

City of Azusa

Housing Element Update 2021-2029

Initial Study and Negative Declaration



City of Azusa

Economic & Community Development Department
213 E. Foothill Blvd.
Azusa, CA 91702

Consultant

MIG
1650 Spruce Street, Suite 102
Riverside, California 92507

Public Draft August 6, 2021

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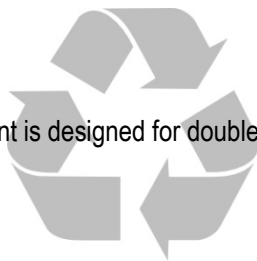


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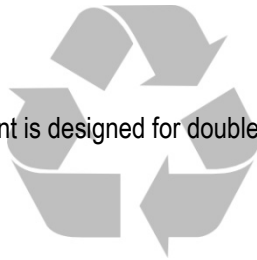
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1 PURPOSE AND AUTHORITY

The purpose of this Initial Study is to identify and assess the significance of the physical effects on the environment due to potential future development guided by the goals and policies of the City of Azusa 6th Cycle 2021-2029 Housing Element Update. Pursuant to the California Environmental Quality Act (CEQA), the proposed Housing Element Update (HEU) is considered a "Project" and thus requires analysis and determination of environmental effects prior to approval.

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) Statutes and Guidelines and the City of Azusa local rules and regulations. The proposed Project requires discretionary approval by the City of Azusa and review by the California Department of Housing and Community Development (HCD). As the project initiator, and because of the legislative approvals involved, the City of Azusa is the Lead Agency with respect to this Initial Study pursuant to §15367 of the CEQA Guidelines. Specifically, the HEU Project requires City of Azusa approval of a General Plan Amendment (GPA) No. 2021-01. No other governmental agencies have discretionary permitting authority with respect to approval of the proposed Project, and no Trustee Agencies, as defined in §21070 of the CEQA Statutes, has jurisdiction over resources such that Trustee agency approval is required for entitlement approval.

Pursuant to §15074 of the CEQA Guidelines, prior to approving the Project, the City of Azusa is obligated to consider the findings of this Initial Study and to either adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) or determine that an Environmental Impact Report (EIR) is required due to potentially significant, unavoidable environmental impacts. The findings of this Initial Study support adoption of Negative Declaration (ND), as discussed in Section 4. Either of these determinations indicate that the environmental impacts of the programs for accommodating housing pursuant to the proposed HEU, in accordance with the governing land use planning policies and zoning standards, will be less than significant and that an EIR is not required.

Contents

This document has been prepared to comply with Section 15063 of the State CEQA Guidelines that sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (see Section 2)
- Identification of the environmental setting (see Section 2.11)
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (see Section 3)
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (see Sections 2.6 and 2.7)
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (see Section 5.1)

Tiering

Section 15152 et al of the CEQA Guidelines describes "tiering" as a streamlining tool as follows:

- "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.*
- Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR*

or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

- (c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.
- (d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:
 - (1) Were not examined as significant effects on the environment in the prior EIR; or
 - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
- (e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.
 - (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.
 - (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).
 - (3) Significant environmental effects have been "adequately addressed" if the lead agency determines that:
 - (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or
 - (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.
- (g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.
- (h) There are various types of EIRs that may be used in a tiering situation. These include, but are not limited to, the following:
 - (1) General Plan EIR (Section 15166)
 - (2) Staged EIR (Section 15167)
 - (3) Program EIR (Section 15168)
 - (4) Master EIR (Section 15175)
 - (5) Multiple-family residential development/residential and commercial or retail mixed-use development (Section 15179.5)

(6) *Redevelopment project (Section 15180)*

(7) *Projects consistent with community plan, general plan, or zoning (Section 15183)*

This Initial Study for the 2021-2029 Housing Element has been prepared to tier from the General Plan “Program” EIR of the City of Azusa dated November 2003, as amended or otherwise supplemented. For the City of Azusa, documents by which the analysis recorded herein has been tiered from are available for public review at:

City of Azusa
213 E. Foothill Blvd.
Azusa, California 91702

2 PROJECT DESCRIPTION

Project Title

City of Azusa 2021-2029 Housing Element Update

Lead Agency/Project Sponsor Name and Address

City of Azusa
213 E. Foothill Blvd.
Azusa, CA 91702

Contact Person and Phone Number

Robert (Dean) Flores, Assistant Planner
Planning Division, City of Azusa
213 E. Foothill Blvd.
Azusa, CA 91702
Phone: (626) 812-5017
Fax: 626-334-5464
dflores@AzusaCA.Gov

The Project

This Initial Study analyzes the potential environmental impacts associated with adoption of the City of Azusa's sixth cycle (2021-2029) Housing Element and all implementing program actions.

The Housing Element is a required component of the City's General Plan and must be updated on a regular basis, as set forth in Government Code Section 65588. The Housing Element consists of these components, described in detail below: 1) housing needs, 2) constraints to housing development, 3) housing resources (available sites and funding sources), and 4) a housing plan.

The 2021-2029 Housing Element applies to all properties within the City of Azusa on which existing and proposed General Plan land use designations and zoning districts allow residential and/or mixed-use development. The Housing Element does not specifically authorize the construction of any housing development nor does it indicate where and when specific housing projects will occur. The Housing Element is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). For the 2021-2029 planning period, the City of Azusa's share is 2,651 housing units. This allocation is referred to as the Regional Housing Needs Assessment, or RHNA.

This Initial Study examines the potential environmental impacts at a program level for the Housing Element, since this policy document does not specifically authorize the construction of any development, nor does it indicate where and when specific housing projects will occur.

Project Location

The City of Azusa is located in the San Gabriel Valley, at the foot of the San Gabriel Mountains in Los Angeles County. It is located 20 miles east of downtown Los Angeles and is surrounded by the cities of Duarte and Irwindale to the west, the city of Glendora to the east, and the city of Covina to the south. The northern part of the City is bounded by the Angeles National Forest. Major freeways and roadways serving the City include Interstate 210 (I-210), which passes east-west through the City, and State Route 39 (SR39), which passes north-south through the City (see Exhibit 1).

General Plan Designations

The Azusa General Plan and Development Code provide for a range of land use designations/zones in the city that can accommodate residential units. Multiple residential and commercial General Plan land use designations provide opportunities

for development of housing projects, including: Low Density Residential, Medium Density Residential, Moderate Density Residential, Neighborhood Center, Commercial/Residential Mixed Use, Residential/Commercial Mixed Use, and Transit Station. The Housing Element 2021-2029 Update does not propose to change any particular parcel's General Plan land use designation.

Zoning Districts

Multiple residential and commercial zones within the city provide opportunities for development of housing projects at various densities. Residential density within the various zones is calculated at dwelling units per acre (du/acre), with the exception of the TOD Specific Plan, where density is not limited to a stated maximum. Residential uses are permitted in the following zones: Neighborhoods (Neighborhood Centers, Traditional Neighborhoods, Transitional Neighborhoods, and Tract Neighborhoods), Districts (University District, Edgewood District), and Corridors (Foothill Boulevard Corridor, Azusa Avenue Corridor, San Gabriel Avenue Corridor, South Azusa Avenue Corridor, and Arrow Highway Corridor). The Housing Element 2021-2029 Update does not propose to change any particular parcel's zoning designation.

Housing Element

REQUIREMENTS AND CONTENT

A Housing Element is one of the eight required General Plan elements. It addresses existing and future housing needs of persons of all income levels and provides policy guidance to decision-makers and City staff. The City is not required to construct housing to meet those needs, but it must create a regulatory environment that supports and encourages housing production and equal access to housing.

State law requires that all housing elements address four key topics: 1) housing needs, 2) constraints to housing development, 3) housing resources, and 4) a housing plan. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the California Government Code establishes the legal requirements for a housing element and encourages the provision of affordable and decent housing, in suitable living environments, in all communities, in working toward statewide goals. The 2021-2029 Housing Element is the policy document that addresses current and projected housing needs consistent with State law.

HOUSING NEEDS AND RESOURCES

Several factors influence the demand for housing in the City of Azusa, including population growth, the cost of housing, and housing needs of "special needs groups" that include the elderly, large families, female-headed households, households with a physically or developmentally disabled person, farm workers, and the homeless. The 2021-2029 Housing Element examines the housing needs of different groups of people based on demographic metrics that include owners versus renters, lower-income households, overcrowded households, elderly households, special needs groups, and homeless persons.

California housing element law requires that each city and county develop local housing programs designed to meet its "fair share" of housing needs for all income groups, based on projected population growth. The California Department of Housing and Community Development (HCD), Housing Policy Division develops Regional Housing Needs Assessments (RHNA) for each region of the State represented by councils of governments. In Southern California (exclusive of San Diego County), SCAG determines the housing allocation for its member cities and Counties. SCAG has assigned the City of Azusa a RHNA allocation of 2,651 housing units for the 2021-2029 planning period, divided among the household income categories identified in Table 1.

Housing units that have been approved or proposed but not yet built or that are under construction as of June 2021 may be credited toward the RHNA. Table 2 (RHNA Credits and Remaining Need) identifies RHNA credits and the remaining housing need to be accommodated by land use policy and zoning regulations.

Table 1: City of Azusa Regional Housing Needs Assessment Allocation

Income Group	Total Allocation (DU)	Income Group Ratio (%)
Extremely Low/Very Low	760	28.7%
Low	368	13.9%
Moderate	382	14.4%
Above Moderate	1,141	43.0%
Total	2,651	100%
Source: SCAG 2021		

Table 2: RHNA Credits and Remaining Need

	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
APPROVED PROJECTS					
619 N. San Gabriel Avenue	--	--	--	6	6
The Orchard	--	--	--	163	163
820 N. Soldano	--	--	--	6	6
300 W. Foothill	--	--	--	7	7
573-577 E. Arrow Highway	--	--	--	10	10
The Avenue (800 N. Azusa)	--	--	--	127	127
Subtotal				319	319
PROPOSED PROJECTS					
The Citrus View	--	--	--	102	102
807 The Promenade	--	--	--	23	23
333 N. Azusa Avenue	--	--	--	4	4
Subtotal	--	--	--	129	129
Total	--	--	--	448	448
RHNA	760	368	382	1,141	2,651
Remaining RHNA	760	368	382	693	2,203

State law requires that jurisdictions demonstrate in the Housing Element that land inventory is available and adequate to accommodate the RHNA allocation. The City of Azusa has determined that the inventory of vacant and underutilized residential and mixed-use sites and estimated production of accessory dwelling units during the planning period is sufficient to accommodate the remaining RHNA of 2,203 units. Sites currently available and appropriate to accommodate a portion of the RHNA are categorized and summarized in Table 3. These sites are referred to herein as “Inventory Sites” and/or “RHNA Sites”.

Table 3: Currently Available Vacant/Underutilized Land Inventory

Site Type	Affordability Level				
	Ex./Very Low Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	Total
Projected ADU construction	86	163	8	109	366
Vacant Residential Sites	--	--	2	32	34
Underutilized Residential Sites	--	--	82	30	112
Vacant Mixed-Use Sites	--	--	187	--	187
Underutilized Mixed-Use Sites	--	--	530	--	530
Azusa TOD Specific Plan Sites	1,051		273	--	1,324
Religious Institution Sites	96		--	--	96
Total Sites Available	1,396		1,082	171	2,865
Remaining RHNA after approved/proposed projects	760	368	382	693	2,203
Surplus Sites to Meet the RHNA	268		700	(522)	446

HOUSING CONSTRAINTS

The Housing Constraints section identifies and addresses regulations and conditions that constitute constraints to housing production and preservation, including governmental and nongovernmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability. Where constraints were identified, programs to address those constraints are included in the Housing Plan.

AFFIRMATIVELY FURTHERING FAIR HOUSING

New for the 6th cycle and consistent with the Affirmatively Furthering Fair Housing (AFFH) mandate imposed by AB 686, a detailed analysis of segregation/integration patterns and disparities in access to opportunity is included in the Housing Element. The 2018 Analysis of Impediments (AI) to Fair Housing Choice for the Los Angeles County Development Authority (LACDA) and Housing Authority of the County of Los Angeles serves as the fair housing planning document for portions of County of Los Angeles, including unincorporated areas and the Urban County which represents 47 smaller cities in the county, including the City of Azusa. In response to this analysis, a program was included in the Housing Plan to continue the City's efforts to affirmatively further fair housing.

SUMMARY OF GOALS, POLICIES, AND PROGRAMS

The Housing Element includes the following goals and policies to direct housing decisions over the 2021-2029 planning period:

Goal H1	Maintain and enhance the quality of existing housing and residential neighborhoods in Azusa.
Policy H1.1	Encourage neighborhood involvement and pursue comprehensive neighborhood preservation and reinvestment strategies and for portions of the community with aging and deteriorating housing and infrastructure.
Policy H1.2	Leverage State and federal loans and grants to assist in preserving existing housing through rehabilitation and home improvement assistance to lower- and moderate-income households, seniors, and the disabled.
Policy H1.3	Encourage the rehabilitation of substandard residential properties by homeowners and landlords.
Policy H1.4	Promote increased awareness among property owners and residents of the importance of property maintenance to long-term affordable housing.
Policy H1.5	Cooperate with non-profit housing providers in the acquisition, rehabilitation, and maintenance of older apartment complexes and single-family houses to be preserved as long-term affordable housing.
Policy H1.6	Assist in the conservation and preservation of all affordable housing units, and work to preserve existing affordable housing that is considered at risk of converting to market-level rents.
Goal H2:	Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter and owner households.

Policy H2.1	Facilitate housing development of affordable to lower-income households by providing technical assistance, regulatory incentives and concessions, and financial resources as funding permits.
Policy H2.2	Encourage and provide incentives for both the private and public sectors to produce or assist in the production of affordable housing, with emphasis on housing affordable to persons with disabilities, seniors, large families, female-headed households with children, and people experiencing homelessness.
Policy H2.3	Establish partnerships with private developers and non-profit housing corporations to assist Azusa in meeting its housing goals.
Policy H2.4	As funding allows, provide rental assistance to address existing housing problems and support regional programs to assist prospective homebuyers.
Goal H3:	Encourage a variety of housing types to meet the existing and future needs of Azusa residents.
Policy H3.1	Accommodate a range of residential development types in Azusa, including low-density single-family homes, moderate-density townhomes, higher-density multi-family units, and residential/commercial mixed use in order to address the City's share of regional housing needs.
Policy H3.2	Continue to maintain an up-to-date residential sites inventory, and provide information to interested developers in conjunction with information on available development incentives.
Policy H3.3	Create mixed-use opportunities along key commercial corridors as a means of enhancing pedestrian activity and community interaction.
Policy H3.4	Encourage development and long-range planning that uses compact urban forms that foster connectivity, walkability, and use of alternative transportation modes, in particular within the Azusa TOD planning area.
Policy H3.4	Continue to allow accessory dwelling units as a means of providing additional infill housing opportunities.
Policy H3.5	Support the provision of high-quality rental housing for large families, students, and senior households.
Policy H3.6	Encourage housing for low- and moderate-income households to be located in many different locations and not concentrated in any single portion of the city.
Policy H3.7	Encourage infill development and recycling of land to provide adequate residential sites and support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.
Goal H4	Minimize the impact of governmental constraints on housing production and affordability.
Policy H4.1	Review and adjust residential development standards, regulations, ordinances, departmental processing procedures, and residential fees related to rehabilitation and construction that are determined to constrain housing development.
Policy H4.2	Provide regulatory incentives, such as density bonuses and reduced parking, to offset the costs of developing affordable housing.
Policy H4.4	Maintain the City's coordinated, interdepartmental Development Review process for larger-scale projects in the City.
Policy H4.5	Monitor State and federal housing-related legislation, and update City plans, ordinances, and processes as appropriate to remove or reduce governmental constraints.
Policy H4.6	Facilitate coordination between lending institutions, the real estate and development community, and the City to better understand and address non-governmental constraints and facilitate production of affordable housing.
Goal H5	Promote and affirmatively further fair housing opportunities and promote housing throughout the community for all.
Policy H5.1	Affirmatively further fair housing related to the sale, rental, and financing of housing to avoid discrimination based on race, religion, age, sex, marital status, ancestry, national origin, color, familial status, or disability, or any other arbitrary factor.
Policy H5.2	Assist in the enforcement of fair housing laws by providing support to organizations that can receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
Policy H5.3	Facilitate increased participation among traditionally underrepresented groups in the public decision-making process.
Policy H5.4	Promote greater awareness of fair housing practices and requirements, tenant and landlord rights and obligations through outreach and education for the broader community of residents, residential property owners and operators.
Policy H5.5	Encourage housing construction or alteration to meet the needs of residents with special needs, such as the elderly and disabled.

