrovia General Plan Safety Element. No activities such as groundwater pumping at the site or in the project area have impacted the soils of the site such that subsidence would occur.

The proposed project consists of the installation new facilities that would replace existing facilities in developed areas of the Trask Scout Reservation site, as well as trail enhancement, stream rehabilitation, and other improvements that would not include development of structures. Therefore, implementation of the proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. Impacts are considered less than significant and no mitigation is required.

- d. No Impact According to the United States Department of Agriculture (USDA) Web Soil Survey Soil map prepared for the project site (Appendix 6), the proposed project is located on Trigo family, granitic substratum, 60 to 90 percent slopes and Olete-Kilburn-Etsel families complex, 50 to 80 percent slopes. Expansive soils are generally of a clay type soil, not a granitic syvstratum such as the Trigo series soils that underlay the project site. Thus, based on the absence of clay-type soils on site, the proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. No impacts are anticipated and no mitigation is required.
- e. No Impact The project does not propose any septic tanks or alternative wastewater disposal systems, as these systems have already been developed within the project site, and are not anticipated to be modified as a result of the proposed project beyond the addition of directing WTP backwash to the existing septic/leach field system. Therefore, determining if the project site soils are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply, as these systems already exist onsite and no additional alternative disposal systems are proposed. No impacts are anticipated and no mitigation is required.
- f. Less Than Significant With Mitigation Incorporated The potential for discovering paleontological resources during development of the proposed project is considered highly unlikely based on the fact that the proposed facilities would be installed on areas that have been previously engineered and disturbed at depth. No unique geologic features are known or suspected to occur on or beneath the sites. However, because these resources are located beneath the surface and can only be discovered as a result of ground disturbance activities, the following mitigation measure shall be implemented:
 - GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

With implementation of MM **GEO-5**, the potential impact to paleontological resources would be reduced to a less than significant level.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
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?			×	

VIII. GREENHOUSE GAS EMISSIONS

The following information utilized in this section was obtained from the technical study "Air Quality and GHG Impact Analyses, Trask Scout Reservation Water System Rehabilitation and Enhancement Project, Monrovia, California" prepared by Giroux & Associates dated August 16, 2020, and provided as Appendix 3 to this document.

Thresholds of Significance

In response to the requirements of SB 97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California Code of Regulations in March 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates GHG emissions, directly or indirectly, that may have a significant impact on the environment, or,
- Conflicts with an applicable plan, policy or regulation adopted to reduce GHG emissions.

California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15064.4 specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to "select the model or methodology it considers most appropriate." The most common practice for transportation/combustion GHG emissions quantification is to use a computer model such as CalEEMod, as was used in the ensuing analysis.

The significance of those emissions then must be evaluated; the selection of a threshold of significance must take into consideration what level of GHG emissions would be cumulatively considerable. The guidelines are clear that they do not support a zero net emissions threshold. If the lead agency does not have sufficient expertise in evaluating GHG impacts, it may rely on thresholds adopted by an agency with greater expertise.

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO₂ equivalent/year. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released revisions which recommended a threshold of 3,000 MT CO₂e for all land use projects. This 3,000 MT/year recommendation has been used as a guideline for this analysis. In the absence of an adopted numerical threshold of significance, project

related GHG emissions in excess of the guideline level are presumed to trigger a requirement for enhanced GHG reduction at the project level.

SUBSTANTIATION

a&b. Less Than Significant Impact – Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. Many scientists believe that the climate shift taking place since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed project evaluated in the greenhouse gas (GHG) analysis cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. However, the proposed project may participate in the potential for GCC by its incremental contribution of greenhouse gasses combined with the cumulative increase of all other sources of greenhouse gases, which when taken together constitute potential influences on GCC.

Statewide, the framework for developing the implementing regulations for AB 32 is under way. Maximum GHG reductions are expected to derive from increased vehicle fuel efficiency, from greater use of renewable energy and from increased structural energy efficiency. Additionally, through the California Climate Action Registry (CCAR now called the Climate Action Reserve), general and industry-specific protocols for assessing and reporting GHG emissions have been developed. GHG sources are categorized into direct sources (i.e. company owned) and indirect sources (i.e. not company owned). Direct sources include combustion emissions from on-and off-road mobile sources, and fugitive emissions. Indirect sources include off-site electricity generation and noncompany owned mobile sources.

Construction Activity GHG Emissions

The worst-case scenario for maximum GHG emissions would be if all construction activities occur in the same calendar year. The CalEEMod2016.3.2 computer model predicts that the construction activities associated with the proposed project would generate the annual CO₂e emissions identified in Table VIII-1.

Table VIII-1
CONSTRUCTION EMISSIONS (METRIC TONS CO₂e)

Year 2021	CO ₂ e
Clear and Grub	18.4
Foundation Install	15.7
Grading	12.1
Trail Improvements	9.5
Total	55.7

CalEEMod Output provided in appendix

GHG impacts from construction are considered less than significant as they are below the adopted 3,000 MT threshold. No mitigation is required.

Operational Activity Emissions

The proposed project would ensure the provision of potable water to campers and would have minimal operational impacts. The proposed project would not generate any additional vehicle trips over existing conditions. There is currently only one 15-HP booster pump and the project proposes an additional similar booster bump for redundancy, which would allow continuous operation of the pumps in the event that one pump fails to operate or is undergoing maintenance. Therefore, because the new pump would only operate in the event the old pump is not working there would be no new pumping operational emissions. Minimal electricity would be required to operate the small new Seccua Virex Pro WTP unit. Therefore, operational GHG emissions are less than significant. No mitigation is required.

Consistency with GHG Plans, Programs, and Policies

The City of Monrovia created and implemented an Energy Action Plan (EAP) in 2008. The EAP lists goals for the City's future and sets forth commitments to achieve these goals through specific actions. The report focused on three resource areas which are: Energy, Water, and Transportation. The plan examined demand reduction strategies that can offset the energy, water, and transportation needs for the City of Monrovia, including the use of renewable energy sources.

Monrovia has identified future goals to reduce the City's peak electric load by 10 percent within seven years (by Fiscal year 2014/2015) through energy efficiency, shifting the timing of energy demands, and conservation measures.

The only electrical measure related to the proposed project is in regard to water pumping for municipal water. Specifically, the EAP recommends replacing water pump motors with newer energy-efficient models to not only save energy but to contribute to the efficiency of the water pumping system. The project proposes one 15-HP booster pump which would alternate in use with the current similar booster pump to ensure continuous pumping. However, only one pump would operate at any specific time. The new pump would contribute to efficiency of the updated water system.

Transportation issues were also discussed in the EAP. Given that 43 percent of greenhouse gases derive from transportation, a major portion of California legislation related to the environment and carbon emission focus on this sector. However, the proposed project would not generate any additional trips over existing conditions.

Except for short-term construction emissions, the proposed project is GHG neutral and the small amount of construction equipment employed for use for completion of the proposed project is less than significant. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		\boxtimes		
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?				\boxtimes
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?			X	

IX. HAZARDS AND HAZARDOUS MATERIALS

SUBSTANTIATION

a&b. Less Than Significant With Mitigation Incorporated – The proposed project would include facilities in support of a new replacement pre-assembled WTP unit, as well as replacement of an existing reservoir with two new 50,000 gallon steel reservoirs. The proposed project includes a variety of other site improvements, the majority of which would occur within developed sites at the Trask Scout Reservation. The proposed project would occur mainly within a small area adjacent to the main camp area, where the existing clear well and treatment plant are located, but the trail clean-up would occur in the area between the main camp area and the location of the existing reservoir (shown on Figure 1).

During construction of the proposed project, there are activities that can expose the public to significant hazards from accidental circumstances. The first pathway occurs when petroleum products are accidentally released from construction equipment or storage facilities. For example, vandalism can cause a release from stored fuels, or a hydraulic hose may break on a large piece of construction equipment. This type of impact is readily mitigated by immediately stopping the

construction activity; controlling the accidental release; and carrying out remediation of the area contaminated by the spill. The following mitigation measure addresses this circumstance.

All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

With incorporation of MM **HAZ-1**, no residential contamination would remain and the potential impact would be reduced to a less than significant level.

The roadway adjacent to the project site is owned and operated by the Angeles National Forest. The roadway leading to the Trask Scout Reservation can be used in support of construction. The existing regulatory mandates ensure that the hazardous materials and any hazardous wastes transported to and from the project site will be properly managed. These regulations are codified in Titles 8, 22, and 26 of the California Code of Regulations. For example, maintenance trucks for construction equipment must transport their hazardous materials in appropriate containers, such as tanks or other storage devices. In addition, the haulers must comply with all existing applicable federal, state and local laws and regulations regarding transport, use, disposal, handling and storage of hazardous wastes and material, including storage, collection and disposal. Compliance with these laws and regulations related to transportation would minimize potential exposure of humans or the environment to significant hazards from transport of such materials and wastes. These impacts are considered to be less than significant. No mitigation is required.

Operation of the proposed improvements is not anticipated to require routine transport of use of hazardous materials or routine generation of hazardous wastes. The proposed WTP is completely enclosed. The Seccua Virex Pro WTP produces small quantities of sludge. The quantities are so small that the sludge is stored within the system, which is then flushed out using backwash water (treated water) stored in a 400 gallon freestanding backwash tank (Figure 3). The used backwash water is then directed to a sump, where a submerged pump conveys it through a proposed sewer main to an existing septic well (next to the Admin Building), from there it will be finally spread through an existing leach field (Figure 4). Backwash is not considered to be brine because the WTP would remove organic contaminants, not salts or minerals; therefore, backwash can be discharged into the existing Trask sewer system. As such, no hazardous materials would be used in support of the proposed WTP, and no new hazardous materials are anticipated to be introduced as part of the operation of the project as proposed. Compliance with all federal, state and local regulations ensure that the proposed project is constructed and operates in a manner that poses no substantial hazards to the public or the environment. Therefore, impacts under these issues are considered less than significant with the incorporation of MM **HAZ-1** above.

c. No Impact –The nearest schools to the Trask Scout Reservation are located more than one mile south of the project site near Foothill Boulevard, the closest of which is Mayflower Elementary School located at 210 N Mayflower Ave, Monrovia, CA 91016. It is not anticipated that the proposed project would emit hazardous emissions or handle large quantities of hazardous materials or substances that would cause a significant impact to a local school. As such, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during construction or operation in a quantity that would pose any danger to people adjacent to, or in the general vicinity of, the project site. No impacts are anticipated and no mitigation is required.

d. Less Than Significant Impact – The project site is not located in an area that has been included on a list of hazardous material clean-up sites compiled pursuant to Government Code Section 65962.5 and, as a result it would not create a significant hazard to the public or environment. According to the California State Waterboard's GeoTracker, which provides information regarding Leaking Underground Storage Tanks, there are no locations within a 2,500 foot radius of any of the proposed project facilities that are identified as Leaking Underground Storage Tank (LUST) site or Department of Toxic Substances (DTS) site (Figure IX-1), nor are there any remediated LUST or DTS cleanup sites.

The Trask facility is a Waste Discharge Requirement (WDR) site, and currently retains an active permit thereof (Figure IX-2)². Development of the proposed project would not result in a violation of the WDR. Furthermore, the nature of the proposed project is not such that persons working or residing in the area would be exposed to any hazards from any nearby contaminated sites. Thus, the proposed construction and operation of the site with the proposed replacement facilities and other site enhancements would have a less than significant potential to create a significant hazard to the population or to the environment from their implementation. No mitigation is required.

- e. No Impact San Gabriel Valley Airport, a single runway general aviation airport, is the closest airport to the project site, which is located approximately 6 miles southwest of the project site. Given the large distance between the project site and nearby airports, proposed project implementation would not result in a safety hazard for people residing or working in the project area. Furthermore, there are no private airstrips/public use airports located within two miles of the project site. Therefore, the development of the proposed project would have no potential to result in a safety hazard or excessive noise for people residing or working in the project area. No impacts are anticipated and no mitigation is required.
- f. Less Than Significant With Mitigation Incorporated The proposed project would be confined to the project site, with minimal potential to interfere with the adjacent roadway. The project site can be accessed through North Canyon Boulevard; access is monitored by the Angeles National Forest, which minimizes risk of impairing or interfering with an adopted emergency response or evacuation plan as no residents beyond the sole Park Ranger that lives at the Trask Scout Reservation live north of the project site.

A limited potential to interfere with an emergency response or evacuation plan could occur during construction. This is because the proposed project is accessed by North Canyon Boulevard, which is narrow at points due to a large number of switchbacks; therefore, mitigation to address traffic disruption and emergency access issues is required, and is included in Section XVII, Transportation. Therefore, with the implementation of mitigation measure MM TRAN-1 identified in the Section XVII, there is a less than significant potential for the development of the proposed project to physically interfere with any adopted emergency response plans, or evacuation plans.

g. Less Than Significant Impact – The project area is an area susceptible to wildland fires, and is located within a delineated Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area (LRA) (Figure XX-1). Recent fires in the Angeles National Forest have encroached upon the Trask Scout Reservation. The proposed project would develop a new water treatment plant, new reservoirs, as well as various other site improvements. The potential for loss of life is considered to be low for the following reason: beyond the sole Park Ranger that resides at the Trask Scout Reservation, the site is only occupied by visitors for camp-out trips during appropriate times of the year, mainly in the summer.

