

INITIAL STUDY
13131 LOS ANGELES STREET INDUSTRIAL PROJECT

August 2019

Lead Agency:



City of Irwindale
5050 North Irwindale Avenue
Irwindale, California 91706

Prepared by:



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INITIAL STUDY
13131 LOS ANGELES STREET INDUSTRIAL PROJECT

Lead Agency: City of Irwindale (City)

Project Proponent: Duke Realty

Project Location: 13131 Los Angeles Street, Irwindale, California
Adjacent to the Project site are commercial and industrial buildings (City of Baldwin Park) to the east, the San Gabriel River Freeway (I-605) to the north, an industrial building to the west, and a quarry to the south.

Project Description:

The Project involves the demolition of the existing on-site buildings and structures for the construction of a stand-alone concrete tilt-up building (±528,710 square feet) located at 13131 Los Angeles Street (APN: 8353-020-007). The 24.88-acre property is currently occupied with multiple buildings. The land is zoned M-2 (Heavy Manufacturing), designated "Industrial/Business Park" by the City's General Plan, and subject to the Irwindale Commercial & Industrial Design Guidelines. The Project Proponent is pursuing the Project on a speculative basis, meaning that the proposed building's future tenants are not yet identified. The Project will require the following approval from the City:

Site Plan and Design Review Permit (DA) to address the site configuration, design, location, and impact of the proposed use and the compliance of the Project with the established Zoning Code standards and the "City of Irwindale Commercial and Industrial Design Guidelines."

Public Review Period: August 15, 2019 to September 13, 2019

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CONTENTS

Draft Initial Study – 13131 Los Angeles Street Project.....	1
SECTION 1.0 Background	1-1
1.1 Summary.....	1-1
1.2 Introduction.....	1-1
1.3 Surrounding Land Uses/Environmental Setting.....	1-1
SECTION 2.0 Project Description	2-1
2.1 Project Background.....	2-1
2.2 Project Objectives	2-1
2.3 Project Characteristics	2-1
2.4 Project Timing	2-1
2.5 Regulatory Requirements, Permits, and Approvals.....	2-4
2.6 Consultation With California Native American Tribe(s)	2-4
SECTION 3.0 Environmental Factors Potentially Affected and Determination.....	3-1
3.1 Environmental Factors Potentially Affected.....	3-1
SECTION 4.0 Environmental Checklist and Discussion	4-1
4.1 Aesthetics	4-1
4.2 Agriculture and Forestry Resources.....	4-3
4.3 Air Quality	4-5
4.4 Biological Resources	4-7
4.5 Cultural Resources.....	4-12
4.6 Energy.....	4-14
4.7 Geology and Soils	4-15
4.8 Greenhouse Gas Emissions	4-19
4.9 Hazards and Hazardous Materials.....	4-20
4.10 Hydrology and Water Quality	4-23
4.11 Land Use and Planning	4-26
4.12 Mineral Resources.....	4-27
4.13 Noise	4-28
4.14 Population and Housing	4-30
4.15 Public Services.....	4-31
4.16 Recreation	4-33
4.17 Transportation.....	4-33
4.18 Tribal Cultural Resources	4-35
4.19 Utilities and Service Systems	4-37

Initial Study
13131 Los Angeles Street Industrial Project

4.20	Wildfire.....	4-40
4.21	Mandatory Findings of Significance.....	4-42
SECTION 5.0	List of Preparers.....	5-1
5.1	City of Irwindale.....	5-1
5.2	ECORP Consulting, Inc.	5-1
5.3	KOA Corporation.....	5-1
SECTION 6.0	Bibliography.....	6-1

LIST OF FIGURES

Figure 1.	Regional Location.....	1-3
Figure 2.	Project Location.....	1-4
Figure 3.	Site Plan.....	2-2
Figure 4.	Building Elevations.....	2-3

ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH ₄	Methane
City	City of Irwindale
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CO Plan	Federal Attainment Plan for Carbon Monoxide
CRHR	California Register of Historic Places
CWA	California Water Act
DOC	California Department of Conservation
DTSC	Department of Toxic Substances Control
EIC	Eastern Information Center
EIR	Environmental Impact Report

ACRONYMS AND ABBREVIATIONS

EPA	Environmental Protection Agency
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
General Plan	City of Irwindale General Plan (2008)
GHGs	Greenhouse Gases
LSTs	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendent
MMT	Million Metric Tons
MND	Mitigated Negative Declaration
MSHCP	Multiple Species Habitat Conservation Plan
msl	Mean sea level
MTCO ₂ eq	Metric Tons of Carbon Dioxide Equivalent
NAHC	Native American Heritage Commission
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
N ₂ O	Nitrous Oxide
NO _x	Nitrogen Oxides
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OHV	Off-Highway Vehicle
OPR	California Office of Planning and Research
PM ₁₀ and PM _{2.5}	Particulate Matter
Q Zones	Quarry zones
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation and Recovery Act
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
USACE	United States Army Corps of Engineers
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SP	Service Population
SoCAB	South Coast Air Basin
SR	State Route
SRA	Sensitive Receptor Area

ACRONYMS AND ABBREVIATIONS

SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USFWS	U.S. Fish and Wildlife Service

SECTION 1.0 BACKGROUND

1.1 Summary

Project Title:	13131 Los Angeles Street Industrial Project
Lead Agency Name and Address:	City of Irwindale, 5050 North Irwindale Avenue Irwindale, CA 91706
Contact Person and Phone Number:	Marilyn Simpson, Community Development Manager (626) 430-2209
Project Location:	13131 Los Angeles Street The Project is located east of the San Gabriel River and Interstate 605 in the western portion of the City of Irwindale (Figure 1. Regional Location).
General Plan Designation:	Industrial/Business Park
Zoning:	M-2 (Heavy Manufacturing)

1.2 Introduction

The City of Irwindale is the Lead Agency for this Initial Study. The Initial Study has been prepared to identify and assess the anticipated environmental impacts of the 13131 Los Angeles Street Industrial Project. This document has been prepared to satisfy the California Environmental Quality Act (CEQA) (Pub. Res. Code, Section 21000 *et seq.*) and State CEQA Guidelines (14 CCR 15000 *et seq.*). CEQA requires that all state and local government agencies consider the environmental consequences of Projects over which they have discretionary authority before acting on those Projects. A CEQA Initial Study is generally used to determine which CEQA document is appropriate for a Project (Negative Declaration [ND], Mitigated Negative Declaration [MND], or Environmental Impact Report [EIR]).

1.3 Surrounding Land Uses/Environmental Setting

Surrounding the Project site are commercial and industrial buildings (City of Baldwin Park) to the east, Rivergrade Road and the San Gabriel River Freeway (I-605) to the north, an industrial building (SCE Material Supply, Irwindale Distribution Center) to the west, Los Angeles Street and a gravel quarry (Vulcan Durbin Materials Plant) to the south (Figure 2. Project Location).

Initial Study
13131 Los Angeles Street Industrial Project

Until recently, the approximate 24.9-acre Proposed Project site has been the location of a former hollow core concrete manufacturing business. The site has largely been cleared of facilities associated with this former use, with the exception of two small buildings (an office and weld shop), vehicle bay, three trailers, gravel bins, a batch plant, concrete basting beds, and several plywood sheds. The vacant site is largely unpaved and has been highly disturbed through decades of industrial manufacturing and heavy truck usage.

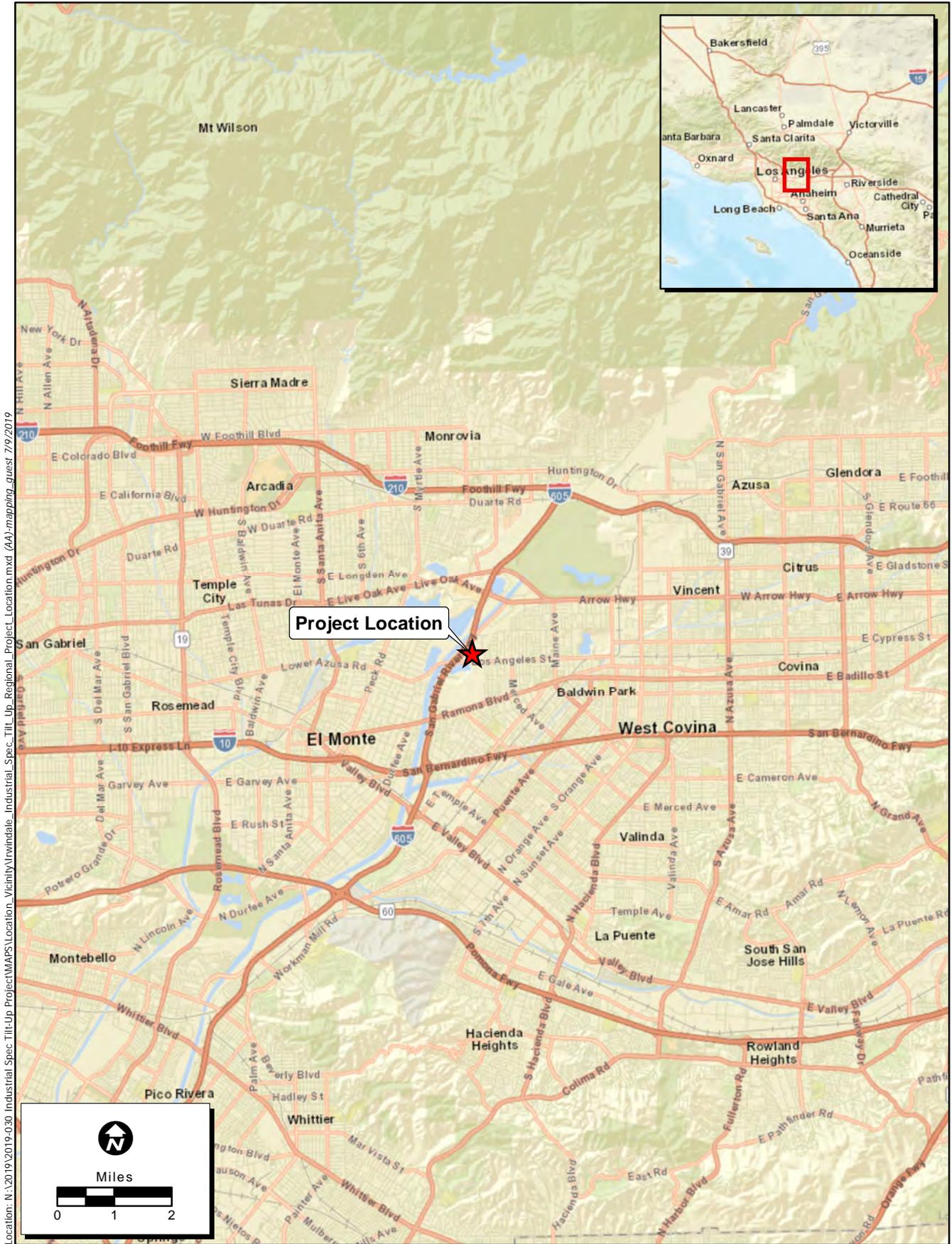


Figure 1. Regional Project Location

2019-030 Irwindale Industrial Spec Tilt-Up Project



Location: N:\2019\2019-030_Industrial_Spec_Tilt-Up Project\MAPS\Location_Vicinity\Irwindale_Industrial_Spec_Tilt-Up_Project_Location.mxd 0-mapping_guest 7/9/2019

Map Date: 7/9/2019
 Base Source: NAIP 2018

Figure 2. Project Location

2019-030 Irwindale Industrial Spec Tilt-Up Project

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SECTION 2.0 PROJECT DESCRIPTION

2.1 Project Background

The Project site was previously occupied by a pre-cast concrete manufacturing and distribution business from 1967 until 2017. This use took advantage of nearby sand and gravel quarries for source material and convenient access to the San Gabriel Freeway (I-605) for heavy duty truck trips.

The current Project proponent, Duke Realty, approached the City in 2018 with plans for a ±528,710 square foot speculative concrete tilt-up building on the site.

2.2 Project Objectives

- To locate an industrial/warehouse building on a site that is accessible to regional markets and consistent with the existing General Plan and zoning.
- To develop an industrial/warehouse project that is compatible with surrounding uses and conforms with established City Commercial and Industrial Design Guidelines.