In addition to goals and policies, the Housing Element includes a number of implementation action programs to implement the policy direction. Many programs are included to comply with new State laws. Some of the most significant programs include:

Program H2-4: Inclusionary Housing Ordinance

- Study and, if shown to be appropriate for Azusa, adopt an inclusionary housing ordinance and program. Assess any constraints such an ordinance might have on residential development in the city and modify accordingly.
- Ensure consistency between a new Inclusionary Housing Ordinance and State density bonus regulations.
- Monitor the impact of an adopted inclusionary housing policy/ordinance on production of market rate housing in response to market conditions.

Program H3-3: Senior Housing

- Continue to provide appropriate standards to encourage development of senior housing to meet the needs of the City's growing senior population, including include densities up to 40 units per acre and reduced parking and dwelling unit size requirements.
- Amend the Development Code to remove the Minor Use Permit requirement for senior citizen apartments in all zones where it is currently permitted with a Minor Use Permit, and instead allow senior citizen apartments as a permitted use.

Program H3-4: Accessory Dwelling Units (ADUs)

- Adopt an updated ADU ordinance to comply with Government Code Section 65852.2 and submit the ordinance to HCD for their review.
- As revisions to State law occur, update the City's ADU Ordinance to comply.
- Create a public outreach program to encourage ADU development. Opportunities could include advertising ADU development opportunities on the City's website, through social media, at City Hall, and at City events.
- Coordinate with neighboring jurisdictions and the local council of governments to participate in educational opportunities and incentives for the Azusa community, such as workshops on ADUs, stock plans, etc.
- Monitor ADU permit applications and approvals through the Housing Element Annual Progress Report process. Identify and implement additional incentives or other strategies, as appropriate, to ensure adequate sites during the planning period.

Program H3-7: No Net Loss

Government Code §65863 states that no jurisdiction shall "reduce, or require, or permit the reduction of, the residential density for any parcel to, or allow development of any parcel at, a lower residential density, or allow development at a lower residential density than projected" for sites identified in the Housing Element sites inventory unless the jurisdiction makes written findings that the reduction is consistent with the General Plan, and that the remaining sites identified in the Housing Element are adequate to accommodate the jurisdiction's need.

- Evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that any density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level.
- If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

Program H3-9: Development on Religious Institution Sites/AB 1397 Reuse

- Allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households on sites identified in Appendix B as subject to AB 1397.
- Consider options and implement a preferred option to comply with the density requirements of AB 1397 such as:
 - Adopt a Religious Institution Housing Overlay in the Development Code that applies to all religious institution sites in mixed use and MODR zones and allows development at 30 units per acre.
 - Adopt a Religious Institution Housing Overlay that applies only to sites that were used in the previous Housing Element(s) and identified in Appendix B as subject to AB 1397 and allows development at 30 units per acre.

Program H4-2: Supportive and Transitional Housing

- Continue to allow the establishment of transitional and supportive housing development and single-room occupancy developments (SROs).
- Consistent with State law, transitional housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Consider any necessary revisions to the Development Code to make this intent clear.
- Update the Development Code to comply with AB 2162 (Supportive Housing Streamlining Act), effective January 1, 2019, which requires supportive housing to be considered a use by right (ministerially permitted) in zones where multi-family and mixed use are permitted, including nonresidential zones permitting multi-family uses, if the proposed housing development meets specified criteria. Comply with AB 2162 requirements to allow for modifications for required parking for units occupied supportive housing residents that are located within one-half mile of a public transit stop.
- Review the Development Code and make any necessary changes to ensure compliance with AB 101 (Low-Barrier Navigation Centers). Law AB 101 requires that Low-Barrier Navigation Centers be allowed by right in areas zoned for mixed-use and nonresidential zones permitting (by right or conditionally) multi-family uses.

Program H4-4: Stacked Flats and Other Multi-Family Housing

- Review and update the Development Code to allow stacked flats as a permitted use in all neighborhoods, corridors, and districts where currently townhomes are currently allowed, within both mixed-use arrangements and as stand-alone residential housing. Remove the requirement for a Minor Use Permit. Assess new multi-family developments through the Design Review process.
- Continue to promote and provide incentives for the development of stacked flats in the Azusa TOD Specific Planning Area.
- Promote and provide incentives, as appropriate, for the development of stacked flats in the Moderate Density Neighborhoods, Neighborhood Centers, and Mixed-Use Districts.
- Review and update the Development Code to remove the MUP requirement for triplexes and fourplexes, townhouses and rowhouses in the higher density Neighborhood Districts. Assess new multi-family developments through the Design Review process.

Program H4-5: Minimum Unit Sizes

- Amend the Development Code to reduce the minimum unit sizes in Neighborhoods, Centers, and Districts to match the minimum unit sizes allowed in the TOD Specific Plan.

Program H4-6: Parking for Multi-family Uses

- Amend the Development Code to remove the requirement for garages for multi-family dwellings. Instead, allow parking in the form of parking structures, subterranean, and carports. Include in the Development Code standards for parking design.
- Continue to allow waivers of covered parking requirements for affordable housing units, consistent with existing Development Code Section 88.36.080.

Program H4-7: Objective Design Standards

- Amend the Development Code to add reference to the Housing Accountability Act Requirements, indicating that multi-family housing (and mixed-use buildings containing at least two-thirds residential) cannot be denied or density reduced.
- Review the existing Form-Based Code and consider objective design standards. Adopt objective design standards to ensure that the City can provide local guidance on design and standards for by-right projects as allowed by State law. Adoption of objective design standards will facilitate high-quality residential development and compliance with State objectives. The objective design standards will ensure provision of adequate private open space, parking, and related features, as well as architectural design.

Program H5-5: Safety and Environmental Justice Element

As part of a comprehensive update to the General Plan, update the Safety Element and adopt a new Environmental Justice Element to comply with State law.

GENERAL PLAN BUILDOUT

The Azusa General Plan was adopted in 2004, which was assessed for environmental impacts through a Draft and Final General Plan EIR. The General Plan EIR identified that realistic build out of general plan land use policy would result in an increase of 3,371 new units. At the time the EIR was drafted, the estimated number of existing units was higher than reported by the Census and Department of Finance for that year (14,433 rather than Department of Finance 2003 report of 13,181). As of 2020, the Department of Finance estimates that there are 14,651 units in Azusa.

Two different methods could be used to assess residual development capacity:

- Using the existing (2003) and build-out numbers provided in the General Plan EIR and comparing to current information provided by Department of Finance
- Using the build-out numbers provided in the General Plan EIR and comparing to past (2003) and current (2020) Department of Finance housing estimates

Table 4: Residual General Plan Buildout Capacity

Buildout	General Plan EIR	Department of Finance
2003 Housing Units	14,433	13,181
Buildout/Estimated Increase in Housing Units by 2025	3,371	3,371
Total Estimated Buildout 2025	17,804	16,552
2020 Housing Units	14,651	14,651
Residual General Plan Capacity	3,153	1,901

As such, there is remaining capacity within the General Plan build out assumptions for between 1,901 and 3,153 units. The higher end of this estimate of remaining capacity exceeds the identified RHNA for the 2021-2029 planning period (2,561). The sites inventory identifies a total of 2,865 potential units that could be developed on sites with existing zoning in place, plus 448 projects in the pipeline for a total of 3,313 units by 2029.

Buildout of the 2004 General Plan was anticipated to occur in 2025. The RHNA projection period exceeds the timeframe planned for in the General Plan by four years. The City anticipates initiating a comprehensive update to the General Plan within the next few years.

Surrounding Land Uses

The Housing Element applies throughout the city. Uses consist of a full range of suburban land uses.

Environmental Setting

The City of Azusa is a largely built-out suburban community well served by a network of freeways and commuter rail lines, including I-210, SR39, and the Azusa Downtown and Azusa Pacific light rail stations. City departments provide public services, including: water, sewer, law enforcement, parks and recreation.,

Topography is generally flat, sloping downward to the south, with some steeper terrain as it transitions to the mountains in the north, where the Planning Area meets the Angeles National Forest. Local geologic conditions affecting development include the presence of the Sierra Madre Fault and the Upper Duarte Fault, as well as multiple unnamed faults, and the regional presence of the Sierra, Raymond, Whittier, and San Andreas Central faults. Additionally, liquefaction and landslide hazards are present in the northern extent of the city.

Given the predominantly suburban nature of the community, no known threatened or endangered plant or animal species are present in the urbanized areas of the city. Some wetlands and associated flora and fauna are known to occur in the northern portion of the city, generally within the San Gabriel River.

The City is located in the South Coast Air Basin, over which the South Coast Air Quality Management District has regulatory authority.

The key noise sources in the community include vehicular noise from freeways and arterial roadways, as well as railroad noise from the Los Angeles County Metro light rail system which passes through the city, and the Metrolink San Bernardino Line commuter rail system which is located south of the city.

Required City Approvals

The City Council must adopt a General Plan Amendment to incorporate the 2021-2029 Housing Element into the General Plan. The City Council must adopt zoning text amendments associated with the implementation programs outlined in the Housing Element.

Other Agency Approvals

The State of California, Department of Housing and Community Development (HCD) is required to review the Housing Element for compliance with State law (Article 10.6 of the California Government Code) but does not have actual approval authority.

Exhibit 1: Regional Context and Vicinity Map

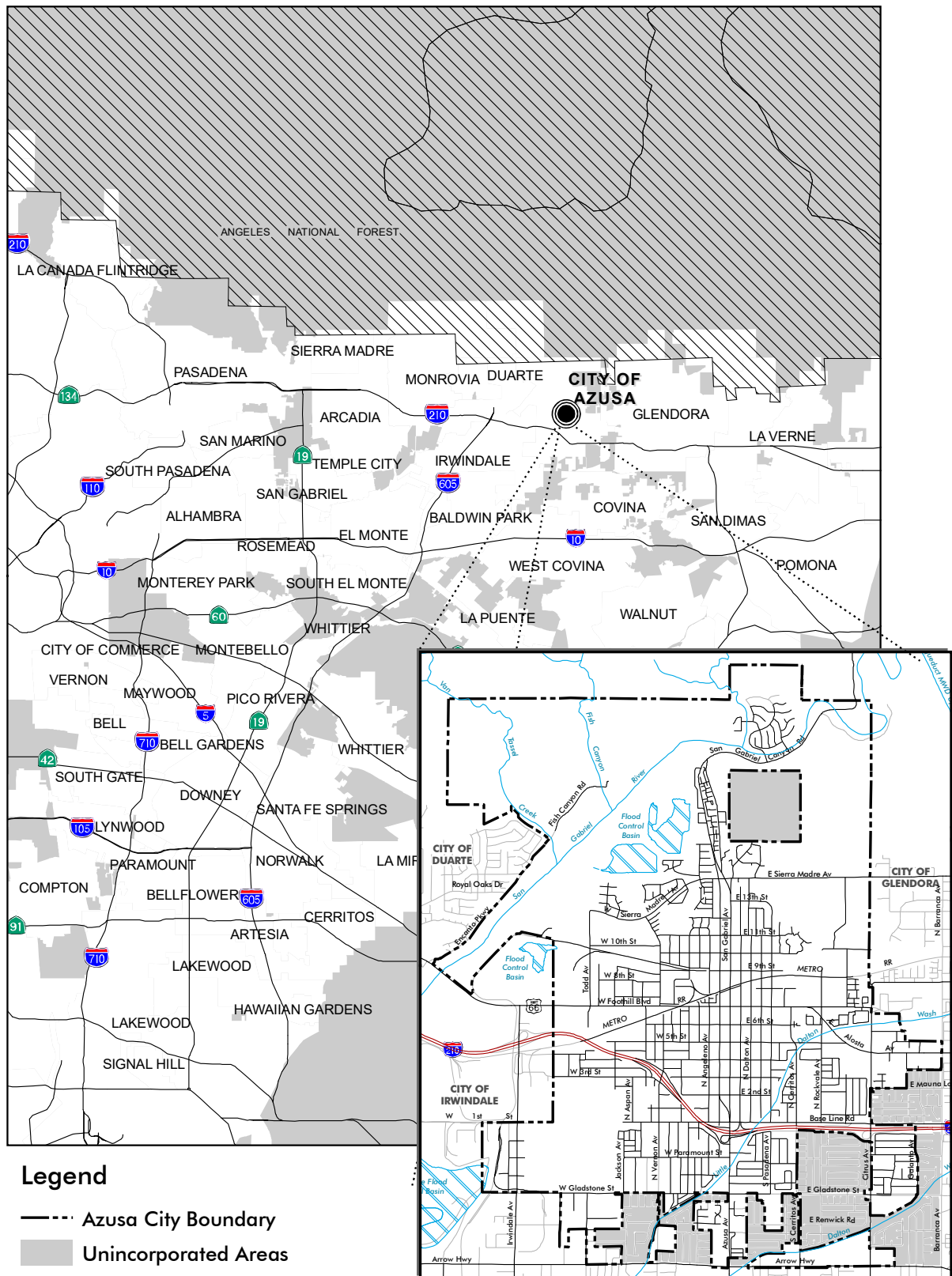
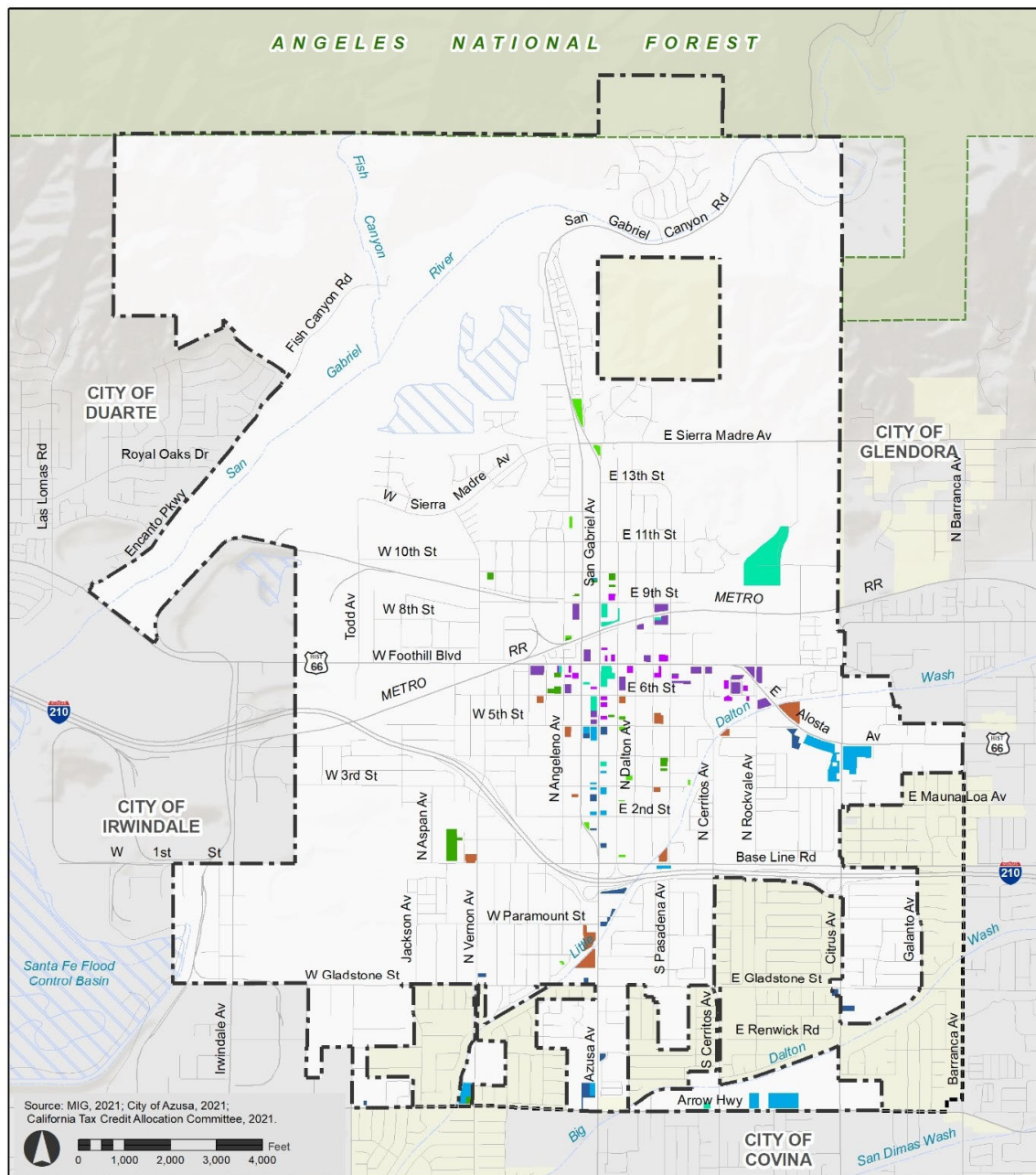


Exhibit 2: Azusa Sites Inventory



Sites Inventory

- Residential Vacant
- Residential Underutilized
- Mixed-Use Vacant
- Mixed-Use Underutilized
- Azusa TOD Specific Plan Small Parcel
- Azusa TOD Specific Plan Large Parcel
- Religious Institutions

Approved and Proposed Projects

- Yes

Base Map Features

- City of Azusa Boundary
- Freeways
- Railroads
- Water Channels
- Sphere of Influence
- Los Angeles County Boundary

City of Azusa Housing Element

3 DETERMINATION

Environmental Factors Potentially Affected

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

Determination

On the basis of this initial evaluation:

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



Robert (Dean) Flores, Assistant Planner
City of Azusa

08/04/2021

Date

4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. Aesthetics

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. The City's General Plan EIR identified that the primary scenic vistas of the City are the adjacent San Gabriel Mountains to the north as well as vistas from Sierra Madre Avenue, Azusa Avenue/Route 39, and Foothill Boulevard. However, the General Plan EIR concluded that impacts to these scenic vistas would be less than significant with implementation of General Plan policies regarding building design. (City 2004). The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City. Impacts will be less than significant and no mitigation is required.

