

BRADBURY ROAD WIDENING PROJECT

ADMIN DRAFT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

Lead Agency:

City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

Project Applicant:

City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

2 Park Plaza, Suite 1120
Irvine, California 92614

September 2022

This page intentionally left blank.

Table of Contents

1	INTRODUCTION.....	1
1.1	PURPOSE OF THE INITIAL STUDY.....	1
1.2	DOCUMENT ORGANIZATION.....	2
2	PROJECT SETTING	3
2.1	PROJECT LOCATION.....	3
2.2	EXISTING LAND USES.....	3
2.3	EXISTING GENERAL PLAN AND ZONING DESIGNATIONS	3
2.4	SURROUNDING LAND USE, GENERAL PLAN AND ZONING DESIGNATIONS.....	4
3	PROJECT DESCRIPTION	15
3.1	PROJECT OVERVIEW.....	15
3.2	PROJECT FEATURES	15
3.3	CONSTRUCTION	15
3.4	DISCRETIONARY APPROVALS AND PERMITS.....	16
4	ENVIRONMENTAL CHECKLIST.....	17
4.1	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	17
4.2	DETERMINATION	18
4.3	ENVIRONMENTAL CHECKLIST QUESTIONS	20
1.	AESTHETICS.....	20
2.	AGRICULTURE AND FORESTRY RESOURCES	23
3.	AIR QUALITY	26
4.	BIOLOGICAL RESOURCES	32
5.	CULTURAL RESOURCES	38
6.	ENERGY	41
7.	GEOLOGY AND SOILS	44
8.	GREENHOUSE GAS EMISSIONS	50
9.	HAZARDS AND HAZARDOUS MATERIALS.....	53
10.	HYDROLOGY AND WATER QUALITY.....	57
11.	LAND USE AND PLANNING.....	63
12.	MINERAL RESOURCES	68
13.	NOISE	69
14.	POPULATION AND HOUSING	72
15.	PUBLIC SERVICES.....	73
16.	RECREATION	75
17.	TRANSPORTATION	76
18.	TRIBAL CULTURAL RESOURCES	78
19.	UTILITIES AND SERVICE SYSTEMS.....	83
20.	WILDFIRES	85
21.	MANDATORY FINDINGS OF SIGNIFICANCE.....	87
5	GENERAL REFERENCES.....	89
6	DOCUMENT PREPARERS AND CONTRIBUTORS.....	90

Figures

Figure 1: Regional Location	5
Figure 2: Local Vicinity.....	7
Figure 3: Aerial View of the Site and Vicinity.....	9
Figure 4: Existing Views of the Site from Bradbury Road	11
Figure 5: Conceptual Site Plan.....	13

Tables

Table 1: Existing General Plan and Zoning	3
Table 2: Construction Schedule	16
Table 3: SCAQMD Regional Daily Emissions Thresholds.....	27
Table 4: Regional Construction Emissions Summary	28
Table 5: Localized Construction Emissions.....	29
Table 6: Construction Equipment Fuel Usage	42
Table 7: Estimated Construction Vehicle Fuel Usage.....	42
Table 8: Total Construction Fuel Usage.....	43
Table 9: Project Construction Emissions	51
Table 10: Consistency with City Plans and Policies	64

Appendix

A	Air Quality, Greenhouse Gas, and Energy Impact Analysis
B	General Biological Assessment
C	Tree Survey and Arborist Report
D	Mitigation, Monitoring, and Reporting Program (MMRP)

1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines, Sections 15000 et seq.).

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Project. As required by State CEQA Guidelines Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Bradbury, in consultation with other jurisdictional agencies, to determine if a Mitigated Negative Declaration (MND) or an Environmental Impact Report (EIR) is required for the Project.

This Initial Study informs City of Bradbury decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the Project. A “significant effect” or “significant impact” on the environment means *“a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project”* (Guidelines §15382). As such, the MND’s intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Pub. Res. Code §21003.1)
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (State CEQA Guidelines §15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City of Bradbury to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (State CEQA Guidelines §15126.4)

Existing Plans, Programs, or Policies (PPPs)

Throughout the impact analysis in this Initial Study, reference is made to requirements that are applied to all development on the basis of federal, state, or local law, and Existing Plans, Programs, or Policies currently in place which effectively reduce environmental impacts. Existing Plans, Programs, or Policies are collectively identified in this document as PPPs. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts. Where the application of these measures does not reduce an impact to below a level of significance, a project-specific mitigation measure is introduced.

1.2 DOCUMENT ORGANIZATION

This Initial Study and MND includes the following sections:

Section 1.0 Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study and MND was prepared by the City of Bradbury to evaluate the proposed Project's potential to impact the physical environment.

Section 2.0 Project Setting

Provides information about the proposed Project's location.

Section 3.0 Project Description

Includes a description of the proposed Project's physical features and construction and operational characteristics.

Section 4.0 Environmental Checklist

Includes the Environmental Checklist and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment.

Section 5.0 General References

Includes the resources that were referenced in preparation of this IS and MND.

Section 6.0 Document Preparers and Contributors

Includes the persons that prepared this IS and MND.

2 PROJECT SETTING

2.1 PROJECT LOCATION

The Project site is located in the San Gabriel Valley region of Los Angeles County, California on the boundary of and within both the City of Bradbury and the City of Monrovia. The site is within the United States Geological Survey (USGS) Azusa 7.5-Minute Series Quadrangle and is within Section 25, Township 1 North, Range 11 West. The City of Bradbury is approximately 16 miles northeast of downtown Los Angeles and 26 miles north of downtown Santa Ana. The regional location of the Project site is shown in Figure 1, *Regional Location*.

The Project site is located on Bradbury Road and Wildrose Avenue on the western border of the City of Bradbury and eastern border of the City of Monrovia. The Project site is bound by Deodar Lane to the north, Winding Oak Lane to the south, single family residential properties to the west, and Bradbury Estates community to the east. Regional access to the Project site is available by Interstate 210 (I-210) and I-605 via Mount Olive Drive and Royal Oaks Drive. The Project site and the surrounding area is shown in Figure 2, *Local Vicinity*.

2.2 EXISTING LAND USES

The 1.38-acre Project site is currently developed with a local roadway. The Project site generally follows the roadway bend from Bradbury Road (north-south) to Wildrose Avenue (west-east). The existing roadway is 24 feet in width. The roadway is flat with shrubs and trees directly abutting the east side of Bradbury Road and steep slopes extending north of Wildrose Avenue. Slopes north of Wildrose Avenue supports dense tree coverage and is bordered by a chain-link fence near the roadway. A single-family residential neighborhood is directly west of Bradbury Road, and the roadway ROW and includes curbs and gutters, sidewalks, and ornamental landscaping. Additional features include overhead utility lines, streetlights, and roadway signage. Existing conditions of the Project site is shown in Figures 3, *Aerial View*, Figures 4, *Existing Views of the Site from Bradbury Road*, and Figure 5, *Conceptual Site Plan*.

2.3 EXISTING GENERAL PLAN AND ZONING DESIGNATIONS

The existing land use designations of the site are as follows:

Table 1: Existing General Plan and Zoning

City	General Plan	Zoning
City of Bradbury	A-5 (Agriculture Residential Estate)	A-5 (Agriculture Residential Estate Zoning District)
City of Monrovia	Residential Low (5.8 dwelling units [du] per acre)	Residential Low

The City of Bradbury's Municipal Code Section 9.73.010, et al. describes that the A-5 zone provides for the development of single-family residential areas and to maintain the integrity of existing single-family residential areas within the City. The Residential Low zone in the City of Monrovia allows for large single-family residential lots with a minimum of 7,500 square feet.

2.4 SURROUNDING LAND USE, GENERAL PLAN AND ZONING DESIGNATIONS

The Project site is located within a developed, residential area within the cities of Bradbury and Monrovia as described below:

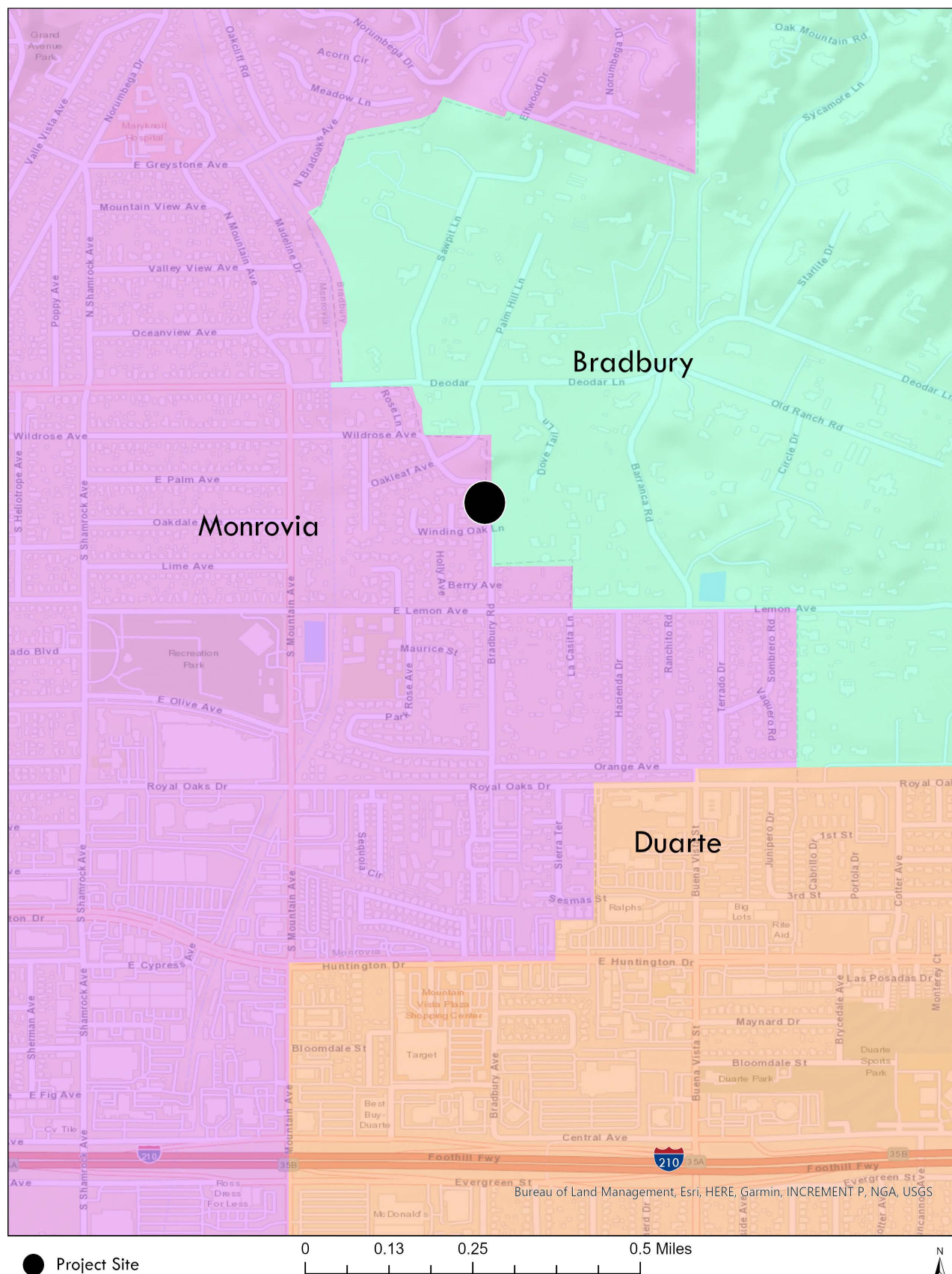
North: Bradbury Estates gated residential community is to the north of the site. The subdivision is designated as A-5 (Agriculture Residential Estate) in the General Plan and zoned A-5 (Agriculture Residential Estate Zoning District) in the City of Bradbury. The security gate is located on Deodar Lane just east of Wildrose Avenue. A steep grade with dense oak tree coverage delineates Bradbury Road from residences to the north, obstructing views to and from adjacent properties.

West: The City of Monrovia begins to the west of the Project site. Land use includes single family residences with driveway access to Bradbury Road/Wildrose Avenue. Adjacent residences are designated as Residential Low (5.8 du/acre) in the City of Monrovia General Plan and zoned as Residential Low.

South: Area south of the Project site is divided by Bradbury Road between the City of Monrovia (west) and the City of Bradbury (east). To the southwest, land use includes single family residences with driveway access to Bradbury Road/Wildrose Avenue. Adjacent residences are designated as Residential Low (5.8 du/acre) in the City of Monrovia General Plan and zoned as Residential Low. To the southeast, land use includes Bradbury Estates residences. The subdivision is designated as A-5 (Agriculture Residential Estate) in the General Plan and zoned A-5 (Agriculture Residential Estate Zoning District) in the City of Bradbury.

East: Land use to the east of the Project site is also includes Bradbury Estates residences. A private driveway to recreational equestrian facility (part of Bradbury Estates) to the east is accessible via Bradbury Road. Shrubs and trees directly about the east side of Bradbury Road, screening views of private estates. The subdivision is designated as A-5 (Agriculture Residential Estate) in the General Plan and zoned A-5 (Agriculture Residential Estate Zoning District) in the City of Bradbury.

Regional Location



Bradbury Road Widening Project

Figure 1

This page intentionally left blank.

Local Vicinity



Bradbury Road Widening Project

Figure 2

This page intentionally left blank.

Aerial View of Site and Vicinity



This page intentionally left blank.