2.3 Project Characteristics

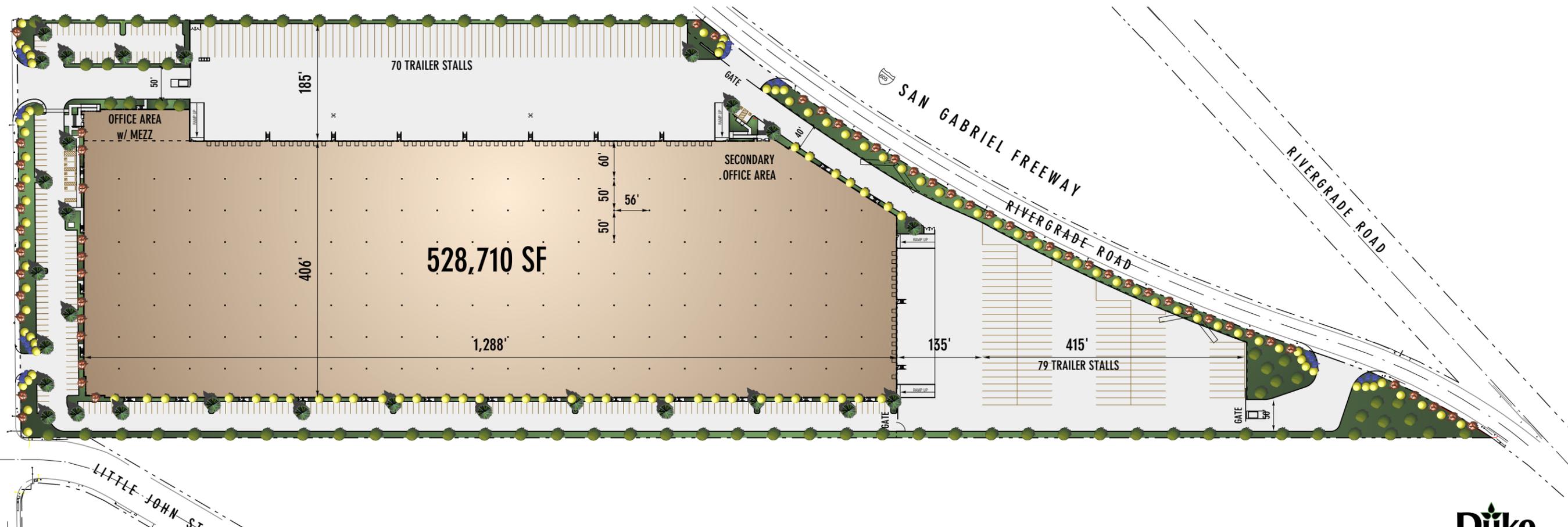
The Proposed Project involves the demolition of the existing on-site buildings (two small office buildings) and structures for the construction of a ±528,710 square feet stand-alone concrete tilt-up building located at 13131 Los Angeles Street (APN: 8353-020-007) (Figure 3. Site Plan). The proposed building would be 47.5 feet tall, with architectural features extending up to 53.5 feet tall. The building would feature forklift ramps and roll-up dock doors on the northern and western sides, respectively (Figure 4. Building Elevations). The Proposed Project will include 80 trailer parking spaces on the southeast corner of the site, 70 trailer parking spaces along the western end of the site, and 261 standard vehicle parking spaces around the perimeter of the building. Landscaping and a fire lane will be installed around the perimeter of the building. The Project Proponent is pursuing the Project on a speculative basis, meaning that the proposed building's future tenants are not yet identified.

2.4 Project Timing

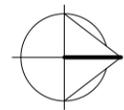
The Proposed Project is anticipated to be built in a single phase, with initial demolition, grading and construction scheduled to commence in spring of 2020 if approved.

Location: N:\2019\2019-030 Industrial Spec Tilt-Up Project\MAPS\Borders\Irwindale_Industrial_Spec_Tilt-Up_Site_Plan.mxd (44)-mapping_guest_7/9/2019

LOS ANGELES STREET



SITE PLAN



Duke REALTY

RGA
Office of Architectural Design

15231 Alton Parkway, Suite 100
Irvine, CA 92618
T 949-341-0920
F 949-341-0922

Map Date: 7/9/2019
Source: RGA

Location: N:\2019\2019-030 Industrial Spec Tilt-Up Project\MAPS\Borders\Irwindale_Industrial_Spec_Tilt-Up_Building_Elevations.mxd (A4)-mapping_guest 7/9/2019



NORTH ELEVATION
SCALE: 1" = 30'-0"



PARTIAL SOUTH ELEVATION
SCALE: 1/8" = 1'-0"



WEST ELEVATION
SCALE: 1" = 30'-0"



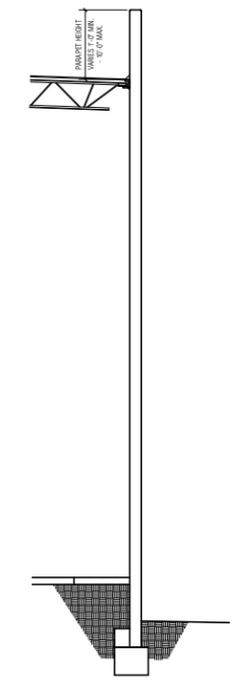
SOUTH ELEVATION
SCALE: 1" = 30'-0"



EAST ELEVATION
SCALE: 1" = 30'-0"

- KEYNOTES**
1. PRIMARY ENTRANCE.
 2. PAINTED 12' WIDE X 15' HIGH LEVEL VERTICAL LIFT TRUCK DOOR.
 3. PAINTED 9' WIDE X 10' HIGH VERTICAL LIFT TRUCK DOOR.
 4. 2' X 7' PAINTED METAL MAN DOOR.
 5. TYPICAL 2" WIDE X 3/4" DEEP HORIZONTAL / VERTICAL REVEAL.
 6. BLUE GLASS IN ANODIZED ALUMINUM STOREFRONT FRAME SYSTEM.
 7. PAINTED CONCRETE TILT-UP EXTERIOR WALL CONSTRUCTION.
 8. PROPOSED FUTURE TENANT SIGNAGE LOCATION TO BE APPROVED UNDER A SEPARATE PERMIT.
 9. DOWNSPOTS ON THE EAST & WEST ELEVATIONS SHALL BE EXTERNAL AND PAINTED TO MATCH THE BUILDING.
 10. PAINTED CONCRETE TILT-UP SCREEN WALL (ADJACENT TO NORTHWEST OFFICE POD ONLY) WITH REVEAL SCORES.

- FINISH SCHEDULE**
- | |
|--|
| 1. FIELD COLOR - PPG - OATMEAL - 1023-1 |
| 2. ACCENT COLOR - PPG - SHARKSKIN - 1025-4 |
| 3. ACCENT COLOR - PPG - DARK ASH - 1025-5 |
| 4. ACCENT COLOR - PPG - OLIVE GRAY - 1027-4 |
| 5. STONE VENEER - EL DORADO STONE - ANDANTE FIELDLEDGE |
| 6. GLAZING - SEE KEYNOTE 5 - PPG VISTACOLOR PACIFICA REFLECTIVE 42 |



TYPICAL WALL SECTION
SCALE: 1/2" = 1'-0"

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Irvine, CA 92618
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CONSULTANT

PROFESSIONAL SEALS

LOS ANGELES STREET PROJECT
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CITY OF IRVINDALE, CA

Duke REALTY
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CD	NO	DATE	DESCRIPTION
DD	9/1/18		SCHEMATIC DESIGN
MARK			
RG A PROJECT NO:	1910-00		
OWNER PROJECT NO:	0000-00		
CAD FILE NAME:	1910-00-A3-1P		
DRAWN BY:	CF		
CHECKED BY:	DR		
COPYRIGHT:	RG A, OFFICE OF ARCHITECTURAL DESIGN		
SHEET TITLE:	ELEVATIONS		

SHEET: **A3-1P**

Map Date: 7/9/2019
Source: RGA



Figure 4. Building Elevations

2019-030 Irwindale Industrial Spec Tilt-Up Project

2.5 Regulatory Requirements, Permits, and Approvals

The following approvals and regulatory permits would be required for implementation of the Proposed Project:

- Site Plan and Design Review Permit (DA)
- Grading and Building permits

2.6 Consultation With California Native American Tribe(s)

The following California Native American tribes traditionally and culturally affiliated with the Proposed Project area have been notified of the Proposed Project: Gabrielino Band of Mission Indians – Kizh Nation; Gabrielino/Tongva San Gabriel Band of Mission Indians; Gabrielino Tongva Indians of California Tribal Council; Gabrielino/Tongva Nation.

The Gabrielino Band of Mission Indians – Kizh Nation requested consultation pursuant to Public Resources Code section 21080.3.1. A summary of the status of the consultation process is provided in Section 4.18 of this Initial Study.

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SECTION 4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION

4.1 Aesthetics

4.1.1 Environmental Setting

Regional Setting

State Scenic Highways

The California Scenic Highway Program protects and enhances the scenic beauty of California’s highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view (Caltrans 2011). Two State Scenic highways are located within Los Angeles County: State Route (SR) 2 and SR 110. SR2, the closest scenic highway to the Proposed Project site, is located over 11 miles north of the Proposed Project site.

Visual Character of the Project Site

The Proposed Project site was formerly occupied by a pre-cast concrete manufacturing business. The site has largely been cleared of facilities associated with this former use, with the exception of two small office buildings and parking areas along Los Angeles Street, a central concrete batch plant, remnant central conveyor line and loading apparatus. The vacant site is largely unpaved and has been highly disturbed through decades of industrial manufacturing and heavy truck usage.

4.1.2 Aesthetics (I) Environmental Checklist and Discussion

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The City of Irwindale General Plan (2008) (General Plan) does not address scenic vistas. The Proposed Project site is located within a heavy industrial area and is surrounded by commercial and industrial buildings (City of Baldwin Park) to the east, Rivergrade Road and the San Gabriel River Freeway (I-605) to the north, an industrial building (SCE Material Supply, Irwindale Distribution Center) to the west, Los Angeles Street and a quarry (Vulcan Durbin Plant) to the south. The Proposed Project is not within the vicinity of a scenic vista; therefore, no impact would occur.

Initial Study
13131 Los Angeles Street Industrial Project

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

Caltrans (Caltrans, 2011) identifies two state scenic highways within Los Angeles County: SR 2 and SR 110. SR 2, the closest of the two scenic highways, is located more than 11 miles north of the Proposed Project site. As such, no impact would occur and no further analysis of this subject is required.

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project is located within an urbanized area zoned M2 – Heavy Manufacturing. The Proposed Project site was previously utilized as a pre-cast concrete manufacturing business for multiple decades. The site has largely been cleared of facilities associated with this former use, with the exception of two small office buildings and parking areas along Los Angeles Street, a central concrete batch plant, remnant central conveyor line and loading apparatus. The vacant site is largely unpaved and has been highly disturbed through decades of industrial manufacturing and heavy truck usage. There are no public views or scenic vistas within the vicinity of the Proposed Project site. As such, no impact would occur and no further analysis of this subject is required.

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Would the project 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"/>

The Proposed Project site currently consists of a mostly vacant lot with two small buildings (an office and weld shop), vehicle bay, three trailers, gravel bins, a batch plant, concrete basting beds, and several plywood sheds. The Proposed Project would consist of the construction of a ±528,710 square foot tilt-up building in a heavily developed area zoned for heavy manufacturing. Although the construction of a new building may reintroduce light sources onto this site, a light plan will be submitted to the City and the

building design will fully comply with the City of Irwindale Commercial and Industrial Design Guidelines. A less than significant impact would occur. No further analysis of this subject is required.

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

The California Department of Conservation (DOC) provides online mapping of important agricultural and forestry resources, including Prime Farmland, Unique Farmland, Farmland of Statewide Importance, properties zoned for agriculture or forestry uses, and properties under Williamson Act contract. The Proposed Project site and its surrounding areas are entirely developed and not used for agricultural or forestry uses and are therefore not mapped as such (DOC 2016).

4.2.2 Agriculture and Forestry Resources (II) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project site is zoned as M-2 Heavy Manufacturing by the City and is designated in the General Plan as Industrial/Business Park. Until recently, the approximate 24.9-acre Project site has been the location of a former pre-cast concrete manufacturing business. The Proposed Project site is not currently used as farmland or agricultural land, nor is it mapped as such (DOC 2016). Therefore, no impact would occur and no further analysis of this subject is required.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is zoned as M-2 Heavy Manufacturing by the City and is designated in the General Plan as Industrial/Business Park. It is not zoned for agricultural use, nor is it under a Williamson Act contract. No impact would occur and no further analysis is required.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is zoned as M-2 Heavy Manufacturing by the City and is designated in the General Plan as Industrial/Business Park. No forest land, timberland, or timberland zoned Timberland Production exists on or near the Proposed Project site. No impact would occur, and no further analysis is required.

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is zoned as M-2 Heavy Manufacturing by the City and is designated in the General Plan as Industrial/Business Park. Forest land is not present on or near the Proposed Project site. No impact would occur and no further analysis is required.

Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is zoned as M-2 Heavy Manufacturing by the City and is designated in the General Plan as Industrial/Business Park. Until recently, the approximate 24.9-acre Project site has been the location of a former pre-cast concrete manufacturing business. Farmland and forest land are absent from the site. No impact would occur.

4.3 Air Quality

4.3.1 Environmental Setting

The Project site is located within the City of Inwindale. The California Air Resource Board (CARB) has divided California into regional air basins according to topographic features. Los Angeles County and the Project site are located in a region identified as the South Coast Air Basin (SoCAB). The SoCAB occupies the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The air basin is on a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean on the southwest, with high mountains forming the remainder of the perimeter. The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

Both the U.S. Environmental Protection Agency (EPA) and the CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O₃) (precursor emissions include nitrogen oxide [NO_x] and reactive organic gases [ROG], carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas.

4.3.2 Air Quality (III) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Air quality within the South Coast Air Basin (SoCAB) is regulated by the South Coast Air Quality Management District (SCAQMD). Standards for air quality are documented in the SCAQMD’s Air Quality Management Plan (AQMP) adopted in 2016. The Proposed Project would result in the emission of pollutants into the Air Basin during short-term construction and long-term operational activities. The pollutant levels emitted by the Project’s construction and operation have the potential to exceed the daily significance thresholds established by the SCAQMD, thereby potentially conflicting with or obstructing implementation of the SCAQMD’s 2016 Air Quality Management Plan. As such, an air quality technical report will be prepared and the required EIR shall evaluate the Proposed Project’s potential to conflict with the adopted SCAQMD’s Air Quality Management Plan.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The South Coast Air Basin is a non-attainment area for the federal ozone (O₃) and particulate matter (PM_{2.5}) standards and is also a nonattainment area for the state standards for O₃, PM₁₀, and PM_{2.5}. Development of the Project site as proposed by the Project could cumulatively contribute to a net increase of criteria pollutants in the region. Therefore, the required EIR shall address the Project's potential to result in cumulatively considerable increase of pollutants for which the South Coast Air Basin is in non-attainment.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Project does not propose any sensitive receptors or land uses that may be considered point source emission sources. However, the Project has the potential to expose sensitive receptors in the vicinity to diesel particulate matter emissions from mobile sources associated with the Project (i.e. diesel-fueled vehicles and equipment). Diesel particulate matter dissipates greatly beyond approximately 1,000 feet from the source, but there are sensitive receptors (e.g. single-family homes) located within 1,000 feet of the Project site and along Los Angeles Street east of the Project site. Therefore, a diesel health risk assessment shall be prepared that evaluates impacts to maximum exposed sensitive receivers in the vicinity of the Project and its primary truck route. The health risk assessment also shall evaluate the Proposed Project's potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards. This information shall be included in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, and applications of asphalt or architectural coatings. However, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors

emitted during construction would be temporary, short-term, and intermittent, and would cease with the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. As such, the Proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

During long-term operation, the Proposed Project site would contain a light industrial building, the operating characteristics of which are not typically associated with objectionable odors. The temporary storage of refuse associated with the Proposed Project's long-term operational use could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City's solid waste practices, thereby precluding any significant odor impact. The Project would be required to comply with SCAQMD Rule 402 which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. As such, long-term operation of the Proposed Project would not create objectionable odors affecting a substantial number of people. Nevertheless, this subject will be analyzed in the required EIR.