The proposed project would also increase the area's water supply capabilities and is therefore viewed as a benefit to fire protection. Additionally, the proposed project has access to a roadway that is only accessible by those permitted by the Angeles National Forest, and as such, there are minimal conflicts preventing a successful evacuation of the site. Given that the proposed project serves as a

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² https://geotracker.waterboards.ca.gov/profile report?global id=WDR100000321

INITIAL STUDY

camp site for visitors, and does not propose any new human occupancy structures or long-term occupancy, the proposed project would have a less than significant potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No mitigation is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
X. H	YDROLOGY AND WATER QUALITY: Would the ct:				
dísch	olate any water quality standards or waste narge requirements or otherwise substantially ade surface or groundwater quality?		\boxtimes		
interf	ubstantially decrease groundwater supplies or fere substantially with groundwater recharge such roject may impede sustainable groundwater agement of the basin?				
the s	obstantially alter the existing drainage pattern of ite or area, including through the alteration of the se of a stream or river or through the addition of rvious surfaces, in a manner which would:				
(i)	result in substantial erosion or siltation onsite or offsite?				
(ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?			X	
(iii)	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or,			×	
(iv)	impede or redirect flood flows?			\boxtimes	
	flood hazard, tsunami, or seiche zones, risk se of pollutants due to project inundation?			×	
quali	onflict with or obstruct implementation of a water ty control plan or sustainable groundwater agement plan?				×

X. HYDROLOGY AND WATER QUALITY

SUBSTANTIATION

a. Less Than Significant Impact With Mitigation Incorporated – The proposed project would rehabilitate parts of an old water treatment facility, and install a new water treatment plant within the City of Monrovia in the Angeles National Forest. This new WTP would treat water to serve the Park Ranger and visitors of the Trask Scout Reservation to Division of Drinking Water (DDW) standards. The majority of the proposed project would be located at sites within Trask that are already developed or contain existing facilities that would be modified by the proposed project.

The proposed project would occur mainly within a small area adjacent to the main camp area, where the existing clear well and treatment plant are located, but the trail clean-up would occur in the area between the main camp area and the location of the existing reservoir (shown on Figure 1). Three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater; from stormwater runoff; and potential discharges of pollutants, such as accidental spills. The proposed project is served by an existing septic well that is conveyed

to a leach field that would not be modified by the proposed project. The Seccua Virex Pro WTP produces small quantities of sludge. The quantities are so small that the sludge is stored within the system, which is then flushed out using backwash water (treated water) stored in a 400 gallon freestanding backwash tank (Exhibit 1). The used backwash water is then directed to a sump, where a submerged pump would convey it through a proposed sewer main to an existing septic well (next to the Admin Building), from there it will be finally spread through an existing leach field (Figure 4). Backwash is not considered to be brine because the WTP would remove organic contaminants, not salts or minerals; therefore, backwash can be discharged into the existing Trask sewer system. Thus, the proposed project is not anticipated to result in a violation of waste discharge requirements from wastewater generation, as the intent of the proposed project is to ensure that the proposed new facilities meet DDW water quality standards.

The proposed project may result in some soil erosion during construction activities. Because the proposed new facilities (specifically those associated with the WTP and new reservoirs) would occur within areas that are developed or currently contain similar existing facilities, it is not anticipated that the proposed project would have a potential to cause substantial soil erosion, and subsequent water quality impacts. However, because the proposed project is located within the Angeles National Forest and is therefore surrounded by vegetation and native soils, best management practices (BMPs) during construction would be required. Due to the small size of the proposed project (less than one acre), a Storm Water Pollution Prevention Plan (SWPPP) is not required. However, the GLAAC-BSA shall implement BMPs during construction, which would be enforced by the following mitigation measure:

- HYD-1 The City shall require that the GLAAC-BSA selected construction contractor implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the GLAAC-BSA include the following:
 - The use of silt fences or coir rolls;
 - · The use of temporary stormwater desilting or retention basins;
 - The use of water bars to reduce the velocity of stormwater runoff:
 - The use of wheel washers on construction equipment leaving the site;
 - The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;
 - The storage of excavated material shall be kept to the minimum necessary to efficiently perform the construction activities required. Excavated or stockpiled material shall not be stored in water courses or other areas subject to the flow of surface water; and
 - Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.

Implementation of the MM **HYD-1**, as well as MM **HAZ-1**, is considered adequate to reduce potential impacts to stormwater runoff and pollutant control to a less than significant level.

b. Less Than Significant Impact – The project does not propose the installation of any water wells that would directly extract groundwater. The proposed project would clean up the raw water collector, which would enable this collector to be more efficient, though the water demand is not anticipated to grow beyond that which presently exists to serve the Trask Scout Reservation. The proposed project would connect to existing water connections, though some of the onsite piping would be removed or

abandoned, while new appurtenances in support of the proposed new WTP may be installed as part of the proposed project. The existing 25,000 gallon reservoir would be removed, and two new reservoirs capable of storing 50,000 gallons each would be filled to store additional water, thereby requiring an additional 75,000 gallon one time fill up upon the initial reservoir fill.

The proposed project is not anticipated to require greater water supplies from the stream inlet in order to operate, particularly because the proposed project would treat a comparable amount of water for potable use to that which is used by the Trask Scout Reservation at present. Furthermore, the San Gabriel Valley Groundwater Basin is located southwest of the project site, therefore as the proposed project is located in the San Gabriel Mountains, no groundwater basin underlies the project site (Figure X-1). Thus, the proposed project is not forecast to cause a significant demand for new groundwater supplies, as the project site is supplied with water drawn from Sawpit Creek. The proposed project would have a less than significant potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin. No mitigation is required.

c. i. Result in substantial erosion or siltation onsite or offsite?

Less Than Significant Impact – The proposed project is not anticipated to significantly change the volume of flows downstream of the project site, and would not be anticipated to change the amount of surface water in any water body in an amount that could initiate a new cycle of erosion or sedimentation downstream of the project site. The existing onsite drainage would capture any potential incremental increase in runoff from the project site associated with project development. Furthermore, the proposed project includes stream restoration and trail restoration, which is anticipated to minimize past and future erosion within the site.

Given that the proposed project is located within an existing site, containing existing development, it is not anticipated that the new facilities—the majority of which would be developed within, in place of, or adjacent to existing facilities—would result in new drainage patterns such that new drainage patterns would emerge that would not be accommodated by existing onsite facilities. Furthermore, the reservoirs specifically, which would be developed in a relatively remote area of the Trask Scout Reservation, would be designed to minimize erosion potential in the reservoir site vicinity. The downstream drainage system would not be altered and given the control of future surface runoff from the Trask Scout Reservation site, the potential for downstream erosion or sedimentation would be controlled to a less than significant impact level. No mitigation is required.

c. <u>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?</u>

Less Than Significant Impact – The proposed project is not anticipated to alter the existing drainage courses or patterns onsite and would maintain the existing offsite downstream drainage system through control of future discharges from the site, which would prevent flooding onsite or offsite from occurring. This is because the existing onsite drainage would capture any potential incremental increase in runoff from the project site associated with proposed project development. Furthermore, as stated above, the proposed project would include stream restoration, which is anticipated to minimize the potential for flooding on- or off-site.

Given that the proposed project is located within an existing recreation site, containing existing development, it is not anticipated that the new facilities—the majority of which would be developed within, in place of, or adjacent to existing facilities—would result in new drainage patterns such that new drainage patterns would emerge that would not be accommodated by existing onsite facilities. The downstream drainage system would not be altered and, given the control of future surface runoff from the Trask Scout Reservation site, the potential for the proposed project to result in flooding onsite or offsite would be controlled to a less than significant impact level. No mitigation is required.

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

Less Than Significant Impact – The proposed project is not anticipated to alter the site such that drainage within the site would be altered, and would maintain the existing offsite downstream drainage system through control of future discharges from the site, which would prevent the proposed project from exceeding the capacity of existing or planned stormwater drainage systems and from providing substantial additional sources of polluted runoff. This is because the existing onsite drainage would capture any potential incremental increase in runoff from the project site associated with proposed project development. Furthermore, the proposed project includes stream restoration, including improvement of the environmental health of Sawpit Creek, which would minimize sources of pollution within the stream.

Given that the proposed project is located within an existing site, containing existing development, it is not anticipated that the new facilities—the majority of which would be developed within, in place of, or adjacent to existing facilities—would result in new drainage patterns such that new drainage patterns would emerge that would not be accommodated by existing onsite facilities. The downstream drainage system would not be altered and given the control of future surface runoff from the Trask Scout Reservation site, the potential for the proposed project to 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 would be controlled to a less than significant impact level. No mitigation is required.

c. iv. Impede or redirect flood flows?

Less Than Significant Impact – According to the Federal Emergency Management Agency National Flood Hazard Layer Viewer (Figure X-1) the proposed project footprint is not located in an area that contains any flood hazards. The project site is located in an area of undetermined flood hazard, and given the topography of the site, it is not anticipated to be or known to be exposed to significant flood events. Furthermore, development of the project site is not anticipated to redirect or impede flood flow, particularly given that drainage onsite would be directed to the existing drainage systems, which are capable of intercepting the future flow rate from the project site. Therefore, the potential impeding or redirecting flood flow impacts are less than significant. No mitigation is required.

- d. Less Than Significant Impact The proposed project is located upstream from the LACFCD dam, and therefore cannot be impacted by inundation from the nearby dam. The proposed project, as stated above, is not located in a flood hazard zone. Finally, the proposed project is located at an elevation of about 1,550 feet, and is located about 30 miles north of the Pacific Ocean. Therefore, inundation from tsunami is unlikely, and implementation of the proposed project would not expose people or structures to a significant risk of releasing pollutants due involving flooding as a result of a levee or dam, tsunami or another flood hazard than that which presently exists within the project footprint. No mitigation is required.
- e. No Impact The Trask Scout Reservation is located in an area with no underlying groundwater basin. The San Gabriel Valley Groundwater Basin is located southwest of the project site. Historically, the Trask Scout Reservation has been served with water supply by a raw water collector in Sawpit Creek, and under the proposed project, Trask would continue to obtain its water supply from Sawpit Creek surface flows, though the raw water collector and inlet structure would be rehabilitated to improve efficiency within this water system. No greater water is anticipated to be drawn from the raw water collector under the operation of the proposed project over the long term. Therefore, as the proposed project is not served by a water supply drawn from an underlying groundwater basin, and because the proposed project would not require an increased supply drawn from Sawpit Creek—which flows south into the San Gabriel River and is part of the Los Angeles River Watershed—the proposed project would have no potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No impact or Does Not Apply
XI. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?				\boxtimes
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?				×

XI. LAND USE AND PLANNING

SUBSTANTIATION

- a. No Impact The proposed new reservoirs, WTP, and associated site rehabilitation and improvements would be constructed on land that contains existing, similar, facilities in support of the Trask Scout Reservation. The proposed project would replace many existing facilities within the existing Trask Scout Reservation, which is located on a site that is designated by the City of Monrovia for Angeles National Forest use, with a Zoning Classification of Angeles National Forest and Hillside Reserve (Figure XI-1). Essential infrastructure improvements, such as water storage reservoirs, and water treatment plants can be constructed within any land use designation. The land use surrounding the proposed project location are the same as those underlying the project site (Angeles National Forest). Given that the proposed project would introduce new and replacement facilities consistent with that which presently exists within the Trask Scout Reservation, the proposed project would have no potential to physically divide an established community. No impacts are anticipated and no mitigation is required.
- b. No Impact Please refer to the discussion under issue XI(a) above. As previously stated, the project site is zoned by the City of Monrovia as Angeles National Forest and Hillside Reserve, and the Land Use Designation of the project site is Angeles National. In general, water production facilities are zone independent because they are needed to support all types of development. The entirety of the proposed project would occur within area immediately surrounding the project site is generally residential in nature or supports open space use. The project site currently contains one reservoir, a water treatment system, and associated water supply appurtenances in support of the Trask Scout Reservation. The addition of a second reservoir, a replacement WTP, and associated site rehabilitation and improvements at this location would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to the general plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. No impacts are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XII. MINERAL RESOURCES: Would the project:				
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?				\boxtimes
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?				×

XII. MINERAL RESOURCES

SUBSTANTIATION

a&b. No Impact – The proposed project is located in the within the City of Monrovia within a site containing the existing Trask Scout Reservation, intended for camp-outs and other GLAAC-BSA-related activities. The project site is located within the San Gabriel Mountains within the boundaries of the existing Trask Scout Reservation site. According to the Mineral Land Classification map developed by the California Department of Conservation (Figure XII-1), no known mines or mineral resources are known to occur on or in the vicinity of the project site. As no current mining operations exist at the project site or have been identified by the City, implementation of the proposed project would not result in in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impacts are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIII. NOISE: Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			\boxtimes	
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?				\boxtimes

XIII. NOISE

Background

Noise is generally described as unwanted sound. The Trask Scout Reservation is located within the Angeles National Forest, with no surrounding development. The project area is accessible to hikers, but no development containing sensitive receptors (residences, churches, schools, etc.) is located within a one-mile radius of the proposed project. As such, the Trask Scout Reservation is in a low-background noise environment.

The unit of sound pressure ratio to the faintest sound detectable to a person with normal hearing is called a decibel (dB). Sound or noise can vary in intensity by over one million times within the range of human hearing. A logarithmic loudness scale, similar to the Richter scale for earthquake magnitude, is therefore used to keep sound intensity numbers at a convenient and manageable level. The human ear is not equally sensitive to all sound frequencies within the entire spectrum. Noise levels at maximum human sensitivity from around 500 to 2,000 cycles per second are factored more heavily into sound descriptions in a process called "A-weighting," written as "dBA."

Leq is a time-averaged sound level; a single-number value that expresses the time-varying sound level for the specified period as though it were a constant sound level with the same total sound energy as the time-varying level. Its unit is the decibel (dB). The most common averaging period for Leq is hourly. The State of California has established guidelines for acceptable community noise levels that are based on the Community Noise Equivalent Level (CNEL) rating scale (a 24-hour integrated noise measurement scale). The guidelines rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land use types. The State Guidelines, Land Use Compatibility for Community Noise Exposure, single-family homes are "normally acceptable" in exterior noise environments up to 60 dB CNEL and "conditionally acceptable" up to 70 dB CNEL based on this scale. Multiple family residential uses are "normally acceptable" up to 65 dB CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries and churches are "normally acceptable" up to 70 dB CNEL, as are office buildings and business, commercial and professional uses with some structural noise attenuation.