B) Less Than Significant Impact. Scenic resources are isolated, natural or manmade objects offering a unique visual display to the onlooker, in contrast to the expanse and variety of aesthetic values offered in scenic vistas. Elements considered as scenic resources in the General Plan EIR include the San Gabriel River, and the palm trees lining Palm Drive.

Significant impacts could occur if the Housing Element update and potential development of the Inventory Sites substantially damaged scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

According to the California Department of Transportation (Caltrans) website, none of the freeways in the vicinity of the City are currently designated as scenic, although Route 39 through the City is considered to be eligible. (Caltrans 2021). The General Plan EIR concluded that implementation of the General Plan policies described above would reduce overall aesthetic impacts to less than significant levels and no mitigation was required.

Future development of any individual Inventory Site will be subject to project-specific review pursuant to CEQA. Considering that the General Plan EIR analyzed impacts to scenic resources at the program level and concluded that impacts were less than significant and no General Plan Land Use designation changes are proposed as part of the Project, impacts of adoption and implementation of the proposed Housing Element will be less than significant and no mitigation is required.

C) Less Than Significant Impact. Visual character is the composite physical values of a structure or structures, in context of the built and/or natural environment, that include architectural treatment, landscaping, location, and the intangible qualities such as historical context or uniqueness that establish a thematic visual display for the onlooker when viewing the location. Defining visual character is generally subjective, relying on the opinion of the onlooker coupled with the expertise and institutional knowledge of the local jurisdiction to define the visual character of an area or property.

The visual character of Azusa is primarily of a suburban nature. A variety of housing types from single-family homes, tract residential developments, and multi-family housing surround commercial zones along major arterials such as Foothill Boulevard and Azusa Avenue. Much of the recent housing built has been tract residential development and is typical of Southern California Mid-Century development and is relatively suburban in nature. The northern portion of the City consists of the foothills of the San Gabriel Mountains, and is primarily open space with vistas of the mountains. The City contains little vacant land but many parcels of various sizes with older light industrial uses are slowly being redeveloped with modern uses.

Future development implemented through the policies of the Housing Element will have the effect of incrementally changing the visual character of each Inventory Site. If the change in the visual character or quality of a Inventory Site, in context of the existing visual character and quality of the surrounding environment, can be perceived as 'degrading', then the effect of the project may result in potentially significant impacts. Adverse changes to the visual character of an area can reduce the quality of life for occupants and visitors of the area, reduce the uniqueness or singularity of the viewing experience, and/or reduce the historical and/or communal value of the visual setting.

There is no widely recognized threshold for determining when the effects of a project 'degrade' visual character or quality to the point that potentially significant environmental impacts could occur. However, the current CEQA threshold is whether or not a project (in an urbanized area) would conflict with applicable zoning and other regulations governing scenic quality. Thus, future development on the Inventory Sites will be subject to applicable General Plan Policies and zoning regulations related to height, mass and scale, architectural style, materials, landscaping, and a variety of other standards that will ensure future housing development is consistent with the visual character intended for the area. Therefore, impacts due to changes to visual character or quality will be less than significant with implementation of existing regulations and no mitigation is required.

D) Less Than Significant Impact. Future development guided by the implementation of the proposed Housing Element Update will result in new sources of light and glare. Outdoor lighting will be required in parking lots and pedestrian pathways for security purposes and may be included as accent lighting in landscaping and architectural features. Indoor lighting will also likely be visible through windows. Lighting associated with vehicle travel to and from the Inventory Sites will also be generated. Outdoor lighting when viewed at night can result in glare that can be defined as "excessive, uncontrolled brightness" from a luminaire. Glare can also occur during the day due to light reflecting off building materials such as highly polished metal and reflective glass. Inappropriate installation of light and reflective materials in future housing could result in effects on nighttime and daytime views through scattering excessive light in the viewers' eyes, causing a partial or complete inability to see due to light scattering in the eye. The effects of excessive light and glare can result in nuisance impacts ranging from viewer annoyance or an inability to see features in the night sky, to health and safety impacts such as temporary blindness while operating a motor vehicle.

The General Plan EIR found that impacts related to light and glare will be less than significant with implementation of lighting requirements set forth in the General Plan and zoning regulations. Future housing developed to meet local and regional housing needs will be subject to the City's Municipal Code regulating the installation and operation of lighting. Implementation of the lighting requirements of the General Plan and Municipal Code will ensure that lighting is appropriately designed to provide necessary security while not creating undue nuisance or hazards for people at surrounding properties or on roadways in the vicinity of the Inventory Sites. Furthermore, future housing will be subject to standards enumerated in the City's Zoning Code or other documents, requiring review by staff that will limit the use of highly reflective materials thereby minimizing the potential for daytime glare. Impacts to daytime and nighttime views will be less than significant with implementation of existing regulatory requirements and no mitigation is required.

2. Agricultural 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 (CALESA) 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 (CALFIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, as well as forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB).

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Result in loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) No Impact. According to the "Important Farmland Finder" within the state's Farmland Mapping and Monitoring Program (FMMP) website, there is no land considered Prime Farmlands, Unique Farmlands, or Farmlands of Statewide Importance, (DOC 2020a). The General Plan EIR found there would be no significant impacts related to the loss of these farmland types by future development within the City.

The proposed Housing Element Update does not propose the re-zoning or re-designation of any Inventory Sites to agricultural uses or zones as analyzed in the General Plan EIR. In addition, the Housing Element does not propose any specific development that will result in the conversion of farmland to non-agricultural use. Future development consistent with the proposed Housing Element will be subject to General Plan Policies related to the orderly development of undeveloped properties and will be subject to City review and approval. Therefore, implementation of the proposed Housing Element will not result in increased impacts as analyzed in the General Plan EIR. There will be no impacts related to the conversion of important farmland and no mitigation is required.

B) No Impact. According to the California Department of Conservation, Williamson Act reports and statistics, there are no Williamson Act Land Conservation Contract lands within the City including any Inventory Sites (DOC 2020b). The General Plan EIR found there would be no impacts related to the loss of land under Williamson Act contract. The proposed Housing

Element does not propose the re-zoning or re-designation of any Inventory Sites to agricultural uses or zones as analyzed in the General Plan EIR. Future development consistent with the proposed Housing Element will be subject to General Plan Policies related to the orderly development of undeveloped properties and will be subject to City review and approval. Therefore, implementation of the proposed Housing Element will not result in increased impacts as analyzed in the General Plan EIR. There will be no impacts related to the loss of land under Williamson Act contract and no mitigation is required.

C-D) No Impact. Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' There is no forest land located within the City including any proposed Inventory Sites. The General Plan EIR indicated the City did not contain any forest land or land supporting forest resources. Therefore, the proposed Housing Element will not result in direct loss or substantial changes to any forest land and no mitigation is required.

E) No Impact. As discussed above, there is no designated farmland or forest land within the City including any Inventory Sites. Therefore, the proposed Housing Element will not result in the indirect conversion of any agricultural or forest land to non-agricultural or non-forest uses. There will be no impact and no mitigation is required.

3. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The U.S. EPA and CARB are the federal and State agencies charged with maintaining air quality in the nation and California, respectively. The U.S. EPA delegates much of its authority over air quality to CARB which has geographically divided the State into 15 air basins for the purposes of managing air quality on a regional basis. An air basin is a CARB-designated management unit with similar meteorological and geographic conditions.

The City of Azusa is located in the northern extent of the South Coast Air Basin (Basin). The basin encompasses approximately 10,600 square miles and is bounded to the north by the Mojave Desert Air Basin. Air quality in the Basin is managed by the South Coast Air Quality Management District (SCAQMD). Pursuant to the California Clean Air Act, SCAQMD is responsible for bringing air quality within the basin into conformity with federal and State air quality standards by reducing existing emission levels and ensuring that future emission levels meet applicable air quality standards. SCAQMD works with federal, State, and local agencies to reduce pollutant emissions through adoption and implementation of rules and regulations.

The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O₃), particulate matter (PM), which consists of “inhalable coarse” PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM₁₀) and “fine” PM (particles with an aerodynamic diameter smaller than 2.5 microns, or PM_{2.5}), CO, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. The U.S. EPA refers to these six common pollutants as “criteria” pollutants because the agency regulates the pollutants on the basis of human health and/or environmentally-based criteria and because they are known to cause adverse human health effects and/or adverse effects on the environment (USEPA 2020a and 2020b). CARB has also established California Ambient Air Quality Standards (CAAQS) for the six criteria air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS).

A) Less Than Significant Impact. Future development under the General Plan, and updated Housing Element, will have to demonstrate compliance with the current SCAQMD regional and local significance thresholds and prepare site-specific studies of criteria air pollutants. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993), this analysis will include compliance with the Air Quality Management Plan (AQMP) if a project: is consistent with the growth assumptions in the AQMP (Criterion 1) and does not increase the frequency or severity of an air quality standards violation or cause a new one (Criterion 2).

The proposed Housing Element does not propose densities higher than already permitted in the General Plan, thus, implementation will not result in an increase in population and households over that contemplated in the 2016 AQMP. These increases are within the growth assumptions estimated by SCAG that supports the AQMP and therefore would not result in a

conflict with or obstruction of the AQMP, and does not increase the frequency or severity of an air quality standards violation, or cause a new violation. Therefore, impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

B) Less Than Significant Impact. The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SCAQMD in its *CEQA Air Quality Analysis Handbook* (SCAQMD 1993) and, furthermore, would be determined to potentially conflict with implementation of the AQMP. The Azusa General Plan contains the following goals and policies related to air quality:

Goal 1 Improve Air Quality in Azusa and Reduce Exposure to Air Pollutants.

Policy 1.1 Integrate air quality concerns into land use planning decisions (AQ1 through AQ4, and AQ8).

Policy 1.2 Integrate air quality concerns into site design review (AQ1 and AQ5).

Policy 1.3 Reduce pollutant emissions from quarry operations, off-road vehicles use areas, industrial uses, and vehicular traffic (AQ4, and AQ6 through AQ8).

Policy 1.4 Participate in regional air quality planning strategies (AQ8).

Policy 1.5 Consider encouraging the use of "green roof" construction technologies. (AQ1)

Additionally, the following Air Quality Implementation Programs are contained within the General Plan:

1 Design Review: Through design review processes:

- Encourage setbacks and landscaping to create buffer zones between residential and industrial land uses, as specified in the City Design (land use component) Element
- Encourage maximum allowable setbacks of residential and other sensitive uses along busy streets and adjacent to busy intersections. In mixed-use developments, residential units should be placed on upper levels as opposed to street level, or in the rear of the development as opposed to the street edge;
- Require facilities for the needs of automobiles, pedestrians, bicyclists, and transit riders in site design and site amenities;
- Encourage energy-efficient design elements in new development including appropriate site orientation, solar design, use of landscaping, and insulating materials, to reduce energy consumption for heating and cooling; and
- Maximize indoor air quality by incorporating adequate ventilation into site design and orientation. Encourage use of windows that open and close, pollution reducing plants and indoor trees, nontoxic building materials and finishes, and ventilation systems.

2 Land Use Patterns Encouraging Alternative Transportation. Encourage land use patterns that enable people to use alternative transportation methods such as transit, walking, and cycling in their day-to-day activities. Expand opportunities for people to live and work in close proximity.

3 Promote Mixed-Use Development. Promote mixed-use development that provides commercial services close to residential zones and employment centers, enabling citizens to walk or bicycle to services rather than drive.

4 Environmental Review. Through environmental review processes:

- Conduct an air quality analysis for all industrial development proposals and require pollutant-reducing mitigation measures for proposals that may generate significant levels of air pollution; and
- Evaluate the potential for a use to result in objectionable odors for proposed industrial, manufacturing, processing, and food and beverage production operations.

5 Provide Sidewalks, Bicycle Lanes, and Bus Shelters Continue to require new development and significant renovation projects to include sidewalks, bicycle lanes, and bus shelters allowing for easy use of alternative modes of transportation.

6 Reduce Auto Emissions. Reduce automobile emissions:

- By reducing low-speed and idling emissions at major intersections that operate at Level of Service E or F; and
- From idling vehicles at drive-thru restaurants and similar commercial operations by requiring a two-window system and sufficient pass-through lanes.

7 Code Enforcement, Policing, and Monitoring.

- Provide consistent and effective code enforcement of all probable fugitive dust emitters such as automobiles, off road vehicles, heavy diesel trucks, and quarries to assure that fugitive dust emissions are minimized.
- Actively monitor dust control strategies and report infractions to the South Coast Air Quality Management District.

The General Plan EIR concluded that growth within the City consistent with the General Plan would have significant and cumulatively considerable air quality impacts due to the amount of new housing and non-residential growth, and because the Los Angeles County portion of the SCAB is designated as a non-attainment area for Ozone (O₃, Carbon Monoxide (CO) and respirable Particulate Matter (PM₁₀). PM₁₀ levels were anticipated to increase in the City of Azusa based on General Plan growth projections and was therefore considered a significant and unavoidable impact in the General Plan. The proposed HEU will not increase growth in the City beyond that anticipated in the General Plan and analyzed in its EIR. Therefore, the proposed HEU is consistent with the findings of the General Plan EIR, will not create a new or significantly increased impact, or require additional mitigation at this programmatic level.

Future housing developed in accordance with the goals and policies of the Housing Element will have the effect of contributing incrementally to the mobile, energy, and area sources that cumulatively contribute to criteria pollutant levels and associated air pollution in the Basin. The SCAQMD is responsible for preparing the Air Quality Management Plan (AQMP) for the Basin (SCAQMD 2016). The AQMP includes strategies and control measures to reduce and/or maintain the effects that construction and operation of various uses within the Basin have on regional air quality. The effects of future housing development on regional air quality could result in potentially significant impacts on the health of residents if it is determined that a project's individual contribution to cumulative air pollution levels is considerable by exceeding the annual emissions thresholds established by the SCAQMD in its *CEQA Air Quality Analysis Handbook* (SCAQMD 1993) and, furthermore, would be determined to potentially conflict with implementation of the AQMP. Criteria pollutants can directly damage the environment, both natural and man-made. Impacts to human health include a variety of acute and chronic respiratory illnesses. Development of future housing will be subject to environmental evaluation for exemption and potential analysis pursuant to CEQA upon application for entitlement permits. Projects found to be exempt from CEQA will not have a significant impact on the environment as declared by state legislation. Other projects will be subject to standard analysis and mitigation if required.

The General Plan EIR concluded that build out of the General Plan will be inconsistent with the 2016 AQMP and will result in substantial increases in criteria pollutant emissions within the air basin. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long term air quality impacts in the City have already been contemplated, and the proposed Housing Element will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to environmental evaluation pursuant to CEQA. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

C) Less Than Significant Impact. Common sensitive receptors include children under age 14, the elderly over age 65, athletes, and people with cardiovascular and chronic respiratory diseases. Future housing projects are not considered uses that emit substantial levels of hazardous air pollutants that could have an effect on the environment such that potentially significant impacts will occur.

In addition, industrial processes with state or federal toxic emissions requirements must prepare health risk assessments and/or obtain various permits (depending on the process) from the SCAQMD, minimizing impacts to surrounding uses. With implementation of existing regulatory requirements (or mitigation if required), impacts to sensitive receptors will be less than significant and no separate mitigation for the Housing Element Update is required.