4.4 Biological Resources

4.4.1 Environmental Setting

The Resource Management Element of the City General Plan (2008) meets state requirements for an open space element and a conservation element. The Resource Management Element focuses on remaining natural resources in the City that must be considered in future planning and development. The biological resources (flora and fauna) outlined within this section include alluvial scrub vegetation, eleven species of birds, the coast horned lizard (*Phrynosoma coronatum blainvillii*), and three species of rare plants. Due to the highly developed nature of the Proposed Project site and its surrounding areas, none of these flora and fauna are anticipated to occur on the Proposed Project site.

Soils

According to the Web Soil Survey (USDA 2019), soils on the Proposed Project site are mapped as Urban land, commercial-Soboba complex, 0 to 5 percent slopes. The parent material of this soil type is human-transported material derived from granite. These soils are not native and are typical of developed urban areas.

Vegetation Communities

The native vegetation found locally is characterized by the alluvial plain and is referred to as "alluvial scrub". This type of vegetation grows on sandy, rocky alluvium deposits by streams and includes a unique mix of sage scrub and desert species. It dominates a major outwash fan at the mouths of canyons along the coastal side of the San Gabriel and San Bernardino mountains. This vegetation community does not occur on the Proposed Project site.

Special-Status Wildlife

The following sensitive wildlife species are listed in the City General Plan as currently known to inhabit the City, or to have inhabited the City in the past:

- **Northern harrier** (*Circus cyaneus*) is a California Department of Fish and Wildlife (CDFW) Species of Special Concern, Second Priority and is listed by California Natural Diversity Data Base (CNDDDB) as uncommon and regionally threatened. It may occasionally forage in the winter months, but no suitable breeding habitat is present in the City planning area. The Proposed Project site is not considered suitable habitat for this species.
- **Sharp-shinned hawk** (*Accipiter striatus*) is a priority CDFW Species of Special Concern. Birds in this priority are defined as not in immediate danger of regional extirpation, and populations within most of their range do not appear to be declining seriously; however, by virtue of their small populations in the State, the species are vulnerable to extirpation should a serious threat materialize. This bird is most commonly found in mixed woodlands, which do not exist on the Proposed Project site. The Proposed Project site is not considered suitable habitat for this species.
- **Osprey** (*Pandion haliaetus*) is a priority CDFW Species of Special Concern, indicating that populations of this species are on the decline throughout much of its range, but that regional populations are still sufficiently large that danger of widespread extirpation is not immediate. The osprey has been observed in the City. Ospreys tend to hunt and nest in close proximity to bodies of water, which does not apply to the Proposed Project site. The Proposed Project site is not considered suitable habitat for this species.
- **Cooper's hawk** (*Accipiter cooperii*) is also a priority CDFW Species of Special Concern. No suitable nesting habitat for the Cooper's hawk exists in the City though it has been observed foraging. Cooper's hawks prefer mature forests, open woodlands, wood edges, and river groves. The Proposed Project site is not considered suitable habitat for this species.
- **Prairie falcon** (*Falco mexicanus*) is also a priority CDFW Species of Special Concern. It nests on rocky cliffs or outcroppings adjacent to open, arid valleys used for foraging. This species is rarely seen on the southern slopes of the San Gabriel Mountains. The Proposed Project site is not considered suitable habitat for this species.
- **Burrowing owl** (*Athene cunicularia*) is also a priority CDFW Species of Special Concern. It breeds and forages in open grasslands and agricultural fields with earthen drainage embankments. The Proposed Project site is not considered suitable habitat for this species.
- **California black-tailed gnatcatcher** (*Polioptila melanura californica*) is listed by U.S. Fish and Wildlife Service (USFWS) as a candidate species because of continuing and increasing pressures on its habitat from development. In addition, CDFW lists the gnatcatcher as a species of special concern in the second priority category, indicating a distinct population decline throughout its range in California. This species is commonly found in dense thorn scrub and thickets of the Desert Southwest. The Proposed Project site is not considered suitable habitat for this species.

- **Yellow warbler** (*Dendroica petechia*) is a CDFW Bird of Special Concern. They are considered widely distributed and may pass through urban and developed areas such as the City, their preferred and most common habitat is streamside riparian thickets. The Proposed Project site is not considered suitable habitat for this species.
- **Yellow breasted chat** (*Icteria virens*) is a CDFW Bird of Special Concern. Similar to the yellow warbler, they may pass through urban and developed areas such as the City, although their preferred and most common habitat consists of brushy tangles, briars, and stream thickets. They tend to nest in very dense scrub. The Proposed Project site is not considered suitable habitat for this species.
- **Yellow-billed cuckoo** (*Coccyzus americanus occidentalis*) is an FWS Category 2 candidate species for federal listing. They tend to inhabit and nest in woodlands, thickets, orchards, streamside groves. In the western U.S., they prefer streamside trees, including cottonwood-willow groves. The Proposed Project site is not considered suitable habitat for this species.
- **Willow flycatcher** (*Empidonax traillii*) is also an FWS Category 2 candidate species for federal listing. They typically nest in thickets of deciduous trees and shrubs, especially willows, or along woodland edges, often near streams or marshes. The Proposed Project site is not considered suitable habitat for this species.
- **Coast horned lizard** (*Phrynosoma coronatum blainvillii*) is listed by FWS as a candidate species. It is found in open spaces within scrub communities such as coastal sage scrub, but its habitat is declining due to development and flood control projects. The Proposed Project site is not considered suitable habitat for this species.

Special-Status Plants

The following sensitive plant species are listed in the City General Plan as currently known to be present within the City, or to have been observed in the City in the past:

- **Braunton's milk-vetch** (*Astragalus brauntonii*) is a perennial plant listed as a sensitive species by the FWS. The habitat of this species is limited to the foothills of the Los Angeles Basin. The preferred habitat of this species is brushy areas such as chaparral. The Proposed Project site is not considered suitable habitat for this species.
- **Slender-horned spine flower** (*Centrostegia leptoceras*) is listed by FWS as an endangered species. It is also listed as endangered by CDFW as rare and endangered by the California Native Plant Society (CNPS). This small, prostrate annual occurs in sandy openings of undisturbed soils. Due to the disturbed nature of onsite soils, the Proposed Project site is not considered suitable habitat for this species.
- **San Gabriel Mountain Dudleya** (*Dudleya densiflora*) is listed as a sensitive species by the FWS. This species has a limited range and is usually found on rocky cliffs in canyons at the southern base of the San Gabriel Mountains, a habitat that does not occur within the City planning area and the Proposed Project site is not considered suitable habitat for this species.

Wildlife Movement Corridors

The Proposed Project site has been surrounded by a chain link fence and used as a pre-cast concrete manufacturing business for multiple decades. The site has been highly disturbed through decades of industrial manufacturing and heavy truck usage. Additionally, it is surrounded by development in each direction. The Proposed Project site is therefore not considered part of a wildlife movement corridor.

4.4.2 Biological Resources (IV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project site is highly disturbed having been subject to decades of heavy truck use and manufacturing activity associate with the prior pre-cast concrete manufacturing operation. The site is vegetatively barren with the exception of two trees in the north-central portion of the Project site and several trees on the southern boundary. Although sensitive species listed in the City General Plan are known to inhabit the City, Due to the developed and highly disturbed nature of the Project site, there is no significant likelihood of these plant or animal species, or their habitats, occurring on the site.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project site has been graded and is mostly devoid of vegetation and would therefore be characterized as "developed". Riparian habitats and other sensitive natural communities are absent from the Proposed Project site. No impact would occur and no further analysis of this subject is required.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is located in a heavily developed area zoned for heavy manufacturing and has been used as a pre-cast manufacturing business for over 50 years. No wetlands or waters are located on the Proposed Project site. No impact would occur and no further analysis is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project site has been surrounded by a chain link fence and used as a pre-cast concrete manufacturing business for multiple decades. The site has been highly disturbed through decades of industrial manufacturing and heavy truck usage. Additionally, it is surrounded by development in each direction. Although the site is not considered part of a wildlife corridor, two isolated trees occur within the north central portion of the Proposed Project site, and several trees occur along the Proposed Project site frontage with Los Angeles Street. These trees provide possible nesting habitat for raptors in addition to passerine species. Although removal of these trees would not be considered a significant biological resource impact, all nesting migratory birds are protected under the federal Migratory Bird Treaty Act (MBTA). As such, to ensure that there would be no impacts to protected active nests, a City condition of approval will be established assuring compliance with the MBTA.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Included in the City's Resource Management Element of their General Plan are policies intended to continue the maintenance and conservation of the City's natural resources. The Proposed Project site is devoid of any significant biological resources. The Proposed Project does not conflict with any local

policies or ordinances to protect biological resources. No impact would occur. No further analysis is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is zoned M-2 Heavy Manufacturing and is designated in the General Plan as Industrial/Business Park. The site is currently developed and does not contain habitat for sensitive biological resources. The Proposed Project would not conflict with any habitat conservation plans. No impact would occur.

4.5 Cultural Resources

4.5.1 Environmental Setting

Cultural Resources

A Historic Resources Inventory was performed for the Proposed Project site by Dudek in May 2019 (Dudek 2019). The goal of this report was to determine if cultural resources were present in or adjacent to the Project area and assess the sensitivity of the Project area for undiscovered or buried cultural resources.

The study involved completion of a California Historical Resources Information System (CHRIS) records search, a pedestrian survey of the Proposed Project site, and evaluation of buildings and structures over 45 years of age located on the property for historical significance. The significance evaluation included conducting archival and building development research for each property; outreach with local libraries, historical societies, and advocacy groups; and completion of a historic context.

Dudek evaluated the Project site for historical significance and found that it does not appear eligible for inclusion in the National Register of Historic Places (NRHP), California Register of Historical Resource (CRHR), City of Los Angeles Historic-Cultural Monument (HCM), or local register (6Z) due to a lack of significant historical associations and integrity. The buildings and structures on the property are therefore not considered historical resources for the purposes of CEQA. As such, the Proposed Project would have no impact on historical built environment resources for the purposes of CEQA.

No archaeological resources were identified within the Proposed Project site as a result of the CHRIS records search. No specific archaeological resources or sensitivity concerns were identified by any sources consulted.

4.5.2 Cultural Resources (V) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As a result of the background research, field survey, and property significance evaluations, buildings at the Proposed Project site were evaluated and found not eligible for the NRHP, CRHR, or as a City of Los Angeles HCM, or local register, due to a lack of significant historical associations, architectural merit, and compromised integrity. Nevertheless, the potential for substantial adverse changes in the significance of a historical resource will be addressed in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No archaeological resources or sensitivity concerns were identified within the Project site as a result of the CHRIS records search and other records sources. However, it is possible that intact archaeological deposits are present at subsurface levels. The potential for unanticipated impacts to archaeological resources and human remains during construction activities will be addressed in the required EIR. Mitigation measures to reduce any significant impacts to less than significant levels will be identified.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No human remains or dedicated cemeteries were identified during the background research, field survey, and property significance evaluation. Compliance with California Health and Safety Code Section 7050.5 governing the discovery, notification, disposition and treatment of discovered human remains and related grave goods will be adhered to during Project construction. Mitigation will be identified in the required EIR to assure compliance with Code provisions.

4.6 Energy

4.6.1 Environmental Setting

The Project site is currently a vacant, former pre-cast concrete manufacturing site with no significant energy demand or consumption.

4.6.2 Energy (VI) Environmental Checklist and Discussion

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

This impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment fuels necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. An energy analysis will be prepared for the Proposed Project and included in the required EIR to address the potential for wasteful, inefficient or unnecessary consumption of energy resources.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project will be required to comply with California Energy Efficiency Standards for Nonresidential Buildings (Title 24) and the 2016 Building and Energy Efficiency Standards adopted by the Californian Energy Commission (CEC), which include new construction of nonresidential buildings. Under the 2016 Standards, nonresidential buildings are 5 percent more energy efficient than the 2013 Standards. Nonresidential buildings constructed in accordance with the 2013 Building Energy Efficiency Standards are 30 percent more energy efficient than the prior 2009 standards as a result of better windows, insulation, lighting, ventilation systems, and other features. The Proposed Project will also be required to comply with the latest California Green Building Standards (Title 24, California Code of Regulations) that establish planning and design standards for sustainable site development, energy efficiency (in excess of California Energy Code Requirements) and water conservation, among other environmental design factors. Regardless, an energy analysis will be prepared and included in the required EIR to address the potential

for the Proposed Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.7 Geology and Soils

4.7.1 Environmental Setting

The soils generally found in the City consist of a surface layer of very coarse sand, gravel, cobbles, and boulders, derived by erosion from local mountains. These surficial soils are typically over five feet in depth, well drained, and have moderately rapid permeability. They generally exhibit slow runoff, with a slight erosion hazard. Throughout much of the City, the original surface soil has been disrupted and removed by gravel quarry operations or urbanization (City 2008).