The City of Monrovia's Municipal Code, Section 9.44.040, states the following regarding allowable noise levels: A) The noise standards imposed by this section shall apply to all properties in the city occupied for residential purposes, without regard to zoning classification. Except as otherwise allowed in this chapter,

no person shall create or allow the creation of noise on any such residential property which causes the noise level to exceed the actual measured median ambient noise level, or the following presumed ambient noise level, whichever is greater:

Time	Allowable Noise Level—dBA
7:00 a.m. to 9:00 p.m.	55
9:00 p.m. to 7:00 a.m.	50

Additionally, the City of Monrovia's Municipal Code, Section 9.44.080 states the following pertaining to exemptions for construction: The following activities shall be exempt from the provisions of this chapter: (E) The operation of any mechanically powered saw, sander, drill, grinder, lawn or garden tool or similar tool between 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 10:00 a.m. and 10:00 p.m. on weekends and holidays; (F) Construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays

SUBSTANTIATION

a. Less Than Significant Impact – The project site is located in an area setback into the Sawpit Canyon within the Angeles National Forest, which is considered a low-background noise level environment. Noise is presently generated on the project site only when the Trask Scout Reservation is being utilized by visitors for campouts, however given the distance to the nearest residences (over 1 mile to the southwest), noise generated at the campground would attenuate to a reasonable level or more likely dissipate before it reaches the nearest sensitive receptors.

Short Term Noise

Short-term construction noise impacts associated with the proposed project are anticipated to be minimal as heavy construction equipment is not anticipated to be required to accomplish a majority of the actions proposed by this project. Construction is anticipated to require the following list of equipment, including, but not limited to: backhoe, excavators, shovels, weed removal tools, brooms, hammers, crow bars, electrical cutters, jack hammers, dumpers, vibratory compactors, tractors, water hoses, wheelbarrow, levels, drilling tools, spatulas, pliers, etc.

Construction equipment generates noise that ranges between approximately 75 and 90 dBA at a distance of 50 feet. Refer to Table XIII-1, which shows construction equipment noise levels at 25, 50 and 100 feet from the noise source. Given the one-mile distance between the proposed project and the nearest sensitive receptors, it is anticipated that noise generated by construction would attenuate at the nearest receptor. Furthermore, according to the City of Monrovia's Municipal Code, Section 9.44.080, construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays is exempt from the City's Noise Performance Standards. The proposed project would be constructed during the hours in which construction is exempt from the City's Noise Performance Standards. The proposed project would be constructed in compliance with the City's Noise Performance Standards, and therefore construction of the proposed project would be less than significant. No mitigation is required to minimize noise impacts from construction.

Long-Term Noise

Noise attenuates at a rate of approximately 6 to 7 decibels per doubling of distance. As such, noise generated as a result of the proposed project would attenuate to a less than significant level, or an inaudible level by the time it reached the residences one-mile to the southwest.

The proposed project does not include many new facilities beyond those that exist at the Trask Scout Reservation at present. The proposed project would remove an existing reservoir, and replace it with

two new reservoirs, a new backup generator would be installed, a new booster pump, new fire hydrants, water fountains, and other new features would be installed. These new facilities are not of a type that would generate significant new permanent noise at the Trask Scout Reservation. As stated above, at present, minimal noise is generated by the activities at the Trask Scout Reservation, though ambient noise levels at the facility increase during camp-outs with many visitors at the site. However, given the great distance (one-mile) between the Trask Scout Reservation and the nearest residences to the southwest, the minimal new noise generated by the operation of the facilities proposed as part of the proposed project would be less than significant. With no sensitive receptors nearby, the proposed project would not expose of persons to or generation of noise levels in excess of established standards. Thus, based on the existing noise environment at the Trask Scout Reservation, operation of the proposed project would not violate noise standards outlined in the City of Monrovia Municipal Code. Therefore, operation of the proposed project would be less than significant. No mitigation is required.

b. Less Than Significant Impact – Vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noises. Sources of groundborne vibrations include natural phenomena (e.g. earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g. explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second), and discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts related to human development are generally associated with activities such as train operations, construction, and heavy truck movements.

The Federal Transit Authority (FTA) Noise and Vibration Assessment³ states that in contrast to airborne noise, ground-borne vibration is not a common environmental problem. Although the motion of the ground may be noticeable to people outside structures, without the effects associated with the shaking of a structure, the motion does not provoke the same adverse human reaction to people outside. Within structures, the effects of ground-borne vibration include noticeable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The FTA Assessment further states that it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. However, some common sources of vibration are trains, trucks on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment. The FTA guidelines identify a level of 80 VdB for sensitive land uses. This threshold provides a basis for determining the relative significance of potential project related vibration impacts.

Due to the large size of the project site, and the lack of any sensitive receptors within a reasonable distance of the project site, the proposed project would not expose people to generation of excessive groundborne vibration or groundborne noise levels. During construction, certain construction activities have some potential to create vibration, but due to the size of the site and lack of sensitive receptors nearby, impacts would be considered less than significant. Furthermore, the City of Monrovia Municipal Code Section 17.32.050 places restrictions on vibration such that no vibration shall be permitted which causes a noticeable tremor beyond the boundary line of the property upon which the vibration exists. The proposed project would comply with this restriction because no sensitive receptors exist within the vicinity of the project that would be impacted by project related vibration. Thus, vibration impacts less than significant. No mitigation is required.

TOM DODSON & ASSOCIATES

³ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Noise and Vibration Manual.pdf

Table XIII-1
NOISE LEVELS OF CONSTRUCTION EQUIPMENT AT 25, 50 AND 100 FEET (in dBA Leq)
FROM THE SOURCE

Equipment	Noise Levels at 25 feet	Noise Levels at 50 feet	Noise Levels at 100 feet
Earthmoving			
Front Loader	85	79	73
Backhoes	86	80	74
Dozers	86	80	74
Tractors	86	80	74
Scrapers	91	85	79
Trucks	91	85	79
Material Handling	•		
Concrete Mixer	91	85	79
Concrete Pump	88	82	76
Crane	89	83	77
Derrick	94	88	82
Stationary Sources	•		
Pumps	82	79	70
Generator	84	78	72
Compressors	87	81	75
Other			
Saws	84	78	72
Vibrators	82	76	70

Source: U.S. Environmental Protection Agency "Noise"

c. No Impact – San Gabriel Valley Airport, a single runway general aviation airport, is the closest airport to the proposed project, and is located approximately 6 miles southwest of the project site. The proposed project is not located within the El Monte Airport (renamed to the San Gabriel Valley Airport) Noise Contours (Figure XIII-1), as depicted in the El Monte Airport Master Plan Report.⁴ Given the large distance between the project site and nearby airports, it is not anticipated that persons working in the project area to excessive noise levels generated by the nearby Airport. No private airstrips are located in close proximity to the proposed project. Therefore, there would be no impacts. No mitigation is required.

⁴ https://dpw.lacounty.gov/avi/airports/documents/SGV MP.pdf

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No impact or Does Not Apply
XIV. POPULATION AND HOUSING: Would the project:				
a) Induce substantial 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)?			\boxtimes	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				×

XIV. POPULATION AND HOUSING

SUBSTANTIATION

- a. Less Than Significant Impact Implementation of the proposed project would not induce substantial population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The proposed project is considered a vital infrastructure project because it proposes to improve the water quality at the Trask Scout Reservation site, thus allowing continued use of the recreational facility. This is because the regulatory oversight of surface water treatment at Trask was changed from the Los Angeles County Department of Public Health to the DDW bringing additional regulations and standards. Since its transfer, Trask could not satisfy DDWs regulations with its existing surface water treatment system. As a result, Trask is proposing to install a new water treatment system to meet DDW treatment regulations and standards. It is anticipated that construction would require a temporary work force; however, this is short-term and, with a maximum of about 15 employees, would not induce substantial population growth. It is not anticipated that Trask would require any additional permanent employees in support of the proposed site improvements. Therefore, operation of the Trask Scout Reservation would not result in any increase in population and impacts would be less than significant. No mitigation is required.
- b. No Impact The proposed development would occur on a site that currently contains the existing Trask Scout Reservation facilities. Implementation of the proposed project would develop new reservoirs, WTP, and associated site rehabilitation and improvements. No housing is proposed as part of the proposed project. No persons permanently reside within the project site with the exception of the Park Ranger, and visitors using the site during camp-outs. Therefore, implementation of the proposed project would not displace any existing housing or displace a substantial number of people that would necessitate the construction of replacement housing elsewhere. Therefore, there would be no impacts. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XV. PUBLIC SERVICES: 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:				
a) Fire protection?			\boxtimes	
b) Police protection?			\boxtimes	
c) Schools?			\boxtimes	
d) Parks?				\boxtimes
e) Other public facilities?				\boxtimes

XV. PUBLIC SERVICES

SUBSTANTIATION

a. Less Than Significant Impact – The City of Monrovia is served by Monrovia Fire and Rescue, the headquarters for which (Station 101) are located at 141 E. Lemon Avenue in the City of Monrovia about 2.5 miles southwest of the project site. Fire protection agreements with the City of Arcadia and the Los Angeles County Fire Department provide for additional resources for the City of Monrovia.

The proposed project would not include the use or storage of highly flammable materials. The proposed project would develop two new reservoirs, a new water treatment plant (pre-assembled), and other site improvements that could benefit fire protection services by providing greater water storage at Trask Scout Reservation. These new facilities do not present a fire hazard, though it is located within a very high fire hazard severity zone within a Local Responsibility Area, and therefore there may be a potential for wildfires at this site (see Figure IX-2). The proposed reservoir would be made of steel and concrete, which are considered fire-resistant. Furthermore, the water treatment system would not contain materials that are highly flammable, though it would be housed within a prefabricated shed. Thus, the proposed site improvements are not anticipated to generate greater fire risk than exists at present. As such, no new or altered fire protection facilities would be required to serve the proposed project. Impacts to the existing fire protection system would be less than significant. No mitigation is required.

b. Less Than Significant Impact – The project site is located within the Angeles National Forest, within the City of Monrovia. The City of Monrovia is served by the Monrovia Police Department provides police services to the residents of Monrovia. The police headquarters building is located at 140 East Lime Avenue, approximately 2.5 miles southwest of the project site.

The proposed project is not the kind of use that would likely attract criminal activity, except for random trespass and theft. The project site can only be accessed through North Canyon Boulevard; access is monitored by the Angeles National Forest, which minimizes risk of trespass as no residents beyond the sole Park Ranger reside at the Trask Scout Reservation. Because Trask would remain not readily accessible to the public, a less than significant potential exists for demand for police protection or expansion of police infrastructure. Due to the project's location within an existing facility, and the lack of new personnel associated with operation of the proposed facilities, implementation of the proposed project would not substantially increase the demand for law enforcement services beyond that

- already existing at the project site. Impacts to the existing police protection system would be less than significant. No mitigation is required.
- c. Less Than Significant Impact The project site is located within the Monrovia Unified School District (MUSD). Within the City, the MUSD operates one pre-school, five elementary schools, two middles schools, one traditional high school, and one alternative high school. The nearest schools are located more than one mile south of the project site near Foothill Boulevard, the closest of which is Mayflower Elementary School located at 210 N Mayflower Ave, Monrovia, CA 91016.
 - As discussed under Chapter XIV, Population and Housing, the proposed project would not induce population growth within the City, as it will neither construct housing, nor result in a growth in employment opportunities within the area. Thus, the proposed project would not generate an increase in elementary, middle, or high school population. Therefore, school impacts would be less than significant. No mitigation is required.
- d. No Impact The proposed project would be developed within an existing site meant for camp-outs and recreational activities: the Trask Scout Reservation. The proposed project would not expand the recreational facilities, but would provide access to drinking water that meets DDW standards, as well as other improvements to the overall Trask site. The proposed project would install water fountains and includes trail restoration. Implementation of the proposed project would not impact any current or planned park use, as it will be constructed within the existing Trask Scout Reservation site. Additionally, according to the Open Space Element and the Parks Master Plan, parkland acquisitions are provided by the Dwelling Unit Tax and Special Open Space Tax. Payment of any applicable fees by a project proponent would offset incremental impacts. Thus, implementation of the proposed project would not cause a substantial adverse physical impact to any parks within the City. No impacts are anticipated and no mitigation is required.
- e. No Impact Other public facilities include library and general municipal services. The library system in the City of Monrovia is operated by the Public Library Division. Since the project will not directly induce substantial population growth, it is not forecast that the use of such facilities will increase as a result of the proposed project. As a result, the implementation of the project will not 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 public services to include other public facilities. Thus, no impacts are anticipated and no mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVI. RECREATION:				
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?			\boxtimes	
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?			×	

XVI. RECREATION

SUBSTANTIATION

- a. Less Than Significant Impact The proposed project includes improvements to the Trask Scout Reservation, which serves the GLAAC-BSA with facilities onsite consisting of an Administration Building, Warehouse, Fort Rotary, Kitchen, Bathrooms, and recreational amenities for its campers and visitors. The proposed project would enhance the existing facilities at the Trask Scout Reservation, but would not enable a greater number of visitors as no new recreational or camp-out related facilities are included as part of the proposed project. Furthermore, as previously discussed in Section XIV, Population and Housing, and Section XV, Public Services, the proposed project would not contribute to an increase in the population beyond that already allowed or planned for by local and regional planning documents. Therefore, the proposed project would not result in an increase in the demand for parks and other recreational facilities. Impacts are less than significant and no mitigation is required.
- b. Less Than Significant Impact As stated above, the proposed project would install improvements to the Trask Scout Reservation. While the project proposes recreational facility improvements, including the installation of fire hydrants, water fountains, trail restoration, and upgrades to the electrical system, the proposed project would result in less than significant impacts on the environment resulting from the installation and operation of these improvements. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVII. TRANSPORTATION: Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			×	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			\boxtimes	
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?		\boxtimes		

XVII. TRANSPORTATION

SUBSTANTIATION

a. Less Than Significant Impact – The project does not propose any new roads. Operations at the Trask Scout Reservation under the proposed project would not generate greater traffic to and from the site than that which would occur at present. As a result, operation of the proposed project is not anticipated to conflict with alternative transportation plans, policies or programs. The proposed project would not require the development of new public roads and no alterations to any existing public roads will result from project implementation. The proposed rehabilitation and enhancements would be constructed entirely within the existing Trask Scout Reservation boundaries and would therefore not impact or otherwise decrease performance or safety of public transit, bicycle, or pedestrian facilities during this phase.