Existing Views



Northbound views of the northeastern boundary of the Project Site from Bradbury Road.



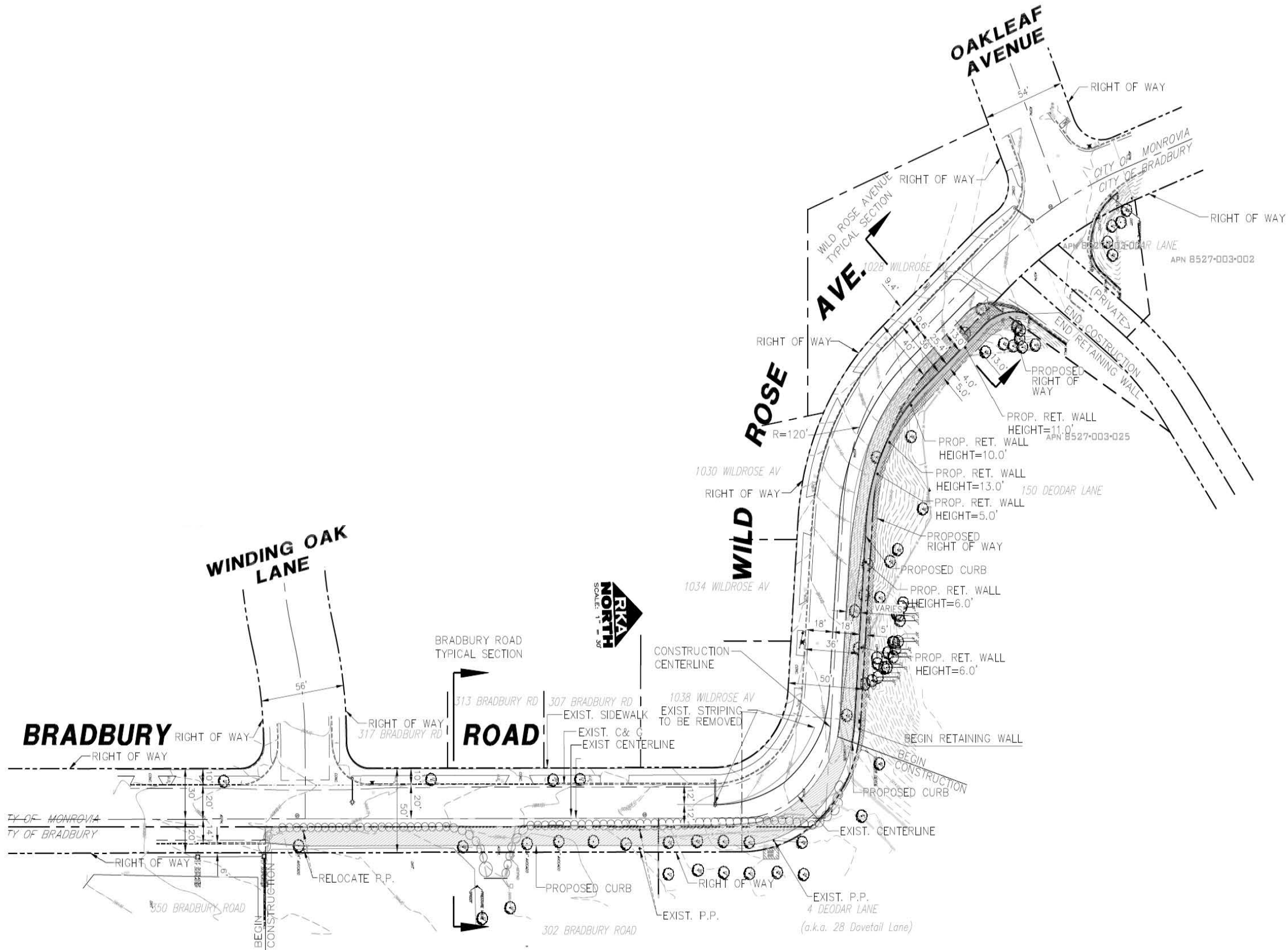
Southbound views of the southeastern boundary of the Project Site from Bradbury Road.



Westbound views of the northern boundary of the Project Site from Wildrose Avenue.

This page intentionally left blank.

Conceptual Site Plan



This page intentionally left blank.

3 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The Project would widen Bradbury Road (Wildrose Avenue) from 24 feet to 36 feet, maintaining one lane in each direction, from Winding Oak Lane to Deodar Lane (proposed Project). The road widening would extend north of Wildrose Avenue beyond the existing roadway limits. Several trees would be removed as a result of proposed widening. Existing slopes adjacent to the roadway would be regraded and a new retaining wall would be installed north of Wildrose Avenue. The Project would include associated hardscape and landscaping improvements along the roadway.

3.2 PROJECT FEATURES

Roadway Improvements

The proposed Project would widen the existing Bradbury Road from 24 feet to 36 providing one 18-foot lane in each direction. Existing roadway improvements along residences to the west (sidewalks, curbs, and gutters) would be maintained as part of the Project. The Project would include demolition of existing pavement, grading of the Project site, roadway pavement, and roadway restriping. See Figure 5, *Conceptual Site Plan*.

The Project would be accommodated within existing City-owned ROW. Partial ROW was acquired from private property to the north (accessor's parcel number [APN] 8527-026-025) to accommodate proposed widening and recorded with the County of Los Angeles. Substantial grading would be required along the slope to the north of Wildrose Avenue. Several oak trees would be removed as part of grading activity. A permanent retaining wall would be constructed between the roadway and the newly graded area. The retaining wall would be approximately 320 feet in length and would range from 5 to 13 feet in height above the top of the slope.

Landscaping

The Project would include removal of 270 linear feet of existing berm, 390 linear feet of existing hedge, and up to 46 trees. Undeveloped grading area to the north and east of Bradbury Road would be revegetated following Project completion as feasible with trees and shrubs consistent with the City's *Design Guidelines* (1995) and existing vegetation along the roadway.

Utilities: Proposed utility work as part of the Project would include relocation of two existing power poles. Two poles and associated overhead power lines would be relocated to accommodate the proposed roadway widening along the eastern side of the roadway. The Project would not impact other existing utilities or propose new utilities.

3.3 CONSTRUCTION

Construction activities for the Project would occur over one phase lasting approximately 2 months and in the following stages: (1) demolition and removal of existing asphalt/pavement; (2) site preparation; (3) grading and excavation; (4) construction of retaining wall; (5) paving; and (6) architectural coating. Following the hardscape project improvements, (6) landscaping and any approved onsite tree replacement would be implemented. Table 2 details total working days for each phase of construction for analytical purposes. Construction activities would be limited to the hours between 7:00 a.m. and 7:00 p.m. on weekdays pursuant to the City's Municipal Code Chapter 127.

Table 2: Construction Schedule

Construction Phase	Work Days
Demolition	10
Site Preparation	5
Grading	2
Retaining Wall	15
Paving	10
Architectural Coating	5
Landscaping	5

3.4 DISCRETIONARY APPROVALS AND PERMITS

The following discretionary approval and permits are anticipated from the City of Bradbury to be necessary for implementation of the proposed Project:

- Adoption of the Initial Study Mitigated Negative Declaration
- Tree Permit

Additionally, the following discretionary approval and permit is anticipated from the City of Monrovia to be necessary for implementation of the proposed Project:

- Encroachment permit

4 ENVIRONMENTAL CHECKLIST

This section includes the completed environmental checklist form. The checklist form is used to assist in evaluating the potential environmental impacts of the proposed Project. The checklist form identifies potential Project effects as follows: 1) Potentially Significant Impact; 2) Less Than Significant with Mitigation Incorporated; 3) Less Than Significant Impact; and, 4) No Impact. Substantiation and clarification for each checklist response is provided in Section 5 (Environmental Evaluation). Included in the discussion for each topic are standard condition/regulations and mitigation measures, if necessary, that are recommended for implementation as part of the proposed Project.

4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (☒) would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

Environmental Factors Potentially Affected

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

4.2 DETERMINATION

(To be completed by the Lead Agency) on the basis of this initial evaluation

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
	City of Bradbury
Printed Name	For

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than

significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significant.

4.3 ENVIRONMENTAL CHECKLIST QUESTIONS

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

Less Than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view of visual setting.

The Project site is within a small urbanized and developed residential area on the border of the City of Bradbury and the City of Monrovia. The site is surrounded by Bradbury Estates, a gated residential community, to the north and east, single family residential units to the south, and single-family residences within the City of Monrovia to the west. There are no designated scenic highways within the City of Bradbury and the Project is not within a designated scenic vista in the City of Monrovia. Existing public viewpoints exist along Bradbury Road, where views of the San Gabriel Mountains can be seen to the north by pedestrians and motorists. However, the proposed Project would widen the existing Bradbury Road and maintain existing roadway improvements. Area to the east of the roadway would be graded and up to 46 trees could be removed as part of the Project. Overall, the Project would result in removal of visual obstruction from the roadway to the mountains. The Project would result in a less than significant impact on scenic vistas.

b) Substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The closest Eligible State Scenic Highway is State Route 39, which is approximately four miles to the east of the Project site and runs through the city of Azusa through the San Gabriel Mountains (California Department of Transportation 2021). State Route 39 is not visible from the Project site, and thus, no impacts to scenic resources within a state scenic highway would occur.

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

Less than Significant Impact. The Project site is located in an urbanized area, within a residentially developed community within the City of Bradbury and City of Monrovia. The land uses of the Project site are designated A-5 (Agriculture Residential Estate) by the City of Bradbury General Plan and Residential Low (5.8 dwelling units [du] per acre) by the City of Monrovia. The site is zoned A-5 (Agriculture Residential Estate Zoning District) within the City of Bradbury and Residential Low within the City of Monrovia. The Project site is currently developed with Bradbury Road, residential driveways and lawn to the west, and lush natural vegetation consisting of trees and shrubs to the east. The visual quality of the Project site would be considered moderate to high and visual character is consistent with aesthetics of a typical suburban residential neighborhood.

As previously mentioned, the Project would widen the existing Bradbury Road. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. Visual changes that would result from the Project would be minor and Project improvements would be consistent with existing conditions. Undeveloped grading area to the north and east of Bradbury Road would be revegetated following Project completion as feasible with trees and shrubs consistent with the City's Design Guidelines (1995) and existing vegetation along the roadway. Furthermore, the Project will be consistent with Chapter 118 of the City's Municipal Code and the City's tree ordinance, which specifies the requirements for removal, preservation, and replacement of prominent and significant trees. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality and also would not degrade the existing visual character, and impacts would be less than significant.

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

Less than Significant Impact. The Project site is located within a developed residential area. Existing sources of light in the vicinity of the Project site includes streetlights and internal and external residential lighting along Bradbury Road, as well from vehicles driving along Bradbury Road.

Although construction activities would occur during daylight hours and construction activities could extend into the evening hours, as permitted by the City's noise ordinance under Municipal Code Chapter 127 (permitted construction activities from 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 7:00 p.m. on weekends). Any temporary lighting required during construction of the Project would be shielded and directed toward work activity areas and away from adjacent residences. Any construction related lighting would be temporary (approximately 2 months). Therefore, construction of the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area, and light impacts associated with construction would be less than significant.

The proposed Project does not include the construction of any structures, and thus would not create glare from finished surfaces such as window glass or other reflective materials. As previously described, the Project consists of the widening of a preexisting roadway. Thus, the Project would not create a new source of substantial light or glare. The roadway would be composed of nonreflective material consistent with the existing roadway material and would not be expected to cause glare. Additionally, the Project would not be capacity increasing and would not result in additional traffic or subsequent light from headlights. Thus, the Project would not create a new source of substantial light or glare and would not adversely affect day or nighttime views in the area. Potential impacts related to shade and shadow would be less than significant.

Existing Plans, Programs, or Policies

No PPP related to aesthetics are required.

Mitigation Measures

No mitigation measures related to aesthetics are required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

2. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to 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) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site is developed with roadway and surrounding land uses include single-family residential. The Project site and its vicinity are not designated for agricultural uses. The California Department of Conservation Farmland Mapping and Monitoring Program identifies the site as urban and built-up land. Thus, the site is not identified as Prime, Unique, or Farmland of Statewide Importance (California Department of Conservation 2021). Therefore, conversion of such farmland designations would not occur from implementation of the proposed Project. Therefore, the Project would result in no impact.

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

No Impact. The Project site is currently zoned A-5 (Agriculture Residential Estate Zoning District) within the City of Bradbury, which is designated as the Agriculture Residential Estate Zoning District. The City of Bradbury's Municipal Code Section, 9.73.010, describes that the A-5 zone provides for the development of single-family residential areas and to maintain the integrity of existing single-family residential areas within the City. Additionally, the A-5 (Agriculture Residential Estate Zoning District) permits agricultural uses such as nursery stock, orchards, vineyards, the raising of field crops, tree, berry and bush crops, or vegetable or flower gardening. As previously described, the Project proposes road widening, which would serve to maintain the integrity of the surrounding residential areas. The Project is zoned Residential Low within the City of Monrovia, which does not provide for agricultural uses. The Residential Low zone in the City of Monrovia allows for large single-family residential lots with a minimum of 7,500 square feet.

The Project is currently developed with roadway surrounded by residential development. The proposed Project would not conflict with existing zoning for agricultural use. In addition, the site is not subject to a Williamson Act contract. Thus, the proposed Project would not result in impacts related to conflict with an existing agricultural zone or Williamson contract, and impacts would not occur.

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))?