A site-specific geotechnical investigation of the Proposed Project site was performed by Southern California Geotechnical (SCG) in November 2018. The report summarizing the conclusions and recommendations resulting from the investigation (SCG 2018) is referenced throughout this section.

Geomorphic Setting

The ground surface cover throughout most of the site generally consists of crushed aggregate base. Ground surface cover surrounding the buildings in the southern area of the site consists of asphaltic concrete pavements. The pavements are in poor condition with areas of moderate to severe cracking throughout. Portland cement concrete (PCC) casting beds and slabs are also present throughout the site. Topography ranges in elevations from 363± feet mean sea level (msl) in the northern area of the site to a minimum elevation of 343± feet msl in along the southern property line. The site topography appears to slope gently downward toward the south at a gradient of approximately 1± percent.

Regional Seismicity and Fault Zones

An “active fault,” according to DOC, Division of Mines and Geology, is a fault that has indicated surface displacement within the last 11,000 years. A fault that has not shown geologic evidence of surface displacement in the last 11,000 years is considered “inactive.”

Soils

As mentioned in Section 4.4 Biological Resources, Web Soil Survey (USDA 2019) maps the soils at the Proposed Project site as Urban land, commercial-Soboba complex, 0 to 5 percent slopes. As a part of the geotechnical investigation, subsurface exploration was conducted down to 50± feet below existing site grades at three (3) locations onsite. In addition, a total of fifteen (15) trenches were excavated at the site to depths of 5 to 10± feet below existing site grades and existing concrete slabs were cored in eight (8) different locations in order to determine the thickness of the existing slab section.

Findings differed slightly at each boring location. At one of the locations, asphaltic concrete pavements were present at the ground surface and extended for 2± inches with no discernable layer of aggregate base. Another location encountered a surficial layer of pea gravel at the ground surface approximately 1 inch thick, underlain by 6± inches of crushed aggregate base. The base materials encountered at most of

Initial Study
13131 Los Angeles Street Industrial Project

the boring and trench locations possess very high strengths and appear to consist of cement treated base. Native alluvial soils were encountered at the ground surface at one of the trench locations and beneath the pavement or aggregate base at all of the boring and trench locations, extending to the maximum depth explored of 50± feet. The alluvium generally consists of dense to very dense gravelly fine to coarse sands and fine to coarse sandy gravels and fine to medium sands with occasional to extensive cobbles and occasional boulders. One of the boring locations encountered a layer of silty fine sand with trace amounts of medium to coarse sands at depths of 27 to 29½± feet below existing site grades.

Free water was not encountered during excavation of any of the trenches or drilling of the borings. Based on the lack of any water within the trenches or borings, and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at a depth in excess of 50± feet at the time of the borings.

4.7.2 Geology and Soils (VII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

i) The Proposed Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Furthermore, SCG did not identify any evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is considered to be low and a less than significant impact would occur.

ii) The Proposed Project site is located in an area which is subject to strong ground motions due to earthquakes. A site-specific seismic hazards analysis was not performed as a part of the geotechnical investigation. However, numerous faults capable of producing significant ground motions are located near the Proposed Project site. Due to economic considerations, it is not

generally considered reasonable to design a structure that is not susceptible to earthquake damage. Therefore, significant damage to structures may be unavoidable during large earthquakes. The proposed structure will, however, be designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage and loss of life. The 2016 California Building Code (CBC) was adopted by all municipalities within Southern California on January 1, 2017. The CBC provides procedures for earthquake resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Specific seismic design parameters presented within the SCG geotechnical investigation are based on the soil profile and the proximity of known faults with respect to the subject site. Therefore, a less than significant impact would occur.

- iii) Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The liquefaction evaluation performed by SCG indicates that none of the soils below the historic high groundwater table are subject to liquefaction during the design seismic event. Based on the results of this analysis, no design considerations related to liquefaction are considered warranted for this Proposed Project. A less than significant impact would occur.
- iv) As mentioned previously, the site topography appears to slope gradually to the south at a gradient of approximately 1± percent. Topography ranges in elevations from 363± feet msl in the northern area of the site to a minimum elevation of 343± feet msl along the southern property line. The Proposed Project site is relatively flat, landslides are not a factor and no impact would occur.

As a City standard condition of approval, the Proposed Project will be required to conform to the geotechnical design and construction recommendations in the project-specific Geotechnical Investigation (SCG 2018). Therefore, risks associated with the foregoing Geology and Soils conditions would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Best Management Practices (BMPs) are included as part of the Storm Water Pollution Prevention Plan (SWPPP) prepared for the Proposed Project and would be implemented to manage erosion and the loss of topsoil during construction-related activities (see Hydrology and Water Quality (IX.) Environmental Checklist and Discussion). Soil erosion impacts would be reduced to a less than significant impact.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Based on the results of the geotechnical analysis, the proposed development is not at risk for landslides, settlement and/or slippage. In addition, the proposed development will not adversely affect the geologic stability of the adjacent properties. This finding is in accordance with Section 111 of the Los Angeles County Building Code. Unstable soils are not present on the Proposed Project site and no impact would occur. No further analysis of this issue is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The near-surface soils generally consist of silty fine sands and gravelly sands. These materials have been visually classified as very low to non-expansive. Therefore, no design considerations related to expansive soils are considered warranted for this site and no impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The site is generally underlain by dense to very dense well-graded sands and sandy gravels. The soils encountered at the boring and trench locations generally possess significant over-sized material including extensive cobble content and occasional boulders throughout the depths explored. None of the soils observed are prohibitive to the installation of waste water disposal systems. No impact would occur. No further analysis of this issue is required.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project site is located in the San Gabriel Valley, which is filled with sediments derived as alluvial fan deposits from the San Gabriel Mountains to the north and as fluvial deposits transported by the San Gabriel River to the west. The Proposed Project site is mapped as surficial Quaternary alluvium, consisting of alluvial gravel, comprised of dense to very dense well-graded sands and sandy gravels. The coarse-grained, younger alluvial surficial deposits have a low paleontological sensitivity. As Proposed Project excavations for utilities are not expected to exceed depths of 3-4 feet below ground surface, excavations would not encounter older, finer-grained Pleistocene age deposits found in the area at depths as shallow as 10 feet below ground surface and considered to have a moderate to high paleontological sensitivity. No unique geologic features have been identified onsite. As such, no impacts to paleontological resources or unique geologic resources are anticipated and a less than significant impact would occur.

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

Greenhouse gas (GHG) emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as CO₂, methane (CH₄), nitrous oxide (N₂O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through, but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. Estimates of GHG emissions are often presented in carbon dioxide equivalents (CO₂e). Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. The SCAQMD provides guidance to local lead agencies on determining significance for GHG emissions in CEQA documents.

4.8.2 Greenhouse Gas Emissions (VIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Initial Study
13131 Los Angeles Street Industrial Project

Construction-related activities that would generate Greenhouse Gas Emissions (GHG) emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Proposed Project site, and off-road construction equipment (e.g., dozers, loaders, excavators). Operation of the Proposed Project would result in GHG emissions predominantly associated with motor vehicle use (i.e. trucks and personal vehicles). The City of Irwindale has not adopted any numerical thresholds of significance for GHG emissions. Significance of the Proposed Project’s GHG impacts will be based on compliance with Assembly Bill 32 and the Draft SCAQMD CEQA GHG Significance Thresholds. Due to the Project’s potential to emit GHGs, a Project-specific GHG emissions assessment shall be prepared for the Project. Results of the GHG emissions report will be documented in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The City of Irwindale has not adopted a GHG-reduction plan. However, State policies and standards adopted for the purpose of reducing GHG emissions include Executive Order (EO) S-3-05, AB 32, and SB 375. The quantitative goal of these regulations is to reduce GHG emissions to 1990 levels by 2020, to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. A Project-specific GHG emissions report shall be prepared to determine whether the Project would be consistent with GHG reduction goals, standards and policies adopted by the State. The required EIR shall evaluate project consistency with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

A Phase I Environmental Site Assessment (ESA) was performed for the Proposed Project site by Leymaster Environmental Consulting, LLC in July 2018 (Leymaster 2018). The purpose of the ESA is to provide an assessment concerning environmental conditions as they exist at the Property. This assessment was conducted utilizing generally accepted ESA industry standards in accordance with ASTM E 1527-13, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process and EPA Final All Appropriate Inquiries (AAI) standard practices.

Results of the ESA include historic research on underground fuel tanks previously installed and removed onsite and the results of their corresponding soil studies and resolutions. The former tanks were determined not to represent an environmental concern. The Proposed Project site is listed in multiple environmental hazards databases as searched by Environmental Data Resources, Inc. (EDR) as part of the ESA. In each case, no substantive information was provided that would indicate a significant environmental threat or concern to the Proposed Project site.

Initial Study
13131 Los Angeles Street Industrial Project

No environmental concerns have been identified for the Proposed Project site as a result of the site listings in the ESA and supplemental agency review attachments.

4.9.2 Hazards and Hazardous Materials (IX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The specific businesses or tenants that will occupy the Project's proposed building are not known at this time. The Project site is located within the M-2 (Heavy Manufacturing) Zone and is designated for Industrial/Business Park use. Based on the list of land uses permitted in the City's M-2 zone, it is possible that hazardous materials could be used during the course of daily operations, including the storage and use of refrigerant that may be used on-site (in the event that cold storage is provided on-site). The Project's potential to create a significant hazard to the public or the environment through the routing transport, use or disposal of hazardous materials during long-term operation shall be analyzed in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

See response to Item (a) above.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>

Bursch Elementary School in Baldwin Park is located approximately one mile southeast of the Proposed Project. Merwin Elementary School is the only public school located in the City of Irwindale. It is located approximately three miles east of the Proposed Project site. There are no schools known to exist within one-quarter mile of the Project site. No impact would occur. No further analysis of this issue is required.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:

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?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As mentioned above, the Proposed Project site is listed in multiple environmental hazards databases as searched by Environmental Data Resources, Inc. (EDR) as part of the ESA. In each case, no substantive information was provided that would indicate a significant environmental threat or concern to the Proposed Project site. No environmental hazard concerns are known to exist at the Proposed Project site. A less than significant impact would occur.

Would the Project:

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 for people residing or working in the project area?

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The closest airport to the Proposed Project site is San Gabriel Airport, located approximately 2.6 miles to the southwest. The Proposed Project site is not addressed in the airport's land use plan. No impact would occur. No further analysis of this issue is required.

Would the Project:

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

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Implementation of the Proposed Project would increase the potential need for emergency access to and from the site. The Project design proposes access to the site from three driveways (two from Los Angeles Street and one from Rivergrade Road). During the course of the City of Irwindale's required review of the Proposed Project's applications, the Proposed Project's design would be reviewed to ensure that adequate access to and from the site and around the proposed buildings is provided for emergency vehicles. With adherence to the City of Irwindale requirements for emergency vehicle access, impacts would be less than significant.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The Proposed Project site is located in a heavily developed industrial area and is not located on or in the vicinity of wildlands. Therefore, no impacts involving wildland fires would occur. No further analysis of this issue is required.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

Regional Hydrology

The Proposed Project is located within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB), which administers the water quality control plan (Basin Plan) within Los Angeles County. The boundaries of the Santa Ana River Basin are defined in part by physical watershed divisions and in part by administrative boundaries (i.e. Orange County/Los Angeles County line). The Proposed Project is within the San Gabriel Valley hydrologic area (Basin No. 405.40), and the Main San Gabriel hydrologic sub-area (Basin No. 405.41) one of the many subareas within the Los Angeles RWQCB. The Project site is encompassed by the 55-square mile Santa Fe Flood Control Basin-San Gabriel River Sub-watershed (USGS 2016).

Site Hydrology and On-Site Drainage

The Project site is located on flat terrain and there are no slopes, natural drainage systems or channel crossings on the site. The northerly portion of the Project site surface drains south-westerly to Rivergrade Road. Runoff is then conveyed further south-westerly in Rivergrade Road to several City-maintained street catch basins. The south-easterly portion of the Project site surface drains southerly to a City-maintained catch basin in Los Angeles Street. Runoff is then conveyed further south via storm drain to a detention basin within the quarry facility south of Los Angeles Street. The south-westerly portion of the Project site surface drains southerly to Los Angeles Street. Runoff is then conveyed westerly to a County-maintained street catch basin in Los Angeles Street.