The proposed project is not anticipated to result in a substantial number of trips such that levels of service or other State and local measures of performance would be violated, particularly given that the proposed project site can be only be accessed through North Canyon Boulevard; access is monitored by the Angeles National Forest, which minimizes the potential for conflicts along the roadway in and out of the Trask Scout Reservation. Furthermore, an average of about 15 round-trips per day are anticipated to occur during construction, and as such, the proposed project would not generate a substantial number of trips to and from the project site during construction along North Canyon Boulevard and connecting roadways. Therefore, based on the availability of roadways and the developed area in which the project site is located, the proposed project has a less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system. No mitigation is required.

b. Less Than Significant Impact – The proposed project would install two new reservoirs, a new water treatment plant and new/rehabilitated appurtenances, and includes various site improvements. The proposed project will require minimal vehicle miles traveled to accomplish once constructed. In the short term, construction of the proposed facilities would result in the generation of about 5 to25 roundtrips per day on the adjacent roadways by construction personnel and trucks removing or delivering materials to the site. The total number of vehicle roundtrips per day is estimated to be 15 trips. The vehicle miles traveled in these instances would likely average less than 50 miles round trip. The number of temporary truck trips would be minimized by using 15 cubic yard material haulers instead of smaller 10 cubic yard trucks to haul material onto and off of the site. Additionally, the same trucks that haul material onto the site would also carry waste material off of the site.

Once constructed, the only traffic that would be generated by the proposed project would be a continuance of visitors to the site's existing use for GLAAC-BSA camp-outs, and trips to and from the site by the Park Ranger who lives onsite. No additional operational trips are anticipated to result from project implementation.

The City of Monrovia's screening threshold for vehicle miles traveled (VMT) exempts "projects generating fewer than 110 daily trips." As such, development of the proposed project is not anticipated to result in a significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts are considered less than significant. No mitigation is required.

- Less Than Significant Impact The proposed project would occur entirely within the project site boundaries. Construction activities would not occur within the adjacent roadways to the project site. There are no uses that would be impacted by construction equipment or construction trips on the adjacent roadways. Large trucks delivering equipment, fill material, or removing small quantities of excavated dirt or debris can enter the site without major conflicts with the flow of traffic on the roadways used to access the site, particularly because the project site can only be accessed through North Canyon Boulevard and access is monitored by the Angeles National Forest, limiting the traffic on adjacent roadways. Additionally, the proposed project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City, as well as the police and fire departments. Therefore, the proposed project would have a less than significant potential to substantially increase hazards due to a geometric design feature or incompatible uses. No mitigation is required.
- d. Less Than Significant With Mitigation Incorporated The project site includes direct access on public roadways and through North Canyon Drive for which access is monitored by the Angeles National Forest limiting the traffic on adjacent roadways. North Canyon Drive is the emergency access route to and from the project site, and also provides access to adjacent fire roads reaching the Angeles National Forest. The traffic along North Canyon Drive during construction would be minimal with no known blockages along the roadway accessing the site. No known emergency access plans or emergency response or evacuation plans would be affected by the proposed project in the short- or long-term. Construction activities would not occur within the roadways adjacent to the project site boundaries. Large trucks delivering equipment would be delivering materials, as well as hauling materials off of the site. However, because the proposed project is accessed by North Canyon Boulevard, which is narrow at points due to a large number of switchbacks, the following mitigation measure is required to address traffic disruption and emergency access issues:
 - TRAN-1 The construction contractor will provide traffic management resources, as determined by the City of Monrovia. The City shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. At a minimum this plan shall include the following:
 - a) Methods to minimize the amount of time spent on construction activities;
 - b) Methods to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes;
 - c) Methods to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure adequate traffic flow;

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⁵ https://www.cityofmonrovia.org/home/showdocument?id=22855

- d) Identification of alternative routes, if necessary, that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities will occur; and
- e) Identification of methods or procedures to ensure that at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.

Upon implementation of the MM **TRAN-1**, any potential increase in hazards due to design features or incompatible use will be considered less than significant in the short term. In the long term, no impacts to any hazards or incompatible uses in existing roadways are anticipated. Operation of the proposed project would be consistent with the surrounding uses, and the design of the proposed project would not create any hazards to surrounding roadways such that emergency access would be impaired. Thus, any impacts are considered less than significant with implementation of mitigation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, 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 the California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		\boxtimes		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		×		

XVIII. TRIBAL CULTURAL RESOURCES

Tribal Resource Definition

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

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

SUBSTANTIATION

a&b. Less Than Significant With Mitigation Incorporated — The project site is located within the area of cultural significance for the several tribes. AB 52 letters were sent out to tribes who requested consultation on future projects within the City of Monrovia. Only two tribes responded: the Fernandeño Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians — Kizh Nation. The Fernandeño Tataviam Band of Mission Indians deferred consultation to the Gabrieleño

Band of Mission Indians – Kizh Nation. The Gabrieleño Band of Mission Indians – Kizh Nation requested several materials related to the proposed project, and requested that mitigation be included as part of the proposed project in order for consultation to conclude. As such, the following mitigation measures shall be implemented to minimize any potential impacts to tribal cultural resources:

TRC-1 Retain a Native American Monitor/Consultant: 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 that consulted on this project pursuant to Assembly Bill A52 - SB18 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the Lead Agency prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present onsite 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 that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The onsite monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site 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 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the Tribal monitor approved by the Consulting Tribe and a qualified archaeologist if one is present. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue in other parts of the Project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

TRC-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects:

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

Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.

TRC-3 Resource Assessment & Continuation of Work Protocol:

Upon discovery of human remains, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 100 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will 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 will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

TRC-4 Kizh-Gabrieleño Procedures for burials and funerary remains:

If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

TRC-5 Treatment Measures:

Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The

Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

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

TRC-6 Professional Standards:

Native American and Archaeological monitoring during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of TCR's shall be taken. The Native American monitor must be approved by the Gabrieleño Band of Mission Indians-Kizh Nation. Principal personnel for Archaeology must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California.

As such, with implementation of MM **CUL-1**, and MMs **TRC-1** through **TRC-6**, the proposed project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, or object with 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. Thus, any impacts are considered less than significant with implementation of mitigation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or 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?			\boxtimes	
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?			\boxtimes	
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?			\boxtimes	

XIX. UTILITIES AND SERVICE SYSTEMS

SUBSTANTIATION

a. Water

Less Than Significant Impact – The proposed project would construct new water facilities—two new 50,000 gallon water storage reservoirs as well as a new WTP and new/rehabilitated appurtenances—to support the water supply availability at the Trask Scout Reservation. The proposed project would occur on a site that currently contains an existing 25,000 gallon reservoir and existing WTP and appurtenances. The proposed project would not require any additional water to operate, other than the water proposed to be stored in the proposed reservoirs, which would contribute to the existing water facilities that serve the Trask Scout Reservation. With no increased overall demand for water, the proposed project, is not forecast to require or result in the construction of new water facilities or expansion of existing facilities such that a significant impact would occur. No mitigation is required.

Wastewater

Less Than Significant Impact – The proposed project is located at a site served by an existing septic well that is conveyed to a leach field and that would not be modified by the proposed project. The proposed project does not include expansion or development that would require connection to the wastewater collection system. Under the proposed project, the only use of the existing system is that the used backwash water from the new WTP is directed to a sump, where a submerged pump would convey it through a proposed sewer main to an existing septic well, where from there it would be finally spread through an existing leach field (Figure 4). No connections to the municipal wastewater collection system and wastewater treatment plant are required, and no expansion of the existing

septic system is required to accommodate backwash flow. With no expanded infrastructure required to accommodate this minimal additional wastewater generation at the site, site improvements are not forecast to require or result in the construction of new wastewater facilities or expansion of existing facilities in order to serve the proposed project. No mitigation is required.

Stormwater

No Impact – As stated under issue X(c[i-iv]), implementation the proposed project is not forecast to significantly alter the volume of surface/stormwater runoff that would be generated from the project site. Because the proposed project is located within an existing site containing existing development, it is not anticipated that the proposed new facilities—the majority of which would be developed within, in place of, or adjacent to existing facilities—would result in new drainage patterns such that new drainage patterns would emerge that would not be accommodated by existing onsite facilities. As such, the existing onsite drainage is anticipated to capture any potential incremental increase in runoff associated with proposed project development, and therefore no new drainage facilities are required. With no expanded infrastructure required to accommodate the minimal additional stormwater runoff at the site, site improvements are not forecast to require or result in the construction of new stormwater facilities or expansion of existing facilities in order to serve the proposed project. No impacts are anticipated and no mitigation is required.

Electric Power

No Impact – Development of the proposed project would not require the installation of electrical services beyond that which the site currently requires to operate. The proposed project does not involve substantial new facilities at Trask that would require energy, but instead proposes to install replacement and improved facilities that would not result in a significant net increase in operational energy requirements. Furthermore, it is anticipated that any new equipment installed would be more energy efficient than the existing equipment. Therefore, the proposed project is not anticipated to require expanded or additional electrical connections because additional energy or substantial additional energy beyond that which the site currently requires to operate is not required to operate Trask under the proposed project. Thus, the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities as this is not required to serve the proposed project. No impacts are anticipated and no mitigation is required.

Natural Gas

No Impact – Development of the proposed project would not require installation, expansion, or use of natural gas. Therefore, the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded natural gas facilities. No impacts are anticipated and no mitigation is required.

Telecommunications

No Impact – Development of the proposed project would not include installation of wireless internet service or phone serve. Therefore, the proposed project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication facilities. No impacts are anticipated and no mitigation is required.

b. Less Than Significant Impact – Please refer to the previous discussion under issues X(b) and XIX(a) in Sections X, Hydrology and Water Quality, and XIX, Utilities and Service Systems. The proposed project would construct new water facilities two new 50,000 gallon water storage reservoirs as well as a new WTP and new/rehabilitated appurtenances—to support the water supply availability at the Trask Scout Reservation. The construction and operation of these new facilities would not create a greater demand for water at this site than that which presently exists, as no expanded uses are proposed. The new reservoirs would connect to the existing water distribution system and store water

for future use enabling better overall management of water distribution within the Trask Scout Reservation. Furthermore, the proposed WTP would enable Trask to treat water to DDW standards as the purpose of the proposed project is to rehabilitate the surface water treatment system to satisfy the current treatment regulations and standards, and to enhance the existing water distribution system at Trask. Thus, implementation of the proposed project would have access to sufficient water supplies available to serve the project from existing entitlements and resources. Any impacts are considered less than significant. No mitigation is required.

- c. Less Than Significant Impact Please refer to the previous discussion under issues X(a) and XIX(a) in Sections X, Hydrology and Water Quality, and XIX, Utilities and Service Systems. As previously stated, the Trask Scout Reservation is served by several existing septic systems spread throughout the property to serve the site. The proposed project would require a connection to one of the existing septic wells and leach field to accommodate backwash generated by the proposed Seccua Virex Pro WTP. Expanded wastewater treatment is not required to serve the minimal additional wastewater discharged to the Trask Scout Reservation's existing wastewater collection systems. Therefore, implementation of the project will not create a demand of wastewater treatment services that would impact the provider's ability to serve their existing commitments. Impacts are considered less than significant. No mitigation is required.
- d. Less Than Significant Impact The proposed project would enhance the existing facilities within the Trask Scout Reservation; no additional visitors or camp-outs are anticipated to occur as a result of implementation of the proposed project. Therefore, no additional solid waste beyond that which is generated by the Trask Scout Reservation at present is anticipated during operation of the Trask Scout Reservation upon completion of the proposed project. However, the proposed project would generate construction waste during construction in small amounts. The landfills utilized by the City of Monrovia within the area are:
 - The Mid Valley Sanitary Landfill has a maximum permitted capacity of 7,500 tons per day, and a remaining capacity of 61,219,377 cubic yards (CY), with a maximum permitted capacity of 101,300,000 CY according to CalRecycle.⁶
 - The San Timoteo Sanitary Landfill has a maximum permitted capacity of 2,000 tons per day, and a remaining capacity of 12,360,396 cubic yards (CY), with a maximum permitted capacity of 22,685,785 CY according to CalRecycle.⁷
 - The Sunshine Canyon City/County Landfill has a maximum permitted capacity of 12,100 tons per day, and a remaining capacity of 77,900,000 cubic yards (CY), with a maximum permitted capacity of 140,900,000 CY according to CalRecycle.⁸
 - The El Sobrante Landfill has a maximum permitted capacity of 16,054 tons per day, and a remaining capacity of 143,977,170 cubic yards (CY), with a maximum permitted capacity of 209,910,000 CY according to CalRecycle.⁹

Construction would not require demolition of any structures beyond the removal of the existing reservoir, and the proposed project would require modification to the existing sand filter box and removal of silt at the inlet structure, as well as trail and stream restoration/enhancement, of which, some of this waste can be removed and transported to a green waste collection facility. There is adequate capacity at the nearest landfill as well as in other landfills that serve the area to handle construction waste from the proposed project. Any hazardous materials collected on the project site during construction of the proposed project would be transported and disposed of by a permitted and licensed hazardous materials service provider. Considering the availability of landfill capacity and the amount of solid waste generation from the proposed project during construction, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest landfills. Therefore, it is expected that implementation of the proposed project would be

⁶ https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662

⁷ https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1906?siteID=2688

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402

- served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Any impacts are considered less than significant. No mitigation is required.
- e. Less Than Significant Impact All collection, transportation, and disposal of any solid waste generated by the proposed project is required to comply with all applicable federal, state, and local regulations. As previously stated, no additional solid waste beyond that which is generated by the Trask Scout Reservation at present is anticipated during operation of the Trask Scout Reservation upon completion of the proposed project. The area is served by several nearby landfills, which, as stated under issue XIX(d) above, have adequate capacity to serve the proposed project. Additionally, any hazardous materials collected on the project site during either construction or operation of the proposed project would be transported and disposed of by a permitted and licensed hazardous materials service provider, as previously stated under Section VIII, Hazards and Hazardous Materials. The contract for the proposed project would require that concrete, asphalt and base material be recycled by grinding, which allows reuse of these materials. All metals, woods and equipment that are reusable shall be salvaged and recycled.