D) Less Than Significant Impact. Residential land uses do not generate objectionable odors that could impact a substantial number of people, therefore, future housing development will not result in effects related to odors that could impact a substantial number of people. There are no sources of objectionable odors located in the vicinity of any Inventory Site identified in the proposed Housing Element. As discussed in the General Plan EIR, future industrial uses could be sources of odors that affect sensitive land uses such as residential areas. Implementation of the General Plan will ensure that incompatible land uses are not co-located, minimizing odor impacts. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, impacts in this regard relative to the Housing Element Update will be less than significant and no mitigation is required.

4. Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) Less Than Significant Impact. According to the General Plan EIR, the list of sensitive species in and around Azusa include butterfly, fish, amphibian, reptile, bird, mammal, plant species (95 total) as well as some sensitive habitats. The majority of the City is developed and suburban, with the exception of the northern portion of the City, which contains large areas left natural as hillsides and drainage areas. These areas are, however, designated by the General Plan as Open Space and do not include any proposed development, as identified in the Housing Element update. Thus, any significant species are not thought to occur in the developed areas of the City, where the Housing Element update could have an impact.

The proposed Housing Element update does not include any changes to the General Plan land use designations of the Inventory Sites or any other land use changes that were not previously analyzed in the General Plan EIR; thus, impacts associated with the Housing Element Update will remain within the scope of analysis certified in the General Plan EIR. Future development of the Inventory Sites will be subject to project-specific environmental review pursuant CEQA, as applicable. Considering that the General Plan EIR analyzed impacts to sensitive species and impacts were found to be less than significant with mitigation incorporated, and that the proposed Housing Element does not propose any land use changes or

designate any Inventory Sites that were not already analyzed in the General Plan EIR, impacts will be less than significant, and no mitigation is required.

B-C) Less than Significant Impact. According to the General Plan EIR and a subsequent General Plan Amendment, there are riparian habitats and wetlands within the City of Azusa (City 2004) (City 2013). These are confined to the northern, undeveloped portion of the City, and are primarily associated with the San Gabriel River. The General Plan EIR determined that implementation of General Plan Policies will prevent any potential impacts resulting from the direct and indirect effects of future development within the City to less than significant levels. The proposed Housing Element Update does not include any changes to the land use designations, thus, impacts associated with potential development associated with the Housing Element Update will remain within the scope of analysis certified in the General Plan EIR. Incorporation of the General Plan Policies discussed above will ensure that impacts to riparian and wetland resources resulting from future development of housing will be less than significant and no mitigation measures are required.

D) Less than Significant Impact. The General Plan EIR concluded that the City does not contain any regional wildlife movement corridors within the developable portion of the City, and that impacts to wildlife movement will be less than significant with implementation of General Plan Policies. Wildlife corridors and the movement of animals are important in maintaining genetic diversity, accommodating mating patterns, and ensuring that seasonal behavior is not interrupted. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Future development of Inventory Sites will therefore not result in significant impacts to any creeks, rivers, or other water bodies with incorporation of General Plan Policies, thus, creeks, rivers, and other water courses will remain open as wildlife corridors. Impacts will be less than significant, and no mitigation measures are required.

E) No Impact. According to the General Plan EIR, the City of Azusa has not adopted local ordinances or regulations pertaining to biological resources. However, the City does have tree preservation requirements pursuant to Chapter 62, Article VI of the City's Municipal Code that generally provides procedures to review removal of trees and replacement on public property or as part of development or redevelopment on private property. The tree preservation ordinance was adopted to ensure and enhance the public health, safety, and welfare through proper care, maintenance, and preservation of trees in Azusa. New development projects are required to abide by the Tree Preservation Ordinance. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, implementation of the proposed Housing Element will not conflict with any locally adopted ordinance or regulation. No impact will result, and no mitigation is required.

F) No Impact. There are no established Natural Community Conservation Plans (NCCPs) or Habitat Conservation Plans (HCPs) within or adjacent to the City of Azusa. Therefore, implementation of the proposed Housing Element will not conflict with any NCCP or HCP. No impact will occur and no mitigation is required.

5. Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. The modern area of Azusa was first settled by Europeans as part of the Rancho el Susa in 1841. The Rancho was a land grant from the Mexican government, granted by Governor Juan Bautista Alvarado, to Luis Arenas. Arenas sold the rancho's land to Henry Dalton in 1844. Dalton was an English immigrant and wealthy merchant from the Pueblo of Los Angeles. He renamed it Rancho Azusa de Dalton, and had built a winery, distillery, vinegar house, meat smokehouse, and flour mill. Also, a vineyard was planted. Dalton built a house here on a place known as Dalton Hill, near the modern-day 6th Street and Cerritos Avenue. With the cession of California to the United States following the Mexican-American War, the 1848 Treaty of Guadalupe Hidalgo provided that the land grants would be honored. As required by the Land Act of 1851, a claim for Rancho San Francisquito was filed with the Public Land Commission in 1852 and confirmed by the Commission in 1853, but rejected by the US District Court in 1855, on the grounds that Henry Dalton was not, at the time of the grant, a citizen of Mexico. The decree was reversed by the US Supreme Court, and the grant was patented to Henry Dalton in 1867.

By 1860, Azusa was listed as a township in the National Census, with a population of 363. By 1870, the census listed the area as the township of Azusa – El Monte Township and in 1880 the census listed the area as the township of San Jose and Azusa.

Due to financial problems, Dalton was forced to give the township to a Los Angeles banker, Jonathan S. Slauson, to whom Dalton owed money. Slauson laid out the plan for the city in 1887 and the city was officially incorporated in 1898.

The completion of the Los Angeles and San Gabriel Valley Railroad in January 1887, later sold to the Santa Fe railroad, brought new people looking for homes and investment opportunities in Azusa. The current Gold Line Foothill light rail line is built on the old rail right-of-way.

The City continued to grow slowly, primarily based on the local citrus and agricultural economy until the post-war boom in the late 1940s and 1950s. By this time there was a population boom combined with a decline in the citrus economy. Manufacturing and heavy industry replaced the agricultural industry, and the establishment of the Azusa Pacific (College) University in 1965 brought an academic presence to the City. The development of the freeway system left old Route 66 as a remnant highway while at the same time bringing new families to the City in search of affordable housing which has ultimately transformed Azusa into the City it is today.

As indicated in the City's General Plan EIR, in 1983 the City developed a list of 138 buildings, places, and sites is included in the 1983 General Plan although the listing was considered tentative. This list was prioritized by the Cultural and Historical Landmarks Commission (CHLC) and resulted in 20 listings that are considered to be of the highest priority. No ordinances were adopted for the preservation of these resources at the time of the 1983 General Plan adoption. Since 1983, several of the original 138 listings have been demolished or modified. In 2000, the Cultural and Historical Preservation Commission (formerly the CHLC), developed a list consisting of 60 places, objects, landscapes, and buildings that the Commission

believes best represents the culture and history of Azusa, and have potential to be considered historic. Azusa City Council adopted an historic resource ordinance, Ordinance Number 00-012, which amended the Azusa Municipal Code to include eligibility criteria and the appropriate procedure for placing property onto a Designated Historic Landmark (DHL) list. The General Plan EIR indicated that 5 of the 60 sites were to be placed on the DHL list. None of these five DHL properties, are located on any of the proposed Inventory Sites identified in the Housing Element. However, 4 of the remaining 55 potential properties are on the list of potential properties as shown in Table 4.5-1 of the General Plan EIR. These properties are:

- 626 [North] Alameda Ave
- 513 [North] Alameda Ave
- 534 East Foothill Blvd
- 825 [North] San Gabriel Ave

Discrepancies between the name listed in the General Plan EIR, and the current list of potential RHNA sites is shown with square parentheses. An additional 6 properties are mapped by the City as having potential to be historic, having come from the original list of 138 properties. However, these 6 were not included on the list of potential properties in the General Plan EIR. These properties are:

- 513 [North] Alameda Ave
- 909 [North] Alameda Ave
- 629 [North] Angeleno Ave
- 937 North Azusa Ave
- 250 East Foothill Blvd
- 836 [North] Soldano Ave

Discrepancies between the name listed in the General Plan EIR, and the current list of potential RHNA sites is shown with square parentheses.

Sec. 55-49 (a) of the Azusa Municipal Codes ensures that any alteration or demolition proposed at potential historic landmarks and/or potential historic districts is to be reviewed by the commission prior to any work which could materially alter the property.

The City has also established three potential Historic Districts, the Sunset/San Gabriel District; the Downtown District; and the Foothill District. Several of the proposed RHNA Areas are located within one of the Historic Districts. Sec. 55-47 of the Azusa Municipal Code states that a certificate of appropriateness is required for the alteration, demolition, reconstruction, or replacement of may be permitted to historic landmarks and properties within historic districts, without first obtaining a certificate of appropriateness from the historic commission.

Because potential historic properties are located within the proposed areas of development, implementation of the proposed Housing Element Update has the potential to cause substantial adverse change in significance of a historical resource. None of the properties which could be impacted are listed on a national, state, or local historic register. However, because they have been listed as having potential to be considered for a local register, failure to analyze such a property, could result in a significant impact. By following the Azusa Municipal Code, which would require all potential historic properties to be evaluated, this would ensure that properties meeting the definition for a local resource are identified prior to damage, alteration, or demolition. Additionally, such individual projects will require separate CEQA review and, as such, will be required to be analyzed on a project level for eligibility on a State register; the California Register of Historic Resources (CRHR).

By following existing General Plan goals, plans, and policies, as well as applicable laws and regulations, and codes, alteration of any potentially historic structure, or structures within a historic district will be analyzed to see if it meets eligibility to be included on a local historic register. Additionally, project level CEQA analysis will ensure that the eligibility of a potential resource is analyzed for the CRHR. Impacts will be less than significant, and no mitigation is required.

B) Less Than Significant Impact. The Tongva are an Indigenous people of California from the Los Angeles Basin and the Southern Channel Islands, an area covering approximately 4,000 square miles. In the precolonial era, the people lived in as many as 100 villages and primarily identified by their village name rather than by a pan-tribal name. During colonization, the people were referred to as Gabrieleño and Fernandeano, names derived from the Spanish missions built on their land - Mission San Gabriel Arcángel and Mission San Fernando Rey de España. The name *Tongva* is widely used but others choose to identify as *Kizh*.

There is significant evidence of native American activity in the (San Gabriel Valley. Many artifacts and implements have been found in various places. Near the mouth of the San Gabriel Canyon, southerly from the Duarte Ditch, near where it crosses the wash, are to be found stones in a long rambling line which, no doubt, had some important significance to the native Americans. These stones are still fairly well established. At the Forks there is an old burial ground. Seven sets of remains have been previously discovered. Each body had a cairn of stone placed over the abdomen, at the top of which was a stone mortar.

In the San Gabriel Canyon there are several huge rocks, the largest weighing some 75 or 80 tons. These are covered with native American markings yet quite distinct, though no doubt having weathered the storms of several generations. Mortars were also found in large rocks.

Similar to potential impacts resulting from the effects of future housing development on historical resources, impacts to archaeological resources can result in the loss of information important to the history (and potentially the pre-history) of California and the people who created and/or used the materials.

The number of archaeological resources recorded within the City limits is minimal. Past archaeological surveys conducted in undeveloped areas in the City, including ridgelines and slopes have not uncovered any archaeological resources. Considerable development occurred in the City prior to the establishment of a formal archeological removal process which could explain the limited number of recovered archaeological resources.

Archaeological resources were uncovered during grading activities associated with buildout of the Rosedale community, just north of the Azusa Transit-Oriented Development (TOD) Specific Plan area. In addition, glass pieces and artifacts have been discovered near the intersection of 2nd Street and Azusa Avenue.

The General Plan establishes a process for identifying and preserving prehistoric or historic archaeological resources, including human remains. Implementing Program HR2, identifies the necessary procedure developers should follow if previously unknown resources are identified. The General Plan ensures that archaeological and historical resources shall be protected and preserved to the maximum extent feasible.

In addition, two state laws (SB 18 and AB 52) that apply to this project requires the City to consult directly with local Native American tribes to determine if any tribal cultural resources will be impacted by private development or public works projects proposed in the City. All future development of the RHNA Sites will be required to prepare Cultural Resource Assessments/Evaluations (CRAs/CREs) to determine if there are any impacts to cultural or tribal cultural resources as required by the General Plan Conservation Element. This is considered regulatory compliance and not specific mitigation under CEQA.

No requests for consultation under either AB52 or SB18 for the proposed HEU have been made by a Native American tribe with geographic or traditional connection to the area of land in which the City of Azusa is located. Additional details are provided in Chapter 18, Tribal Cultural Resources.

The General Plan EIR concluded that build out of the General Plan will not result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long-term impacts in the City have already been contemplated, and the proposed Housing Element Update will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to review in compliance with CEQA requirements. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

C) Less Than Significant Impact. According to the General Plan EIR, this region has been occupied by Native American tribes for thousands of years. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Future development of the proposed Inventory Sites that require site preparation and earthmoving activities have the unlikely potential to uncover buried or surficial human remains outside of a recognized cemetery or other burial location. Construction activities that result in disturbing or destroying human remains could result in impacts to our knowledge of the burial practices of the people who were buried, the people who buried the remains, and the pre-historic or historic context and circumstances under which the buried became deceased. Should human remains be discovered, State Health and Safety Code §7050.5 is required to be implemented. This requires halting work in the immediate area of the find and notifying the County Coroner, who must then determine whether the remains are of forensic interest. If the coroner, with the aid of a supervising archaeologist, determines that the remains are or appear to be of Native American origin, the coroner is required to contact the Native American Heritage Commission for further investigations and proper recovery of such remains, if necessary. Implementation of existing regulations will ensure that any discovered remains are appropriately collected and examined for any significant information that can be elicited. Potential impacts due to effects on human remains will be less than significant with implementation of existing regulations and no mitigation is required.

6. Energy

Would the project:

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

A) Less Than Significant Impact. Energy is primarily categorized into three areas: electricity, natural gas, and fuels used for transportation. According to the U.S. Energy Information Administration (USEIA), California is the most populous state in the United States, representing 12 percent of the total national population, has the largest economy, and is second only to Texas in total energy consumption. However, California has one of the lowest per capita energy consumption levels in the U.S. This is a result of California's mild climate, extensive efforts to increase energy efficiency, and implementation of alternative technologies. California leads the nation in electricity generation from solar, geothermal, and biomass resources (USEIA 2018).

Electricity. In 2018, almost half of California's net electricity generation was from renewable resources, including hydropower (U.S. EIA, 2019). In 2018 the California electric system used 281,120 GWh of electricity, nearly 71% of which (199,595 GWh) was produced in-state (CEC 2019a). The Azusa Light and Water Department (Department), a municipal utility, provides electricity to City residents and businesses. The Department maintains a joint-use agreement with Southern California Edison (SCE), permitting the Department to use SCE's transmission lines to transport electricity to the Azusa Substation located at 809 North Angeleno Street. In the 2018 fiscal year, SCE sold approximately 87,143 million kilowatt hours (kWh) of electricity (SCE 2019a); approximately 46% of the electricity that SCE delivered to customers came from carbon-free resources, including solar energy (approximately 13%), wind energy (approximately 13%), and geothermal energy (approximately 8%) (SCE 2019b).

Natural Gas. California accounts for less than 1% of total U.S. natural gas reserves and production; however, almost two-thirds of California households use natural gas for home heating (U.S. EIA 2019). In 2018, California consumed about 12,638 million therms³ of natural gas. Approximately 35% of natural gas was consumed by the residential sector which makes up approximately two-thirds of county-wide consumption (CEC 2019b). The Southern California Gas Company (SoCalGas) provides natural gas service to the City SoCalGas is the principal distributor of natural gas in Southern California and provides natural gas for residential, commercial, and industrial markets.

Transportation. California's transportation sector consumed 80.6 million Btu of energy per capita in 2017, which ranked 31st in the nation (U.S. EIA 2017). Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific formulations required by the California Air Resources Board.

Housing Element Update. Future housing developed in accordance with the goals and policies of the HEU will have the effect of contributing to increased energy consumption in the City which will be part of regional growth in energy use and the surrounding communities continue to grow as well. Future growth in the City will be required to be consistent with the state's energy conservation regulations as codified in Title 24 of the CCR and the California Green Building Code. As long as future development adheres to these requirements, the Housing Element Update will have less than significant impacts relative to energy consumption and efficiency and no mitigation is required. Therefore, the proposed Project would not use energy in a wasteful, inefficiency, or unnecessary manner.