No Impact. The Project site is an existing roadway that has a zoning designation of A-5 (Agriculture Residential Estate Zoning District). The site is not zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, the proposed Project would not result in impacts related to a conflict with existing forest land or timberland zoning.

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

No Impact. As previously mentioned, the Project would consist of roadway widening within a residentially developed area. A General Biological Assessment completed by Hernandez Environmental Services in 2021 for the Project identified 0.29 acre of coast live oak woodlands along the sloped area within the Project site north and east of the roadway. The Project is not identified as forest land within the City's General Plan, nor is it designated for future timber harvest by the California Department of Forestry and Fire Protection (California Department of Forestry

and Fire Protection 2021). There is no designated forest land on or adjacent to the Project site. Therefore, the Project would not result in the loss of forest land or conversion of forest land to a non-forest use.

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

No Impact. As previously described the Project would consist of the widening of a roadway within a residentially developed area. No farmland or forest land exists on or adjacent to the Project site. Therefore, the implementation of the proposed Project would not involve other changes in the existing environment which would result in the conversion of farmland to a non-agricultural use or the conversion of forest land to a non-forest use. Therefore, the Project would result in no impact.

Existing Plans, Programs, or Policies

There are no impacts reducing Plans, Programs, and Policies related to agriculture and forestry that are applicable to the Project.

Mitigation Measure

No mitigation measures related to agriculture and forestry are required.

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

The discussion below is based on the Air Quality, Greenhouse Gas, and Energy Analysis, prepared by EPD Solutions, Inc., which is included as Appendix A. The Air Quality, Greenhouse Gas, and Energy Analysis analyzed a more conservative project, which included additional demolition of pavement. Therefore, actual emissions would be slightly less than what is analyzed below.

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

No Impact. The Project site is located in the South Coast Air Basin, which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The 2016 AQMP details goals, policies, and programs for improving air quality in the Basin.

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, if a proposed Project would result in growth that is substantially greater than what was anticipated, then the proposed Project would conflict with the AQMP. On the other hand, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the Project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The Project site is a previously developed site that is located on an existing roadway and extends

into adjacent residential land uses. The proposed Project would include demolition of existing pavement, grading of the Project site, roadway pavement, and roadway restriping in order to widen the existing Bradbury Road from 24 feet to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles.

Bradbury Road currently includes one lane in each direction. Proposed improvements would maintain one lane in each direction, and further, would not be capacity-increasing or growth-inducing. The operational capacity of the roadway would not change; therefore, the operational emissions of the Project would have a net zero change from the existing road. Therefore, the Project would result in no impact on implementation of the applicable air quality plan.

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

Less than Significant Impact. The South Coast Air Basin (SCAB) is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed Project, could cumulatively contribute to these pollutant violations. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating Project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table 3. Should construction or operation of the proposed Project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

Table 33: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NO _x	100	55
VOC	75	55
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550
Lead	3	3

Source: Regional Thresholds presented in this table are based on the SCAQMD Air Quality Significance Thresholds, March 2015 (Source: EPD, 2021 (Appendix A)).

As stated previously, the operational capacity of the roadway would not change; therefore, the operational emissions of the Project would have a net zero change from the existing road. The construction of the Project was assumed to include:

- Demolition (assumed 490 tons of debris);
- Site preparation to remove the trees and other shrubs;
- Grading to level the site, which includes 322 cubic yards of export;
- Paving for the asphalt and concrete (approximately 9,722 SF of pavement); and
- Architectural coating for the roadway striping.

The duration of construction would last about 2 months. The changes to the CalEEMod defaults include the following:

- The site preparation phase was extended from one day to five days due to the number of trees needing removal;
- The building construction phase was removed as there are no buildings to construct;
- All equipment hours were changed to eight hours assuming an eight hour work day;
- Acres graded during site preparation were moved to grading as that is when grading would occur;
- Applied SCAQMD Rule 1113 which requires Low volatile organic compound (VOC) paints with a maximum of 50gram/liters of VOC; and
- Applied SCAQMD Rule 403 which requires watering during grading activities to reduce fugitive dust.

Demolition is also assumed to be substantially less than assumed as a result of project changes, which would no longer necessitate asphalt removal, and therefore, would reduce demolition loads.

The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring. Construction activities would generate emissions from the demolition of existing pavement, grading of the Project site, roadway pavement, and roadway restriping. In addition, the project would generate a need for construction worker vehicle trips to and from the Project site during the estimated 2 months of construction.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM₁₀, and PM_{2.5} emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling and is included as PPP AQ-2.

In addition, implementation of SCAQMD Rule 1113 that governs the VOC content in architectural coating, paint, thinners, and solvents, would be required and is included as PPP AQ-3. As shown in Table 4, CalEEMod results provide that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less than significant impact.

Table 4: Regional Construction Emissions Summary

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO _x	CO	SO _x	PM-10	PM-2.5
2022						
Demolition	1.6	15.8	12.3	0.0	1.4	0.8
Site Prep	0.6	6.9	4.2	0.0	0.3	0.3
Grading	1.5	19.2	8.6	0.0	3.9	2.1
Paving	1.0	7.0	8.9	0.0	0.5	0.4
Architectural Coating	0.6	1.9	2.5	0.0	0.1	0.1
Maximum Daily Emissions	1.6	19.2	12.3	0.0	3.9	2.1
SCAQMD Significance Thresholds	75	100	550	150	150	55

Threshold Exceeded?	No	No	No	No	No	No
---------------------	----	----	----	----	----	----

Source: EPD, 2021 (Appendix A)

Project construction would not exceed any of the criteria pollutant thresholds applicable to the Project site. Therefore, the Project would result in a less than significant impact on any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The SCAQMD recommends the evaluation of localized NO₂, CO, PM₁₀, and PM_{2.5} construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. The impacts were analyzed pursuant to the SCAQMD's Final Localized Significance Threshold Methodology. According to the LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (Southern California Air Quality Management District 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NO_x, CO, PM₁₀, and PM_{2.5} pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 8, West San Gabriel Valley.

Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. The closest sensitive receptor to the Project is a residence directly adjacent and west of Bradbury Road.

The localized thresholds from the mass rate look-up tables in SCAQMD's Final Localized Significance Threshold Methodology document, were developed for use on projects that are less than or equal to 5-acres in size or have a disturbance of less than or equal to 5 acres daily and were used to evaluate LSTs. Localized construction emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table 5. As shown in Table 5, with implementation of SCAQMD Rules 403 and 1113 (included as PPP AQ-2 and PPP AQ-3), the maximum daily construction emissions from the proposed Project would not exceed the applicable SCAQMD LST thresholds. Additionally, the impacts would be temporary, only lasting the duration of construction which would be anticipated to occur over a two month period.

Table 5: Localized Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO _x	CO	PM-10	PM-2.5
2022				
Demolition	14.9	11.7	1.2	0.8
Site Prep	6.9	4.0	0.3	0.2
Grading	15.7	7.5	3.4	2.0
Paving	7.0	8.2	0.3	0.3
Architectural Coating	1.9	2.4	0.1	0.1
Maximum Daily Emissions	15.7	11.7	3.4	2.0
SCAQMD Significance Thresholds	89	623	5	3
Threshold Exceeded?	No	No	No	No

Source: EPD, 2021 (Appendix A)

As stated previously, the operational capacity of the roadway would not change and the operational emissions of the Project would have a net zero change from the existing road. Therefore, the Project would result in less than significant impacts on sensitive receptors.

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

Less Than Significant Impact. The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would include widening of a roadway and would not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by non-residential land uses are required to be in compliance with SCAQMD Rule 402, which would prevent nuisance odors (PPP AQ-1).

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with other emissions, such as odors, would not adversely affect a substantial number of people.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 402. The construction plans and specifications shall state that the Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

PPP AQ-2: Rule 403. The construction plans and specifications shall state that the Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.

PPP AQ-3: Rule 1113. The construction plans and specifications shall state that the Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only “Low-Volatile Organic Compounds” paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

Mitigation Measures

No mitigation measures related to air quality are required.

Sources

Air Quality, Greenhouse Gas, and Energy Impact Analysis. Prepared by EPD Solutions (EPD, 2021) (Appendix A).

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

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?

No Impact. The Project site includes the existing Bradbury Road alignment, residential lot, and slopes containing coast live oak woodlands. A General Biological Assessment was prepared for the Project by Hernandez Environmental Services in 2021. The Project site is surrounded by residential development and woodlands. A survey of the Project site was conducted on August 11, 2021. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish

and Wildlife (CDFW), or California Native Plant Society (CNPS) were found to occur on the site during the site survey. Therefore, the Project would result in no impact on species identified as a candidate, sensitive, or special status species.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. The Project site does not contain any state or federally jurisdictional water features or riparian habitat. The Project site contains two habitat types, including 1.09 acre of developed areas and 0.29 acre of coast live oak woodland habitat. The proposed Project would widen Bradbury Road (Wildrose Avenue) from 24 feet to 36 feet. Implementation of the proposed Project would result in impacts to approximately 0.65 acre of developed areas and 0.18 acre of coast live oak woodland habitat.

The City's General Plan includes Open-Space Policy No. 1: Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration. Chapter 118 of the City's Municipal Code includes the City's tree ordinance, which specifies the requirements for removal, preservation, and replacement of native, prominent and/or significant trees. A Native Tree Survey and Arborist Report was prepared for the Project by Golden State Land & Tree Assessment in 2021 to classify the status of trees within and directly northeast of the Project site. The arborist assessed 44 native trees that were composed of two distinct species, coast live oak (*Quercus agrifolia*) and a single specimen of interior live oak (*Quercus wislizeni*), which may be a hybrid. Of the native trees surveyed, 39 qualify as a Prominent Trees Per Bradbury Municipal Code Section 9.11-030, having a diameter at breast height (DBH) of 6-inches or greater and an expected mature height of 15 feet or higher. In all, 19 of the trees onsite qualified for removal at the time of survey due to the trees being diseased, infested, or having a poor growth form. The other 25 trees were determined to be in fair to good health at the time of survey and would require mitigation, if removed.

A follow-up site visit was conducted by the City's contracted engineer, arborist, and landscape architects. Two additional trees were surveyed that had not been previously surveyed by the arborist. Both trees were recommended for removal. Overall, approximately 21 trees were proposed for removal due to being seriously diseased, dead, or a significant health or fire hazard risk and 25 trees were determined to be in fair to good health at the time of survey and would require mitigation, if removed. In total, up to 46 trees could be removed as part of the Project.

Removal of native or prominent trees on the Project would require permit approval by the Planning Commission prior to removal, including a no fee permit for diseased, infested, or trees having a poor growth form pursuant to the Chapter 118 of the Municipal Code. Native or prominent trees would be replaced at a 1:1 ratio either at an on-site or offsite location, pursuant to mitigation measure BIO-1. The City of Bradbury will replace all removed trees, with final number to be determined prior to grading (see Mitigation Measure BIO-5), at a 1:1 ratio with 15-gallon trees of the same species. Due to the limited amount of land available within the city, the Bradbury Estates would have capacity to accommodate approximately 16 trees to provide enough space for successful establishment and future growth of the trees. If additional replacement trees are required, the City of Bradbury will work with the City of Duarte to accommodate remaining trees.

The Project would preserve oak trees in-place within and surrounding the Project site wherever feasible. During construction, the road improvements have the potential to significantly impact the

substrate beneath many oaks outside of the proposed grading and pavement areas. Portions of root crowns would be impacted, possibly changing the nearby grade, hydrology, and other conditions. Given the degree of the resident trees' inherent lean to the south and their potential to fall towards the roadway, a post-installation inspection must be performed that includes a workplan for bracing (as needed) to mitigate potential tree failure. An arborist would be retained by the City and evaluate all trees that were preliminarily surveyed by the arborist prior to construction, as well as the two that were not previously surveyed. The arborist would be present during initial ground-disturbing activities to determine whether individual trees, or root systems, impacted during construction would necessitate removal of the tree based on the health, risk of failure, and other potential issues that could occur as a result of the project (measure BIO-5). Following construction, a monitoring plan would be implemented, per measure Mitigation Measure BIO-2. With implementation of mitigation measures BIO-1 through BIO-5, impacts would be less than significant.

Therefore, coast live oak woodland habitat removal would be completed in consistency with Chapter 118 of the City's Municipal Code and Open-Space Policy No. 1 within the City's General Plan and would be mitigated through tree replacement (Mitigation Measures BIO-1). Project impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service would be less than significant with mitigation.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The Project site and adjacent areas are located within a developed urban area and do not contain natural wetlands. Therefore, the Project would not result in impacts to wetlands.

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

Less than Significant with Mitigation Incorporated. Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations. The Project site does not support conditions of migratory wildlife corridors or linkages. The Project site is developed and surrounded by a roadway and developed land uses. The site and surrounding areas do not provide function for wildlife movement. Additionally, the surrounding area is developed. There are no rivers, creeks, or open drainages near the site that could function as a wildlife corridor. Thus, implementation of the Project would not result in impacts related to wildlife movement or wildlife corridors.

Migratory non-game native bird species are protected under the federal Migratory Bird Treaty Act. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests. Trees and shrubs located on the Project site can be used by nesting songbirds or raptors during the nesting bird season of February 1 to September 15.

Therefore, Mitigation Measure BIO-4 has been included to require that if commencement of vegetation clearing occurs between February 1 and September 15, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of activities to confirm the absence of nesting birds. With implementation of Mitigation Measure BIO-4, potential impacts to nesting birds would be less than significant.