Thus, due to the small size of the proposed project and the limited amount of wastes that would be generated, potential impacts to the waste disposal systems are considered less than significant and the proposed project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. No mitigation is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?		\boxtimes		
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 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?		\boxtimes		
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?		×		

XX. WILDFIRE

SUBSTANTIATION

a. Less Than Significant With Mitigation Incorporated – The Trask Scout Reservation is an area susceptible to wildland fires, and is located within an area delineated as a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area (LRA); the hillside of the City of Monrovia is located within a VHFHSZ. The City of Monrovia has not adopted an emergency evacuation plan; however, given the recent fire in the Angeles National Forest north of and within the City of Monrovia, the proposed project is located within an area that would be and has been evacuated in the event of a wildfire in the Angeles National Forest.

The project site is accessible from nearby public roadways and through North Canyon Drive on which access is monitored by the Angeles National Forest limiting the traffic on adjacent roadways. North Canyon Drive is the emergency access route to and from the project site, and also provides access to fire roads reaching the Angeles National Forest. The traffic along North Canyon Drive during construction would be minimal with limited anticipated blockages along the roadway accessing the site. During operation, the traffic along North Canyon Drive is not anticipated to increase beyond that which exists at present day-to-day and during camp-outs. Given that, no emergency access plans or emergency response or evacuation plans will be affected by this project in the short- or long-term. Construction activities would not occur within the roadways adjacent to the project site boundaries.

However, the proposed project is accessed by North Canyon Boulevard, which is narrow at points due to a large number of switchbacks, therefore, mitigation is required to address traffic disruption from large vehicles delivering construction equipment during construction. MM **TRAN-1** would ensure adequate emergency access is maintained during construction. During operation of the Trask Scout Reservation with the proposed rehabilitation and enhancements, access to the site by fire and other emergency services would remain unchanged and therefore, even though the proposed project is located in a VHFHSZ, improvements at this existing site would not impair an adopted emergency response plan or emergency evacuation plan. While the project site is located within a very high fire

hazard severity zone within an LRA, impacts to emergency response and/or emergency evacuation plans are considered less than significant with implementation of MM **TRAN-1**.

b. Less Than Significant Impact – The proposed project is located within Sawpit Canyon in the San Gabriel Mountains, and is therefore located in an area along a hillside. The Trask Scout Reservation is a developed site with asphalt and concrete in the main camp area, and camper cabins set throughout the Canyon within the boundaries of Trask. Though there are slopes throughout the site as a result of the project's location within the San Gabriel Mountain foothills, no major modifications to the site are proposed outside of areas that currently contain development. None of the proposed development would occur on steep slopes, and the proposed project would enable greater storage of water onsite such that wildfire risks would be minimized when compared to the availability of water on the site at present (25,000 gallons are stored onsite at present, while 100,000 gallons are proposed to be stored at the site under the proposed project).

The recent fire in the Angeles National Forest did reach the Trask Scout Reservation, but the features of the site did not exacerbate wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. This is because (a) the only occupant of the site is a Park Ranger responsible for caring for the site in the absence of campers and visitors, and (b) evacuation routes are easily accessible from the site in the event of a wildfire. No new occupants of the site are anticipated under the proposed project, as the project proposes to enhance the site within the existing site boundaries, and enable greater water storage and enable the water supplied to the site to meet DDW standards. Therefore, the proposed project would have a less than significant potential to, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. No mitigation is required.

- c. Less Than Significant With Mitigation Incorporated The proposed project would construct new water facilities—two new 50,000 gallon water storage reservoirs as well as a new WTP and new/rehabilitated appurtenances—to support the water supply availability at the Trask Scout Reservation. The overall site purpose and layout would not be altered by the proposed project and would therefore remain consistent with that which exists at the Trask Scout Reservation at present. The proposed project includes trail clean-up, which would contribute to minimizing fire risk within the site. During construction, because the proposed project is setback into the San Gabriel Mountains with vegetation consistent with the Angeles National Forest, construction may exacerbate fire risk temporarily as the sites for the trail restoration and reservoirs are being cleared, the proposed project requires the following mitigation measure, which would minimize fire risk during activities that would utilize electric equipment by requiring construction crews to carry fire prevention equipment during activities involving electrical equipment.
 - WF-1 During site clearing within the project site when any electrical construction equipment is in use, the construction crew shall have fire prevention equipment (such as fire extinguishers, emergency sand bags, etc.) accessible at all times to put out any accidental fires that could occur from the use of electrical construction/maintenance equipment.

The proposed project would not result in any ongoing impacts to the environment that would exacerbate fire risk as the proposed project would be designed in accordance with fire department recommendations and to City design standards. Therefore, with the implementation of MM **WF-1** above, the proposed project would not have a significant potential to exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d. Less Than Significant With Mitigation Incorporated – The proposed project would be developed within the existing Trask Scout Reservation, which contains existing development consistent with the camp. It is not anticipated that the proposed new facilities—the majority of which would be developed within, in place of, or adjacent to existing facilities—would result in new drainage patterns such that new drainage patterns would emerge that would not be accommodated by existing onsite facilities. As such, the proposed project would not expose people or structures to significant risks due to drainage channels or runoff. Similarly, the proposed project would not require extensive modification to native soils as the majority of the features proposed would occur within portions of the camp that have been engineered and developed. The reservoirs would be located at the existing reservoir sites, and would be developed in accordance with the 2019 CBC, which is further enforced through implementation of MM **GEO-1**, thus minimizing the potential for post fire slope instability. Therefore, with the implementation of MM **GEO-1**, the proposed project would have a less than significant potential to 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact or Does Not Apply
XXI. MANDATORY FINDINGS OF SIGNIFICANCE:				
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?		\boxtimes		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		×		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		×		

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

SUBSTANTIATION

The analysis in this Initial Study and the findings reached indicate that the proposed project can be implemented without causing any new project specific or cumulatively considerable unavoidable significant adverse environmental impacts. Mitigation is required to control some potential environmental impacts of the proposed project to a less than significant impact level. The following findings are based on the detailed analysis of the Initial Study of all environmental topics and the implementation of the mitigation measures identified in the previous text and summarized following this section.

a. Less Than Significant With Mitigation Incorporated – With respect to biological resources, the proposed project has been identified as having a less than significant potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The proposed project requires mitigation to prevent significant impacts from occurring as a result of implementation of the proposed project.

With respect to cultural resources, the proposed project's potential for impacting cultural resources is low, particularly given the mitigation measures required to be implemented under this project. No cultural resources of importance were found at the project site, so it is not anticipated that any resources could be affected by the proposed project. However, because it is not known what could be unearthed upon any excavation activities, mitigation measures are provided to ensure that, in the unlikely event that any resources are found, they are protected from any potential impacts.

In conclusion, while proposed project has no potential to cause a significant impact to any biological or cultural resources, the inclusion of MMs BIO-1 through BIO-3 and MM CUL-1, ensure any potentially significant impacts are mitigated to less than significant.

- b. Less Than Significant With Mitigation Incorporated The proposed project is not considered growth-inducing, as defined by State CEQA Guidelines. However, the proposed project has 10 potential impact categories that are individually limited, but may be cumulatively considerable: Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Transportation, Tribal Cultural Resources, and Wildfire. These impact categories require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental categories were found to have no significant impacts without implementation of mitigation. The proposed project would not contribute to growth within the City of Monrovia as it will make improvements to an existing facility, but would not expand the Trask Scout Reservation. Therefore, the proposed project would not contribute a significant cumulative impact as a result of population growth within the City. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than cumulatively considerable and as such, less than significant impacts.
- c. Less Than Significant With Mitigation Incorporated The proposed project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Air Quality, Geology and Soils, Hazards & Hazardous Materials, and Wildfire require the implementation of mitigation measures to reduce potential human impacts to a less than significant level. All other environmental categories were found to have no significant impacts on humans and did not require mitigation. Thus, the potential for direct human effects from implementing the proposed project has been determined to be less than significant with mitigation implementation.

Conclusion

This document evaluated all CEQA categories and issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the categories of Aesthetics, Agriculture and Forestry Resources, Greenhouse Gases, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Utilities & Service Systems. The categories of Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Transportation, Tribal Cultural Resources, and Wildfire require the implementation of mitigation measures to reduce potential project- specific and cumulative impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these categories to a less than significant impact level.

Based on the evidence and findings in this Initial Study, the City of Monrovia proposes to adopt a Mitigated Negative Declaration for the Trask Scout Reservation Water System Rehabilitation and Enhancement Project. A Notice of Intent to Adopt a Mitigation Negative Declaration (NOI) will be issued for the proposed project by the City. The Initial Study and NOI will be circulated for 30 days of public comment. At the end of the 30-day review period, a final MND package will be prepared and it will be reviewed by the City for possible adoption at a future Development Review Committee meeting, which is anticipated to occur on September 1, 2021. If you or your agency comments on the MND/NOI for this project, you will be notified about the meeting date in accordance with the requirements in Section 21092.5 of CEQA (statute).

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2019

Authority: Public Resources Code sections 21083 and 21083.09

Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

Air Quality

- AIR-1 <u>Fugitive Dust Control</u>. The following measures shall be incorporated into project plans and specifications for implementation during construction:
 - Apply soil stabilizers to inactive areas.
 - Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.
 - Stabilize previously disturbed areas if subsequent construction is delayed.
 - Apply water to disturbed surfaces and haul roads 3 times/day.
 - · Replace ground cover in disturbed areas quickly.
 - Reduce speeds on unpaved roads to less than 15 mph.
 - Trenches shall be left exposed for as short a time as possible.
 - Identify proper compaction for backfilled soils in construction specifications.

This measure shall be implemented during construction, and shall be included in the construction contract as a contract specification.

- AIR-2 <u>Exhaust Emissions Control</u>. The following measures shall be incorporated into Project plans and specifications for implementation:
 - Utilize off-road construction equipment that has met or exceeded the maker's recommendations for vehicle/equipment maintenance schedule.
 - Contactors shall utilize Tier 4 or better heavy equipment.
 - Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

Biological Resources

- BIO-1 Commencement of any project-related disturbance shall either be restricted to outside the LBVI nesting season, which is typically from April 1st through July 31st, to avoid any potential adverse effects on this species or where commencement of project-related disturbance cannot be restricted outside the LBVI nesting season, protocol LBVI presence/absence surveys shall be required to determine whether this species occurs in the project area and whether the project is likely to adversely affect this species. Per the USFWS LBVI survey guidelines, all riparian areas and any other potential vireo habitats shall be surveyed at least eight (8) times during the period from April 10 to July 31. Presence/absence surveys shall be conducted by a qualified biologist who is familiar with the various LBVI vocalizations and the eight survey visits shall be spaced at least 10 days apart.
- BIO-2 The Applicant shall prepare and submit a Regional Water Quality Control Board 401 Certification, United States Army Corps of Engineers 404 Permit, and Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement. No ground disturbance within jurisdictional waters shall occur until the Applicant obtains the above permits and provides the City verification of permit acquisition. Note that the final compensation package contained in the permit shall be implemented by the Applicant. If the permit conditions are different than the mitigation listed in this document to protect biological resources, the City shall implement the mitigation identified in the permits, which must be equivalent or more effective in mitigating or avoiding potential significant effects and the substitution of any mitigation measure will not cause any potentially significant effect on the environment.
- BIO-3 The State of California prohibits the "take" of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the State identified nesting season (generally, raptor nesting season is January 1 through September 15;

and passerine bird nesting season is February 1 through September 1). Alternatively, the following measures shall be taken:

- To avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist shall conduct pre-construction nesting bird surveys prior to any project-related disturbance to suitable nesting areas to identify any active nests or roosts. The nesting bird surveys shall include both daytime and nighttime survey visits to determine the presence/absence of both diurnal and nocturnal species within the project area, including SPOW. The nighttime component to address the potential for presence of nocturnal species shall be conducted by a qualified avian biologist, who will conduct 3 consecutive nights of survey in accordance with the CDFW's recommended protocol for SPOW survey.
- If no active nests or roosts are found, no further action would be required.
- If an active nest is found, the qualified Avian Biologist shall set appropriate no-work buffers around the nest which would be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nest(s) and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Cultural Resources

CUL-1 In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.

Geology & Soils

GEO-1 The GLAAC of BSA shall retain a qualified engineering geologist to investigate site proposed for water storage reservoirs. The recommendations of the engineering geologist relative to mitigating the potential for ground rupture, ground shaking, landslide, expansive soils and other geological constraints shall be incorporated in the design and construction of these facilities. Design of such facilities shall follow the following design performance criteria. Comprehensive geotechnical investigation shall be required prior to engineering and design development or structural and/or substantial rehabilitation of structures identified under Risk Class I & II, e.g., public facilities, as identified below:

Risk Class I & II, Structures Critically Needed after Disaster: Structures which are critically needed after a disaster include important utility centers, fire stations, police stations, emergency communication facilities, hospitals, and critical infrastructure elements such as bridges and overpasses, water storage reservoirs, and smaller dams.

Acceptable Damage: Minor non-structural; facility should remain operational and safe, or be suitable for quick restoration of service.

Risk Class III: High occupancy structures; uses are required after disasters, i.e., places of assembly such as schools and churches.

Acceptable Damage: Some impairment of function acceptable; structure needs to remain operational.

Risk Class IV, Ordinary Risk Tolerance: The vast majority of structures in urban areas; most commercial and industrial buildings, small hotels and apartment buildings, and single family residences.