B) Less Than Significant Impact. The analysis in Section 6.A above demonstrates that the proposed Project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or

energy efficiency. As discussed above, future development under the HEU would be subject to the California Title 24 Building Code energy efficiency standards for residential and non-residential buildings, which would help reduce energy consumption overall within the City.

Equipment and vehicles associated with construction and operation of new development would also be subject to fuel standards at the state and federal level. Truck traffic from some new non-residential development would inherently benefit from programs implemented to achieve the goals of the state's Sustainable Freight Plan, such as the turnover of older, less fuel-efficient trucks, as fuel economy standards are rolled out and zero emission vehicles (ZEV) trucks and vehicles in general becomes more widely available and cost effective for businesses and residents. Therefore, the Project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation is required.

7. Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A.i) Less Than Significant Impact (Fault Rupture). Based on current mapping available from the California Geological Survey (CGS), there are no known Alquist-Priolo Earthquake Fault Zones within the City limits. However, there are several major active faults near the City, which are shown below in Table 5. Additionally, previous geologic studies have identified seven faults that may traverse the City.

The Sierra Madre Fault is considered the “master” fault responsible for thousands of feet of vertical and significant left-lateral offset thrusting the San Gabriel Mountains southward up and over the San Gabriel Basin. It extends from San Fernando on the west to San Dimas-C Claremont on the east. In Azusa, the fault is concealed at its western end where it crosses the mouth

of Van Tassel Canyon and extends in an arcuate path across the San Gabriel River floodplain. It is exposed in the hill above Clearhaven Drive where Wilson Diorite is thrust over Topanga Formation. The fault dips about 40 to 90 degrees into the mountain and is intermittently exposed as it continues eastward. It exits the study area about 500 feet north of the intersection of Sierra Madre Boulevard and Citrus Avenue. The County of Los Angeles and the State consider the Sierra Madre Fault potentially active. The Sierra Madre Fault is considered capable of surface rupture within the City.

Table 5: Critical Faults Within a 100-Kilometer Radius of Azusa

Fault Name	Approximate Distance from City	Magnitude
Sierra	1	7.2
Raymond	11	6.5
Whittier	19	7.5
San Andreas Central	33	8.3
SOURCE: City of Azusa, "Azusa General Plan Update: Analysis of Existing Conditions and Trends," December 2001		

New housing that would be built under the HEU would still be within the growth limits identified in the General Plan and evaluated in its EIR. New housing would be subject to state seismic safety requirements of the California Building Code as adopted by the City. In addition, new development is required to prepare a geotechnical hazards assessment to identify site specific design and construction guidelines to protect occupants and structures from anticipated seismic impacts. Therefore, impacts related to fault rupture would be less than significant and no mitigation is required.

A.ii) Less Than Significant Impact (Groundshaking). Seismicity is a well-known hazard of Southern California. The San Andreas Fault represents the boundary between two tectonic plates, the northwest-moving Pacific plate and southeast-trending North American plate. Movement along this boundary has resulted in many earthquakes from the region's numerous faults (CGS 2020a). The entire City of Azusa is subject to severe groundshaking.

The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City, therefore new housing that would be built under the HEU would still be within the growth limits identified in the General Plan and evaluated in its EIR. New housing would be subject to state seismic safety requirements of the California Building Code as adopted by the City, and additional requirements set down in the City's municipal code. Therefore, impacts related to seismic groundshaking would be less than significant and no mitigation is required.

A.iii) Less Than Significant Impact (Liquefaction). Liquefaction occurs when water-saturated sediment temporarily loses strength and acts as a fluid. Liquefaction-induced ground failure historically has been a major cause of earthquake damage in Southern California. Liquefaction potential and severity depends on several factors, including soil and slope conditions, proximity to fault, earthquake magnitude, and type of earthquake.

A groundwater depth of less than 50 feet below ground surface is important when assessing liquefaction. The majority of the City is either underlain by bedrock area with no aerially continuous groundwater surface) or by alluvium with groundwater greater than 100 feet deep. This includes the steep mountainous areas and the areas generally south of Foothill Boulevard. An area generally bounded by Sierra Madre Avenue on the north, 5th Avenue on the south, Orange Avenue on the west, and Cerritos Avenue on the east has groundwater depths between 50 and 100 feet. On the eastern side of the City, groundwater depth is between 30 to 50 feet deep in the area east of Cerritos Avenue, west of Citrus Avenue, south of 10th Street, and north of 6th Street. North and east of these previous two areas, groundwater may be predominately less than 30 feet deep.

In the northwest portion of the City, in the San Gabriel River floodplain, groundwater is, in general, less than 50 feet deep. This area is roughly defined by the mountains on the north, east and west, by Azusa Avenue on the east, the Southern Pacific - Santa Fe right-of-way on the south, and the city limits on the west.

In general, the northern part of the City (primarily to the north of 2nd Street) is subject to liquefaction due to the local potential for strong groundshaking, prevalence of alluvial soils, and shallower groundwater levels (CGS 2020b).

The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City, therefore new housing that would be built under the HEU would still be within the growth limits identified in the General Plan and evaluated in its EIR. New housing would be subject to state seismic safety requirements of the California Building

Code as adopted by the City. In addition, new development is required to prepare a geotechnical hazards assessment to identify site specific design and construction guidelines to protect occupants and structures from anticipated seismic impacts, including liquefaction. Therefore, impacts related to liquefaction would be less than significant and no mitigation is required.

A.iv) Less Than Significant Impact (Landslides). According to the General Plan EIR, portions of Azusa near the mountainous portions of the City are susceptible to landslides from potentially unstable slopes. However, none of the RHNA sites are located within or adjacent to any of these mountainous areas. Housing may still be developed in other areas of the City which may be more susceptible to landslides. Implementation of CBC requirements and City practices and policies related to landslides during the environmental review process will assure that appropriate design measures and mitigation is incorporated where necessary. Implementation of these existing regulations would reduce potential landslide impacts. Therefore, there would be no impact related to landslides and no mitigation is required.

B) Less Than Significant Impact. Natural forces, both chemical and physical, are continually at work breaking down and moving rocks, minerals, and soils. Erosion poses environmental hazards through the effect of removing soils that can undermine roads and buildings and destabilize slopes. Erosion can also result in environmental damage by depositing soils in downstream reservoirs, lakes, and drainage structures that can result in impacts to wildlife and human health by changing the ecological properties or the physical boundaries of the water body or drainage control device. The City of Azusa General Plan EIR stated that in order to reduce impacts to a less than significant impact a geotechnical investigation would be required on a project-by-project basis, to evaluate soil erosion and the potential for soil erosion on a site that is subject to development.

Developments would be designed and constructed in conformance to the specific recommendations provided in the geotechnical report. Thus, impacts will be less than significant with implementation of the project specific geotechnical recommendations.

C) Less Than Significant Impact. The City of Azusa, similar to the entire Los Angeles Basin, is subject to moderate to severe groundshaking from frequent earthquakes. In addition to liquefaction, strong groundshaking can trigger other seismic hazards including lateral spreading, landslides, subsidence, or collapse.

The City's soils consist of a mix, dependent on location. The steeper mountains are made up of very old "basement" rocks that are generally very hard and resistant to erosion. Formations in the foothills are old "bedrock" formations and the oldest "alluvium" formations. South of the steep mountains and foothills are the intermediate-age and younger alluvium formations (often called alluvial fans because of their shape on a map), and man-made fill deposits. The anticipated development as a result of the Housing Element would be entirely located on alluvial deposits, which can be unstable in certain conditions.

The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City, therefore new housing that would be built under the HEU would still be within the growth limits identified in the General Plan and evaluated in its EIR. New housing would be subject to state seismic safety requirements of the California Building Code as adopted by the City. In addition, new development is required to prepare a geotechnical hazards assessment to identify site specific design and construction guidelines to protect occupants and structures from anticipated seismic impacts, including liquefaction, lateral spreading, landslides, subsidence, or collapse. Therefore, impacts related to unstable geology or soils would be less than significant and no mitigation is required.

D) Less Than Significant Impact. Expansive soils are those that greatly increase in volume when they absorb water and shrink when they dry out. Expansion is measured by shrink-swell potential defined by the relative volume change in soil while gaining in moisture. If the shrink-swell potential is rated moderate to high, damage to buildings, roads, and other structures can occur.

The City consists of soils of the Hanford, Ramona-Placentia (9 to 15 percent grade), Tujunga-Soboba, and Vista-Amargosa associations. Soils of the Ramona-Placentia, Tujunga-Soboba, and Vista-Amargosa associations are primarily located to the northern portion of the City. The area to the south of 11th Street contains soil of the Hanford association. Soils of the Hanford, Tujunga-Soboba, and Vista-Amargosa associations have lowshrink-swell behavior. However, soils of the Ramona-Placentia association have high shrink-swell behavior. The area that has soils of the Ramona-Placentia association is located to the east of San Gabriel Canyon Road, in the northeastern portion of the City. The General Plan Land Use map designates a portion of the area with soils of the Ramona-Placentia association for residential uses. Expansive materials, if left untreated, can cause damage to structures, including cracking, heaving, and buckling of foundations.

Future housing developed pursuant to the policies of the proposed Housing Element will be subject to the requirements of the California Building Code (CBC) as adopted by the City, including preparation of a soils report. The CBC requires analysis of soils and application of engineering standards to ensure project sites are made suitable for building construction, particularly in regard to foundation design.

Foundation and structural design for proposed development of the RHNA sites will be subject to analysis and design recommendations by a licensed geotechnical engineer for review and approval by the City. In addition, the General Plan requires the preparation of a geotechnical report on a project-by-project basis. Therefore, impacts due to geological and soils hazards will be less than significant and no mitigation is required.

E) No Impact. The City General Plan requires use of the public sewer system and prohibits the installation or maintenance of septic tanks or other facilities intended for the disposal of sewage. Therefore, there are no impacts and no mitigation is required.

F) Less Than Significant Impact. According to the General Plan EIR, there are no listed geological resources and/or unique geological features located within the City. The General Plan establishes a process for identifying and preserving paleontological resources. Implementing Program HR2, identifies the necessary procedure developers should follow if previously unknown resources are identified. The General Plan ensures that paleontological resources shall be protected and preserved to the maximum extent feasible.

The General Plan EIR concluded that build out of the General Plan will not result in less than significant impacts related to the substantial adverse change in the significance of paleontological resources. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, long-term impacts in the City have already been contemplated, and the proposed Housing Element Update will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to review in compliance with CEQA requirements. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

8. Greenhouse Gas Emissions

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less than Significant Impact. Climate change is the distinct change in measures of climate for a long time period. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e., changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes, raising livestock, and deforestation activities; and some agricultural practices.¹

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

Although GHG emissions is now a required section for CEQA projects, the General Plan EIR was prepared prior to current CEQA requirements and does not analyze GHG emissions. However, this project is consistent with the analysis in the EIR because land use designations are unchanged and housing growth anticipated under the HEU is no greater than that evaluated in the General Plan EIR which concluded overall development would have significant air quality impacts.

California Assembly Bill 32 (AB32), the Global Warming Solutions Act of 2006, is a California State Law enacted in 2006. The purpose of the law is to slow down climate change by establishing a comprehensive, state-wide program to reduce greenhouse emissions from all sources within the state. Azusa is committed to meeting the GHG reduction goals of AB32.

Additionally, in August 2008, the SCAQMD adopted the Climate Action Plan (CAP) which required the development of guidance to assist Lead Agencies, project proponents, permit applicants, and interested parties in assessing and reducing project-specific contributions of greenhouse gas emissions and resulting cumulative impacts due global climate change.

Future development will emit greenhouse gases from various sources depending on type of use and size of the project.

¹ United States Environmental Protection Agency. *Frequently Asked Questions About Global Warming and Climate Change. Back to Basics*. April 2009.

All discretionary projects will be required to evaluate potential greenhouse gas impacts through the CEQA review process. No general plan land use changes are proposed and, therefore, emissions are no greater than what would be generated under the General Plan EIR. Thus, the project does not create any new or more severe impacts. However, it is likely that future projects, especially larger ones, will require project-specific mitigation for their estimated GHG emissions.

B) Less than Significant Impact. In August 2008, the SCAQMD adopted the Climate Action Plan (CAP) which required the development of guidance to assist Lead Agencies, project proponents, permit applicants, and interested parties in assessing and reducing project-specific contributions of greenhouse gas emissions and resulting cumulative impacts due to global climate change.

Future housing will be constructed on undeveloped and currently developed, underutilized properties. GHG emissions will be evaluated during the City's standard environmental review process as required by CEQA, relying on the Best Performance Standards (BPS) method promulgated by the SCAQMD. Applicable measures will be incorporated into future projects, ensuring GHG emissions are reduced to levels that will not be considered cumulatively considerable in the context of global climate change and resulting impacts. Some projects may be required to identify a GHG emissions inventory using regulatory and industry standard methodologies and measures. Incorporation of appropriate BPS will ensure compliance with the SCAQMD CAP and by extension the targets identified in the state Scoping Plan for reduction of GHG emissions. No general plan land use changes are proposed and, therefore, emissions are no greater than what would be generated under the General Plan EIR. Thus, the project does not create any new or more severe impacts. However, it is likely that future projects, especially larger ones, will require project-specific mitigation for their estimated GHG emissions.

9. Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A-D) Less than Significant Impact. Residential and mixed-use housing development do not cause or contribute substantially to potential hazards to the public or the environment because these uses do not involve the use, transport, or disposal of appreciable amounts of hazardous materials or wastes. For purposes of the following analysis, a “significant hazard to the public or the environment” is characterized by the effects of exposure to hazardous materials and/or wastes from a facility or facilities that are subject to operations-specific federal, state, regional, or local regulations and implementation processes (including permitting, accident contingency, and clean-up requirements) based on the amount of material or waste undergoing use, transport, or disposal and the resulting impacts to human health or ecosystem functions. Residential uses are characterized by the use of common, widely available hazardous materials including paints and other solvents, cleaners, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials are not subject to federal or state permitting at the consumer level and it is

reasonably foreseeable that upset and accident conditions cannot be met by the use, transport, and disposal of such materials and wastes from future residences. Consumer-level household hazardous materials and wastes are not subject to federal or state permitting by the consumer, and their use is at such levels as to not have the potential to result in risk of upset or accident that could harm a substantial number of people, including children attending schools in the area, or have a substantial effect on the functions of the local or regional ecosystem.

Hazardous Sites: The proposed Inventory Sites are not listed as hazardous waste and substances sites, leaking underground storage tank sites, solid waste disposal sites, hazardous waste facilities subject to corrective action, or sites regulated by the Regional Water Quality Board.² The General Plan requires that residential projects and other sensitive receptors be located an adequate distance from existing and potential sources of toxic emissions. In addition, CEQA requires the assessment of risk involving the transportation, disposal, manufacture, storage, and handling of any hazardous materials for new development. Therefore, development of future housing on proposed Inventory Sites will be required to assess impacts due to the accidental release of hazardous materials as part of standard environmental review procedures pursuant to CEQA and City policy.

Materials and Wastes Transport: According to the General Plan EIR, hazardous materials pass through the City in route to other destinations via rail, surface streets, and freeways. While train derailment can occur at any time, it is during an earthquake that a derailment and hazardous materials release would pose the greatest risk of hazards. The City has no direct authority to regulate the transport of hazardous materials on local and regional roadways or railways; however, under upset and accident conditions, it is reasonably foreseeable that most of the spill would be contained within the right-of-way of a roadway with minimal chance of hazardous materials or wastes reaching adjacent homes. On the other hand, it is reasonably foreseeable that train derailment would result in extensive impacts to adjacent residents as the train and multiple train cars leave the tracks and violently careen with the adjacent environment. Transportation of hazardous materials and wastes by truck and rail is regulated by the U.S. Department of Transportation (DOT). DOT regulations establish criteria for safe handling procedures. Federal safety standards are also included in the California Administrative Code. The California Health Services Department also regulates the haulers of hazardous waste but does not regulate all hazardous materials. Although there is some reasonably foreseeable potential for exposure of future residents to hazardous materials and wastes under upset and accident conditions, federal and state regulations are in place with a focus on prevention of accidental releases and measures for appropriate containment and cleanup when accidents occur.

Facilities: According to the Envirostor³ website of the California Department of Toxic Substances Control, the City of Azusa has 21 total facilities listed within the City although only twelve of them require further action (testing or remediation). These sites spread throughout the City as a result of its long history with industrial uses. Both the federal government and the State of California require all businesses that handle hazardous materials or extremely hazardous materials to submit a business risk management plan to the local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the City is the Los Angeles County Fire Department. The business risk management plan must include an inventory of the hazardous materials and emergency response plans and procedures to be used in the event of a significant release of a hazardous material. Implementation of federal and state requirements for the operation of these types of facilities will ensure that exposure to residential uses will be minimized or avoided.