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

Less than Significant with Mitigation Incorporated. See Response to 4 b). Implementation of the Project would not conflict with local policies or ordinances protecting trees with implementation of mitigation measures BIO-1 through BIO-5.

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?

No Impact. The Project site is developed area. The Project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Project would not result in impacts to biological habitat plans.

Existing Plans, Programs, or Policies

Bradbury Municipal Code Chapter 118: no removal or topping of existing prominent and/or significant trees is permitted on a building site without prior approval of the Planning Commission. A tree preservation and landscaping plan shall be included as part of the architectural review.

Mitigation Measures

A tree preservation and plan would be submitted to the City which would include the following measures.

Mitigation Measure BIO-1: Tree preservation and planting plan. City Planning Department and shall review, and the Planning Commission shall approve a tree preservation and planting plan which replaces native oak trees and prominent trees in accordance with Municipal Code Section 9.118.040, as follows:

- The City of Bradbury will replace all removed trees, final number to be determined (see Mitigation Measure BIO-5), at a 1:1 ratio with 15-gallon trees of the same species prior to project closeout;
- The Bradbury Estates will accommodate up to approximately 16 replacement trees;
- The City of Bradbury and Bradbury Estates Homeowner's Association will be responsible, in partnership, for the maintenance of the trees in perpetuity once planted;
- The remaining replacement trees will be planted in the City of Duarte, at the Donald and Bernice Watson Recreation Trail, then to parks and medians, in that order of priority;
- The City of Bradbury will purchase and deliver trees to the City of Duarte, in which the City of Duarte will plant within (4) weeks of receipt;
- The City of Duarte will be responsible for the maintenance of the trees in perpetuity once planted.

Mitigation Measure BIO-2 - Monitoring Plan. An ongoing maintenance and monitoring plan shall be approved and implemented by the City of Bradbury Planning Department for trees preserved onsite and for replacement trees, to ensure long-term tree health, and to minimize potential tree failure.

Mitigation Measure BIO-3 - Tree Protection during Construction.

Construction plans shall include a note to require tree protection measures during construction, as follows:

1. Dripline fencing must be placed a minimum of 1 foot in radius from the tree per 1 inch of diameter at breast height (for example, 6-inch trunk = 6 feet protection radius/12 feet diameter).
2. Dripline fencing must be erected so that it is visible and structurally sound enough to deter construction equipment, foot traffic, and the storing of equipment under tree canopies.
3. Raising or lowering the grade in the root zone of trees can be fatal or ruin the health of trees for years to come. Grade change and soil compaction force out the oxygen and literally press the life out of the soil. A retaining wall can be used to minimize the amount of the root zone that is affected, but it is essential that the footing is not continuous. Gravel and aeration pipes should be placed inside the retaining wall before the fill is placed. Consult with a qualified civil engineer for proper design calculations.
4. Trenching within the protection zone must be avoided wherever possible. Most of the roots are in the top 1 to 2 feet of soil, and trenching can sever a large percentage of roots.
5. Oil from construction equipment, cement, concrete washout, acid washes, paint, and solvents are toxic to tree roots. Signs should be posted on the fencing around trees notifying contractors of the fines for dumping. Portable latrines that are washed out with strong detergents can damage the fine roots of the trees. Portable latrines should not be placed near trees, nor where frequent and regular foot traffic to them will compact the soil below the trees.
6. Construction creates large amounts of dust, and the oaks and any other trees to be preserved will need to be kept clean. Dust reduces photosynthesis on all trees. Strict dust control measures must be implemented during construction to minimize this impact, and an occasional rinsing with a solution of water and insecticidal soap will help control pests.

Mitigation Measure BIO-4 – Nesting Birds. The following measures shall be implemented to mitigate potential impacts on nesting birds:

- Project ground disturbing and vegetation clearing activities should occur outside of the bird nesting season of February 1 through September 15;
- If avoidance of ground disturbing and vegetation clearing activities cannot be implemented and these activities will occur during the bird nesting season, a qualified biologist shall conduct pre-construction nesting bird surveys during the nesting bird season within 3 days prior to vegetation removal and/or construction activities; and,
- If active nests are found during nesting bird surveys, they will be flagged and a 500-foot buffer for raptors and a 250-foot buffer for migratory song birds, shall be installed around the nests. The buffers must remain in place until the young have fledged and the nest becomes unoccupied.

Mitigation Measure BIO-5 – Tree Monitoring during Construction. A qualified arborist with Tree Risk Assessment Qualification (TRAQ) credential, and field experience with evaluation, maintenance, and care of Coast Live Oak (*Quercus agrifolia*) trees, will be retained by the City and present during initial ground distributing activities and site preparation activities. The arborist will determine

whether individual trees, or root systems, impacted during construction would necessitate removal of the tree based on the health, risk of failure, and other potential issues that could occur as a result of the project. The arborist may direct the installation of bracing and/or guying measures, corrective pruning, or other treatment for the protection in-place of trees (including root systems) impacted by the project. Trees originally considered for removal may be preserved with corrective measures if determined that preservation would not result in risk to public safety. Trees identified as potentially impacted during preliminary tree surveys will be subject to removal or preservation at the discretion of the arborist monitor during construction. Trees identified for removal would be subject to mitigation under Mitigation Measure BIO-1.

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

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria:

- (1) listed in, or determined eligible for listing in, the California Register of Historical Resources;
- (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
- (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
- (4) determined to be a historical resource by the project's Lead Agency.

According to the PRC, a resource is considered historically significant if it meets at least one of the following criteria:

- 1) Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2) Associated with the lives of persons important to local, California or national history;
- 3) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- 4) Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Several buildings and structures were listed as historically significant in the City of Bradbury's General Plan Community Resources Element. The Community Resources Element identified the following structures as historically or architecturally significant:

- An old stone milk house and cistern at 1774 Royal Oaks Drive, North.
- A single-story prairie style home that was designed by the Frank Lloyd Wright studio at 5 Bradbury Hills Road.

- An old building referred to as Stone Carriage House at 555 Deodar Lane.
- An 1890's two-story Queen Ann Farmhouse at 2001 Gardi Street (City of Bradbury 2014).

As previously mentioned, the Project would widen the existing Bradbury Road. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The Project would extend into a portion of a property to the north (APN 8527-026-025), that has been acquired by the City, to accommodate proposed widening. The Project area has been previously disturbed and graded for existing roadway and utility improvements. The Project would not include removal of any structures from the Project site or disturbance of any historic properties identified above. Therefore, the Project would not be anticipated to result in any impacts to a historical resource as defined in §15064.5.

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

Less than Significant Impact with Mitigation Incorporated. According to the City's General Plan, the City of Bradbury has historically served as a rural community of ranches and large homesteads. Aerial imagery available through Google Earth dating back to 1985 shows the Project site and surrounding area developed with residential land uses, similar to existing conditions.

As previously mentioned, the Project would widen the existing Bradbury Road. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The Project would extend into a portion of a property to the north (APN 8527-026-025), that has been acquired by the City, to accommodate proposed widening. The Project area has been previously disturbed and graded for existing roadway and utility improvements. Ground-disturbing activities would require roadway removal, tree and shrub removal, and substantial re-grading of slopes adjacent to the roadway, which have the potential to contain native soils.

Project grading is anticipated to remain within the artificial fill material but has the potential to encroach into native soils that have not been previously disturbed and could contain archaeological resources. As a result, Mitigation Measure CUL-1 has been included to provide procedures to be followed in the event that potential archaeological resources are discovered during grading, excavation, or construction activities. Mitigation Measure CUL-1 requires that work in the vicinity of a find be halted until the find can be assessed for significance by a qualified archaeologist to determine the appropriate treatment and documentation of the discovery (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15064.5(f)). Mitigation Measure CUL-1 would reduce potential impacts to undiscovered archaeological resources to a less than significant level.

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

Less than Significant Impact. The Project site has been previously disturbed, as described above, and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. Existing regulation under the California Health and Safety Code, included as PPP CUL-1, outlines the procedures to undertake if human remains are found on the Project site. Compliance with existing regulations would ensure impacts related to potential disturbance of human remains are less than significant.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. Should human remains be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

Mitigation Measures

Mitigation Measure CUL-1: Inadvertent Discoveries. Prior to the issuance of any permits ground-disturbing activities that cause excavation of soils (including as grading, excavation, and trenching), the City of Bradbury shall ensure that all Project grading and construction plans and specifications shall state that in the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code. Any resources identified shall be treated in accordance with California Public Resources Code Section 21083.2(g). If the discovered resource(s) appears Native American in origin, the Native American Monitor shall evaluate any potential tribal cultural resource(s) and shall have the opportunity to consult on appropriate treatment and curation of these resources.

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

The discussion below is based on the Air Quality, Greenhouse Gas, and Energy Impact Analysis, prepared by EPD Solutions, Inc., which is included as Appendix A.

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

Less Than Significant Impact.

During construction of the proposed Project, energy would be consumed in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project sites, construction worker travel to and from the Project sites, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt.

Construction activities related to the roadway widening and associated improvements would not be expected to result in demand for fuel greater than other roadway projects in southern California. Construction does not involve any unusual or increased need for energy. In addition, the extent of construction activities that would occur are limited to an approximate two-month period, and the demand for construction-related electricity and fuels would be limited to that time frame.

The electric power used would be for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers. Natural gas is not anticipated to be needed for construction activities. The construction equipment associated with construction activities (off-road/heavy duty vehicles) would rely on diesel fuel as would vendor and haul trucks involved in delivering building materials and removing the demolition debris from the Project site. Construction workers would travel to and from the Project site throughout the duration of construction, and for a conservative analysis it is assumed that construction workers would travel in gasoline-powered passenger vehicles.

Table 6: Construction Equipment Fuel Usage, used the total fuel consumption and horsepower-hour data contained within the ARB OffRoad2017 emission model for specific types of diesel construction equipment. Total fuel consumption is a conservative analysis and would likely overstate the amount of fuel usage, as specific construction equipment is not expected to operate during the duration of the construction activity (i.e., crane). Table 7: Estimate Construction Vehicle Fuel Usage, summarizes the Project's construction vehicle fuel usage based on vehicle miles traveled and fuel usage factors contained in the ARB EMFAC2017. The trips included are worker vehicles, vendor vehicles, and haul vehicles. Table 8: Total Construction Fuel Usage, shows the overall fuel consumption for construction of the proposed Project.

Table 6. Construction Equipment Fuel Usage

Activity	Equipment	Number	Hours per day	Horsepower	Load Factor	Days of Construction	Total Horsepower-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Demolition	Concrete/Industrial Saws	1	8	81	0.73	10	4730	0.041910092	198
	Rubber Tired Dozers	1	8	247	0.4	10	7904	0.02058395	163
	Tractors/Loaders/Balckhoes	1	8	97	0.37	10	2871	0.019134328	64
Site Preparation	Graders	1	8	187	0.41	5	3067	0.021157546	65
	Tractors/Loaders/Balckhoes	1	8	97	0.37	5	1436	0.019134328	27
Grading	Rubber Tired Dozers	1	8	247	0.4	2	1581	0.02058395	33
	Graders	1	8	187	0.41	2	1227	0.021157546	26
	Tractors/Loaders/Balckhoes	1	8	97	0.37	2	574	0.019134328	11
Paving	Pavers	1	8	130	0.42	5	2184	0.021518869	47
	Rollers	1	8	80	0.38	5	1216	0.019841433	24
	Tractors/Loaders/Balckhoes	1	8	97	0.37	5	1436	0.019134328	27
Architectural Coating	Air Compressors	1	8	78	0.48	5	1498	0.027625227	41
Total									726

Table 7. Estimated Construction Vehicle Fuel Usage

Construction Source	Number	VMT	Fuel Rate	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Haul Trucks	88	1,760	6.57	268	0
Worker Vehicles	42	3,469	27.75	0	125
Total				1,323	125

As seen in Table 8, Project construction would consume 994 gallons of diesel fuel and 125 gallons of gasoline. Project construction would not include unusual characteristics that would make the construction fuel and energy consumption associated with construction of the Project less efficient compared with other similar construction sites throughout the state. The consumption would also be temporary and localized. Construction contractors are required to demonstrate compliance with

applicable California Air Resources Board (CARB) regulations governing the accelerated retrofiting, repowering, or replacement of heavy-duty diesel on- and off-road equipment as part of the City's construction permitting process. In addition, compliance with existing CARB idling restrictions, which is included as PPP E-1, would reduce fuel combustion and energy consumption. Therefore, impacts related to construction energy usage would be less than significant.

Table 8. Total Construction Fuel Usage

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	268	125
Off-road Construction Equipment	726	0
Total	994	125

As stated previously, the operational capacity of the roadway would not change and energy consumption of the Project wouldn't change. Therefore, the Project would result in less than significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources.

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

No Impact. The Project would include widening of a roadway. Project operation would not include the operation of facilities or other stationary structures that require the consumption of energy. Mobile sources, such as vehicles and trucks, require energy consumption; however, mobile sources are not applicable to a state or local plan for renewable energy. Therefore, the Project would result in no impact.

Existing Plans, Programs, or Policies

PPP ENG-1: CalGreen Compliance. The Project is required to comply with the CalGreen Building Code as included in the City's Municipal Code (Chapter 150.001) to ensure efficient use of energy. CalGreen specifications are required to be incorporated into building plans as a condition of building permit approval.