Acceptable Damage: An "ordinary" degree of risk should be acceptable. The criteria envisioned by the Structural Engineers Association of California provide the best definition of the "ordinary" level of acceptable risk. These criteria require that structures be able to:

- a. Resist minor earthquakes without damage;
- b. Resist moderate earthquakes without structural damage, but with some non-structural damage; or
- c. Resist major earthquakes, of the intensity or severity of the strongest experienced in California, without collapse, but with some structural, as well as non-structural damage.

Risk Class V, moderate to High Tolerance: Open space uses, such as farms, ranches and parks without high occupancy structures; warehouses with low intensity employment; and the storing of non-hazardous materials.

Acceptable Damage: Not applicable.

- GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. Where covering is not possible, measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup such that erosion does not occur.
- GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the project is being constructed.
- GEO-4 Excavated areas shall be backfilled and compacted such that erosion does not occur. Paved areas disturbed by this project shall be repaved in such a manner that roadways and other disturbed areas are returned to the pre-project conditions or better.
- GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource.

Hazards and Hazardous Materials

HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the proposed project. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

Hydrology and Water Quality

- HYD-1 The City shall require that the GLAAC-BSA selected construction contractor implement specific Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving offsite into receiving waters. These practices shall include a Plan that identifies the methods of containing, cleanup, transport and proper disposal of hazardous chemicals or materials released during construction activities that are compatible with applicable laws and regulations. BMPs to be implemented by the GLAAC-BSA include the following:
 - The use of silt fences or coir rolls:
 - The use of temporary stormwater desilting or retention basins;
 - The use of water bars to reduce the velocity of stormwater runoff;
 - The use of wheel washers on construction equipment leaving the site;
 - The washing of silt from public roads at the access point to the site to prevent the tracking of silt and other pollutants from the site onto public roads;
 - The storage of excavated material shall be kept to the minimum necessary to efficiently
 perform the construction activities required. Excavated or stockpiled material shall not be
 stored in water courses or other areas subject to the flow of surface water; and
 - Where feasible, stockpiled material shall be covered with waterproof material during rain events to control erosion of soil from the stockpiles.

Transportation

- TRAN-1 The construction contractor will provide traffic management resources, as determined by the City of Monrovia. The City shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. At a minimum this plan shall include the following:
 - a) Methods to minimize the amount of time spent on construction activities;
 - b) Methods to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes;
 - Methods to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure adequate traffic flow;
 - d) Identification of alternative routes, if necessary, that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities will occur; and
 - e) Identification of methods or procedures to ensure that at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.

Tribal Cultural Resources

TRC-1 Retain a Native American Monitor/Consultant: 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 that consulted on this project pursuant to Assembly Bill A52 - SB18 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the Lead Agency prior to the issuance of any permit necessary to commence a ground- disturbing activity. The Tribal monitor will only be present onsite 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 that will

provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The onsite monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site 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 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the Tribal monitor approved by the Consulting Tribe and a qualified archaeologist if one is present. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue in other parts of the Project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

- TRC-2 Unanticipated Discovery of Human Remains and Associated Funerary Objects:

 Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.
- TRC-3 Resource Assessment & Continuation of Work Protocol:

 Upon discovery of human remains, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 100 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will 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 will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).
- TRC-4 Kizh-Gabrieleño Procedures for burials and funerary remains:

 If the Gabrieleño Band of Mission Indians Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items

made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

TRC-5 Treatment Measures:

Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

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

TRC-6 Professional Standards:

Native American and Archaeological monitoring during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of TCR's shall be taken. The Native American monitor must be approved by the Gabrieleño Band of Mission Indians-Kizh Nation. Principal personnel for Archaeology must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California.

Wildfire

WF-1 During site clearing within the project site when any electrical construction equipment is in use, the construction crew shall have fire prevention equipment (such as fire extinguishers, emergency sand bags, etc.) accessible at all times to put out any accidental fires that could occur from the use of electrical construction/maintenance equipment.

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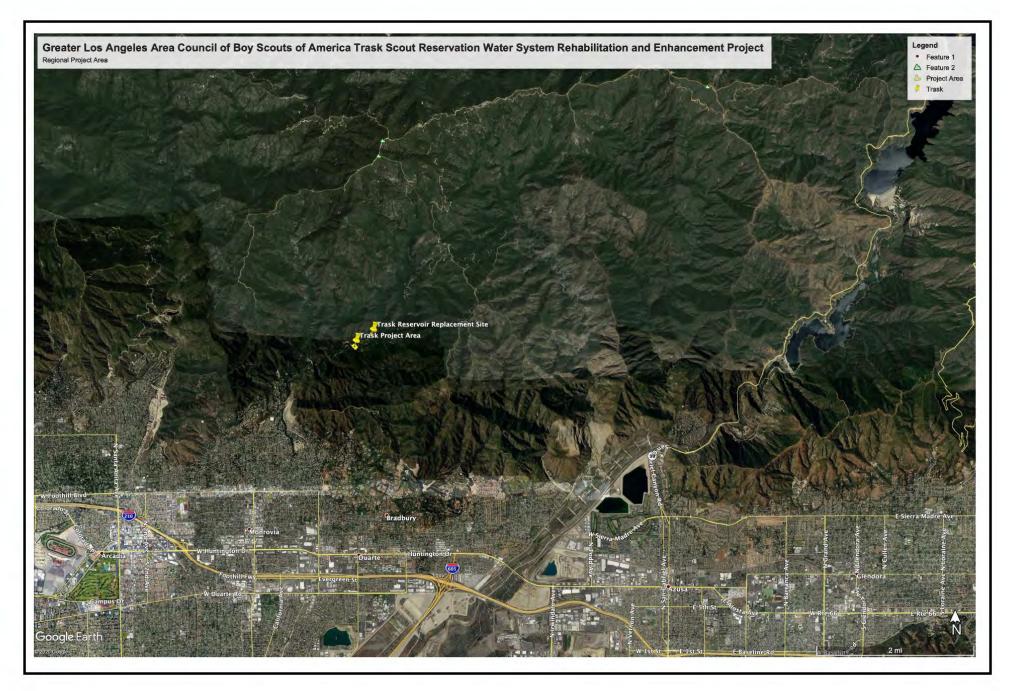
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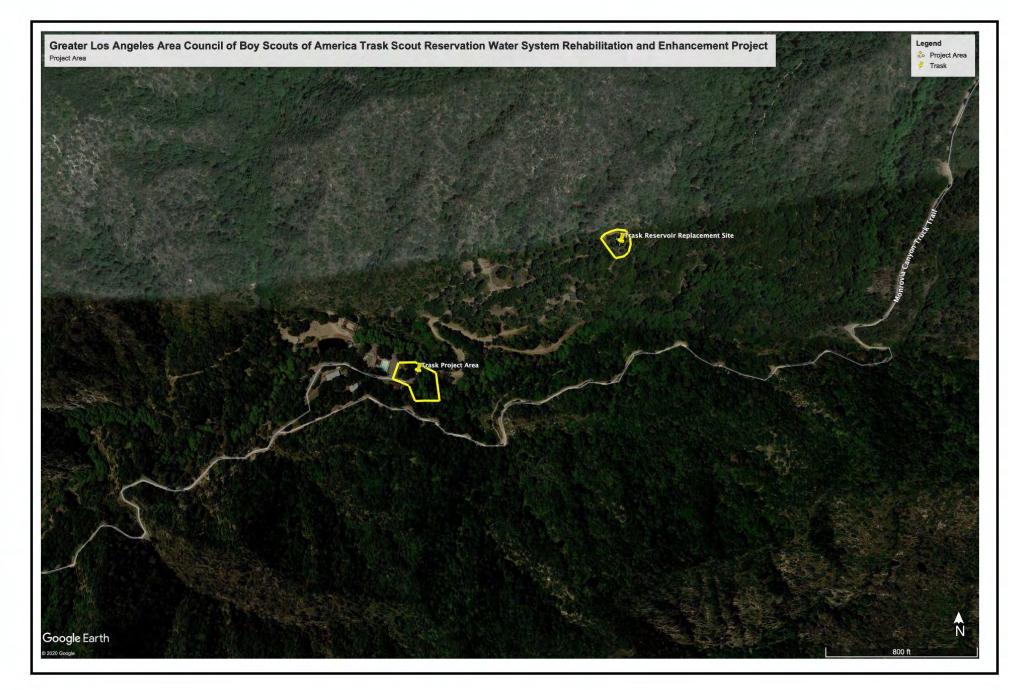
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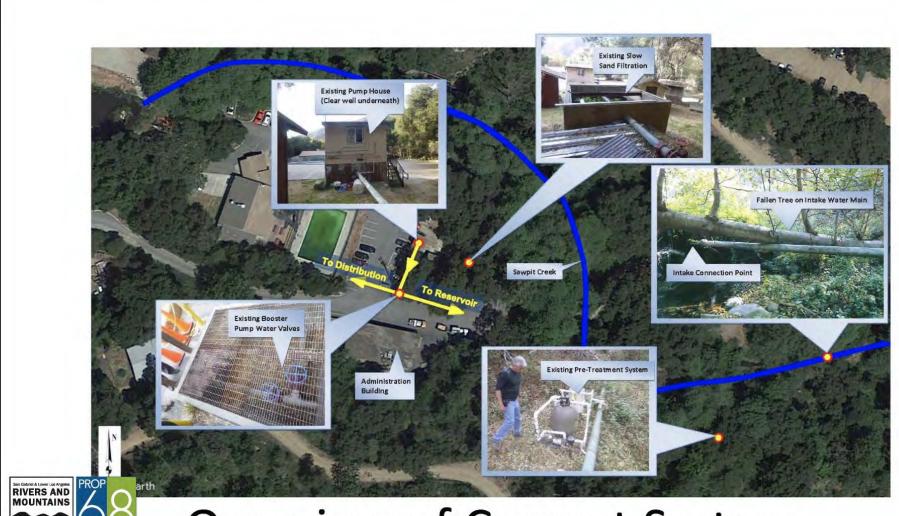
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FIGURES