Considering the preceding analysis, the proposed Housing Element Update will not result in effects from the use, transport, or disposal of hazardous or acutely hazardous materials or wastes, under normal or upset and accident conditions, which could impact human health or the environment with implementation of existing regulations, standards and General Plan Policy. Impacts will be less than significant.

E) No Impact. Airport safety issues and their connection with land use planning are generally associated with hazards posed by departing and landing aircraft crashes and the effects those crashes could have on uses and people on the ground. Development within the approach and departure zones of an airport or airstrip are subject to the effects of potentially widespread, although rare, aircraft crashes; therefore, the denser the development and population within these zones, the greater the risk of impacts to human health. Aircraft crashes can result in the substantial loss of property and life depending on

² California Environmental Protection Agency. Cortese List Data Resources. <http://www.calepa.ca.gov/SiteCleanup/CorteseList/> [December 7, 2020]

³ DTSC envirostor website <https://www.envirostor.dtsc.ca.gov/public/>

the size of the aircraft, its velocity, the pitch, yaw, and roll at the moment of impact, and the type of cargo it is carrying. Development within the vicinity of an airport can result in increased potential for impact due to height, glare, and electronic interference that can disrupt flight patterns and pilots operating out of the airport.

The Los Angeles County Airport Land Use Commission (ALUC) is responsible for ensuring that development within the vicinity of an airport does not cause undue risk to airport operations or the safety of persons on the ground. The commissioners represent the county, its cities, and the public. Legislation passed in 1982 established a direct link between airport land use plans and the land use plans and regulations adopted by cities and counties, as established in California Public Utilities Code Section 21676. In accordance with this legislation, the ALUC must review the general and specific plans of local jurisdictions for consistency with the county's airport comprehensive land use plan (CLUP). Primary and Secondary Review Areas must be identified for each facility. Projects proposed within the geographic boundaries of the Primary Review Area are referred to the ALUC for review and evaluation. Within the Secondary Review Area, only those projects involving a structure or other object with a height that would exceed that permitted under adopted land use zoning would be referred to the ALUC for review.

The two nearest airports are El Monte Airport, approximately 9.5 miles southwest of Azusa, and Brackett Airport, approximately 11 miles east. The closest international airport is Ontario International Airport, located 18.4 miles east of Azusa. The City does not fall within the Planning Boundary/Airport Influence Area for these airports. Therefore, Azusa is not located within two miles of any airport and is not located within any airport land use plan, so there is no impact and no mitigation required.

F) No Impact. The City Office of Emergency Management coordinates disaster response and recovery efforts in the City of Azusa. The City's goal is to respond to emergency situations with a coordinated system of emergency service providers and facilities. The City has planned responses to extraordinary emergency situations associated with natural disasters, technological incidents, terrorist activities, and war-related operations. The City is part of a county and statewide emergency management system that addresses evacuation and movement of people in the event of an emergency. It should be noted that the City's plans are flexible in order to respond to the inherent chaos associated with disasters in a manner that is coordinated but responsive to the immediate needs of the situation. The proposed Housing Element Update does not include any land use, circulation, or safety changes that could conflict with implementation of the Office of Emergency Management or other emergency response programs. No impact will occur.

G) Less than Significant Impact.] As noted by CalFire Fire Hazard Severity Zone Maps, the northern part of the City is located in a Very High Fire Hazard Severity Zone (VHFHSZ) (CalFire 2011). Only one of the proposed RHNA Sites is located in a VHFHSZ. Because Azusa is an urbanized community, generally structural fires rather than wildland fires represent the greatest fire risk in the City. The CBC focuses on the construction and materials used in roofs, attic ventilation, exterior walls, decking, floors and underfloors, and ancillary buildings, structures, and appendages. Implementation of these requirements will ensure that future housing with the Wildland Urban Interface (WUI) is constructed to withstand wildland fires, thereby minimizing any associated impacts. Therefore, impacts will be less than significant with implementation of existing regulations.

10. Hydrology and Water Quality

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
A) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. Azusa lies within the San Gabriel Groundwater Basin, an extensive geologic feature from which 46 separate water departments, private water companies, and other water agencies draw approximately 200,000 acre-feet of water annually to meet potable water needs.

The US Environmental Protection Agency (EPA), the Los Angeles Region Regional Water Quality Control Board (RWQCB), and the Los Angeles County Health Department are responsible for monitoring and regulating groundwater in the San Gabriel Valley. The National Pollutant Discharge Elimination System (NPDES) permit is the primary regulation for storm water pollutant sources in the City of Azusa. The NPDES was developed as part of the municipal storm water program to address storm water pollution from new development and redevelopment by the private sector. Additionally, Los Angeles County provides storm water requirements via its Standard Urban Storm Water Mitigation Plan (SUSMP). The SUSMP contains a list of minimum required Best Management Practices that must be used for a designated project.

Azusa's Municipal Code implements the City's storm water quality management strategies consistent with its General Construction permit from the Regional Water Quality Control Board. These regulations are applicable to all storm water generated on any developed or undeveloped land within the City.

Housing is a common type of urban development and is addressed in the City waste discharge requirements for construction and operational sources of pollutants that can affect downstream surface water bodies by discharge into the local storm drain system. Discharge of pollutants into water bodies can result in effects on the beneficial uses of the water body. Beneficial uses include water for agricultural uses, special areas for biological resources, cold freshwater habitat, commercial and sport fishing, multitudes of habitats, freshwater replenishment sources, areas of artificial or natural groundwater recharge, water for industrial supply and process, water for domestic uses, waters used for navigation, areas where rare or endangered species could occur, fish spawning grounds, migration, shellfish harvesting, and recreational activities.⁴ The resulting impacts due to effects on water quality and associated beneficial uses include disruption of the ecosystem due to the loss of habitat, potential harm or death to sensitive species, and a narrowing of migratory options and species' gene pools. Impacts to humans range from quality of life issues such as the loss of recreational waters to potential health impacts due to contamination of drinking water supplies and contamination of fish and other marine life farmed and sold for food.

The proposed Housing Element does not include any policies or programs that would conflict with implementation of the NPDES program such that future residential development could result in exceedance of the waste discharge requirements and thus will not substantially impact downstream water quality. Furthermore, future housing development will be subject to environmental inquiry and potential review pursuant to CEQA. Impacts related to violation of water quality standards and waste discharge requirements will be less than significant with implementation of existing permit regulations.

B) Less Than Significant Impact. The proposed Housing Element can accommodate projected housing demand over the next eight years, which will require potable water for drinking, food preparation, cleaning, and bathing as well as water for landscape irrigation. Future housing will generate demand for water in addition to the demand of existing uses and the incremental increase in demand as growth occurs in the area; therefore, the future housing will contribute to cumulative, long-term increases in demand for groundwater and other water resources. The City contains the San Gabriel River, which has fully improved flood control channels. Water is essential to the proper function of an ecosystem and human life and activities; thus, water shortages can impact the health and well-being of humans and the quality of the environment.

According to state law, local water agencies must regularly update their Urban Water Management Plan (UWMP) every 5 years and large development projects must prepare a separate water supply assessment (WSA) to identify how to avoid or reduce impacts on surface or groundwater supplies over a 20-year period even under drought conditions.

The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR.; thus, impacts associated with potential development of the Inventory Sites will remain within the scope of analysis in the General Plan EIR. Future development of the Inventory Sites will be subject to environmental inquiry and possible project-specific environmental review pursuant to CEQA. Considering the proposed Housing Element is consistent with the analysis documented in the General Plan EIR and will not increase surface or groundwater demand beyond that assessed in the General Plan EIR, the HEU will result in equivalent or less than significant impacts related to the decline in groundwater levels when compared to the analysis and conclusions in the General Plan EIR.

C) Less Than Significant Impact. The City contains the San Gabriel River, which has fully improved flood control channels. Future development of housing will occur on currently or previously developed sites and undeveloped sites but would not alter existing drainage channels or patterns. Development on currently or previously developed sites is unlikely to substantially change the hydrological conditions of the site that was undoubtedly graded and engineered to convey on-site flows to local storm drains or water quality basins in accordance with the City standard requirements for drainage and flood control, as specified in the Municipal Code. Development on previously undeveloped sites may result in more substantial changes to the site topography and drainage conditions as cut and fill activity occurs to balance the site for building construction. The concern with changes in on-site drainage is the potential for flooding, erosion, siltation, pollutant loading, and exceedance of storm drain capacity due to the lack of or improperly designed conveyance of runoff. The effects of changes in drainage patterns can result in impacts to human health and quality of life and the environment through damage or destruction of structures,

⁴ Los Angeles Regional Water Quality Control District. Water Quality Control Plan (Basin Plan)(CWB 2018)

sedimentation of downstream water bodies and the resulting impact to aquatic biological resources, decreased water quality with similar impacts to aquatic biological resources, and storm water backup that can result in similar types of flooding impacts.

According to the General Plan EIR, implementation of the General Plan will reduce potential impacts related to additional runoff such as erosion and flooding to less than significant levels and requires the maintenance of adequate facilities for water and storm drain services. The proposed Housing Element does not propose any land use changes or designate any Inventory Sites that were not already analyzed in the General Plan EIR. Therefore, impacts due to the effects of changes in drainage patterns or potential erosion relative to the HEU will be less than significant with implementation of existing regulations and General Plan Policies.

D) Less Than Significant Impact. The northern portions of the City adjacent to the San Gabriel River are within the 100-year flood zone. The proposed General Plan does not designate residential land uses in the 100-year flood zone, and none of the proposed Housing Element RHNA Sites are located within a 100-year flood hazard area.

For future housing under the HEU, the General Plan requires each project to demonstrate it is not impacted by a 100-year flood zone or what steps it will take to eliminate that risk. CEQA also requires projects identify specific criteria and conditions that must be met to avoid potential impacts from flood hazards such as application of flood hazard regulations, evaluation of development sites for flood hazard potential, and application of flood-proofing strategies. Therefore, impacts will be less than significant and no mitigation is required.

Inundation from the Gabriel Dam or Morris Dam poses the greatest threat from dam inundation for the City. These dams are owned and maintained by the Los Angeles County Department of Public Works. According to the General Plan EIR, 95 percent of the City is located within the inundation area of one of these dams. The County of Los Angeles' emergency response plans as administered by the County of Los Angeles Office of Emergency Management along with mutual aid from local jurisdictions would implement their evacuation plans should such a dam inundation threaten the area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Amendments pursuant to AB 162 provide up-to-date inundation maps in the General Plan, as provided by the California Emergency Management Agency.

Seiche is the process by which water sloshes outside its containing boundaries, generally due to an earthquake. *Seiche* can result in localized flooding that can result in property damage or personal injury. According to the General Plan EIR, Azusa could be exposed to *seiche* hazards from the lakes associated with San Gabriel Dam, Cogswell Dam, or Morris Dam. Due to the distance of the City from these bodies of water, overflow from *seiche* would likely not result in any substantial downstream flooding, in particular to the RHNA Areas identified in the Housing Element

Mudflows require a slope, water, and unconsolidated soil to occur. The project area is not subject to mudflows because the RHNA Areas and their surroundings do not contain steep slopes. therefore, impacts resulting from the effects of *seiche* in the City will be less than significant and no mitigation is required.

A *tsunami* is a large wave that generates in the ocean, generally from an earthquake, and builds intense strength and height before impacting a coast. Tsunami can result in significant property damage and loss of life due to the intense, destructive nature of the wave and the often-sudden occurrence with little chance for warning. Azusa is not subject to impacts from a tsunami because it is not located near an ocean or sea.

Therefore, the potential impacts of flooding, tsunami, or *seiche* and any related release of pollutants would be less than significant and no mitigation is required.

E) Less Than Significant Impact. This assessment is for both surface water management planning and sustainable groundwater management plans.

Water Quality Control Plan. The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan)⁵ is the water quality control plan for the greater Los Angeles Basin, including

⁵ https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/

the City of Azusa. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan (CWB 2018). The Basin Plan is continually being updated to include amendments related to implementation of the total maximum daily load⁶ (TMDL) of specific potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB region, and changes to beneficial use designations and associated water quality objectives. The General Plan requires future development to be consistent with the Basin Plan. Therefore, the HEU will not conflict with or obstruct implementation of a water quality control plan.

Groundwater Management Plan. In 2014 the governor signed the Sustainable Groundwater Management Act (SGMA) into law which requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans (GSPs) for crucial groundwater basins in California.

As previously mentioned, Azusa lies within the San Gabriel Groundwater Basin. The basin is replenished by stream runoff from the San Gabriel Mountains, rainfall onto the valley floor, subsurface inflow from the adjacent Raymond and Puente Basins, and percolation from urban water usage. In addition, imported water purchases from the Metropolitan Water District of Southern California (MWD) and the State Water Project (SWP) is used to recharge the basin. The Los Angeles County Department of Public Works (LACDPW) artificially recharges the groundwater supply aquifers underlying the County by spreading imported water, local runoff (including the water impounded by the upstream dams during storms), and recycled water at their 27 spreading facilities. The Department of Public Works major spreading facilities are located downstream of the San Gabriel Canyon. The Metropolitan Water District (MWD) and the San Gabriel Valley Municipal Water District deliver imported water to the San Gabriel Canyon Spreading Grounds and to the San Gabriel River for spreading in cooperation with the Main San Gabriel Basin Watermaster. Imported and recycled water discharged into the channels and runoffs resulting from storm events are diverted into the spreading facilities. At the spreading facilities, the water percolates down to the water table.

The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City. New housing growth under the HEU will not exceed that identified in the General Plan and evaluated in the General Plan EIR. The master groundwater planning of the Watermaster is based on adopted land use plans in the General Plans of the cities that utilize Central Basin groundwater. Therefore, the HEU will not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts will be less than significant and no mitigation is required.

⁶ TMDL is a regulatory term in the U.S. Clean Water Act, describing a plan for restoring impaired waters that identifies the maximum amount of a pollutant that a body of water can receive while still meeting water quality standards

11. Land Use and Planning

Would the project:

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

A) No Impact. Communities form neighborhoods within a broader assemblage of land uses, acting as physically bounded and social networks that often define a person's local sense of place and help shape an individual's social and cultural perspective. A significant impact would occur if proposed Inventory Sites are sufficiently large or configured in such a way so as to create a physical barrier within an established community.

The proposed Housing Element identifies RHNA Sites throughout the City of Azusa. The RHNA Sites rely on existing land use designations to accommodate new residential and mixed-use development, and no changes are proposed. The General Plan does not designate any established communities that would be affected by implementation of the proposed Housing Element; therefore, implementation of the proposed Housing Element will not create any physical barrier within the community. Furthermore, project implementation will not require new infrastructure systems such as roadways or flood control channels not already planned and previously considered in the General Plan EIR. As such, the Housing Element update will not divide or disrupt neighborhoods or any other established community elements. No impact will occur and no mitigation is required.

B) No Impact. The Housing Element update sets forth policies to encourage housing development consistent with adopted land use policies established in the General Plan. No changes in General Plan land use or development intensities are proposed. The Housing Element does not include any goals, policies, or programs that would conflict with adopted General Plan goals and policies to mitigate impacts due to effects generated by development within the Planning Area, as specified in the certified General Plan EIR. No impact will occur and no mitigation is required.

12. Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A-B) Less Than Significant Impact. Minerals refer to aggregate resources, or rock, sand, and gravel, energy-producing fields, including oil, gas, and geothermal substances, and related mining operations. The California Department of Conservation (DOC) classifies land in the state into mineral resource zones based on the known or inferred mineral resource potential of that land (DOC, 2020a). The City of Azusa lies within the San Gabriel Fan District, which is a designated aggregate production zone. Aggregate from this district is of very high quality and is used to set engineering standards for concrete in the region. Five aggregate sectors (A through E) have been identified within the San Gabriel Fan District. The sectors of concern for the City of Azusa are Sectors A, B, and E and have an estimated aggregate resource of 280 million tons in Sector A, 200 million tons in Sector B, and 360 million tons in Sector E.

Land in the City has been classified by the California Division of Mines and Geology (CDMG) according to the presence or absence of significant sand and gravel deposits (suitable for use in construction-grade aggregate). The land classification is presented in the form of maps showing Mineral Resource Zones (MRZ). There are four MRZ classifications, MRZ-1 through MRZ-4 as described below:

- MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2 are areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- MRZ-3 are areas containing mineral deposits the significance of which cannot be evaluated from available data.
- MRZ-4 are areas where availability information is inadequate for assignment to any other MRZ-zone.