4.10.2 Hydrology and Water Quality (X) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Initial Study
13131 Los Angeles Street Industrial Project

The California Porter-Cologne Water Quality Control Act (Section 13000 (Water Quality) et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation, which would result in the generation of potential water quality pollutants such as silt, debris, chemical paints, and other solvents with the potential to affect water quality. Long-term operation of the Project site with land use allowed under the M-2 (Heavy Manufacturing) zone are anticipated to generate storm water pollutants such as bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. The Project's potential to violate any water quality standards or waste discharge requirements during short-term construction and/or long-term operational activities shall be analyzed in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The site-specific geotechnical investigation of the Proposed Project site (SCG 2018) indicates the static groundwater table at the site existed at a depth in excess of 50± feet at the time of the subsurface exploration. Historic groundwater data indicates the historic high groundwater level for the site is 35 feet below ground surface. According to a Low Impact Development (LID) Report (Thienes Engineering 2018) prepared for the Proposed Project, the Project would replace 5,000 square feet or more of impervious surface area on the developed site. This redevelopment of the site would result in an increase of more than 50 percent or the impervious surfaces of the previous concrete manufacturing development, which was not subject to Low Impact Development (LID) requirements. The Project impact on groundwater recharge, groundwater supplies and sustainable groundwater management of the basin will be analyzed in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:				
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- (i) Construction of the Proposed Project would involve grading of the site's existing ground contours and altering the site's existing drainage pattern. Best Management Practices (BMPs) would be included as part of the Storm Water Pollution Prevention Plan (SWPPP) prepared for the Proposed Project and would be implemented to control erosion and siltation impacts during construction activities. Upon buildout of the Project, stormwater runoff from all portions of the Project site would be captured by on-site storm drains that would be routed to catch basins onsite and at Los Angeles Street and Rivergrade Road. Nevertheless, the required EIR will fully analyze the potential for erosion or siltation on- or off-site.
- (ii) Preliminary Hydrology Calculations (Thienes Engineering 2018) indicate the Proposed Project condition 50-year peak flow rates from the Proposed Project site to the City-maintained catch basins in Rivergrade Road and Los Angeles Street are higher than existing condition rates. Detention in the onsite truck yards is proposed to reduce proposed condition discharge to below existing condition discharge. The required EIR will analyze the impact of the Proposed Project on rates or amounts of surface runoff and potential flooding.
- (iii) According to the site-specific LID Report (Thienes Engineering 2018), an underground Corrugated Metal Pipe (CMP) detention system will be utilized to treat the Stormwater Quality Design Volume and route stormwater greater than the 85th percentile into the mainline. Impacts of runoff on stormwater drainage system capacities and additional sources of polluted runoff will be fully analyzed in the required EIR.
- (iv) Pursuant to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06037C1700F, the Proposed Project site is located in Zone X, which is determined to be outside the 0.2% annual chance floodplain. Therefore, impacts related to placement of structures within a 100-year flood hazard area would be less than significant. No further discussion of this subject is required.

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

According to the City of Irwindale General Plan Safety Element (2008), the Project site is not identified within a flood hazard, tsunami, or seiche zone. Due to the depth of the Vulcan Durbin Quarry area across Los Angeles Street south of the Project site, impounded water in this quarry is not expected to overtop quarry walls during a seismic event. Therefore, the possibility of an earthquake induced seiche from the Vulcan Durbin Quarry would be less than significant. As a result, risk of release of pollutants due to project inundation from these sources is less than significant. No further discussion of this issue is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The required EIR will analyze the potential for Proposed Project conflicts with the applicable water quality control plan and groundwater management plans.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The Proposed Project site is located in an area zoned M-2 Heavy Manufacturing. Since 1967, the Proposed Project site has been used by a pre-cast concrete manufacturing company. The Proposed Project would involve the demolition of existing on-site buildings and the construction of a ±528,710 square feet stand-alone concrete tilt-up building, as well as corresponding parking, landscaping, and utilities. would develop an industrial warehouse project that is compatible with surrounding uses. Compatibility with surrounding land uses and conformity with established City Commercial and Industrial Design Guidelines would be established through the City’s project review and Site Development Permit. The Project Proponent is pursuing the Project on a speculative basis, meaning that the proposed building’s future tenants are not yet identified.

4.11.2 Land Use and Planning (XI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As mentioned above, the Proposed Project site is zoned for Heavy Manufacturing. The Proposed Project would be consistent with this zoning designation and would not divide an established community. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would demolish several existing buildings and ancillary structures associated with a former concrete manufacturing business and construct a light industrial/warehouse building and associated parking, utilities, and landscaping. While this use is consistent with the Proposed Project site's current M-2 Heavy Manufacturing zoning designation, no specific tenant(s) have been identified to occupy the proposed building. The Proposed Project is compatible with surrounding uses and shall be required to demonstrate compliance with established City Commercial and Industrial Design Guidelines. A less than significant impact is anticipated. Nevertheless, Proposed Project compliance with land use plans, zoning and the Design Guidelines will be addressed in the required EIR.

4.12 Mineral Resources

4.12.1 Environmental Setting

Significant mineral aggregate resources are located within the City boundaries due to the San Gabriel River flood plain. Because of this, the City has many construction aggregate quarry operations. Some areas within the City contain regionally significant mineral deposits in accordance with the State Mining and Reclamation Act (SMARA), at Public Resources Code section 2762 and State Mining and Geology Board Reclamation Regulations, 14 California Code of Regulations, at section 3676. These areas are detailed within the City General Plan as "Q Zones" (quarry zones). An active quarry is located on the other side of Los Angeles Street, south of the Proposed Project site. The Proposed Project is not located within a Q Zone.

4.12.2 Mineral Resources (XII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project is not located on land associated with a past, current, or anticipated mining location. According to the City General Plan, the Proposed Project site is not located within an identified Q Zone. No impact would occur. No further analysis of this subject is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The City General Plan details locations identified as Q Zones (quarry zones) as a means of designating those areas where quarries and related sand and gravel industries could locate. The Proposed Project is not located within a Q Zone and has been used a site for concrete manufacturing for decades. No impact would occur. No further analysis of this subject is required.

4.13 Noise

4.13.1 Environmental Setting

The Project site is located in an urbanized environment and is subject to typical urban noise sources, such as traffic, industrial operations, and outdoor activities. As the Project site is currently vacant, the principal noise source affecting the site is transportation noise from automobiles and trucks on surrounding roadways, including I-605, Los Angeles Street, Rivergrade Road and Littlejohn Street. Stationary noise sources may include heating, ventilation, and air conditioning (HVAC) systems, compressors, landscape maintenance equipment, or machinery associated with adjacent industrial or commercial uses to the west and east of the site.

4.13.2 Noise (XIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Project-related construction activities, as well as long-term operational activities (including light industrial/warehouse operations and projected increases in vehicular travel along area roadways), may expose persons in the vicinity of the Project site to noise levels in excess of standards in the City's Municipal Code, chapter 9.28, Noise Regulation (City of Irwindale 1976). An acoustical analysis will be prepared and the required EIR shall analyze the potential for substantial temporary or permanent increases in ambient noise levels in the vicinity of the Project in excess of local standards.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Construction activities on the Project site may produce groundborne vibration or groundborne noise levels during earthwork/grading and the operation of heavy machinery. Long-term operation of the Proposed Project is not anticipated to result in perceptible levels of groundborne vibration or noise. The required EIR shall analyze the potential for generation of excessive groundborne vibration or noise levels.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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"/>

The closest airport to the Proposed Project site is San Gabriel Airport, located approximately 2.6 miles to the southwest. The Proposed Project site is not addressed in the airport's land use plan. The Project would

not expose people working in the Proposed Project area to excessive noise levels. No impact would occur. No further analysis of this issue is required.

4.14 Population and Housing

4.14.1 Environmental Setting

The City of Irwindale is a relatively small community of approximately 9.5 square miles in size. The City's industrial history and development patterns have been primarily shaped by the local mining industry and the abundance of both active and inactive quarries throughout the community. Given the abundance of natural resources and limited size of the city, Irwindale's population has remained small in comparison to adjacent jurisdictions and Los Angeles County as a whole. The Proposed Project is zoned M-2 Heavy Manufacturing and is not currently zoned for or used as housing. The nearest residences to the Proposed Project site are located approximately 700 feet to the east.

4.14.2 Population and Housing (XIV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project site was used as a concrete manufacturing business from 1967 until 2017 and is designated "Industrial/Business Park" in the City's General Plan. Moreover, the Proposed Project would be consistent with the site's current zoning designation of "Heavy Manufacturing (M-2)." Accordingly, the Project would not result in growth that was not already anticipated by the City of Irwindale General Plan. The Project site is served by existing public roadways and utility infrastructure is already installed beneath public rights of way that adjoin the property. For these reasons, development of the Proposed Project would not result in direct or indirect growth in the area, and impacts would be less than significant. No further analysis of this subject is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project site is zoned "Heavy Manufacturing (M-2)" and designated "Industrial/Business Park" according to the City's General Plan. The site does not contain any residential structures under

existing conditions. Accordingly, the Proposed Project would not substantially displace existing housing and would not require additional housing construction. No impact would occur and no further analysis of this subject is required.

4.15 Public Services

4.15.1 Environmental Setting

The City's General Plan (2008) describes its public services in its Public Safety, Resource Management, and Infrastructure elements. Information regarding police services, fire services, parks, and other public facilities is included in the section below.

Police Services

On November 1, 1960, the Irwindale Police Department was established with five motorcycles and one police unit. The department now consists of 28 full-time police officers, 7 reserve officers, and 11 civilian employees. The department's enforcement tools include a K-9 unit, stolen vehicle tracking devices, and two motor units and a commercial enforcement unit, each equipped with radar. Response times in most areas of the City are five minutes or less. The Department is responsible for staffing various activities aside from regular patrol duties that encompass calls for service from the business and residential community.

Fire Services

The City of Irwindale is included in the County of Los Angeles Consolidated Fire District, which maintains a single fire station in the City, Station No. 48. This station, located at 15546 Arrow Highway near the Civic Center, consists of 16 full-time fire fighters. The station's equipment resources include one pumper, one reserve truck, and a paramedic unit. The average response time throughout the City is 6 minutes. Additional emergency resources are available from other California Division of Forestry (CDF) stations (the station is located in the City of Baldwin Park). The CDF equipment includes a snorkel truck and a triple pump.

Schools

Merwin Elementary School is the only public school located in the City of Irwindale. It is located approximately 3 miles east of the Proposed Project site.

Parks

The City currently owns and maintains three parks; Irwindale Park (25-acres), Jardin de Roca Park (5-acres), and the Nora Fraijo Pocket Park. Irwindale Park is located in adjacent to City Hall in the central downtown portion of the City near the majority of the residential neighborhoods. Improvements at Irwindale Park include a gym, baseball field, children's playground, tennis courts, and an Olympic size swimming pool. The park also includes picnic tables located throughout the grounds, as well as a picnic shelter for group gatherings complete with gas ranges and electrical capabilities. The newly refurbished gym includes a basketball court, teen room (with big screen TV), and a weight room. The Jardin de Roca Park, located on the west side of Irwindale Avenue opposite City Hall, has a skate park, picnic tables, and playground equipment.

Other Public Facilities

Lack of infrastructure and public services can constrain the development of housing. Costs to extend infrastructure or to provide public services can deter the construction of housing, negatively impact the cost of housing, and the timing of development. The City has adequate domestic water service, public wastewater lines, roads, schools, trash, public facilities, parks and recreation, fire and police services for the level of development projected by the City.

4.15.2 Public Services (XV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project consists of the demolition of buildings associated with a long-standing former concrete manufacturing plant and the development of a ±528,710 square feet stand-alone concrete tilt-up industrial building. The Proposed Project is consistent with the site's "Heavy Manufacturing (M-2)" zoning requirements. Additionally, the Proposed Project is consistent with the City's General Plan, which identifies public service levels sufficient to serve planned growth. Therefore, it is anticipated the Proposed Project would be adequately served by the City's public services during the construction and operational phases. The Project is not expected to generate significant need for additional fire and police protection, nor additional schools, parks, or other public facilities. A less than significant impact would occur and no further analysis of this subject is required.

4.16 Recreation

4.16.1 Environmental Setting

As discussed in Section 4.15 Public Services, The City currently owns and maintains three parks; Irwindale Park (25-acres), Jardin de Roca Park (5- acres), and the Nora Fraijo Pocket Park. Irwindale Park is located in adjacent to City Hall in the central downtown portion of the City near the majority of the residential neighborhoods. Additionally, The Los Angeles County Parks and Recreation Department leases 650-acres of the Santa Fe Dam Reservoir Area for public recreational uses. The park area within the Santa Fe Dam accommodates thousands of picnic bound guests, particularly on national holidays, and often is the site for festival and concert events. Current summer usage may range from 6,000 to 10,000 visitors per day, with occasional peaks in patronage of up to 20,000 persons. The Recreation Area is located approximately two miles northeast of the Proposed Project site.

4.16.2 Recreation (XVI) Materials Checklist

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Proposed Project would not impact existing neighborhood parks. The Project would not increase local or regional population that would result in any increase in demand for neighborhood or regional parks. No impact would occur. No further analysis of this subject is required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) 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"/>

The Proposed Project does not include recreational facilities and would not require construction or expansion of recreational facilities. No impact would occur. No further analysis of this subject is required.

4.17 Transportation

4.17.1 Environmental Setting

The existing roadway system is comprised of key roadways that traverse defined traffic study intersections that serve the Project site. Principal among these are Los Angeles Street/Lower Azusa Road, Rivergrade

Initial Study
13131 Los Angeles Street Industrial Project

Road, and Little John Street that directly serve the Project site. Regional access to the site is derived principally from Los Angeles Street via the nearby San Gabriel Freeway (I-605). A site-specific traffic study will be prepared according to City of Irwindale and Caltrans reporting requirements for inclusion in the required EIR for the Proposed Project. The study shall quantify the volume of vehicular traffic anticipated to travel to and from the Project site. The traffic study will model the effects of Project-related traffic on the local and regional circulation system and identify mitigation measures to reduce significant effects.

4.17.2 Transportation (XVII) Environmental Checklist and Discussion

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

The Proposed Project would contribute an increased volume of vehicular traffic to regional and local roadways, including but not limited to I-605, Los Angeles Street, Rivergrade Road, and Little John Street. This has the potential to adversely affect the performance of the local circulation system on a direct and/or cumulative level. A site-specific traffic study shall be prepared according to the City of Irwindale Policy Guidelines for Traffic Impact Reports (2014) and Caltrans Guide for the Preparation of Traffic Impact Studies (2002). The study shall quantify the volume of vehicular traffic anticipated to travel to and from the Project site. The traffic analysis will also model the effects of Project-related traffic on the local circulation system, taking all modes of transportation into account. The required EIR shall disclose the findings of the traffic study and evaluate the Project's consistency with applicable circulation plans, ordinances, and policies.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) 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"/>

CEQA Guidelines section 15064.3, subdivision (b) details the use of vehicle miles traveled (VMT) to assess the significance of transportation impacts. As detailed in CEQA Guidelines section 15064.3, subdivision (c), a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. As of the preparation of this document (June 2019), VMT analysis has not been adopted by the City of Irwindale, and therefore there is no conflict with provisions of Section 15064.3, subdivision (b).