Mitigation Measures

No mitigation measures related to energy are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 (1994), creating substantial direct or indirect 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 waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

No Impact. The Project site is within an area designated as Alquist Priolo Fault Zone within the Sierra Madre Fault Zone according to the California Geological Survey Earthquake Zones of Required Investigation Map (California Geological Survey 2021). The nearest fault, Duarte Fault, is directly beneath the proposed Project site. The Project would include widening of an existing roadway. The Project would not include the development of land uses that would subject additional persons to risks associated with rupture of a known earthquake fault. Therefore, the Project would not directly or indirectly cause potential risk of loss, injury, or death involving the rupture of a known earthquake fault. No impact would occur.

ii. **Strong seismic ground shaking?**

Less than Significant Impact. The Project site is located within a seismically active region of Southern California. As mentioned previously, the Project site directly overlays the Duarte Fault. Thus, strong ground shaking can be expected at the site. The amount of motion expected at the Project site can vary from none to forceful depending upon the distance to the fault and the magnitude of the earthquake. Greater movement can be expected at sites located closer to an earthquake epicenter, that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude.

The Project proposes widening of the existing Bradbury Road from 24 to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The Project would require grading of the adjacent vegetated slope directly north of the roadway to accommodate proposed widening. A retaining wall would be implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events. The Project would not require the construction of stationary structures that would be subject to strong seismic ground shaking. The proposed roadway would be constructed in consistency with standards identified within Chapter 145, Design Standards, of the City's Municipal Code. Therefore, the Project would result in a less than significant impact on strong seismic ground shaking.

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

Less than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

According to the California Geological Survey Earthquake Zones of Required Investigation Map, the Project site is not located within a Liquefaction Zone. The nearest liquefaction zone is located approximately 0.5 mile to the north. As previously mentioned, the Project proposes widening of the existing Bradbury Road from 24 to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The Project would require grading of the adjacent vegetated slope directly north of the roadway to accommodate proposed widening and construction of a retaining wall. A retaining wall would be

implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events. Grading would be consistent with Sec. 9.121.070, Soil and grading requirements, of the City's Municipal Code. The Project would not require the construction of other buildings or stationary structures that would be subject to seismic-related ground failure. With compliance with existing regulations, impacts related to seismically related ground failure and liquefaction would be less than significant.

iv. Landslides?

Less Than Significant Impact. Landslides and other slope failures are secondary seismic effects that occur during or soon after earthquakes. Areas that are most susceptible to earthquakes induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

The site is relatively flat to the south and hilly to the north with elevations ranging from approximately 617 feet above mean sea-level (AMSL) to 643 AMSL. Topography surrounding the site is generally flat with relatively steep slopes to the north approaching the foothills of the San Gabriel Mountains. As described above, the Project site is located in a seismically active region subject to strong ground shaking. However, the California Geological Survey Earthquake Zones of Required Investigation Map identifies the Project as outside of a landslide zone. The nearest landslide zone is approximately 0.7 mile to the north of the Project site. The Project site includes steep slopes to the north of Bradbury Road that would be regraded to accommodate proposed roadway widening. A retaining wall would be implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events. Grading would be consistent with Sec. 9.121.070, Soil and grading requirements, of the City's Municipal Code. Therefore, the Project would result in less than significant impacts related to seismically induced landslides.

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

Less than Significant Impact. Construction of the proposed Project has the potential to contribute to soil erosion and the loss of topsoil. Excavations and grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water.

The City's Municipal Code Chapter 4, Stormwater and Urban Runoff Pollution Control, implements the requirements of the Los Angeles Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES) Storm Water Permit Order No. R4-2012-0175, as amended, (MS4 Permit) establishes minimum stormwater management requirements and controls that are required to be implemented for construction activities for the Project.

To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the City and RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer), which would be implemented by PPP WQ-1. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Additionally, the Project area would be mostly paved, except for adjacent slopes, which would be supported by a retaining wall and revegetated following construction to reduce erosion potential of exposed soils. With compliance with the City's Municipal Code stormwater management requirements, RWQCB SWPPP

requirements, and installation of BMPs, which would be implemented by the City's project review by the Department of Public Works, construction impacts related to erosion and loss of topsoil would be less than significant.

- 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?**

Less than Significant Impact. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. As described in Response a) iv., the topography of the Project site ranges from flat to hilly and includes a steep slope north of Bradbury Road. The Project site is outside of areas determined to be susceptible to landslide or liquefaction; however, the Project is subject to risk of seismic related strong ground shaking. Steep slopes to the north of Bradbury Road would be graded as part of the Project to accommodate proposed roadway widening. A retaining wall would be implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events. Grading would be consistent with Sec. 9.121.070, Soil and grading requirements, of the City's Municipal Code to ensure geologic stability of the roadway and adjacent slopes.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope towards a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements and such movement typically damages pipelines, utilities, bridges, and structures. As discussed above, the Project site is not within a liquefaction zone, and high groundwater is not located at the Project site. Therefore, the site has a low potential for lateral spreading. Therefore, impacts related to lateral spreading would be less than significant.

Subsidence is a general lowering of the ground surface over a large area that is generally attributed to lowering of the ground water levels within a groundwater basin. Localized or focal subsidence or settlement of the ground can occur as a result of an earthquake motion in an area where groundwater in basin is lowered. The Project site overlies the Main San Gabriel Basin of the San Gabriel Basin, which is adjudicated with prescribed pumping allocations per water purveyor to ensure that a general lowering of the water within the basin would not occur. In addition, the Project would not involve groundwater pumping from the Project area. Therefore, impacts related to subsidence would not occur from implementation of the Project.

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

Less than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Project site slopes from north to south and is not subject to pooling water. The soils in the United States are assigned to four groups (A, B, C, and D) to classify infiltration properties of the soil. According to the Natural Resources Conservation Service Web Soil Survey, the Project site is

predominately soil class “A”, soils having high infiltration rates (Natural Resources Conservation Service 2021). Therefore, the Project site has low expansive soil potential. Therefore, impacts related to expansive soils would be less than significant.

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?

No Impact. No septic tanks or alternative wastewater disposal systems are proposed. The Project would include widening of Bradbury Road and would not require wastewater disposal. Therefore, no impacts related to the use of such facilities would occur from implementation of the project.

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

Less than Significant with Mitigation Incorporated. Paleontological resources, or fossils, are the remains of ancient plants and animals that can provide scientifically significant information about the history of life on Earth. Paleontological “sensitivity” is defined as the potential for a geologic unit to produce scientifically significant fossils. This sensitivity is determined by rock type, past history of the rock unit in producing significant fossils, and fossil localities that are recorded from that unit. Paleontological sensitivity is assigned based on fossil data collected from the entire geologic unit, not just a specific site.

The Project site has the potential to be underlain by paleontological resources according to the City’s General Plan due to sensitivity of the City and surrounding vicinity. As described previously, the Project site has been disturbed from previous development activities that include transportation and residential uses, which reduces the potential of existing resources onsite. Slopes to the north likely contain a mixture of disturbed soils and native soils and lower depths. The proposed Project would include demolition of existing asphalt, grading of the Project site, roadway pavement, and roadway restriping in order to widen the existing Bradbury Road from 24 feet to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. Construction would require substantial grading to accommodate proposed widening of Bradbury Road. Project grading has the potential to encroach into native soils that have not been previously disturbed and could contain paleontological resources. Therefore, Mitigation Measure PAL-1 has been included to provide procedures to be followed in the unlikely event that potential paleontological resources are discovered during grading or excavation activities. Mitigation Measure PAL-1 requires that work shall cease within 50 feet of a find until a qualified paleontologist has evaluated the find in accordance with federal and state regulations. Mitigation Measure PAL-1 would reduce potential impacts to undiscovered paleontological resources to a less than significant level.

Existing Plans, Programs, or Policies

PPP WQ-1: SWPPP. Prior to grading permit issuance, the project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) in accordance with the City’s Municipal Code Section 9.109.050. The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other NPDES regulations to limit the potential of erosion and polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City staff or its designee to confirm compliance.

Mitigation Measures

Mitigation Measure PAL-1: Paleontological Resources. Prior to issuance of a grading permit, the City of Bradbury shall verify that all Project grading and construction plans and specifications state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (i.e., a practicing paleontologist that is recognized in the paleontological community and is proficient in vertebrate paleontology) from the City or County List of Qualified Paleontologists has evaluated the find in accordance with federal and state regulations. Construction personnel shall not collect or move any paleontological materials and associated materials. If any fossil remains are discovered, the paleontologist shall make a recommendation if monitoring shall be required for the continuance of earth moving activities.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

8. GREENHOUSE GAS EMISSIONS.

Would the project:

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 type="checkbox"/>	<input checked="" type="checkbox"/>

The discussion below is based on the Air Quality, Greenhouse Gas, and Energy Impact Analysis, prepared by EPD Solutions, Inc., which is included as Appendix A. The Air Quality, Greenhouse Gas, and Energy Analysis analyzed a more conservative project, which included additional demolition of pavement. Therefore, actual emissions would be slightly less than what is analyzed below.

Explanation

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHGs), play a critical role in the Earth's radiation amount by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses.

Section 15364.5 of the California Code of Regulations defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. Transportation is responsible for 37 percent of the state's greenhouse gas emissions, followed by electricity generation. Emissions of CO₂ and N₂O are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean.

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

Less than Significant Impact. Global climate change (GCC) describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as

a whole. GCC is not confined to a particular Project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

The principal GHGs of concern contributing to the greenhouse effect are CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal. The large majority of GHG emissions generated from residential projects are related to vehicle trips.

The City has not established local CEQA significance thresholds for GHG emissions; however, the SCAQMD has proposed interim numeric GHG significance thresholds that are based on capture of approximately 90 percent of emissions from development, which is 3,000 metric tons carbon dioxide equivalent (MTCO₂e) per year (SCAQMD 2008). This approach is widely used by cities in the South Coast Air Basin, including the City of Bradbury. As such, this threshold is utilized herein to determine if GHG emissions from this Project would be significant.

Construction

During construction, temporary sources of GHG emissions include construction equipment and workers' commutes to and from the site. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Construction GHG emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table 9. As shown, the Project has the potential to generate a total of approximately 1 MTCO₂e per year from construction emissions amortized over 30 years per SCAQMD methodology.

Table 9: Project Construction Emissions

Activity	Annual GHG Emissions (MTCO ₂ e)
Construction Amortized over 30 Years	1
Operation	0
Total Emissions	1
Significance Threshold	3,000
Threshold Exceeded?	No

Source: EPD, 2021 (Appendix A)

Project operation would not include the generation of GHG from stationary sources. Bradbury Road currently includes one lane in each direction. The Project would widen the existing; however, additional lanes would not be added and the Project would not be capacity-increasing. Therefore, the Project would result in a less than significant impact on the generation of GHG.

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

No Impact. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As described in the previous

response, the Project would not exceed thresholds related to GHG emissions. In addition, the Project would not include the operational generation of GHG on site. Therefore, implementation of the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to greenhouse gas emissions that are applicable to the Project.

Mitigation Measures

No mitigation measures related to greenhouse gas emissions are required.

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

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

Less than Significant Impact. A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to environment if released into the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies have a reasonable basis for believing would be injuries to the health and safety of persons or harmful to the environment if released into the home, workplace,

or environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

The proposed construction activities would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, and grease. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements that are implemented by the City during building permitting for construction activities. These regulations include: the federal Occupational Safety and Health Act and Hazardous Materials Transportation Act; Title 8 of the California Code of Regulations (CalOSHA), and the state Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. As a result, routine transport and use of hazardous materials during construction would be less than significant.

Project operation would not include land uses or activities that require routine transport, use, or disposal of hazardous materials. Therefore, operation of the Project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.

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

Less than Significant Impact.

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during construction activities would not pose health risks or result in significant impacts; improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. To avoid an impact related to an accidental release, the use of best management practices (BMPs) during construction would be implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit (and included as PPP WQ-1). Implementation of an SWPPP would minimize potential adverse effects to workers, the public, and the environment. Construction contract specifications would include strict on-site handling rules and BMPs that include, but are not limited to:

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

Through implementation of the City's Municipal Code Section 9.109.050 (and included as PPP WQ-1), risk of significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during Project construction would result in a less than significant impact.

Project operation would not include land uses or activities that require the generation or transport of hazardous materials. Therefore, operation of the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.

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

Less than Significant Impact. The Bradoaks Elementary School is located approximately 0.25 mile southwest of the Project site. However, as described previously, construction of the Project would involve the use, storage, and disposal of small amounts of hazardous materials on the Project site. These hazardous materials would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential for accidental release into the environment near a school. The emissions that would be generated from construction and operation of the Project were evaluated in the air quality analysis discussed above, and the emissions generated from the Project would not cause or contribute to an exceedance of the federal or state air quality standards. Project operation would not include the generation or transport of hazardous materials. Therefore, the Project would not emit hazardous or handle acutely hazardous materials, substances, or waste near a school, and impacts would be less than significant.

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?

No Impact. According to the California Department of Toxic Substances Control EnviroStor database, the Project site is not located on or nearby any hazardous material sites listed, pursuant to Government Code Section 65962.5. As a result, impacts related to hazards from being located on or adjacent to a hazardous materials site would not occur from implementation of the proposed Project.

e) For a project 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?