The General Plan EIR states that the mining areas in Azusa are classified as MRZ-2 by the California Department of Conservation. MRZ-2 is defined as an “area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.” This is a state classification to be recognized in local land use planning.

The General Plan includes policies intended to allow existing mining operations to continue and possibly expand if visual, biological, noise, traffic issues are specifically addressed. The proposed General Plan amendments would not further alter these designations or plans for current or future mining operations. In particular, the proposed RHNA Areas identified in the Housing Element are located in more urbanized areas where surrounding existing and planned land uses would preclude mining operations from occurring already. In addition, the General Plan EIR determined that impacts to mineral resources would be less than significant from implementation of the General Plan and its designated land uses with its policies for protection of mineral resources. With the implementation of these existing General Plan policies to protect mineral resources in other areas of the City, impact will be less than significant, and no mitigation is required.

13. Noise

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) Less Than Significant Impact. Noise can be defined as unwanted sound. The primary sources of noise affecting Azusa comes from various modes of transportation. Because the City is fully urbanized, the predominate noise source in the community is traffic noise. Major freeways include the I-210 running east-west through the City, and SR39 running north-south through the City. The main existing noise sources within Azusa include vehicular traffic on freeways and major arterial streets in the City, as well as from commuter and freight trains.

The rail line extends west to east through the heart of the City and although freight train traffic is not regularly scheduled, residences adjacent to the tracks are affected by the temporary noise of passing trains. The Burlington Northern Santa Fe (BNSF) railway alignment produces a single daytime trip (two pass-bys) due to freight activity. Based on information from the Metropolitan Transportation Authority (MTA), 196 light rail passenger trains operate on Gold Line light rail system from Pasadena to Claremont each day. Light rail operations produce less noise than freight operations because that the trains are lighter and powered by smaller engines.

To ensure that noise producers do not adversely affect sensitive receptors, the City of Azusa identifies land use compatibility standards within the General Plan to use for planning and development decisions. The General Plan Noise Element includes policies, standards, criteria, programs, diagrams, and maps related to protecting public health and welfare from excessive noise exposure. General Plan Goals and Policies together with Municipal Code standards for noise control are incorporated into the land use planning process to reduce noise and land use incompatibilities.

According to the General Plan EIR, construction activity is typically short-term in nature and is generally not considered to have a significant impact on noise sensitive uses as long as construction activity is subject to City laws, regulations, and standards that minimize their noise impacts. . Acoustical analyses for future housing development projects under the HEU will address construction noise impacts on sensitive noise receptors and identify mitigation if required.

Future housing developments on the proposed Inventory Sites are subject to the policies of the existing General Plan designed to minimize noise impacts to noise-sensitive properties as well as the City's Noise Ordinance and Development Code. These noise policies and standards will be implemented during the City's standard environmental review process during the entitlement process for future housing developments..

The proposed Housing Element update does not include any changes to the land use designations of the Inventory Sites; thus, impacts associated with potential development of the Inventory Sites will remain within the scope of analysis in the

General Plan EIR. Future housing development will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate project-level mitigation incorporated, if needed. Potential impacts will be less than significant with implementation of existing policies, standards and regulations.

B) Less Than Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second, and in the U.S. is referenced as vibration decibels (VdB). The background vibration velocity level in residential and educational areas is usually around 50 VdB while the vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors cause most perceptible indoor vibration. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is the general threshold where minor damage can occur in fragile or historic buildings.

The BNSF rail line runs through the central portion of Azusa starting from near I-210 and tracking northeast up to Foothill Boulevard near Lemon Avenue and continuing northeast just south of 9th street at Pasadena Avenue where it continues generally east to the City's eastern boundary at Citrus Avenue. The Federal Transit Administration's (FTA) Vibration Screening Procedure was applied to the nearest railway to determine whether potential exists for railway vibration to substantially impact future development as proposed by the previous General Plan Housing Element Update. Pursuant to the screening procedure, Category 2 land uses (residences and buildings where people normally sleep) located 200 feet or closer have the potential of being substantially impacted by Conventional Commuter Railroad vibration impacts. With regard to railroad operations, noise and vibration impacts would be evaluated on a project-by-project basis pursuant to CEQA and the City's local implementation procedures, and project specific mitigation measures required if necessary.

Typical construction vibration mitigation includes routing and placement of equipment to maximize distance to receptors and use of alternative equipment, such as use of drilled pile drivers as opposed to impact drivers. Subsurface dampeners can also be utilized to reduce groundborne vibration. Short-term Impacts related to groundborne vibration during construction would be expected to be less than significant with implementation of City CEQA review procedures. Typical mitigation for long-term vibration impacts related to occupied buildings include setbacks from vibration sources or building construction to minimize transmission of vibration.

No short- or long-term impacts will be associated with vibration at a programmatic level for this Housing Element Update as no policy changes, developments, or infrastructure improvements are proposed as part of the Housing Element update. Impacts will be less than significant and no mitigation is required.

Cumulative Impacts. Residential land uses typically do not produce excessive noise either individually or cumulatively that could substantially increase existing, ambient noise levels. The future development of the Inventory Sites could increase ambient noise levels due to increased traffic generation in the project vicinity. Thus, development of the Inventory Sites will partially contribute to the noise volumes identified in the General Plan EIR. The City reviews all new development proposals per CEQA which includes the analysis of vehicular traffic noise. The proposed Housing Element does not include changes to land uses and intensities designated in the current General Plan and analyzed in its EIR. The Housing Element does not propose any specific development or any land use changes that would invalidate this prior finding or further increase traffic levels beyond those analyzed in the General Plan EIR. Project-specific increases in ambient noise levels due to future development on each Inventory Site will be evaluated as development is proposed over the long term pursuant to existing policies and procedures. With these existing policies and procedures in place, impacts related to increases in ambient noise levels will be less than significant and no mitigation is required.

C) No Impact. The City of Azusa is not located within two miles or within a comprehensive land use plan for any public or private airport. In addition, no private airstrips are located within the City. No specific new development is associated with the proposed Housing Element update which would necessitate changes to safety policies related to air traffic. No impacts will occur.

14. Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) No Impact. Adoption and implementation of the Housing Element will not, in and of itself, directly result in population growth. Population growth is a complex interaction of immigration, emigration, births, deaths, land use, and economic factors of which the General Plan and Housing Element are only a part. Regional models of population growth and change, accounting for these complexities, are developed by the California Department of Housing and Community Development (HCD) and the Southern California Association of Governments (SCAG). The proposed Housing Element update is designed to guide and accommodate the City's share of the projected regional population growth and associated housing over the next eight years. Pursuant to Government Code 65584, the California Department of Housing and Community Development (HCD) is required to determine the Regional Housing Needs Allocation (RHNA), by income category, for Council of Governments (COGs) throughout the State. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category. The RHNA is based on the California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans. COGs are required to allocate to each locality a share of housing need totaling the RHNA for each income category.

The Housing Element is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by SCAG. SCAG's 2012 Adopted Growth Forecast projects a population of 53,800 by the year 2035 in Azusa. The increase in population due to future development to accommodate the RHNA is consistent with General Plan land use policy and is within the growth assumptions estimated by SCAG.

The Housing Element identifies adequate land and planning mechanisms to accommodate the future housing needs of the growing population derived directly from the population growth estimates for the region, so the proposed housing Element Update would not induce unplanned population growth. No impact will occur.

B) No Impact. The proposed Housing Element update is intended encourage and facilitate housing development and preserve and enhance existing housing stock. The natural recycling of land will not result in the loss of housing units because such redevelopment will result in the development of new housing units. Thus, the availability of residential units in response to increases in population is supported by the Housing Element. Considering residential units will increase naturally as guided by the goals and policies of the proposed Housing Element, no impacts related to the displacement of housing or people would occur and no mitigation is required.

15. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. The city of Azusa is served by the Los Angeles County Fire Department (LACFD) Battalion 16. The LACFD consists of about 4700 employees providing a variety of comprehensive fire and life-safety services to the 4.1 million residents living in 1.25 million housing units in 60 cities and all unincorporated areas of Los Angeles County. Battalion 16 is headquartered at Station 154 in the city of Covina.

According to the General Plan, two LACFD stations are within the City of Azusa; Fire Station No. 97 and Fire Station No. 32.

Fire Station No. 97, located at 18546 E. Sierra Madre Avenue, serves northeast Azusa and western Glendora. The station houses one engine company and one patrol unit and is staffed with four fire personnel. Current equipment and staffing are adequate to serve existing development within Station No. 97's service area. Station No. 97 also covers some of the unincorporated area within the City's eastern Sphere of Influence (SOI).

Fire Station No.32, located on 605 North Angeleno Avenue, serves the central and southeastern portion of the City. The station houses two engine companies (one on reserve), one paramedic squad, one reserve paramedic squad, one water tender, and one unmanned Urban Search and Rescue trailer. Current equipment and staffing (18 members, six on any one shift) are adequate to serve existing development within Station No. 32's service area. Station No. 32 also covers many of the unincorporated areas within the City's southern SOI.

New development under the HEU will result in the incremental increase in need for fire protection services as the City's population grows and the number of residential units increases. The City requires that new development be assessed a pro-rated fee to pay for additional fire facilities and personnel. Construction and operation of a new fire station will be subject to environmental review pursuant to CEQA at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of operating the fire department as well as constructing and operating future fire facilities will be less than significant with implementation of existing regulations.

B) Less Than Significant Impact. Police services are provided by the Azusa Police Department. The Department operates from the main facility at 725 North Alameda Avenue. There are 63 sworn officers, According to the General Plan, there are also 10 reserve officers, 31 civilian employees, 15 crossing guards, and eight volunteers. Based on population from the 2011 census, the sworn officer to population ratio is approximately 1.35 sworn officers for every 1,000 City residents. Response times for priority one calls are currently averaging 3.03 minutes per call. Response times for calls other than priority one average 4.5 minutes per call. Staffing levels, facilities and level of service are considered adequate for the current population.'

According to the General Plan EIR, the Police Department anticipates that as the City grows additional police would be required. Facilities to house additional equipment and officers, and an expanded existing station of future stations may be required in order to maintain an acceptable level of service. The effects of constructing and operating a new police station are

typical of any development project, such as pollutant emissions from use of construction equipment and staff vehicle trips, changes in the visual character of the station site in the context of the neighborhood, and increased vehicle trips on local roadways. The City requires development projects contribute fees based on their proportional impact and demand for new resources. Construction and operation of new facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future police facilities will be less than significant with implementation of existing regulations.

C) Less Than Significant Impact. The Azusa Unified School District provides K-12 educational services to the City of Azusa and is comprised of which include nine elementary, three middle, one K-8, and three high schools, as well as an Adult School and Alternative Education school. The effects of schools that can result in environmental impacts are specific and include peak traffic levels occurring in the morning and early afternoon, playground noise, and field lighting. Furthermore, analyses of school impacts are unique in that any impacts resulting from the effects of schools are considered fully mitigated through the payment of development impact fees pursuant to the Leroy F. Greene School Facilities Act, therefore, pursuant to State law and the payment of development impact fees, impacts will be less than significant.

D) Less Than Significant Impact. In accordance with State law, the City imposes parkland dedication or in-lieu fees on new development equivalent to 3.5 acres of parkland per 1,000 new residents. The proposed Housing Element Update will generate new or relocated residents that will require park and recreation facilities and associated programs, either through expansion of existing facilities or construction of new facilities. Construction or expansion of parks can result in nominal effects such as pollutant emissions from construction activities and operational trip generation potentially resulting in similarly nominal impacts to the environment. The City will continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents. Construction and operation of new or expanded parks and recreation facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future parks and recreation facilities will be less than significant with implementation of existing regulations.

E) Less Than Significant Impact. Residents generated by the provision of new housing guided by the goals and policies of the proposed Housing Element Update will generate the incremental need for a variety of public and quasi-public services including libraries, medical clinics, urgent care facilities, hospitals, social service centers, senior centers, and other facilities. Construction and operation of new or expanded public service facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all project-level environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future public service facilities will be less than significant with implementation of existing regulations.

16. Recreation

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. Pursuant to State law, the City imposes parkland dedication or in-lieu fees on new development equivalent to 3.5 acres of parkland per 1,000 new residents. The proposed Housing Element Update will generate new or relocated residents that will require park and recreation facilities and associated programs, either through expansion of existing facilities or construction of new facilities. However, such increase is consistent with the estimated population increase evaluated under the General Plan EIR and will not result in any new impacts that have not been evaluated. Construction or expansion of parks can result in nominal effects such as pollutant emissions from construction activities and operational trip generation potentially resulting in similarly nominal impacts to the environment. The City will continue to collect in-lieu fees or require construction of new or expanded parks from proponents of new housing to compensate for incremental increases in parks and recreation service demand, thus providing adequate, per-capita facilities for future residents.

B) Less Than Significant Impact. Construction and operation of new or expanded parks and recreation facilities will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed. Potential impacts resulting from the effects of constructing and operating future parks and recreation facilities will be less than significant with implementation of existing regulations.

17. Transportation and Traffic

Would the project:

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

A) Less than Significant Impact. The City is served by local transportation facilities including streets, freight railways, light rail, and bus routes in addition to non-motorized transportation facilities such as sidewalks, trails, and bikeways. These facilities provide options for travel modes that include passenger vehicles, trains, buses, bikes, and walking. These facilities and modes of travel comprise the circulation system for the City, and the broader system, designed with the goals of efficiently moving people and goods throughout the region by providing ease of access to multiple modes of travel.

Road. The City's street system is primarily a grid with streets running north-south and east-west. The primary north-south roadways are Irwindale Avenue, San Gabriel Avenue, Azusa Avenue and Citrus Avenue. The primary east-west roadways are Foothill Boulevard, Alostia Avenue, 1st Street/Baseline Road, and Arrow Highway.

Principal regional access to the City is provided by the I-210 (Foothill) Freeway that runs east-west through the City. This freeway has four general-purpose lanes and one carpool lane in each direction. Full interchange access ramps are located at Irwindale Avenue (just west of the City), Vernon Avenue, Azusa Avenue, and at Citrus Avenue.

Transit. The public transportation system in Azusa provides some non-auto options for commute, utility, and recreational travel, with connections to regional cities and destinations. The City of Azusa is served by bus, light rail, and shuttle services. The following agencies provide local and regional connectivity, providing an alternative to driving a personal vehicle:

- **Foothill Gold Line (light rail).** The Foothill Gold Line is a light rail service that runs from Pasadena to Azusa. The City includes two Gold Line stations as part of the Foothill Gold Line. One of the stations, Azusa Downtown, is located in the heart of the city's downtown. The other is located on the eastern border of the city near Azusa Pacific University and Citrus College (APU/Citrus College Station).
- **Foothill Transit (bus).** The service includes seven bus transit lines to a variety of destinations. These are Foothill Transit Lines 185, 187, 274, 280, 492, 494, and 690, and generally focus on Foothill Boulevard and the downtown area. Many of the current bus routes in the City are regional routes that pass through Azusa and are not designed to provide local transit coverage within the City. Service is often infrequent (30-60 minute service intervals). The City of Azusa also operates a local Dial-A-Ride service.

Freight Rail. The Burlington Northern Santa Fe (BNSF) railroad operates in the Azusa area with infrequent trains (one or two a day) passing through the City. When operating, these trains cause traffic to stop at at-grade crossings. Crossings are located primarily at arterial roadways. The at-grade crossings can be a source of road congestion, restricting car and truck movement when long freight trains pass through the City.

Bicycle Routes. No dedicated bicycle facilities are currently provided in the City.

Pedestrian Facilities. Sidewalks are located throughout the specific plan area, as well as pedestrian crossings at controlled intersections and uncontrolled intersections, and several midblock crossings. Many of the City's sidewalks are landscaped, provide public seating, and are ADA compliant and include compliant curb ramps.

SCAG Plans. Two planning efforts guide the long-term improvement of the circulation system at the regional and local levels. The Regional Transportation Plan (RTP) and Sustainable Communities Strategy (RTP/SCS), was last updated in September 2020 (Connect SoCal) is administered by the Southern California Association of Governments (SCAG) to meet the needs of travel and goods movement through the year 2045.

CMP. Urbanized areas within the state of California such as Los Angeles County are required to adopt a Congestion Management Program (CMP). The goals of the CMP are to reduce traffic congestion and to provide a mechanism for coordinating land use development and transportation improvement decisions. Los Angeles County compiles the data and submits the results to the Southern California Association of Governments (SCAG) for a finding of regional consistency. The I-210 freeway is a roadway component of the Congestion Management Plan system. The Los Angeles County Congestion Management Program (CMP) is administered by the Los Angeles County Metropolitan Transportation Authority (LAMetro 2010). The CMP addresses congestion management through a process developed cooperatively throughout the metropolitan region that provides for safe and effective management and operation of existing and future transportation facilities through demand reduction and operations strategies.