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

All construction planned as part of the Proposed Project would be in conformance with the applicable City of Irwindale standards and would not result in any hazards due to a design feature. The Proposed Project's design would be compatible in transportation design with existing City of Irwindale General Plan designation of "Industrial/Business Park" and "Heavy Manufacturing (M-2)" zoning designation. Thus, impacts are anticipated to be less than significant. However, this impact will be further analyzed in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Implementation of the Proposed Project would result in construction and operation of a light industrial/warehouse building, which would increase the need for emergency access to and from the site. During the course of the City of Irwindale's required review of the Proposed Project's applications, the Proposed Project's design would be reviewed to ensure that adequate access to and from the site and around the proposed buildings is provided for emergency vehicles. With adherence to the City of Irwindale requirements for emergency vehicle access, impacts are anticipated to be less than significant. Nevertheless, this impact will be further analyzed in the required EIR.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

On March 13, 2019, the City of Irwindale sent Proposed Project notification letters to the following California Native American tribes, which had previously submitted AB 52 general consultation request letters pursuant to AB 52 (21080.3.1(d) of the Public Resources Code): Gabrielino-Tongva Tribe, Gabrielino/Tongva Nation, Gabrielino Tongva Nation, Gabrielino/Tongva San Gabriel Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, and Gabrielino Band of Mission Indians-Kizh Nation. Each recipient was provided a brief description of the Proposed Project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation. As a result of the notification letters, the City received a single request for consultation from the Gabrielino Band of Mission Indians-Kizh Nation. A tribal consultation conference with the Kizh Nation was held on March 14, 2019. Although no known tribal cultural resources at the Project site were identified, tribal

Initial Study
13131 Los Angeles Street Industrial Project

representatives indicated the Proposed Project site lies within their ancestral tribal territory and is therefore considered culturally sensitive for potential buried cultural materials.

The status and results of the tribal cultural resources consultation will be documented in the required EIR.

4.18.2 Tribal Cultural Resources (XVIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a 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:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>				
(i) According to the project-specific Historic Resources Inventory Report (Dudek 2019), the Proposed Project site is neither listed or eligible for listing in the California Register of Historical Resources, nor in a local register of historical resources pursuant to PRC 5020.1(k). No impact would occur.				
(ii) The Proposed Project would not result in significant impacts to known TCRs. However, as a result of the AB 52 consultation the Project area has been identified as being culturally sensitive and has the potential to contain unknown TCRs. Significant impacts may occur from the discovery of unknown TCRs during ground disturbing activities from Project construction. Impacts to unknown TCRs would be less than significant with the implementation of mitigation measures that include an opportunity for tribal participation in monitoring of subsurface excavations. The potential for significant impact on tribal cultural resources will be analyzed in the required EIR.				

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

The Project site previously supported an active pre-cast concrete manufacturing facility that utilized existing utility connections at the site. The Proposed Project would include new connections to existing gas, water, and sewer lines off of Los Angeles Boulevard. Additionally, it would involve the addition of fire hydrants, storm drains, drainage basins.

The Infrastructure Element in the City General Plan (City 2008) details the City's utilities and service systems, including water, wastewater, and solid waste. According to the General Plan, The City has adequate domestic water service, public wastewater lines, roads, schools, trash, public facilities, parks and recreation, fire and police services for the level of development projected by the City. Language from the General Plan is included in the sections below.

Water Service

Several different water purveyors serve the City. The City of Azusa Water Department provides basic service to the largest portion of Irwindale from its most northeasterly boundaries to Ornelas Street, including all of the Santa Fe Dam area located to the east of the San Gabriel River Freeway. Irwindale is now close to reaching its capacity with the Valley County Water District, located in the City of Baldwin Park. This District serves the southeasterly portion of the City as well as an area generally bounded by Arrow Highway, Live Oak Avenue, and the I-605 Freeway. California-American Water Company, located in the City of San Marino, serves the area north of the Buena Vista Channel to the Duarte boundary with potable water for domestic, landscaping, and fire protection purposes. Finally, the San Gabriel Valley Water Company, located in the City of El Monte, serves approximately 50 customers in the Vulcan's Durbin Pit area as well as the area generally located between Lower Azusa Road and Ramona Boulevard. The Southern California Water Company serves a portion of the westernmost part of the City north of Live Oak Avenue.

Wastewater

The Los Angeles County Sanitation Districts (LACSD) provide all of Irwindale's sewer services. The majority of the City is served by Sanitation District 22; with a small portion of its southwestern area served by District 15. The District's trunk sewer lines extend throughout the City, with no under-served areas. The Los Angeles County Sewer Maintenance District, located in the City of Alhambra, provides maintenance for the City's six miles of sewers on a contract basis, including emergency services on a 24-hour basis.

Solid Waste

The City has an exclusive franchise agreement with Athens Services to provide mixed waste collection services and other available programs to its residents and business community. Several quarry sites throughout the City are designated for landfill use.

4.19.2 Utilities and Service Systems (XIX) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would install connections to existing utility lines, including gas, water, and sewer, off Los Angeles Boulevard. Small encroachments into adjacent public rights of way of developed/paved streets to connect to existing utilities will be required to serve the Project. Trenching for new onsite utility lines will be required. Physical disturbance for the installation of these new utility lines would be limited and largely indistinguishable from overall grading for development on the Proposed Project site. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Proposed Project site is served by the Valley County Water District, which procures its water supplies primarily from the Main Basin and imported water. According to the District's 2015 Urban Water Management Plan (2016), the minimum water supplies available at the end of an average water year, a single dry year, and multiple dry years would be at least equal if not greater than the District's water demand. The Project proposes a 528,710 square foot industrial building on a speculative basis. As the future tenant(s) are unknown, a General Light Industrial use is conservatively assumed for purposes of water utility demand. This land use type would be expected to yield up 1,142 employees at the Proposed Project site¹. As such, the Proposed Project may be subject to the provisions of Senate Bill 610 (Costa), which would require preparation of a Water Supply Assessment (WSA) to verify that the proposed development can be adequately served by water supplies without the need for new or expanded

¹ Source: Building Area Per Employee by Business Type; U.S. Green Building Council (May 2008).

Initial Study
13131 Los Angeles Street Industrial Project

entitlements². The availability of sufficient water supplies to serve the Proposed Project and potential need for a WSA shall be evaluated in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Wastewater services are provided by LACSD, which owns and operates 11 wastewater facilities throughout Los Angeles County. Wastewater generated by the Proposed Project would be directed to the Joint Outfall System, which treats approximately 400 million gallons per day. As a speculative Industrial/Warehouse building project without an identified tenant(s), the anticipated daily wastewater generation from the Project is unknown. Based on the lack of a project-specific sewer capacity study and lack of a specific LACSD wastewater generation factor for General Industrial Use, the availability of adequate wastewater treatment capacity to serve the Proposed Project will be evaluated in the required EIR.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Waste would be generated during the construction and operation phases of the Proposed Project. Construction waste would primarily consist of discarded materials and packaging. Based on the building square footage of 528,170 and the US EPA's construction waste generation factor of 4.34 pounds per s.f., approximately 1,146 tons of waste would be generated during the construction phase. Based on a Light Industrial waste generation factor of 41.64 pounds of waste per day per employee obtained from CalRecycle, the long-term, ongoing operation of the Proposed Project would generate approximately 0.27 tons of waste per day (CalRecycle, 2019). According to the City General Plan (2008), the City has adequate domestic water service, public wastewater lines, roads, schools, trash, public facilities, parks and recreation, fire and police services for the level of development projected by the City. A less than significant impact would occur.

² SB 610 requires preparation of a Water Supply Assessment (WSA) for any "proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area."

Initial Study
13131 Los Angeles Street Industrial Project

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project would be required to comply with all Resource Conservation and Recovery Act (RCRA) Regulations, including Title 40 of the Code of Federal Regulations (CFR), as well as City of Irwindale waste reduction programs. In accordance with Assembly Bill 341, the Project would be required to work with Athens Services to implement a commercial recycling program during the operational phase. Additionally, The Proposed Project will seek a Site Plan and Design Review Permit (DA), as well as grading and building permits from the City. The implementation of these programs would reduce the amount of solid waste generated by the Proposed Project and diverted to landfills. A less than significant impact would occur.

4.20 Wildfire

4.20.1 Environmental Setting

Government Code 51175-89 directs the California Department of Forestry and Fire Protection (CAL FIRE) to identify areas of very high fire hazard severity zones within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of, potential fuels over a 30 to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure (including firebrands) to buildings.

The Proposed Project is located within a heavily industrialized area and is not in the immediate vicinity of any natural or wildlife areas. It is labeled in the Irwindale submap as non-VHFHSZ (CAL FIRE 2012).

4.20.2 Wildfire (XX) Environmental Checklist and Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project is not located within or near a very high fire hazard severity zone. The Proposed Project is located within a heavily industrialized area and is not in the immediate vicinity of any natural or wildlife areas. It is labeled in the Irwindale submap as non-VHFHSZ (CAL FIRE 2012). Access to the Proposed Project is planned at multiple driveway locations on Los Angeles Street and at Rivergrade Road, thereby facilitating emergency response and evacuation, if necessary. A less than significant impact would occur. No further analysis of this subject is required.

Initial Study
13131 Los Angeles Street Industrial Project

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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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 checked="" type="checkbox"/>	<input type="checkbox"/>
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The Proposed Project is not located within or near a very high fire hazard severity zone. The Proposed Project is located within a heavily industrialized area and is not in the immediate vicinity of any natural or wildlife areas. It is labeled in the Irwindale submap as non-VHFHSZ (CAL FIRE 2012). A less than significant impact would occur. No further analysis of this subject is required.

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

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

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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The Proposed Project is not located within or near a very high fire hazard severity zone. The Proposed Project is located within a heavily industrialized area and will require utility connections to serve the proposed industrial use. However, the Proposed Project is not in the immediate vicinity of any natural vegetation or wildlife areas. It is labeled in the Irwindale submap as non-VHFHSZ (CAL FIRE 2012). A less than significant impact would occur. No further analysis is required.

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

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

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

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Proposed Project is not located within or near a very high fire hazard severity zone. The Proposed Project is located within a heavily industrialized area and is not in the immediate vicinity of any natural or wildlife areas. It is labeled in the Irwindale submap as non-VHFHSZ (CAL FIRE 2012). A less than significant impact would occur. No further analysis is required.

4.21 Mandatory Findings of Significance

4.21.1 Mandatory Findings of Significance (XXI) Environmental Checklist and Discussion

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Based on evaluation and discussions contained in this Initial Study, the Proposed Project would have a potentially significant impact in the following issue areas: air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation and traffic, and utilities and service systems. These environmental issue areas will be evaluated in the EIR and mitigation measures presented as appropriate.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Cumulative impacts are potentially significant. The EIR will address the contribution of the Proposed Project to any identified cumulative impacts.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Initial Study
13131 Los Angeles Street Industrial Project

Based on analysis provided in the Initial Study, there would be potentially significant impacts on human beings. Analysis of direct and indirect impacts to human beings, along with identification of any applicable mitigation measures, requires additional analysis in the required EIR.

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SECTION 5.0 LIST OF PREPARERS

5.1 City of Irwindale

Lead Agency

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CEQA Documentation/Air Quality/Greenhouse Gas/Noise

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Wendy Blumel, Assistant Cultural Group Manager

Laura Hesse, Technical Editor

5.3 KOA Corporation

Transportation/Traffic

Brian Marchetti, Senior Transportation Planner

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SECTION 6.0 BIBLIOGRAPHY

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Initial Study
13131 Los Angeles Street Industrial Project

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Notice of Preparation

Date of Notice: August 14, 2019

To: Agencies, Organizations, and Interested Parties

Subject: Notice of Preparation of a Draft Environmental Impact Report

Project Title: 13131 Los Angeles Industrial Street Project

Project Location: 13131 Los Angeles Street, Irwindale, California 91706

Lead Agency: City of Irwindale

Lead Agency Contact: Marilyn Simpson
Community Development Manager
City of Irwindale, Community Development Department
16102 Arrow Highway, Second Floor
Irwindale, CA 91706
(626) 430-2209
msimpson@IrwindaleCA.gov

This Notice of Preparation (NOP) has been prepared to notify agencies and interested parties that the City of Irwindale (City), as the Lead Agency, will prepare an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the proposed 13131 Los Angeles Industrial Street Project (proposed project). The project description, location, and the potential environmental effects of the project are included below in this NOP. The City requests your comments as to the scope and content of the EIR. Comments must be submitted in writing pursuant to the directions below. If you represent an agency, the City is seeking comments as to the scope and content of the environmental information in the document which is germane to your agency's statutory responsibilities in connection with the proposed project. To the extent that your agency has authority to issue permits or take other actions related to the project, your agency will need to use the EIR prepared by the City when considering your permitting decisions or other approval for the project.

In accordance with the time limits established by CEQA, the City requests comments be received by the close of business on September 13, 2019. **Please send your comments, including a return address and contact name, via mail to the identified Lead Agency Contact.**

Scoping Meeting. In accordance with CEQA Guidelines 15082, a public Scoping Meeting will be held on August 26, 2019 at 6:00 PM at the Irwindale Community Center at 16102 Arrow Highway, Irwindale, CA.

Project Location:

The Project is located at 13131 Los Angeles Street (APN: 8353-020-007), east of the San Gabriel River and Interstate 605 in the western portion of the City of Irwindale (Figure 1. Regional Location). Surrounding the Project site are commercial and industrial buildings (City of Baldwin Park) to the east, Rivergrade Road and the San Gabriel River Freeway (I-605) to the north, an industrial building (SCE Material Supply, Irwindale Distribution Center) to the west, Los Angeles Street and a gravel quarry (Vulcan Durbin Materials Plant) to the south (Figure 2. Project Location).