No Impact. The City of Bradbury is not located within any airport land use plan or within two miles of public use airport. The nearest airport, San Gabriel Valley Air Port is approximately 5.3 miles to the southwest of the Project site. Therefore, the Project would not result in a safety hazard for people residing or working in the Project areas, and no impacts would occur.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Bradbury Road is a two-lane roadway (one lane in each direction) within the Project site. Bradbury Road is identified as a primary evacuation route within the City General Plan and provides access to East Lemon Avenue in the event of an evacuation. Temporary roadway closure of Bradbury Road may be required during some construction activities, including asphalt removal and replacement. Construction is anticipated to last approximately two months. Full roadway closure would be minimized to the least amount of time feasible. Detour would be available via Mountain Avenue approximately 850 feet west of the Project site. Following Project completion, operation of Bradbury Road would be fully restored. The City would coordinate any required roadway closures with emergency service providers in both the City of Bradbury and Monrovia (PPP HAZ-1). Therefore, impacts related to interference with an adopted emergency response or evacuation plan during construction activities would be less than significant.

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

No Impact. According to the California Fire Hazard Severity Zones Mapping, the Project site is not within a Very High Fire Hazard zone. The Project site includes of coast live oak woodlands; however, the Project would result in the removal of trees and shrubs, which would reduce overall fire risk within the Project site. The Project site is located within an urbanized and widening of Bradbury Road would not result in increased exposure of people or structures to loss, injury, or death involving wildland fires. Therefore, the Project would result in no impact related to exposure of people structures to risk of wildland fires.

Existing Plans, Programs, or Policies

PPP HAZ-1: The City of Bradbury will coordinate with emergency service providers within the City of Bradbury and the City of Monrovia regarding planned roadway closures and possible detour routes. The duration of full roadways closures would be minimized to the maximum extent feasible.

Mitigation Measures

No mitigation measures related to hazards and hazardous materials are required.

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

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

**Less Than Significant Impact.
Construction**

The Project would include demolition of existing pavement, grading of the Project site, roadway pavement, and roadway restriping. Grading activities would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute waters.

These types of water quality impacts during construction of the Project would be prevented through implementation of a stormwater pollution prevention plan (SWPPP). Construction of the Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a SWPPP that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. The SWPPP would also include construction BMPs.

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's plan check and permitting process are included as PPP WQ-1, which would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

Transportation land uses result in pollutants such as oil and grease from vehicles. These pollutants could potentially discharge into surface waters and result in degradation of water quality. The Project would include widening of Bradbury Road from 24 feet to 36 feet. The roadway currently includes one lane in each direction. The proposed Project would maintain one lane in each direction and would not result in the addition of roadway capacity, which could increase mobile source pollutant loads. Additionally, sediment is considered a pollutant that could degrade surface water. The northern portion of the Project site includes steep slopes with exposed soils that are subject to potential erosion. The Project would include construction of a retaining wall to support slopes and stabilize soils from potential erosion, minimizing the discharge of sediment into receiving waterbodies. Therefore, the Project would result in a less than significant impact on surface or ground water quality.

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

Less Than Significant Impact. The Project would include grading of the Project site, roadway pavement, and roadway restriping in order to widen the existing Bradbury Road from 24 feet to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. Proposed improvements would increase impervious surface area by minimal amount to accommodate roadway widening. Area adjacent to the roadway would remain pervious and allow infiltration of stormwater, facilitating the recharge

of groundwater. Operation of the Project would not require the pumping or construction of groundwater. Therefore, the Project would result in a less than significant impact on groundwater recharge.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

Less Than Significant Impact.

The Project site does not contain, nor is adjacent to, a stream, river, creek, or other flowing water body. Thus, impacts related to alteration of the course of a stream or river would not occur.

Construction

Construction of the Project would require grading of soils, which would loosen sediment and could result in erosion or siltation. However, as described previously, construction of the proposed Project requires City approval of a SWPPP prepared by a Qualified SWPPP Developer, as included by PPP WQ-1. The SWPPP is required during the City's plan check and permitting process and would include construction BMPs to reduce erosion or siltation. Typical BMPs for erosion or siltation, include use of silt fencing, fiber rolls, gravel bags, stabilized construction driveway, and stockpile management (as described in the previous above). Adherence to the existing requirements and implementation of the required BMPs per the plan check and permitting process would ensure that erosion and siltation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The Project proposes widening of the existing Bradbury Road from 24 to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. Proposed improvements would increase impervious surface area by minimal amount. Area adjacent to the roadway would remain pervious and allow infiltration of stormwater. The northern portion of the Project site includes steep slopes with exposed soils that are subject to potential erosion. The Project would include construction of a retaining wall to support slopes and stabilize soils from potential erosion, minimizing the discharge of sediment into receiving waterbodies. The Project site currently drains into roadway storm drains located at lower elevations south of the Project site along Bradbury Road via sheet flow and conveyance of curbs and gutters. The Project would maintain existing drainage patterns. Therefore, the proposed Project would not alter the existing drainage pattern in the Project area and would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact. As described in the previous response, the Project site does not contain, nor is adjacent to, a stream, river, creek, or other flowing water body. Thus, impacts related to alteration of the course of a stream or river would not occur. In

addition, the proposed Project would be required to implement a SWPPP (included as PPP WQ-1) during construction that would implement BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and flooding on or off-site would not occur.

Increases to impervious surface area would result in the addition of stormwater runoff rates and volume. Proposed improvements would increase impervious surface area by minimal amount. Area adjacent to the roadway would remain pervious and allow infiltration of stormwater. Street and road projects including construction of 10,000 square feet or more of impervious surface are required to implement green street infrastructure in accordance with United States Environmental Protection Agency (USEPA) guidance. The Project would not result in more than 10,000 square feet of impervious surface area. Therefore, the Project would result in less than significant impacts on the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

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

Less Than Significant Impact. As described in the previous responses, the proposed Project would be required to implement a SWPPP (included as PPP WQ-1) during construction that would implement BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and that pollutants would not discharge from the Project site, which would reduce potential impacts to drainage systems and water quality to a less than significant level.

Proposed improvements would increase impervious surface area by minimal amount. Additionally, the Project would not increase roadway capacity that could increase mobile source pollutants on site. Thus, operation of the proposed Project would not substantially increase stormwater runoff, and pollutants would be filtered onsite. Impacts related to drainage systems and polluted runoff would be less than significant with implementation of the existing requirements, which would be verified during the plan check and permitting process.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Project site is located in Zone D per the Federal Emergency Management Administration (FEMA) Flood Insurance Rate Map (FIRM) panel 06037C1415F (FEMA 2021). The site is identified as Zone D because it is located in an area in which flood hazards are undetermined, but possible. The Project would include the widening of a roadway and would not include construction of structures or facilities that would impede existing flood flows. The Project site currently drains into roadway storm drains located at lower elevations south of the Project site along Bradbury Road via sheet flow and conveyance of curbs and gutters. The Project would maintain existing drainage patterns. Therefore, the proposed Project would not impede or redirect flood flows, and impacts would be less than significant.

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

No Impact. A seiche is a surface wave created when an inland body of water is shaken, usually by earthquake activity. The site also is not subject to flooding hazards associated with a seiche because there are no large body of surface water located near the Project site to result in effects related to a seiche, which could result in release in pollutants due to inundation of the site.

The Pacific Ocean is located over 30 miles west of the Project site; consequently, there is no potential for the Project site to be inundated by a tsunami that could release pollutants. Additionally, the Project site is not within vicinity of an inland water body. The nearest water body is 1.7 miles south and downstream of the Project site. Therefore, the Project would have low susceptibility to seiche risk.

Mudflows are often triggered by periods of heavy rainfall. Earthquakes, subterranean water flow and excavation can also trigger mudflows. The Project site includes steep slopes north of Bradbury Road. Adjacent slopes, which would be supported by a proposed retaining wall would be implemented to support the proposed grade of the modified slope to minimize slope failure risk due to inundation, erosion, or other disruptive events. Proposed retaining wall and revegetation would reduce risk of mudflow on the Project site. Therefore, the Project would result in a less than significant impact related to risk of mudflow. Thus, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow that could release pollutants due to inundation of the Project site. No impact would occur.

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

No Impact. As described previously, the Project would be required to have an approved SWPPP, which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the proposed Project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff. With implementation of the operational source and treatment control BMPs that would be required by the City during the project permitting and approval process (pursuant to PPP WQ-1 and PPP WQ-2), potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not obstruct implementation of a water quality control plan.

As described previously, Project operation would not require the consumption or pumping of groundwater resources. Therefore, the proposed Project would not result in the obstruction or conflict with a groundwater management plan, and no impacts would occur.

Existing Plans, Programs, or Policies

PPP WQ-1: Stormwater Pollution Prevention Plan. Prior to grading permit issuance, the Project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a Qualified SWPPP Developer (QSD) in accordance with the City's Municipal Code Chapter 52 and the Los Angeles Regional Water Quality Control Board National Pollution Discharge Elimination System (NPDES) Storm Water Permit Order No. R4-2012-0175 (MS4 Permit). The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other NPDES regulations to limit the potential of erosion and polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by the City of Bradbury staff to confirm compliance.

Mitigation Measures

No mitigation measures related to hydrology and water quality are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
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) Physically divide an established community?

No Impact. The physical division of an established community could occur if a major road were built through an established community or neighborhood, or if a major development was built which was inconsistent with the land uses in the community such that it divided the community. The environmental effects caused by such could include lack of a, or disruption of, access to services, schools, or shopping areas. It could also include the creation of blighted buildings or areas due to the division of the community.

While the building of a major roadway could divide a community, the Project intends to widen an existing roadway. The roadway serves the communities of Bradbury and Monrovia, and does not divide either community. The Project would not alter the nature of the Project site. Therefore, the widening of the existing roadway would not physically divide an established community, and no impact would result.

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?

No Impact. As described previously, the Project would widen an existing roadway within a developed and urbanized area. The Project would not change the nature of the current land use, nor does it propose any changes to the current land use and zoning designations. As previously mentioned, the Project would widen the existing Bradbury Road. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The Project would extend into a portion of a property to the north (APN 8527-026-025), that has been acquired by the City. Proposed widening would not result in the removal of any structures and remaining portion of the residential parcel would continue to function as a single family residential property.

General Plan

The City of Bradbury's General Plan land use designation of the site is A-5 (Agriculture Residential Estate), which does not have the purpose of avoiding or mitigating an environmental effect. The Agriculture Residential Estate land use designation has the allowable permitted land use of single-

family homes and related infrastructure as well as for agricultural uses on parcels of at least five acres.

The City of Monrovia's General Plan land use designation for the site is Low Residential. This land use classification is intended for application to areas that are or are to be developed primarily with single family dwellings. This designation allows for the construction of a maximum of 5.8 dwelling units per acre of land. Other uses such as parks, schools, and churches oriented toward serving the needs of low density detached single family neighborhoods are also allowed. As the Project would not alter the density of any lots, the Project would be consistent with the standards provided by the City of Monrovia.

In addition, the city General Plan Land Use Element denotes that the Bradbury Estates are under the jurisdiction of a Community Services District (CSD), which was formed in order to maintain infrastructure within the community. The General Plan provides requirements for maintenance of the community under the CSD, which includes provisions for the construction, opening, widening, extending, straightening, surfacing, and maintaining in whole or part of any street in the district. Thus, road widening is both accounted for and expected within the Bradbury estates as per the General Plan.

In addition to the General Plan designation, the following goals and objectives from the City's General Plan are applicable to the Project.

Table 10. Consistency with City Plans and Policies

Goal or Objective	Project Consistency
Circulation-Transportation Goal 1: The Circulation-Transportation Element seeks to maintain safe and efficient circulation systems that do not impact the rural residential character of the City.	Consistent. The Project would include widening of Bradbury Road to enhance safety and the efficient movement of vehicles.
Circulation-Transportation Objective 2: Strive for the creation of new transportation facilities for motorists, equestrians, pedestrians, and bicyclists. Emphasize design standards that result in the construction of circulation and transportation systems that are safe and efficient, and sensitive to the needs of the disabled and City's unique rural residential.	Consistent. The Project would include widening of Bradbury Road to enhance safety and the efficient movement of vehicles. The proposed roadway would be constructed in consistency with standards identified within Chapter 145, Design Standards, of the City's Municipal Code.
Circulation-Transportation Policy 1: All public roadways and roadway improvements will be constructed to the City of Bradbury local street standards so as to preserve the rural residential character of the City.	Consistent. The proposed roadway would be constructed in consistency with standards identified within Chapter 145, Design Standards, of the City's Municipal Code.
Open-Space Policy No. 1: Protect and preserve oak woodlands and mandate replacement planting of native oaks where oak woodlands are proposed for alteration.	Consistent. The Project would preserve and protect oak trees in-place wherever feasible. Permits would be submitted to the City for all oak trees proposed for removal in consistency with Chapter 118 of the City's Municipal Code. Trees that meet the requirements for prominent and/or significant trees would be replaced with trees of equal size, significance, and prominence.
Open-Space Policy No. 2: Protect water quality.	Consistent. As discussed in Section 10 of this report, the Project would not result in significant water quality impacts. Project construction would implement a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) in accordance with the City's Municipal Code Section 9.109.050 to avoid and minimize potential water quality impacts to receiving water bodies.