While the RTP/SCS addresses the broader goals of the transportation network, the CMP focuses on specific, regional facilities requiring funding for maintenance and improvements in order to meet the goals of the RTP/SCS. The CMP relies on local jurisdiction standards in determining the performance of the CMP network. The final effort is the City's General Plan Circulation Element that identifies long-term transportation improvements for local facilities. The General Plan includes goals and policies aimed to provide an efficient multi-modal circulation system in the city. General Plan policies also encourage the development of an efficient and safe bikeway and public transportation system. The City of Azusa has defined LOS D as its minimum acceptable peak hour roadway performance standard except in the downtown area, the University District, and at freeway interchanges, where Level of Service E shall be the minimum.

These local and regional planning efforts are designed to reduce the direct and indirect effects of travel so as to minimize or avoid resulting impacts on human health and the environment. The proposed Housing Element is consistent with the growth assumptions used in the development of the RTP/SCS and CMP and the does not include any land use changes to the General Plan, therefore, the Housing Element will not conflict with the goals or transportation planning efforts of the City or SCAG. Furthermore, according to the General Plan EIR, implementation of General Plan policies will avoid or reduce impacts of General Plan build out on the performance of the roadway system.

Based on this preceding analysis, future housing development will not impede local or regional efforts to ensure an efficient circulation system. Future housing development will be subject to preliminary environmental review pursuant to CEQA and if found not to be exempt, subject to full environmental analysis at which time all environmental issues will be vetted and appropriate mitigation incorporated, if needed, should transportation impacts be identified that are not covered under existing or future development impact fees. Potential impacts resulting from conflicts with local and regional transportation plans and performance requirements will be less than significant with implementation of existing standards and regulations.

B) Less Than Significant Impact. In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018, which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA (Section 15064.3). Effective July 1, 2020, the previous CEQA metric of level of service (LOS), typically measured in terms of automobile delay, roadway capacity and congestion, will no longer constitute a significant environmental impact.

The HEU will result in the future development of additional housing in the City although the anticipated growth will be within the limits identified in the existing General Plan and its EIR. Although VMT is now the required metric for evaluating transportation impacts for CEQA projects, and the General Plan EIR, prepared prior to current VMT requirements, uses an LOS metric, this project is consistent with the analysis in the EIR because land use designations are unchanged and VMT under the General Plan EIR and the HEU are the same or similar.

C) No Impact. The Housing Element update does not authorize the construction of any roadway and will result in no effects on the design of existing or future streets. Therefore, it will not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). There will be no impact and no mitigation is required.

D) Less Than Significant Impact. The HEU does not involve any road construction or any development activity and thus will not obstruct or restrict emergency access to or through the City. Future housing development facilitated by implementation of Housing Element policies will be subject to site plan review and approval during entitlement review and/or application for building permits. The Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Impacts involving emergency access will be less than significant with continued implementation of development review procedures. Therefore, any impacts will be less than significant and no mitigation is required.

18. Tribal Cultural Resources

Would the Project

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

A) Less than Significant Impact. The Tongva are an Indigenous people of California from the Los Angeles Basin and the Southern Channel Islands, an area covering approximately 4,000 square miles. In the precolonial era, the people lived in as many as 100 villages and primarily identified by their village name rather than by a pan-tribal name. During colonization, the people were referred to as Gabrieleño and Fernandeño, names derived from the Spanish missions built on their land - Mission San Gabriel Arcángel and Mission San Fernando Rey de España. The name Tongva is widely used but others choose to identify as Kizh.

There is significant evidence of native American activity in the (San Gabriel Valley.. Many artifacts and implements have been found in various places. Near the mouth of the San Gabriel Canyon, southerly from the Duarte Ditch, near where it crosses the wash, are to be found stones in a long rambling line which, no doubt, had some important significance to the native Americans. These stones are still fairly well established. At the Forks there is an old burial ground. Seven sets of remains have been previously discovered. Each body had a cairn of stone placed over the abdomen, at the top of which was a stone mortar.

In the San Gabriel Canyon there are several huge rocks, the largest weighing some 75 or 80 tons. These are covered with native American markings yet quite distinct, though no doubt having weathered the storms of several generations. Mortars were also found in large rocks.

Impacts to tribal cultural resources (TCRs) can result in the loss of information important to the pre-history of California and the Native Americans who created and/or used the materials.

The number of recorded archaeological resources that can also be considered TCRs within the City limits is minimal. Past archaeological surveys conducted in undeveloped areas in the City, including ridgelines and slopes have not uncovered any archaeological resources. Considerable development occurred in the City prior to the establishment of a formal archeological removal process which could explain the limited number of recovered archaeological resources.

Archaeological resources were uncovered during grading activities associated with buildout of the Rosedale community, just north of the Azusa Transit-Oriented Development (TOD) Specific Plan area. In addition, artifacts have been discovered near the intersection of 2nd Street and Azusa Avenue.

The General Plan establishes a process for identifying and preserving prehistoric archaeological resources, including human remains. Implementing Program HR2, identifies the necessary procedure developers should follow if previously unknown resources are identified. The General Plan ensures that archaeological and historical resources shall be protected and preserved to the maximum extent feasible.

In addition, two state laws (SB 18 and AB 52) that apply to this project requires the City to consult directly with local Native American tribes to determine if any tribal cultural resources will be impacted by private development or public works projects proposed in the City. All future development of the RHNA Sites will be required to prepare Cultural Resource Assessments/Evaluations (CRAs/CREs) to determine if there are any impacts to cultural or tribal cultural resources as required by the General Plan Conservation Element. This is considered regulatory compliance and not specific mitigation under CEQA. SB18 notifications are required to be sent to all tribes with geographic or traditional connection to the area of land in which the project is located prior to the adoption of a General Plan or General Plan Update. The list and distribution of local tribes is kept by the Native American Heritage Commission (NAHC).

The City sent SB18 notifications of this proposed project to the following tribes via certified mail, on February 23, 2021:

- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino /Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians

The given mailing address was incorrect, and the following tribe was contacted by email on February 24, 2021:

- Soboba Band of Luiseno Indians

AB52 notifications are required for any tribe that has previously contacted a CEQA lead agency requesting AB52 consultation for future projects. The following tribes have previously contacted the City, requesting AB52 consultation, and were contacted by email on July 22, 2021 inviting the tribes to consult in AB52 consultation:

- Gabrieleno Band of Mission Indians
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino /Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians

No requests for consultation under either AB52 or SB18 for the proposed HEU have been made by any of the Native American tribes contacted by the City of Azusa.

The General Plan EIR concluded that build out of the General Plan will not result in less than significant impacts related to the substantial adverse change in the significance of archaeological resources. The proposed Housing Element does not propose any land use changes or designate any RHNA Sites that were not already analyzed in the General Plan EIR. Therefore, long-term impacts in the City have already been contemplated, and the proposed Housing Element Update will not result in impacts that are greater than those contemplated in the General Plan EIR. In addition, future development of the proposed Inventory Sites will be subject to the Goals and Policies of the General Plan and will be subject to review in compliance with CEQA

requirements. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

B) Less than Significant Impact. If present, there is potential for some Native American artifacts to not be considered unique archaeological resources under the CEQA guidelines (i.e. if there is not a demonstrable public interest in that information, it does not possess a special and particular quality such as being the oldest of its type or the best available example of its type, and it is not directly associated with a scientifically recognized important prehistoric event or person). This would mean there is potential for Native American artifacts, sites, or other resources that are significant to a local tribe to not be considered significant under CEQA. However, because it is possible for a lead agency to determine that an artifact is considered significant to a local tribe, artifacts and other resources that would otherwise have no protection under CEQA therefore have the potential be considered a significant resource under CEQA.

Because Implementing Program HR2 includes the requirements to stop work and analyze archaeological finds, if avoidance of resources is not feasible, the City of Azusa will consider the significance of the resource to a California Native American tribe pursuant to Public Resources Code Section 5024.1 before determining a course of action.

Future development of the proposed RHNA Sites will be subject to General Plan requirements and review in accordance with CEQA requirements. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required at this programmatic level.

19. Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A) No Impact. The Azusa Public Works Department, manages water service and wastewater collection services to City residents and businesses. Potable water in Azusa is provided by the Azusa Light and Water Department via local groundwater primarily and via the San Gabriel River when groundwater is not sufficient and from the Metropolitan Water District in extreme conditions. Wastewater treatment is provided by the Los Angeles Sanitation District for treatment of wastewater with a network of sewer lines and treatment facilities. The City also operates and maintains storm drains within its boundaries.

The Azusa Light and Water Department (Department), a municipal utility, provides electricity to City residents and businesses. The Department maintains a joint-use agreement with Southern California Edison (SCE), permitting the Department to use SCE's transmission lines to transport electricity to the Azusa Substation located at 809 North Angeleno Street.

The Southern California Gas Company (SoCalGas) provides natural gas service to the City. SoCalGas is the principal distributor of natural gas in Southern California and provides natural gas for residential, commercial, and industrial markets.

Future housing under the HEU will consume additional water, electricity, and natural gas while producing additional wastewater for conveyance and treatment. The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City. The new housing is consistent with the General Plan growth projections which were evaluated in the General Plan EIR. The various involved utility agencies and companies develop master service plans based on anticipated land uses outlined in the General Plans of the various jurisdictions they serve. Therefore, these master plans have already taken into account the growth anticipated under the HEU. In addition, future development is required to assure adequate utility service during the development review and CEQA process. Therefore, utility impacts will have no impacts that have not already been analyzed in the General Plan EIR and no mitigation is required.

B) No Impact. The Azusa Light and Water Department, provides potable water in Azusa. Groundwater is the primary source of water which comes from the San Gabriel Groundwater Basin, an extensive geologic feature from which 46 separate water departments, private water companies, and other water agencies draw approximately 200,000 acre-feet of water annually to meet potable water needs. When ground water is not sufficient water is obtained from the San Gabriel River, In extreme or drought conditions, the Azusa Light and Water Department purchase water from the Metropolitan Water District.

The City Azusa Public Works Department regularly reviews and updates its Urban Water Management Plan (UWMP) and coordinates with the Central Basin Watermaster and MWD to assure it can provide adequate water service to the City under all anticipated conditions.

New housing growth under the HEU will not exceed that identified in the General Plan and evaluated in the General Plan EIR. The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City. The City's UWMP is based on the General Plan and the MWD's master water planning is based on adopted land use plans in the General Plans of the cities that utilize San Gabriel Groundwater Basin groundwater. Therefore, the HEU will not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts will be less than significant and no mitigation is required.

C) No Impact. The City owns, operates, and maintains the local sewer lines that collect wastewater generated within the City. The existing sewer lines include a gravity collection system comprised of approximately 80 miles of trunk sewer lines and 1,647 4-foot manholes. Wastewater collected in the City's trunk sewer lines flows south to the Los Angeles County Sanitation District (LACSD) wastewater treatment facilities.

Future housing under the HEU will generate additional wastewater for conveyance and treatment. The new housing is consistent with the General Plan growth projections which were evaluated in the General Plan EIR. The updated Housing Element will not change the location, distribution, or overall density of allowed development within the City. In addition, future development is required to assure adequate wastewater service during the development review and CEQA process. Therefore, there will be no wastewater treatment impacts that have not already been analyzed in the General Plan EIR and no mitigation is required.

D) No Impact. Azusa provides solid waste management for its residents and businesses although it contracts with Athens Services for collection services. All trash in Azusa, whether it's from single family homes, apartments, or businesses, is taken to Athens Services' material recovery facility (MRF). At the MRF, all recyclable materials are recovered and recycled. This includes all paper, glass, plastic, and metal, as well as some organic material like wood, and inert material like rocks.

Future development under the HEU would be required to comply with established solid waste regulations and procedures. Therefore, the HEU will have no solid waste impacts at this programmatic level and no mitigation is required.

E) No Impact. All new development will be required to comply with State mandates and City regulations regarding reduction/recycling of household waste. None of the housing strategies in the proposed Housing Element update will have any effect upon or result in any conflicts with solid waste disposal regulations, as the scope of these revisions does not increase development capacity. No impact will occur, and no mitigation is required.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire risk hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
A) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As stated in Chapter 4, Section 9 of this document (Hazards and Hazardous Materials), the northern part of the City and one of the proposed Inventory Sites is located in a Very High Fire Hazard Severity Zone (VHFHSZ) and is subject to questions relating to Wildfire in Appendix G of the CEQA checklist.

A) Less Than Significant Impact.

The City's Office of Emergency Management is a department within the Azusa Police Department. It coordinates disaster response and recovery efforts in the City of Azusa. The City's goal is to respond to emergency situations with a coordinated system of emergency service providers and facilities. The City has planned responses to extraordinary emergency situations associated with natural disasters, technological incidents, terrorist activities, and war-related operations. The City is part of a county and statewide emergency management system that addresses evacuation and movement of people in the event of an emergency.

The HEU does not involve any road construction or any development activity and thus will not obstruct or restrict emergency access to or through the City. Future housing development facilitated by implementation of Housing Element policies will be subject to site plan review and approval during entitlement review and/or application for building permits. The City Fire Department reviews all plans to ensure compliance with all applicable emergency access and safety requirements. Impacts involving emergency access will be less than significant with continued implementation of development review procedures. Therefore, any impacts will be less than significant and no mitigation is required.

B) Less Than Significant Impact.

The location of the proposed RHNA sites is limited to areas which are already heavily urbanized, with similar existing structures. The HEU would not significantly exacerbate the risks of wildfire, as the project would not be built on significant slopes, would not channel air during firestorms, and would not be in isolated areas where there is an increased risk of wildfire. Occupants in the South Coast Air Basin has been subject to short term significantly reduced air quality and pollutants from

previous significant wildfires in the area. However, because the proposed project would not significantly exacerbate the risks of wildfire, the project would not contribute to the potential to cause wildfire and wildfire related pollutants. Impacts related to implementation of the proposed Housing Element will be less than significant and no mitigation is required.

C. No Impact. The City of Azusa is a predominantly urbanized setting. The City already has infrastructure (roads, powerlines, fire hydrants, etc.) and the proposed RHNA sites are located in urbanized areas. Therefore, the HEU would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk. There are no impacts and no mitigation is required.

D. Less Than Significant Impact. Only one of the proposed RHNA Sites is located in a VHFHSZ. None of the proposed RHNA Sites are located on a significant slope, and the San Gabriel River has fully improved flood control channels, and flooding is not considered to have the potential to have a significant impact in the City. None of the proposed RHNA sites are located within or adjacent to a known landslide zone. Therefore, the HEU would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts will be less than significant and no mitigation is required.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A) Less Than Significant Impact. The results of the preceding analysis indicate that the proposed project will have less-than-significant impacts to sensitive biological, historical, archaeological, and paleontological resources. Impacts to scenic vistas and visual character and resources will be less than significant. Considering the programmatic level of analysis will not authorize any development plan, redevelopment of any existing sites, or construction of new infrastructure, and will not change existing City land use policy regarding locations or intensities of development, it will not result in any effects that would degrade the quality of the environment. The City finds that impacts related to degradation of the environment will be less than significant and no mitigation is required.

B) Less Than Significant Impact. Cumulative effects resulting from full implementation of City land use policies were evaluated in the General Plan EIR. The proposed Housing Element Update will not change any of these policies and does not propose any specific development or redevelopment project that could contribute to short-term or long-term cumulative impacts that were not addressed sufficiently in the General Plan EIR. The proposed project does not include any changes to land use designations and thus is consistent with the project analyzed in the General Plan EIR. The City hereby finds that the proposed Housing Element's individual contribution to potentially significant cumulative impacts is not considerable and no mitigation is required.

C) Less Than Significant Impact. As supported by the preceding environmental evaluation, the project will not result in substantial adverse effects on human beings. It has been determined through quantitative and qualitative analysis supported by substantial evidence that the proposed Housing Element has been determined to have little or no adverse impacts on people or the environment as evaluated in the 19 preceding environmental topics. The City hereby finds that direct and indirect impacts on human beings will be less than significant and no mitigation is required.

5 LIST OF PREPARERS

Lead Agency

City of Azusa
Economic & Community Development Department
213 E. Foothill Blvd.
Azusa, CA 91702

Robert (Dean) Flores, Assistant Planner

Environmental Analysts

MIG
1650 Spruce Street, Suite 106
Riverside, California 92507
951-787-9222

Bob Prasse, Director of Environmental Services
Kent Norton, Senior Environmental Planner/Project Manager
Robert Templar, Director of Cultural Resources
Amanda North, Technician

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