Until recently, the approximate 24.9-acre Proposed Project site has been the location of a former hollow core concrete manufacturing business. The site has largely been cleared of facilities associated with this former use, with the exception of two small buildings (an office and weld shop), vehicle bay, three trailers, gravel bins, a batch plant, concrete basting beds, and several plywood sheds. The vacant site is largely unpaved and has been highly disturbed through decades of industrial manufacturing and heavy truck usage.

Project Description:

The 24.9-acre Project site was previously occupied by a pre-cast concrete manufacturing and distribution business from 1967 until 2017. This use took advantage of nearby sand and gravel quarries for source material and convenient access to the San Gabriel Freeway (I-605) for heavy duty truck trips. The current Project proponent, Duke Realty, approached the City in 2018 with plans for a speculative concrete tilt-up building on the site.

Demolition of the remaining on-site buildings and structures may proceed independently and in advance of proposed project construction of a stand-alone concrete tilt-up building (±528,710 square feet). The proposed building would be 47.5 feet tall, with architectural features extending up to 53.5 feet tall. The building would feature forklift ramps and roll-up dock doors on the northern and western sides, respectively. The Proposed Project will include 80 trailer parking spaces on the southeast corner of the site, 70 trailer parking spaces along the western end of the site, and 261 standard vehicle parking spaces around the perimeter of the building (Figure 3. Site Plan). Landscaping and a fire lane will be installed around the perimeter of the building. The Project proponent is pursuing the Project on a speculative basis, meaning that the proposed building's future tenants are not yet identified.

The land is zoned M-2 (Heavy Manufacturing), designated "Industrial/Business Park" by the City's General Plan, and subject to the Irwindale Commercial & Industrial Design Guidelines. The Project will require the following approvals from the City:

- Demolition Permit
- Certification of the Environmental Impact Report
- Site Plan and Design Review Permit (DA) to address the site configuration, design, location, and impact of the proposed use and the compliance of the Project with the established Zoning Code standards and the "City of Irwindale Commercial and Industrial Design Guidelines.

Other public agencies whose approval (e.g. permits) is required will include, but are not limited to the following:

- a) Regional Water Quality Control Board (RWQCB), Los Angeles Region – National Pollutant Discharge Elimination System (NPDES) Construction General Permit; Stormwater Pollution Prevention Plan (SWPPP)
- b) Los Angeles County Department of Public Works/Building Division – Issuance of all permits related to onsite construction

The Proposed Project is anticipated to be built in a single phase, with grading and construction scheduled to commence in spring of 2020 if approved.

Potential Environmental Effects of the Proposed Project:

The EIR will evaluate the following environmental resource issues in addition to the CEQA-mandated topics such as cumulative impacts, growth inducement, and project alternatives:

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The content of the EIR will be subject to input received during the NOP comment period.

Date: 8/14/19

Signature: Thomas Hahn

Attachments: Figure 1. Regional Location
Figure 2. Project Site
Figure 3. Site Plan

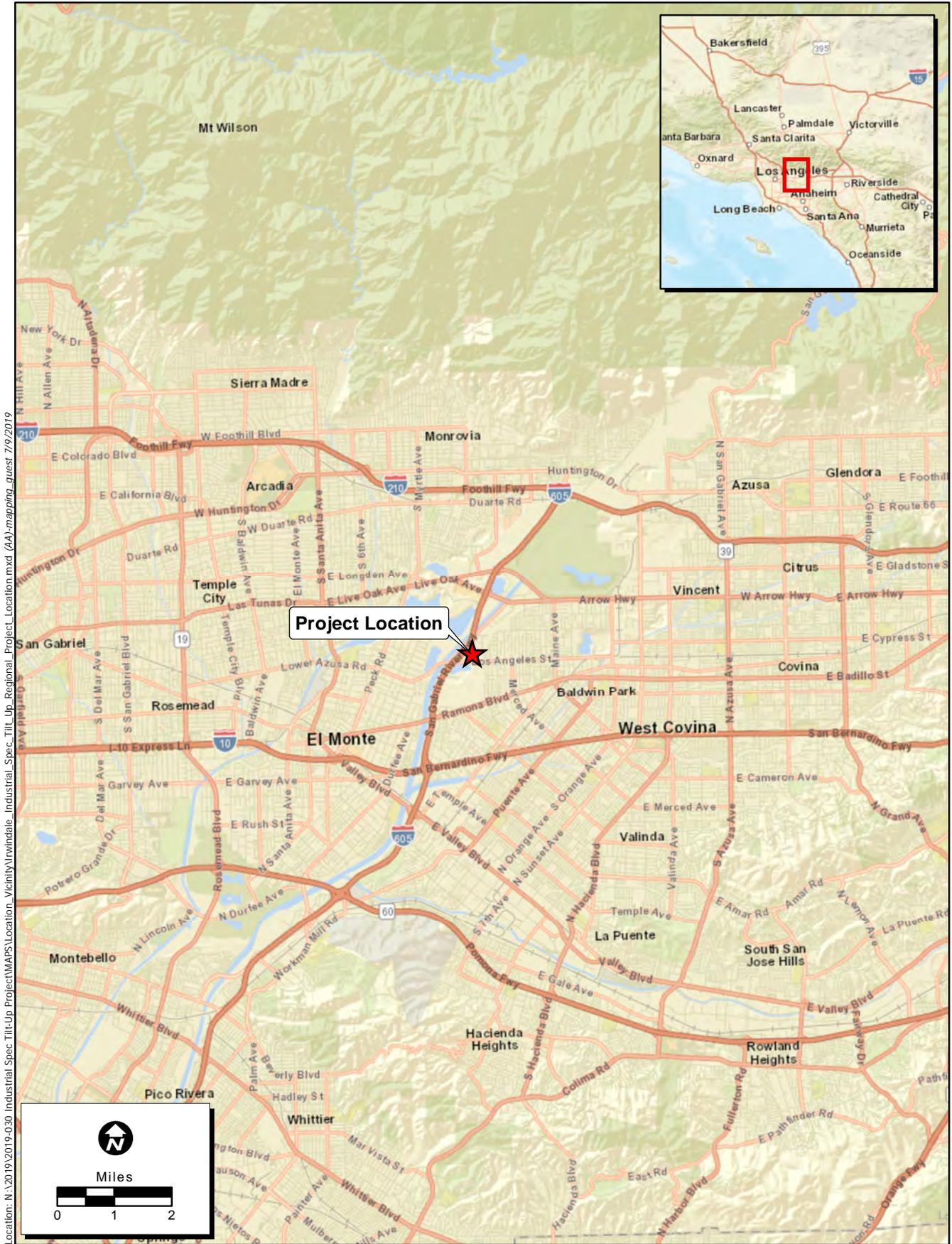


Figure 1. Regional Project Location

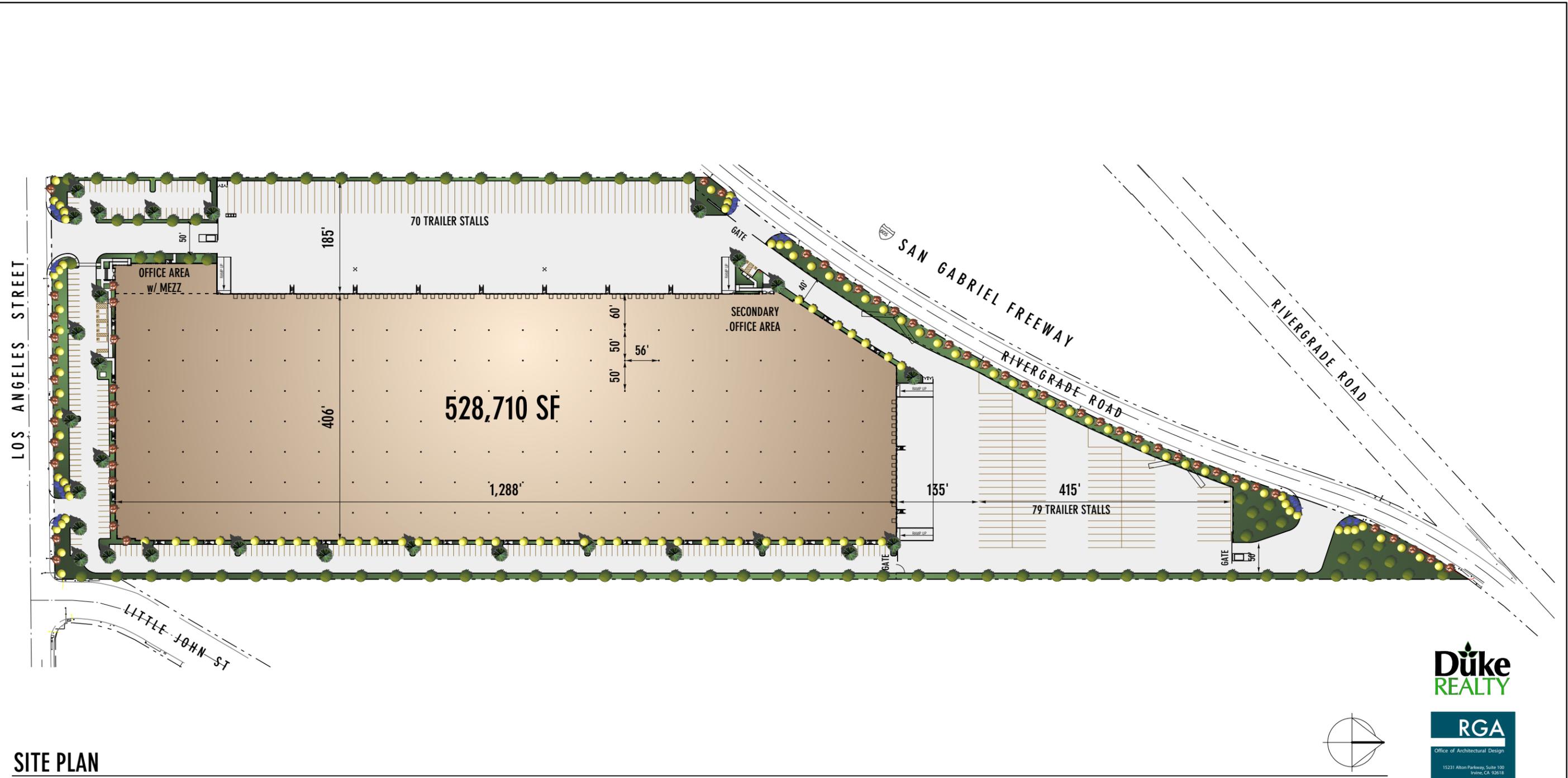
2019-030 Irwindale Industrial Spec Tilt-Up Project



Figure 2. Project Location

2019-030 Irwindale Industrial Spec Tilt-Up Project

Location: N:\2019\2019-030 Industrial Spec Tilt-Up Project\MAPS\Borders\Irwindale_Industrial_Spec_Tilt-Up_Site_Plan.mxd (44)-mapping_auest_7/9/2019



SITE PLAN

Duke REALTY

RGA
Office of Architectural Design

15231 Alton Parkway, Suite 100
Irvine, CA 92618
T 949-341-0920
F 949-341-0922

Map Date: 7/9/2019
Source: RGA

Figure 3. Site Plan
2019-030 Irwindale Industrial Spec Tilt-Up Project



13131 LOS ANGELES STREET INDUSTRIAL PROJECT SCOPING MEETING
 AUGUST 26, 2019

NAME	ADDRESS/COMPANY NAME	E-MAIL ADDRESS	PHONE NUMBER
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Fred Barbara	1668 Collier Pkwy		(626) 222-7815
Brandy Jones	5050 Vandell	bjones@nanda.ca.gov	
Jake Smith			949-797-7043
Manuel Ortiz	CITY OF IRWINDALE	manuel.ortiz@irwindale.ca.gov	626-641-3701
Adam Schmid	Duke Realty	adam.schmid@duke.com	
Robert Diaz	2408 S MOUNTAIN Ave		714 359-5517
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Edwin Arreola	City of Irwindale	earreola@irwindale.ca.gov	
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**CITY OF IRWINDALE SCOPING MEETING – 8/26/2019
13131 LOS ANGELES STREET INDUSTRIAL PROJECT**

Please check the boxes below to indicate which of the environmental factors or issues/topics are of concern and should be addressed within the scope of the **13131 Los Angeles Street Industrial Project EIR**. You may provide specific comments for these issues/topics in the space provided below and on the reverse side of this sheet.

<input checked="" type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Hazards/Hazardous Materials	<input checked="" type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Hydrology/Water Quality	<input checked="" type="checkbox"/> Transportation
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Land Use and Planning	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Utilities and Service Systems
<input checked="" type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Wildfire
<input checked="" type="checkbox"/> Energy	<input checked="" type="checkbox"/> Paleontological Resources	<input checked="" type="checkbox"/> Other <i>including full EIR showing cumulative impacts & economic impact study</i>
<input checked="" type="checkbox"/> Geology and Soils	<input checked="" type="checkbox"/> Population and Housing	
<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Public Services	

*Name (Required): Robert Diaz Phone: _____

*Address (Required): 2408 S. Mountain Ave Irwindale E-Mail: _____
91710

***Note: Your name and contact information will become part of the public record for this project.**

Yes, I would like to be added to your project mailing list to receive information on the EIR notice of availability and future public hearings.

Comments:

**CITY OF IRWINDALE SCOPING MEETING – 8/26/2019
13131 LOS ANGELES STREET INDUSTRIAL PROJECT**

Please check the boxes below to indicate which of the environmental factors or issues/topics are of concern and should be addressed within the scope of the **13131 Los Angeles Street Industrial Project EIR**. You may provide specific comments for these issues/topics in the space provided below and on the reverse side of this sheet.