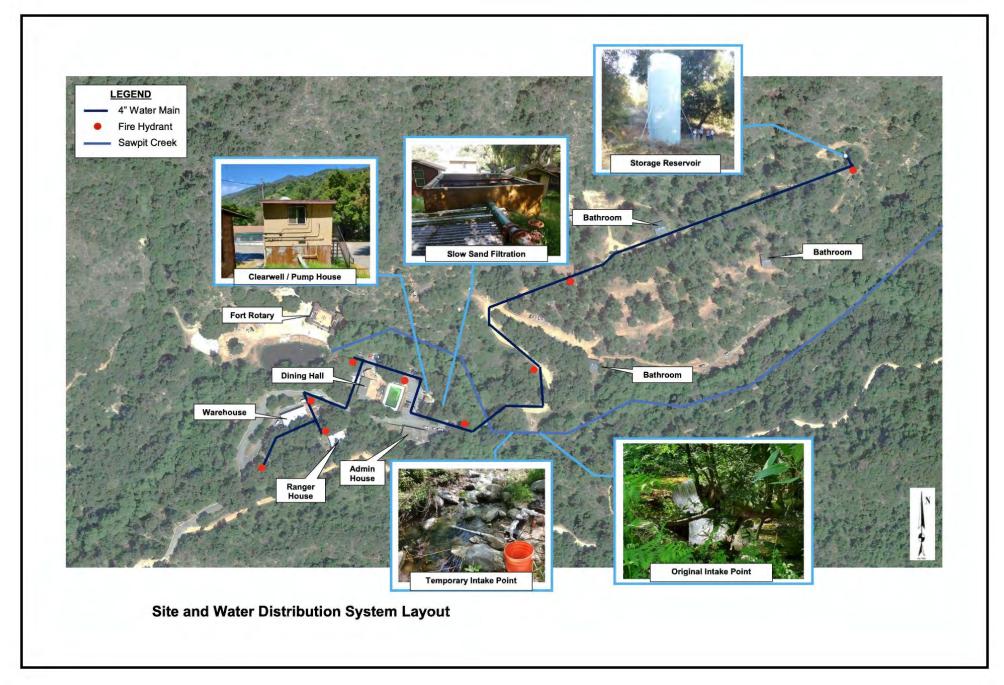






Overview of Current System

FIGURE 3



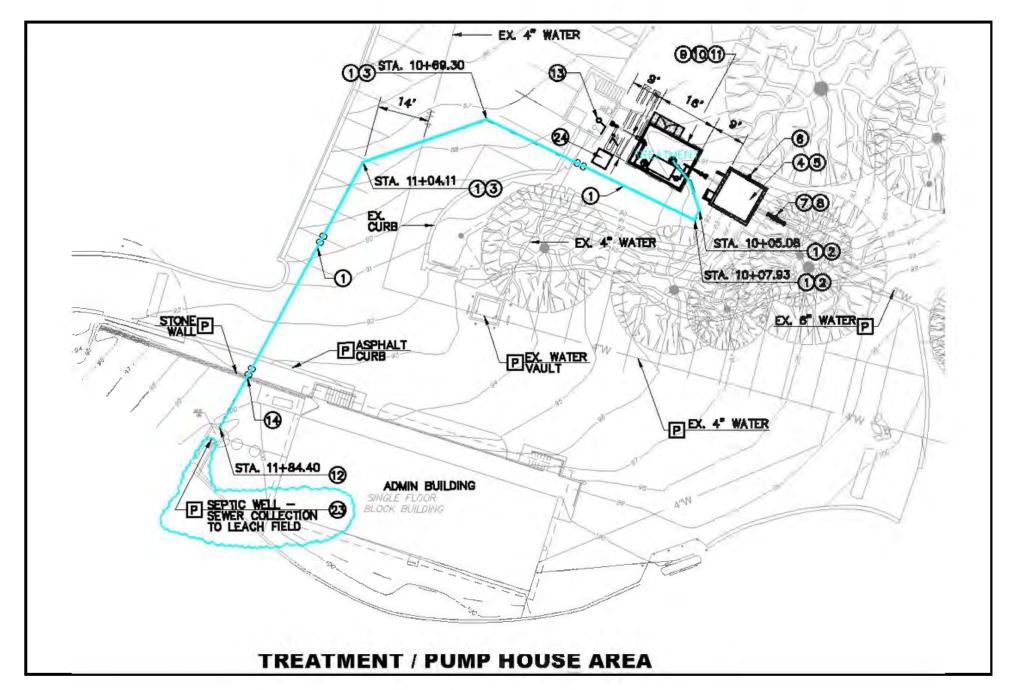
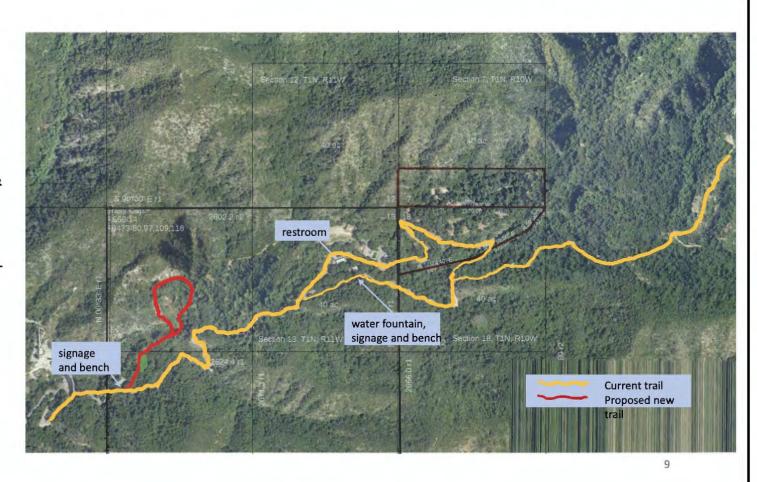
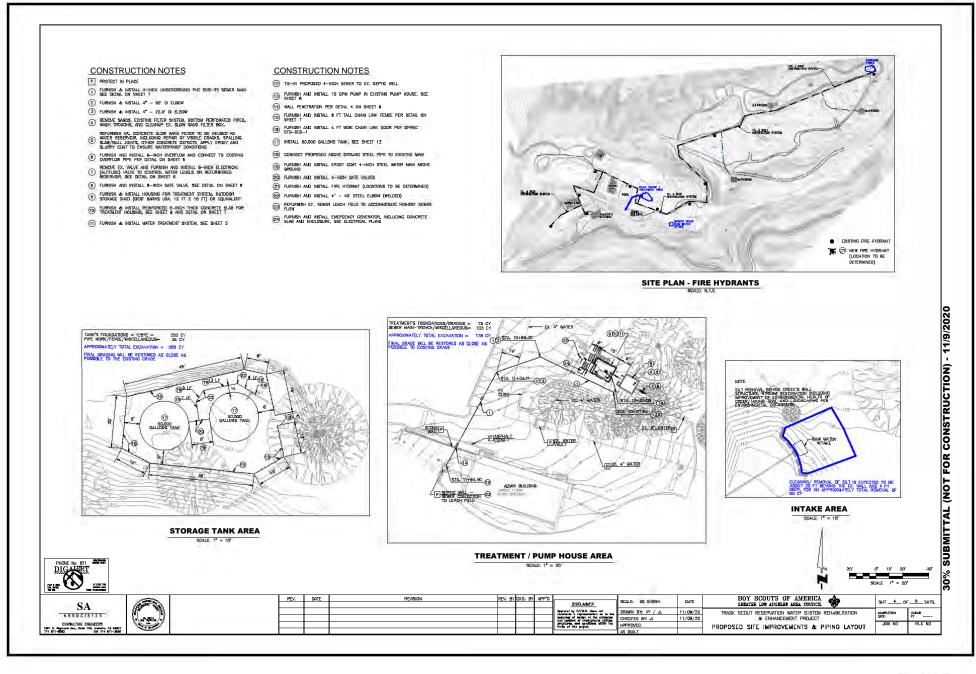


FIGURE 5

- > Creation of new trails
- Maintenance on existing trails & streambed
- Visitor experience improvements (resting area w/ bench, water & restroom access, educational & trail signage)
- Conservation projects remove invasive/harmful plants, plant native plants







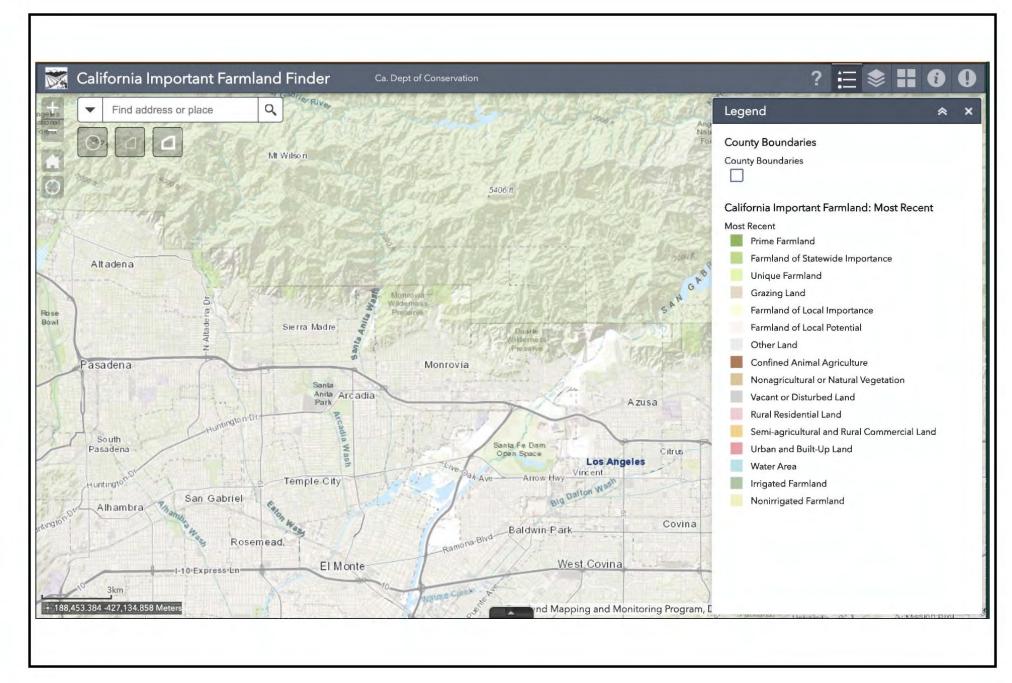
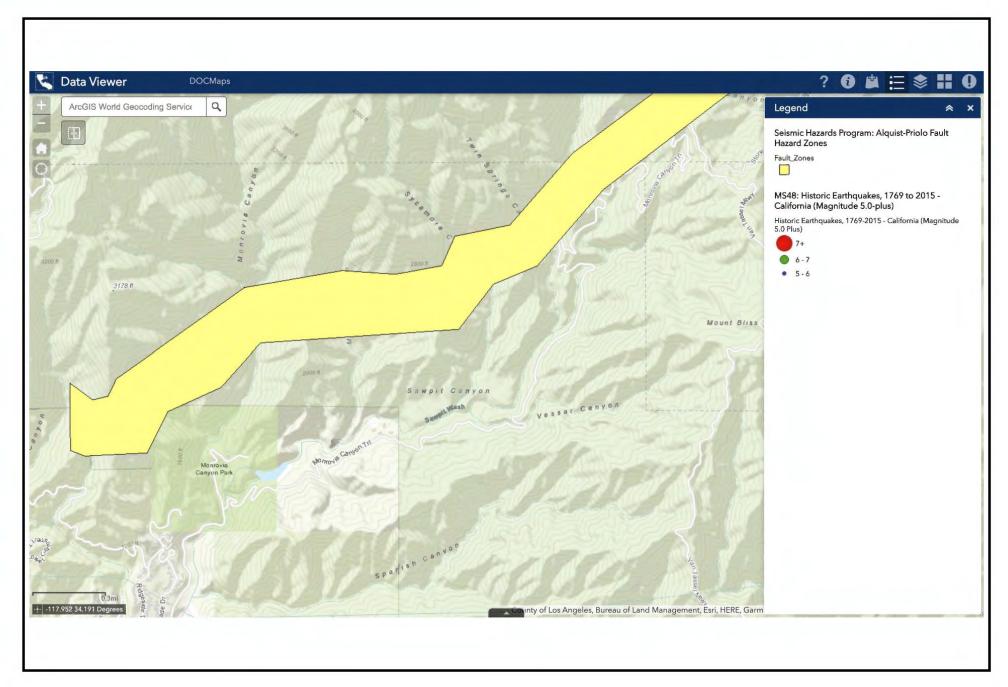
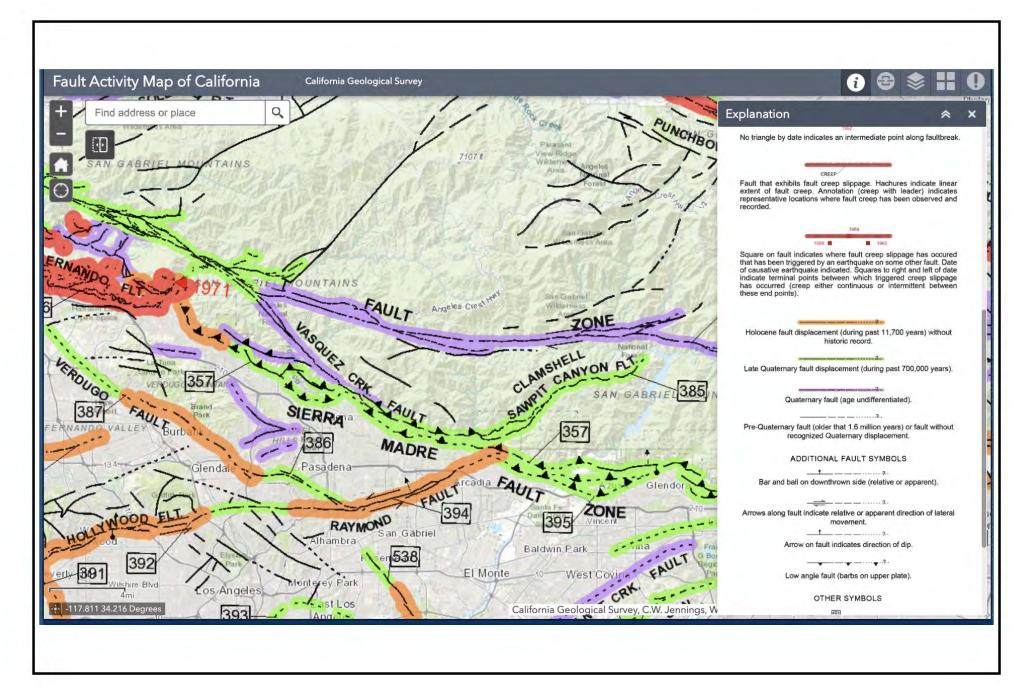
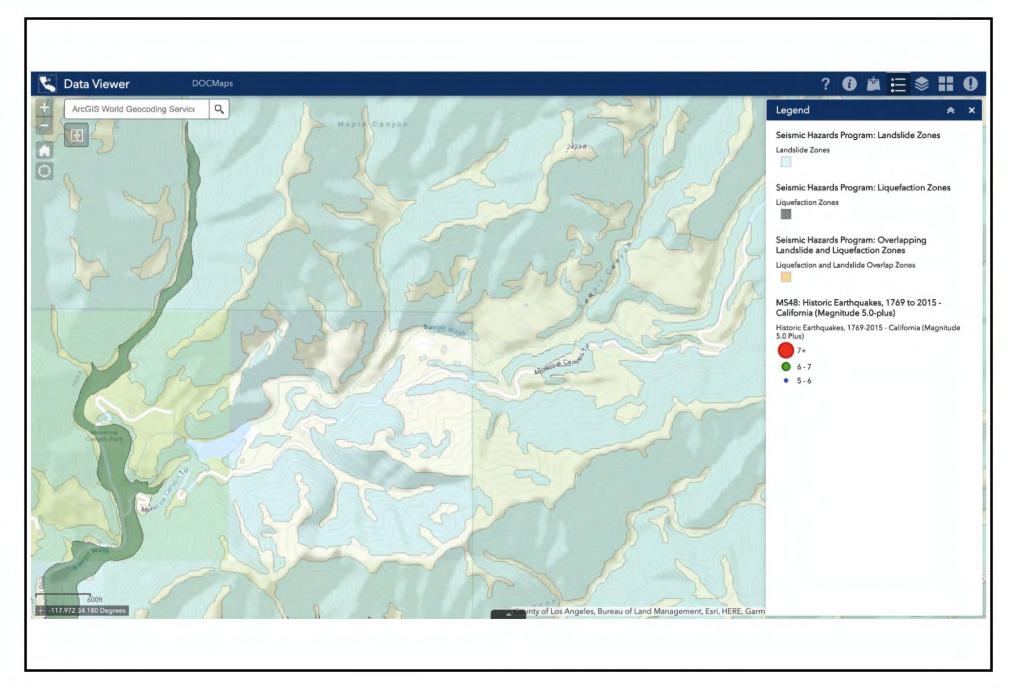