Open-Space Policy No. 3: Mandatory replacement planting of native trees and oaks.	Consistent. The Project would preserve and protect oak trees in-place wherever feasible. Permits would be submitted to the City for all oak trees proposed for removal in consistency with Chapter 118 of the City's Municipal Code. Trees that meet the requirements for prominent and/or significant trees would be replaced with trees of equal size, significance, and prominence.
Open-Space Policy No. 5: Prevention of soil erosion.	Consistent. As discussed in Section 7 of this report, the Project would not result in significant erosion impacts. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the City and RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer), which would be implemented by PPP WQ-1. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil.
Open-Space Policy No. 6: Preservation of historically or culturally significant sites.	Consistent. As discussed in Section 5 of this report, the Project would not result in significant impacts to historically or culturally significant sites. The Project would require grading activities that could disturb potentially native, previously undisturbed soils that may contain undiscovered cultural resources. However, in the event that potential archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the City or County List of Qualified Archaeologists has evaluated the find to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code.
Open-Space Policy No. 7: Protect wildlife and their habitats, including rare and endangered species.	Consistent. As discussed in Section 4, the Project would result in less than significant impacts to biological resources. A biological survey did not identify rare and endangered species or suitable habitats within the Project site. The Project would include tree removal, which could impact nesting birds. However, with implementation of identified measures, impacts to nesting birds would be less than significant.
Open-Space Policy No. 8: Protections of rare and endangered plants.	Consistent. A total of 8 plant species listed as state and/or federal Threatened, Endangered, or Candidate species, or 1B.1 listed plants on the CNPS Rare Plant Inventory have been found to have a potential to exist on the Project site. However, during biological surveys conducted for the Project, none of the species were discovered. The Project would not result in impacts to rare and endangered plants.
Open-Space Policy No. 9: Protect areas of outstanding scenic beauty.	Consistent. Existing public viewpoints exist along Bradbury Road, where views of the San Gabriel Mountains can be seen to the north. As discussed in Section 1, the Project would result in less than significant impacts on views from the roadway.
Open-Space Action No. 1: Protect water quality.	Consistent. As discussed in Section 10 of this report, the Project would not result in significant water quality impacts. Project construction would implement a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) in accordance with the City's Municipal Code Section 9.109.050 to

	avoid and minimize potential water quality impacts to receiving water bodies.
Open Space Action No. 2: Avoid drainage run-off where possible.	Consistent. As discussed in Section 10 of this report, BMPs would be implemented during Project construction, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase, and that pollutants would not discharge from the Project site, which would reduce potential impacts to drainage systems and water quality to a less than significant level. The Project would result in a minimal increase in impervious surface area. Therefore, runoff impacts as a result of additional impervious surface area would be less than significant.
Open Space Action No. 4: Prevent soil erosion.	Consistent. As discussed in Section 7 of this report, the Project would not result in significant erosion impacts. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the City and RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer), which would be implemented by PPP WQ-1. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil.
Noise Policy 11: Prohibit significant noise-generation activities on land located near sensitive noise receptors.	Consistent. The Project would result in less than significant noise impacts as discussed in Section 13. Project construction would be consistent with noise ordinances applicable to the Project related to construction activity. Project operation would not include the implementation of additional noise-generating sources.
Noise Policy 12: Evaluate the noise impacts generated by existing and future projects located in surrounding communities that impact or may impact the Bradbury ambient noise level.	Consistent. The Project would result in less than significant noise impacts as discussed in Section 13. Project construction would be consistent with noise ordinances applicable to the Project related to construction activity. Project operation would not include the implementation of additional noise-generating sources.
Noise Policy 14 – Ensure that construction noise does not cause an adverse impact the residents of the City.	Consistent. The Project would result in less than significant noise impacts as discussed in Section 13. Project construction would be consistent with noise ordinances applicable to the Project related to construction activity.

Therefore, the Project would be consistent with the proposed General Plan goals, policies, and objectives, including land use designations, and the Project would not conflict with any land use plan.

Zoning

The Project site is currently zoned as A-5 (Agriculture Residential Estate Zoning District) within the City of Bradbury, and designated Residential Low within the City of Monrovia.

The City of Bradbury's Municipal Code Section 9.73 describes that the A-5 zone provides for the development of single-family residential areas and to maintain the integrity of existing single-family residential areas within the City. The Code outlines the permitted uses allowable under the A-5 designation. The allowable uses include single-family dwellings, open spaces, nursery stock,

orchards, vineyards, the raising of field crops, tree, berry and bush crops, or gardening, small residential care facilities, and supportive and transitional housing.

The City of Monrovia's Municipal Code Section 17.12 describes that the Residential Low zone. This zone allows for large single-family residential lots with a minimum of 7,500 square feet. As previously mentioned, the Project does not propose the development of any structures, and thus does not conflict with any related development standards. The Project would not alter any existing The Code provides the minimum setbacks for front yard and side yard lot lines from neighboring streets, which are 25 feet and 10 feet, respectively. The Project would not encroach on the existing setbacks, and would not conflict with any development standards provided.

Thus, the proposed project would not conflict with any applicable zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect, and the project would result in no impact.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to land use and planning that are applicable to the project.

Mitigation Measures

No mitigation measures related to land use and planning are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

12. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARMA) provides for the protection of the State's mineral resources. SMARMA mandates the classification of lands with valuable mineral resources for this purpose. The State Mining and Geology Board (SMGB) created four mineral resource zones (MRZ 1-4) designations to establish for these classifications. There are no MRZ zones in the City of Bradbury. Therefore, development of the site would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on the general plan, specific plan or other land use plan?

No Impact. As described above, the Project site is not located within a region of known mineral significance. The site has General Plan designations of A-5 (Agriculture Residential Estate) and Residential Low. The site is within an urbanized area developed with a residential housing, and does not support mineral extraction activities onsite. Therefore, implementation of the Project would not result in the loss of locally important mineral resources, and impacts would not occur.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to mineral resources that are applicable to the Project.

Mitigation Measures

No mitigation measures related to mineral resources are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
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) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. Noise is defined as any unwanted sound. Environmental factors that impact noise levels include wind direction and speed, temperature and humidity, topography, and landscaping. The City of Bradbury includes allowable noise levels in Sec. 9.127.040, Allowable noise levels, of the City Municipal Code. Section 9.127.080 provides activities exempt from the specific noise standards, which includes "Construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 7:00 p.m. on weekends, excluding holidays." Additionally, the City of Monrovia Municipal Code Section 9.44.040, Allowable Noise Levels, identifies ambient noise level standards for various land uses. Section 9.44.080 provides activities exempt from the specific noise standards, which includes "Construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays."

The Project proposes widening of the existing Bradbury Road from 24 to 36 feet. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. The nearest sensitive uses are residences, approximately 25 feet to the west of the Project site, within the City of Monrovia. Project construction activities are anticipated to include demolition, site preparation, grading, paving, and architectural coating. Construction of the proposed project would occur over a two-month period. Noise impacts from construction activities associated with the proposed Project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. During Project construction, noise increases would be exempt from ambient noise level standards as provided by the City of Bradbury and City of Monrovia Municipal Codes. Since the nearest residences to the Project site are to the west within the City of

Monrovia, therefore, dependent on the day, the more prudent noise standard would be applied. In general, both cities allow for construction from 7:00 a.m. to 7:00 p.m. on weekdays, the City of Monrovia Municipal Code Section 9.44.040 allows construction-generated noise level increases from the hours 9:00 a.m. to 6:00 p.m. on weekends, and the City of Bradbury Municipal Code Sec. 9.127.040 prohibits construction noise on holidays. Therefore, the Project would result in a less than significant impact on temporary increases in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinances, or applicable standards of other agencies.

The Project site consists of a two-lane roadway (Bradbury Road) in a residential area. Existing noise sources are limited to typical residential activities and traffic along Bradbury Road. The Project would not be capacity-increasing, and therefore, would not result in the addition of traffic-related noise generation sources. As the Project would not be changing the nature of the existing site, the environmental factors typically responsible for creating noise would not be altered. The Project would extend into a portion of a property to the north (APN 8527-026-025), that has been acquired by the City, to accommodate proposed roadway widening. Proposed Bradbury Road would be shifted 12 feet closer to the existing residence located on APN 8527-026-025. However, the existing residence is accommodated by a large lot and would maintain an approximately 400-foot buffer from the roadway. Therefore, Project operation would result in a less than significant impact on permanent increases in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

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

Less than Significant Impact. The City does not have quantified vibration standards applicable to the proposed Project. Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels.

The nearest residences are approximately 25 feet to the west of the Project site within the City of Monrovia. Project construction activities are anticipated to include demolition, site preparation, grading, paving, and architectural coating. Construction of the proposed Project would occur over a two-month period. Construction would not require the use of equipment known to generate high levels of ground borne vibration, such as pile drivers or large bulldozers. As discussed above, the more prudent noise standard, City of Monrovia Municipal Code Section 9.44.040, would be applied, which would limit construction-generated ground borne vibration between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays. Therefore, impacts related to construction vibration would be less than significant.

Existing ground borne vibration within the Project site includes traffic sources, such as large trucks and tractors. As discussed previously, the Project would not be capacity-increasing, and therefore, would not result in the addition of traffic-related ground borne vibration. Therefore, impacts related to operational vibration would be less than significant.

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

noise levels?

No Impact. There are no airports within two miles of the Project site. The nearest airport, San Gabriel Valley Air Port is approximately 5.3 miles to the southwest of the Project site. Similarly, the Project site is not located within the vicinity of a private airstrip and would not expose people residing or working in the Project area to excessive noise levels related to an airstrip. No impacts related to airport or airstrip noise would occur from implementation of the Project.

Existing Plans, Programs, or Policies

PPP NOI-1: Construction Hours. Per City of Monrovia Municipal Code Section 9.44.080, construction or demolition work will be conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 6:00 p.m. on weekends and holidays. Per the City of Bradbury Municipal Code Section 9.44.040, construction or demolition work will be conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and the hours of 9:00 a.m. and 7:00 p.m. on weekends, excluding holidays. Dependent on the day, the more prudent noise restriction shall be applied.

Mitigation Measures

No mitigation measures related to noise are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

14. POPULATION AND HOUSING.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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) Induce substantial unplanned population growth in an area, either directly or indirectly?

No Impact. The Project site is located within an urbanized and developed community within the City of Bradbury. As previously discussed, the Project would widen the existing Bradbury Road. The Project would not develop any buildings or housing that would result in an increase in population. Thus, there would be no impacts related to unplanned population growth.

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

No Impact. As previously discussed, the Project would widen an existing roadway, and would not encroach on existing residences. Thus, the Project would not result in displacement of people or housing. No impacts would occur.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to population and housing are applicable to the Project.

Mitigation Measures

No mitigation measures related to population and housing are required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

15. PUBLIC SERVICES.

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

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

Fire Protection – No Impact. The Monrovia Fire Department and the Los Angeles County Fire Departments currently provide services to the Project site and surrounding area. The Fire Departments provide services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response. The closest Monrovia Fire Department is Station 101, approximately 1 mile east of the Project site at 141 E Lemon Ave, Monrovia, CA 91016. The closest Los Angeles County Fire Department is Station 44, which is approximately 1.5 miles south of the Project site at 1105 Highland Ave, Duarte, CA 91010.

The proposed Project would not develop any housing or buildings that would increase demand for fire protection. The Project would consist of the widening of a roadway, which would provide adequate fire access. As part of the permitting process, the Project plans would be reviewed by

the City's Building and Safety Division to ensure that the fire protection requirements are met and adequate emergency access is provided. Thus, no impacts would occur.

Police Protection - No Impact. The City of Monrovia Police Department provides policing services to the area that encompasses the Project site. The department is located at 140 E Lime Ave, Monrovia, CA 91016, approximately 1.3 miles east of the Project site. As discussed previously, the Project would not develop any buildings or housing that would increase demand for police protection. Thus, no impacts would occur.

Schools – No Impact. The Project site is located in the City of Bradbury and the City of Monrovia. The City of Bradbury is served by the Duarte Unified School District. The City of Monrovia is served by the Monrovia Unified School District. The Project area is served by both districts.

As discussed, the Project would not develop any buildings or housing that would increase demand for schools. The Project would widen Bradbury Road and would not introduce new students to the area. Thus, no impacts would occur.

Parks – No Impact.

The City of Bradbury is located in the foothills of the San Gabriel Mountains. The 1,216 acre community is developed with open space and sensitive hillside preservation in mind, and limits residential housing to large, low density parcels. In addition, the Project area is served by several parks that provide adequate recreation areas to the existing population. Recreation Park is located at 620 S Shamrock Ave, Monrovia, CA 91016, approximately 0.5 miles away from the Project site. Additionally, Lucinda Garcia Park is 2 miles from the Project site at 502 W Olive Ave, Monrovia, CA 91016.

As discussed previously, the Project would consist of widening an existing roadway and would not develop any buildings or housing that would increase the need for parks. Thus, there would be no additional demand for parks and no impacts would occur.

Other Public Facilities – No Impact. The proposed Project would widen Bradbury Road which is an existing roadway. The Project would not increase the number of residents within the City. Thus, the Project would not result in increased need for any additional services, such as public libraries, post offices, etc. No impacts would occur.

Existing Plans, Programs, or Policies

No Existing Plans, Programs, or Policies are required.

Mitigation Measures

No mitigation measures related to public services are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

16. RECREATION.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

No Impact. The City of Bradbury is located in the foothills of the San Gabriel Mountains. The 1,216-acre community is developed with open space and sensitive hillside preservation in mind, and limits residential housing to large, low-density parcels. In addition, the Project area is served by several parks that provide adequate recreation areas to the existing population. Recreation Park is located at 620 S Shamrock Ave, Monrovia, CA 91016, approximately 0.5 miles away from the Project site. Additionally, Lucinda Garcia Park is 2 miles from the Project site at 502 W Olive Ave, Monrovia, CA 91016.

As discussed previously, the Project would widen the existing Bradbury Road (Wildrose Avenue), would not cause an increase in population, nor increase demand for neighborhood and regional parks. The Project does not consist of the development of any buildings that would increase the demand for parks. Thus, impacts would not occur.

b) Include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. As described above, the Project would widen the existing Bradbury Road (Wildrose Avenue) and would not include development such as buildings or housing that would require the construction or expansion of recreational facilities. Thus, no impacts would occur.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to recreation are applicable to the project.

Mitigation Measures

No mitigation measures related to recreation are required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
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 type="checkbox"/>	<input checked="" 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) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site, delivery of construction supplies and import materials to, and export of debris from, the Project site. However, these activities would only occur for an estimated time period of two months. The increase of trips during construction activities would be limited and would generate less than significant traffic related impacts.

The Project would include widening the existing Bradbury Road from 24 feet to 36. Additionally, the Project would include removal of berms, shrubs, and trees, landscaping improvements, and relocation of two power poles. A retaining wall would be constructed along the slopes to the south of Bradbury Road to accommodate grading required for proposed roadway widening. As discussed in Table 10, Consistency with City Plans and Policies, the Project would be consistent with existing transportation-related goals and policies adopted by the City. Therefore, the project would result in less than significant impacts on the circulation system, including transit, bicycle, and pedestrian facilities.

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

No Impact. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating Transportation impacts. SB 743 specified that the new criteria should promote the reduction of GHG emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 was added to the CEQA

Guidelines that became effective on July 1, 2020 and requires that Vehicle Miles Traveled (VMT) be evaluated for impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for its evaluation.

As previously discussed, the Project site consists of a two-lane roadway (Bradbury Road) in a residential area. The Project includes widening of the existing roadway from 24 feet to 36 feet. The Project would not be capacity-increasing, and therefore, would not result in the addition of VMT. Therefore, the project would result in no impact on VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project would include widening of Bradbury Road to enhance safety and the efficient movement of vehicles. The proposed roadway would be constructed in consistency with standards identified within Chapter 145, Design Standards, of the City's Municipal Code. Proposed improvements would not include a non-standard geometric design or incompatible use. Therefore, the Project would result in no impact related to geometric design feature.

d) Result in inadequate emergency access?

Less Than Significant Impact. Bradbury Road is a two-lane roadway (one lane in each direction) within the Project site. Bradbury Road is identified as a primary evacuation route within the City General Plan and provides access to East Lemon Avenue in the event of an evacuation. Temporary roadway closure of Bradbury Road may be required during some construction activities, including asphalt removal and replacement. Construction is anticipated to last approximately two months. Full roadway closure would be minimized to the least amount of time feasible. Detour would be available via Mountain Avenue approximately 850 feet west of the Project site. Following Project completion, operation of Bradbury Road would be fully restored. The City would coordinate any required roadway closures with emergency service providers in both the City of Bradbury and Monrovia (PPP HAZ-1). Therefore, impacts related to inadequate emergency access would be less than significant.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to transportation that are applicable to the project.

Mitigation Measure

No mitigation measures related to transportation are required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

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:

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)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------	--------------------------

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)?

No Impact. The Project does not include existing structures and would not require the demolition or removal of any listed, or eligible for listing, resources in the California Register of Historical Resources. Therefore, the Project would result in no impact to a historical resource.

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?

Less than Significant Impact With Mitigation.

Assembly Bill 52

Chapter 532, Statutes of 2014 (Assembly Bill [AB] 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or

included in a local register of historical resources.” AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a “tribal cultural resource.” Also, per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

A search of the Sacred Lands File (SLF) was requested for the project to the Native American Heritage Commission (NAHC). The NAHC responded stating that the SLF was positive. The NAHC recommended that the City contact the Gabrieleno Band of Mission Indians – Kizh Nation.

The City sent letters to the following tribes on February 9, 2022 to invite them to request consultation pursuant to AB 52:

- 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 (two letters to two contacts)
- Gabrielino-Tongva Tribe
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians (two letters to two contacts)

One response was received from the Gabrieleno Band of Mission Indians - Kizh Nation on February 16, 2022 via email correspondence indicating the Project is within ancestral tribal territory. No other correspondence was received from the other notified tribes requesting tribal consultation. The City received tribal measures from Gabrieleno Band of Mission Indians - Kizh Nation on May 3, 2022, which were accepted and included as mitigation to the project (Mitigation Measures TCR-1 through TCR-3). Tribal consultation was closed on July 14, 2022.

Specific tribal cultural resources were not identified within the Project site. However, the Project site is considered sensitive to tribal cultural resources due to historic occupation as ancestral tribal territory and could yield tribal cultural resources during Project construction. With implementation of Mitigation Measures TCR-1 through TCR-3, a tribal monitor would be present during Project construction and specific processes would be followed in the event of an unanticipated discovery. Therefore, the Project would result in less than significant impacts with implementation of mitigation.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. Listed previously in Section 5, Cultural Resources.

Mitigation Measures

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

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleno Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-

disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

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

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

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

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

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

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

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

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

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

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

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

TCR-3: Procedures for Burials and Funerary Remains:

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

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

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

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

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

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site

but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------------	--	------------------------------------	--------------

19. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input 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) Require or result in the relocation or construction of new or expanded water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. The proposed Project is within an urbanized, developed area of Bradbury. The proposed Project would widen Bradbury Road and would not require or result in the construction of new or expanded water or wastewater treatment facilities. The Project does not include the development of any buildings that would require water or wastewater infrastructure nor relocate any existing lines. Thus, there would be no impacts as a result of the Project.

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

Less than Significant Impact. As mentioned previously, the proposed Project would widen Bradbury Road and would not include the development of any buildings that would require an operational water supply. However, the proposed Project would use a minimal amount of water during grading for soil compaction and dust control. Water usage would be temporary in nature and would not have a significant impact on water supplies. Thus, impacts would be less than significant.

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

Less than Significant Impact. The proposed Project would not generate wastewater flows as it does not include any buildings that would be occupied or produce wastewater. As mentioned previously, the Project includes widening Bradbury Road which would not produce wastewater or require wastewater services. Thus, no impacts would occur as a result of the Project.

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

Less than Significant Impact. The City of Bradbury is served by Burrtec Waste Industries, Inc., which hauls solid waste to the Puente Hills Material Recovery Facility (MRF). The solid waste is then delivered to the Orange County Landfill system. The City of Bradbury has diverted at least 50% of its solid waste in compliance with state law. The proposed Project would not include demolition of any existing buildings or produce waste from packaging of construction materials. The Project would widen Bradbury Road and would not generate solid waste during construction or operation. Thus, no impacts would occur as a result of the Project.

- e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No Impact. The proposed Project would result in a road widening that would not generate solid waste. The Project does not include any buildings or development that would generate solid waste. Thus, impacts would not occur as a result of the Project.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

No mitigation measures related to utilities and service systems are required.

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

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

No Impact. According to the California Fire Hazard Severity Zones Mapping, the Project site is not within a Very High Fire Hazard zone. The Project includes road widening and does not include housing or buildings that would exacerbate fire conditions. In addition, utilities such as overhead powerlines would be accessible by fire department vehicles. The Project plans would be reviewed by the LA County Fire Department to ensure the road widening allows for fire access pursuant to the requirements of the California Fire Code included as Section 4.03.010 of the City's Municipal Code. As a result, the proposed Project would not impair an adopted emergency response plan or emergency evacuation plan and impacts not occur as a result of the Project.

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

No Impact. As described in the previous response, the Project site is not located within a Very High Fire Hazard Severity Zone. Onsite elevations range from 617 to 643 feet above mean sea level. As mentioned above, the Project site does not include housing or buildings that would exacerbate fire conditions. Therefore, no impacts would occur as a result of the Project.

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

No Impact. As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone. The Project site is located within an urbanized area within the City of Bradbury. The Project involves road widening and relocating two power poles to accommodate the road widening. However, the Project would not include installation or maintenance of associated infrastructure that may exacerbate fire risk. Therefore, no impacts would occur as a result of the Project.

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

No Impact. As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone. As mentioned previously, onsite elevations range from 617 to 643 feet above mean sea level. The area adjacent to the northeast of Bradbury Road has a gentle slope. However, the other areas adjacent to the Project site are relatively flat urban sites that do not contain hillsides or other factors that would expose people or structures to flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. In addition, the Project would not generate slopes and would connect to existing drainage facilities. Thus, the Project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires. Therefore, impacts would not occur as a result of the Project.

Existing Plans, Programs, or Policies

There are no impact reducing Plans, Programs, or Policies related to wildfires that are applicable to the Project.

Mitigation Measures

No mitigation measures related to wildfires are 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 substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant With Mitigation Incorporated. As described in Section 4, *Biological Resources*, the Project site is located within a developed area containing existing roadway, residential lot, and slopes containing coast live oak woodland. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) occur on the site. The proposed Project would widen the existing Bradbury Road. As no sensitive species or habitats are located within the urban and developed site, implementation of the Project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or impact a plant or animal community.

However, the Project site contains trees that could be used for nesting by common bird species that are protected by the federal MBTA and the California Fish and Game Code Sections 3503.5, 3511, and 3515. These bird species are protected during the avian nesting and breeding season, which occurs between February 1 and September 15. Therefore, Mitigation Measure BIO-4 has been included to require a nesting bird survey if construction commences during nesting season. Mitigation Measure BIO-4 would reduce potential impacts to a less than significant level.

As described in Section 5, *Cultural Resources*, the Project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as “historical resources” as defined by CEQA. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource.

Regarding archaeological resources, Project grading of slopes north of Bradbury Road could result in an inadvertent discovery of archaeological resources. As a result, Mitigation Measure CUL-1 has been included to provide procedures to be followed in the event that potential archaeological resources are discovered during grading, excavation, or construction activities. Additionally, the project site is sensitive to tribal cultural resources, and therefore, Mitigation Measures TCR-1 through TCR-3 were included to provide tribal monitoring and procedures for handling inadvertent discoveries. With implementation of Mitigation Measures CUL-1 and TCR-1 through TCR-3 impacts related to important examples of the major periods of California history or prehistory would be less than significant.

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

Less than Significant with Mitigation Incorporated. The Project would widen the exiting Bradbury Road from 24 feet to 36 feet. As described above, all of the potential impacts related to implementation of the Project would be less than significant or reduced to a less than significant level with implementation of mitigation measures that are imposed by the City that effectively reduce environmental impacts. Thus, impacts to environmental resources or issue areas would not be cumulatively considerable; and cumulative impacts would be less than significant with implementation of the previously identified mitigation measures related to biological resources, cultural resources, and paleontological resources.

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

Less than Significant Impact. The Project proposes widening the exiting Bradbury Road from 24 feet to 36 feet. The Project would not consist of any use or any activities that would result in a substantial negative affect on persons in the vicinity. This includes potential impacts such as air quality, GHG, noise, and geologic hazards related to construction, demolition, and the proposed residential activities. All resource topics associated with the proposed Project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to result in no impacts or less-than-significant impacts. Therefore, the proposed Project would result in less than significant direct and indirect environmental effects on human beings.

5 GENERAL REFERENCES

- California Department of Conservation. 2021. "Division of Land Resource Protection. California Important Farmland Finder." <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Forestry and Fire Protection. 2021. "CAL FIRE Proposed Harvest Plans." Accessed December 8, 2021. <https://www.arcgis.com/apps/mapviewer/index>.
- California Department of Transportation. 2021. "Scenic Highways." <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- California Geological Survey. 2021. *Earthquake Zones of Required Investigation Map*. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.
- City of Bradbury. 2014. "2012-2030 General Plan." February. <https://cms7.revize.com/revize/bradburyca/services/forms.php#outer-65>.
- . 2021. *City of Bradbury Municipal Code*. May 18. https://library.municode.com/ca/bradbury/codes/code_of_ordinances?nodeId=COOR_TITXDECO_PTVZODIALLAUS_CH73AGREESZODI_S9.73.020PEUS.
- City of Monrovia. 2021. *City of Monrovia General Plan Land Use Element*. March. <https://www.cityofmonrovia.org/home/showpublisheddocument/18995/637594394771270000>.
- . n.d. *City of Monrovia Municipal Code*.
- EPD Solutions, Inc. 2021. "Construction Air Quality and greenhouse Gas Analysis for the Bradbury Road Widening Project."
- Golden State Land & tree Assessment. 2021. "Native Tree Survey and Arborist Report."
- Hernandez Environmental Services. 2021. "General Biological Assessment for Bradbury Road Extension."
- Natural Resources Conservation Service. 2021. *Web Soil Survey*. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.
- Southern California Air Quality Management District. 2008. "Final Localized Significance Threshold Methodology." <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>.

6 DOCUMENT PREPARERS AND CONTRIBUTORS

Lead Agency:

City of Bradbury
600 Winston Avenue
Bradbury, CA 91008

CEQA Document Preparer:

Environment Planning Development Solutions, Inc.
Konnie Dobrevva, JD
Danielle Thayer
Brooke Blandino
Eilish McNulty

Air Quality, Greenhouse Gas, and Energy Impact Analysis, Appendix A

Environment Planning Development Solutions, Inc.
Alex J. Garber

General Biological Assessment, Appendix B

Hernandez Environmental Services
Elizabeth Gonzalez, Associate Biologist

Tree Survey and Arborist Report, Appendix C

Golden State Land & Tree Assessment
George J Wirtes, MS, RCA #738

This page intentionally left blank.