FIGURE II-1







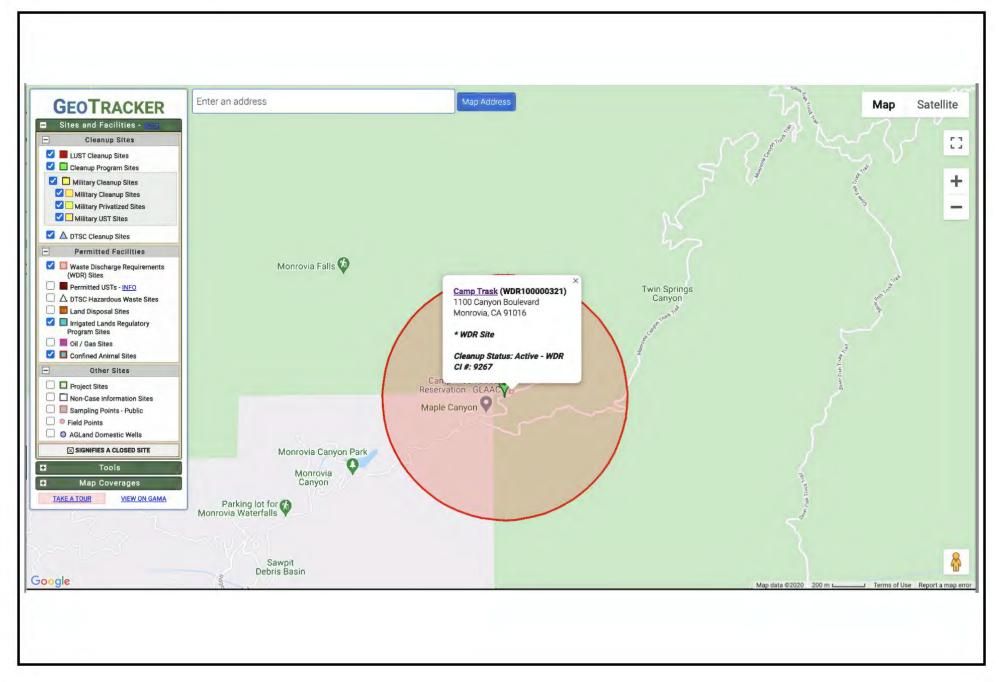
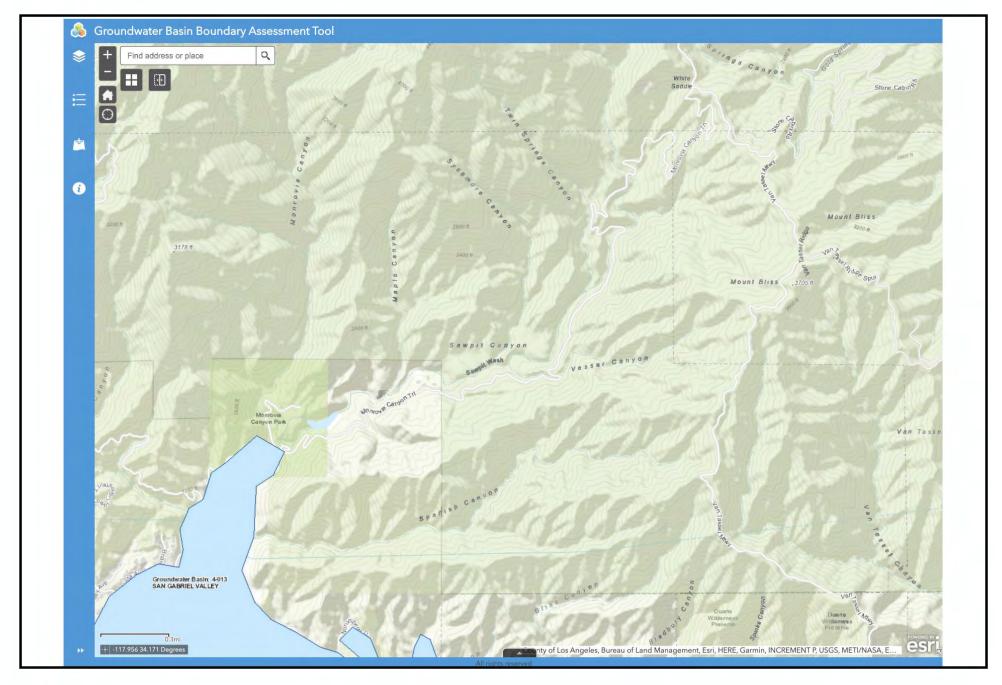
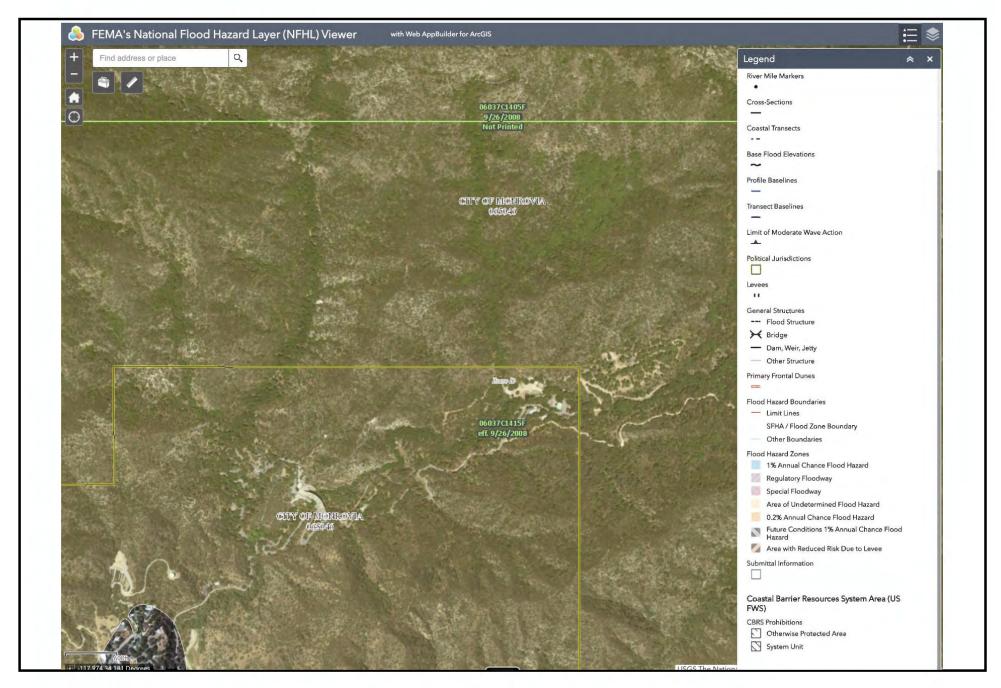
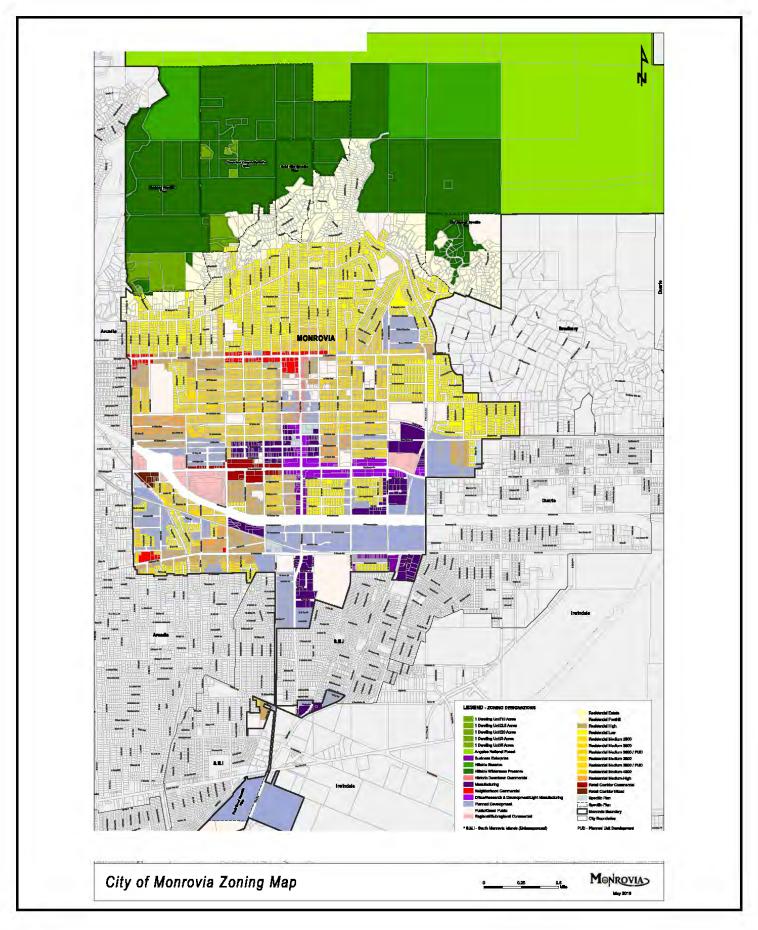


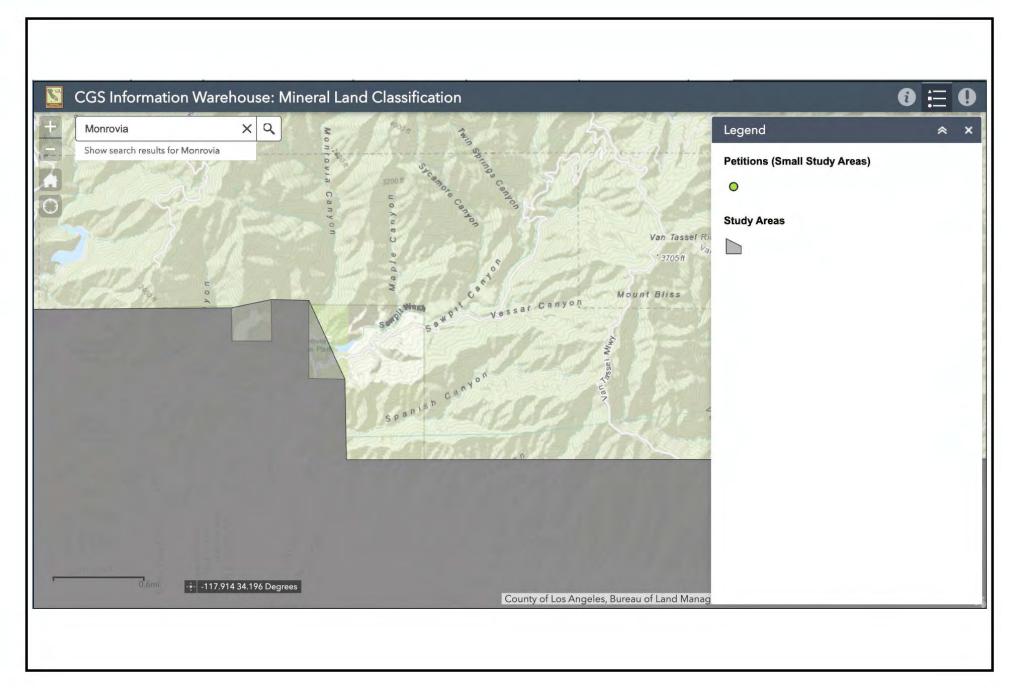
FIGURE IX-1

CAMP TRASK (WDR100000321) - (MAP) **SIGN UP FOR EMAIL ALERTS** 1100 CANYON BOULEVARD ☑ VIEW THIS CASE IN CIWQS WDR PLACE TYPE: Campground MONROVIA, CA 91016 WDR FILE #: 07-080 LOS ANGELES COUNTY **WDR ORDER #: 01-031** * WDR SITE (INFO) PROJECT OVERSIGHT AGENCIES ACTIVE - WDR AS OF 12/31/2003 - DEFINITION LOS ANGELES RWQCB (REGION 4) (LEAD) - CI #: 9267 CASEWORKER: CLARITA S. QUIDILLA PRINTABLE CASE SUMMARY CASEWORKER: DAVID KOO Summary Cleanup Action Report Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement Related Cases PRINTABLE CASE SUMMARY **Regulatory Profile PROJECT STATUS - DEFINITIONS** ACTIVE - WDR AS OF 12/31/2003 - PROJECT STATUS HISTORY DESIGNATED GROUNDWATER BENEFICIAL USE(S) - DEFINITIONS MUN **DWR GROUNDWATER SUB-BASIN NAME CALWATER WATERSHED NAME** Los Angeles River - Raymond - Pasadena (412.31) **Site History** No site history available









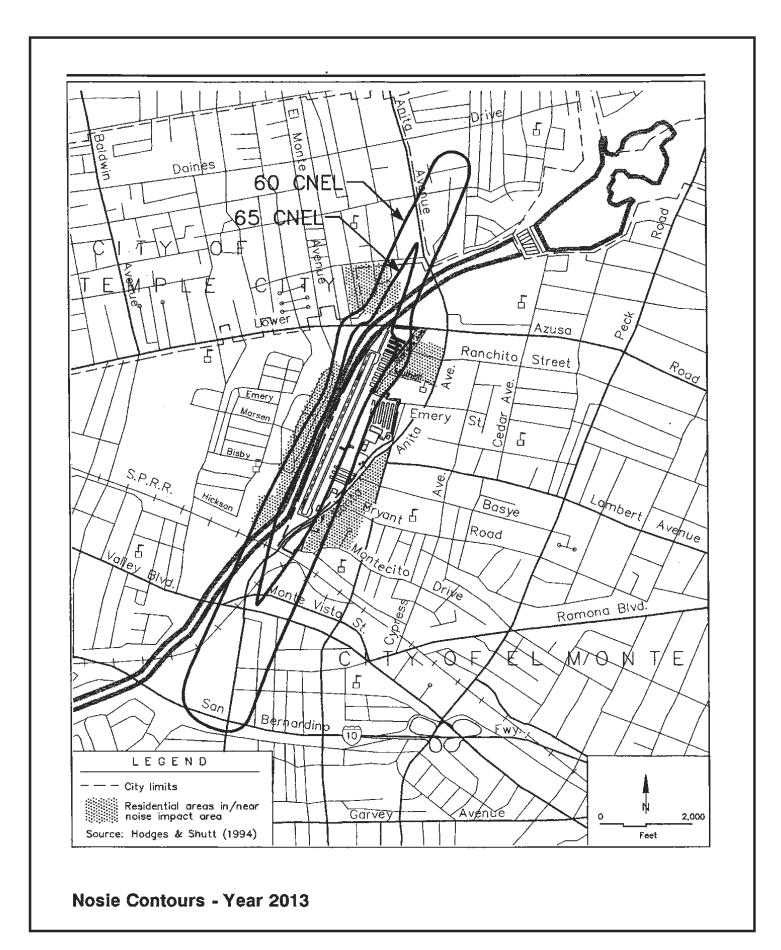


FIGURE XIII-1