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<input checked="" type="checkbox"/> Energy	<input type="checkbox"/> Paleontological Resources	<input checked="" type="checkbox"/> Other
<input type="checkbox"/> Geology and Soils	<input checked="" type="checkbox"/> Population and Housing	<i>WE SHOULD BE CONCERNED ABOUT ALL FACTORS AND ISSUES</i>
<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Public Services	

*Name (Required): Dena Zepeda Phone: 626 622 8753
 *Address (Required): 4658 Frija Irwindale E-Mail: denazepeda@yahoo.com

***Note: Your name and contact information will become part of the public record for this project.**

Yes, I would like to be added to your project mailing list to receive information on the EIR notice of availability and future public hearings.

Comments:

WE here in Irwindale keep getting clogged all around our residential areas with pollution. Please consider our HEALTH!

City of Irwindale

Environmental Impact Report (EIR) Scoping Meeting

PUBLIC COMMENT CARD

Thank you for your interest in the proposed 13131 Los Angeles Street Industrial Project. Please provide your comments below and submit this card during the public scoping meeting or mail to the address/number listed below by 5:00 p.m. on September 13, 2019. Please attach additional pages, if necessary. Your participation and comments are appreciated.

*Name (Required): Dena Zepeda Phone: 626 622 8953

*Address (Required): 4658 FRIJO AVE E-Mail: denazepeda@yahoo.com

*Note: Your name and contact information will become part of the public record for this project.

Yes, I would like to be added to your project mailing list to receive information on the EIR notice of availability and future public hearings.

Please provide your comments below:

Date: 8-26-19

my concerns are our environment being polluted and congested with more trucks, traffic, along with traffic jams. I would hope to see Environmental Friendly Projects. Would like to know how this will benefit Irwindale Residents.

Thank you

Thank you in advance for your comments. Please submit this form by 5:00 p.m. on September 13, 2019 to:



City of Irwindale
Community Development Department, Planning Division
ATTN: Marilyn Simpson
5050 North Irwindale Avenue
Irwindale, CA 91706
msimpson@irwindaleCA.gov

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Congresswoman Judy Chu
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Regional Planning Dept.
San Gabriel Valley Field Office
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Arcadia, California, 91007

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Santa Fe Dam Recreation Area
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Irwindale, CA 91706

Kevin Regan, Deputy Director
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Third Party Environmental Review
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Los Angeles, CA 90012

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Baldwin Park, CA 91706

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Gabrielino-Tongva Tribe
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Glendale, CA 91205

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Gabrielino Tongva Indians of California Tribal
Council
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Bellflower, CA 90707

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Community Development Department
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Los Angeles County Registrar, Recorder, County
Clerk Main Office
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Irvine, CA 92618

Rob Swanson
Deputy Attorney General/Environment Section
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DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

September 11, 2019

Ms. Marilyn Simpson
City of Irwindale, Community Development Department
16102 Arrow Highway, Second Floor
Irwindale, CA 91706

RE: 13131 Los Angeles Industrial
Street Project – Notice of
Preparation (NOP)
SCH # 2019080276
GTS # 07-LA-2018-02773
LA-605/PM: 22.411

Dear Ms. Marilyn Simpson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned Notice of Preparation (NOP). The Proposed Project involves the demolition of the existing on-site buildings and structures for the construction of a ±528,710 square feet stand-alone concrete tilt-up warehouse building. The proposed building would be 47.5 feet tall, with architectural features extending up to 53.5 feet tall. The building would feature forklift ramps and roll-up dock doors on the northern and western sides, respectively. The Proposed Project will include 80 trailer parking spaces on the southeast corner of the site, 70 trailer parking spaces along the western end of the site, and 261 standard vehicle parking spaces around the perimeter of the building. Landscaping and a fire lane will be installed around the perimeter of the building. The Project Proponent is pursuing the Project on a speculative basis, meaning that the proposed building's future tenants are not yet identified.

After reviewing the Notice of Preparation Caltrans has the following comments:

- Please include a Traffic Impact Analysis (TIA) with the proposed Environmental Impact Report (EIR). Due to this project's size, location, and potential impact to State facilities, Caltrans suggests the proposed TIA consider including the following areas of interest:
 - Please provide analysis of the project's impact to the State Highway System and address the added traffic volumes to the on/off-ramps of nearby State Routes. For affected off-ramps, queuing analysis based on Highway Capacity Manual (HCM) queuing methodology is strongly recommended.

- Please consider including a Construction Traffic Management Plan and Truck Haul Route Program for approval by Caltrans. It is recommended this management plan address how the project will minimize congestion on the streets and freeways during the construction period.
- Caltrans recommends that Highway Capacity Manual (HCM) methodology be used when assessing the impact a project may have on the State Highway System. For a traffic impact study of freeway mainline, weave, merge and diverge segments, the methodologies in Chapter 12, 13, and 14 of the Highway Capacity Manual (HCM) 6th edition are limited to under saturated flow conditions. When a freeway facility has oversaturated conditions, Chapter 10 is recommended to be used to determine a more precise density. It is acknowledged that there are limitations of the HCM methodology and it is recommended to use a traffic simulation model for the analysis.

Impacts to off-ramps are considered significant if the traffic generated by the project causes queueing that: (a) exceeds 85% of the off-ramp's storage capacity; or (b) when an auxiliary lane is present, exceeds the lesser of one-half the length of auxiliary lane or 1,000 feet. Additionally, when determining queueing length the analysis should use a local truck factor and 25 feet per passenger car.

When analyzing intersections please consider utilizing Synchro 10. Also, for intersection analysis, instead of using signal timing optimization for matching existing field conditions, please use actual traffic signal timing.

Caltrans is moving towards replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) when evaluating traffic impact. For any future project we encourage the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

As required by SB 743, Caltrans recommends the City of West Hollywood develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria. This step is critical as the TIR may need to be based on VMT criteria depending on when the study is completed.

Further information included for your consideration;

Greenhouse gas reduction by way of reduced vehicle miles traveled (VMT) is critical. The essential component of walkable communities is mixed-use zoning. Residential and appropriate commercial uses should be intertwined to increase accessibility and allow residents to utilize active transportation modes.

Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality or serious injury. These methods include the construction of physically separated facilities such as wide sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing. These suggestions can reduce pedestrian and bicyclist exposure to vehicles ensuring safety by lessening the time that the user is in the likely path of a motor vehicle.

Ms. Marilyn Simpson
September 11, 2019
Page 3 of 3

Signal timing can be adjusted to include Leading Pedestrian Intervals, giving pedestrians a seven second head start. Pedestrian and bicyclist warning signage, flashing beacons, high-visibility continental crosswalks, scramble crossings, flashing yellow turn signals, high-visibility green bike lanes, other signage and buffer striping should be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists.

Any development should keep livability in mind by providing shade trees, native landscaping, bioswales, street furniture, bicycle parking, bus shelters and trash cans. Bus bulb-outs can reduce conflict between bicycles and buses on busy roads. Bus only lanes are encouraged to reduce travel times and make public transit more appealing to discretionary users. Any gated communities should provide pedestrian paths and doors to ensure access to transit, shopping centers, schools and main roads. Whenever possible, a grid pattern with short blocks is recommended to promote walking. Permeable paving materials should be incorporated whenever possible.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

We look forward to reviewing this project's future Draft EIR and will provide additional comments at that time, if warranted. If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2018-02773.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

September 12, 2019

Marilyn Simpson
Community Development Manager
Community Development Department
City of Irwindale
16102 Arrow Highway, Second Floor
Irwindale, California 91706

Dear Marilyn Simpson:

Thank you for providing California Air Resources Board (CARB) staff the opportunity to comment on the Notice of Preparation (NOP) for the 13131 Los Angeles Industrial Street Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019080276. The Project consists of the construction and operation of a standalone concrete tilt-up warehouse building totaling approximately 528,710 square feet within in the City of Irwindale (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB staff is concerned about the air pollution and health risk impacts that would result should the City approve the Project to build the proposed warehouse building. Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of onsite equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.

Existing residences are located east and southeast of the Project site, with the closest residences situated approximately 700 feet from the Project's eastern boundary. In addition to residences, three schools (Walnut Elementary School, Burch Elementary School, and Olive Middle School) are located within one mile of the Project. The communities near the Project are surrounded by existing toxic diesel emission sources, which include existing warehouses and other industrial uses and vehicular traffic along Interstate 605 (I-605). Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB staff is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities

with high exposure burdens, like those in which the Project is located. Diesel emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionately impacted by air pollution from existing freight facilities.

Through its authority under Health and Safety Code, section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). Communities that score within the top 25 percent of the census tracts are exposed to higher concentrations of air pollutants and have a higher Pollution Burden.¹ CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, communities near the Project score within the top 5 percent of the census tracts. Therefore, CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

The NOP does not state whether the industrial uses proposed under the Project would include cold storage warehouses. The operation of cold storage warehouses would include trucks with transport refrigeration units (TRU) that emit significantly higher levels of toxic diesel emissions, oxides of nitrogen (NO_x), and greenhouse gases than trucks without TRUs. Since it is unclear whether the Project would include cold storage warehouse space, any modeling done in support of the air quality analysis of the DEIR and associated health risk assessment (HRA) should assume that a conservative percentage of the truck and trailer fleet that would be serving the Project site are equipped with TRUs.

In addition to the health risk associated with operations, construction health risks should be included in the air quality section of the DEIR and the Project's HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The Office of Environmental Health Hazard Assessment's (OEHHA) guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction.

¹ Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

Marilyn Simpson
September 12, 2019
Page 3

The HRA prepared in support of the Project should be based on the latest OEHHA guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),² and the South Coast Air Quality Management District's CEQA Air Quality Handbook.³ The HRA should evaluate and present the existing baseline (current conditions), future baseline (full build-out year, without the Project), and future year with the Project. The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and city planners will have a complete understanding of the potential health impacts that would result from the Project.

To reduce the exposure of toxic diesel emissions in disadvantaged communities already disproportionately impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel and NO_x emission exposure to all neighboring communities, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

CARB staff appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: See next page.

² Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: <https://oehha.ca.gov/media/downloads/crnrr/2015guidancemanual.pdf>

³ SCAQMD's 1993 Handbook can be found at <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

Marilyn Simpson
September 12, 2019
Page 4

cc: State Clearinghouse
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Stanley Armstrong
Air Pollution Specialist
Exposure Reduction Section
Transportation and Toxics Division

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

California Air Resources Board (CARB) staff recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation to minimize public exposure to air pollution. Below are some measures, currently recommend by CARB staff, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.
4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in the year 2022.¹

¹ In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB staff encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model years 2010 and later. CARB's optional low-NO_x emission standard is available at <https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm>.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to assist in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating onsite.
2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration and cryogenic transport refrigeration are encouraged and can also be included lease agreements.²
3. Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable.
4. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
5. Include contractual language in tenant lease agreements requiring all TRUs, trucks, and cars entering the Project site be zero-emission.
6. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.
7. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later today, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

² CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

8. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,³ Periodic Smoke Inspection Program (PSIP),⁴ and the Statewide Truck and Bus Regulation.⁵
9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while onsite.
10. Include contractual language in tenant lease agreements that limits onsite TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts fully mitigated.
11. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

³ In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at <https://www.arb.ca.gov/cc/hdghg/hdghg.htm>.

⁴ The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>.

⁵ The regulation requires newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>



CITY OF IRWINDALE
COMMUNITY DEVELOPMENT
SEP 13 2019

RECEIVED

September 10, 2019

Marilyn Simpson
Irwindale, City of
5050 Irwindale Avenue
Irwindale, CA 91706

RE: SCH# 2019080276, 13131 Los Angeles Street Industrial Project, Los Angeles County

Dear Ms. Simpson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

September 11, 2019

Ref. DOC 5278491

CITY OF IRWINDALE
COMMUNITY DEVELOPMENT

SEP 13 2019

RECEIVED

Ms. Marilyn Simpson
Community Development Manager
City of Irwindale
Community Development Department
16102 Arrow Highway, Second Floor
Irwindale, CA 91706

Dear Ms. Simpson:

NOP Response for 13131 Los Angeles Street Industrial Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on August 19, 2019. The proposed project is located within the jurisdictional boundaries of District No. 15. We offer the following comments regarding sewerage service:

1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp.
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts Baldwin Park Trunk Sewer, located in Harlan Avenue at Ramona Parkway. The Districts' 18-inch diameter trunk sewer has a capacity of 4.3 million gallons per day (mgd) and conveyed a peak flow of 3.2 mgd when last measured in 2013.
3. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average flow of 58.5 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.
4. The expected increase in average wastewater flow from the project, described in the notice as a 528,710 square foot concrete tilt-up building in a M-2 zone, is 99,242 gallons per day, after the structure on the project site is demolished. For a copy of the Districts' average wastewater

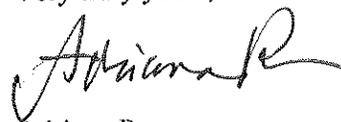
generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, and click on Connection Fee, Service Charge and More. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:dc

cc: L. Smith
A. Schmidt
A. Howard



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

September 10, 2019

msimpson@IrwindaleCA.gov

Marilyn Simpson, Manager
City of Irwindale, Community Development Department
16102 Arrow Highway, Second Floor
Irwindale CA 91706

Notice of Preparation of a Draft Environmental Impact Report for the Proposed 13131 Los Angeles Industrial Street Project¹

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion and public release. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files². These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality and health risk assessment analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

¹ The Proposed Project would include, among others, construction of a 528,710-square-foot warehouse on 24.9 acres.

² Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

Operation of the Proposed Project generates or attracts heavy-duty diesel-fueled vehicles. It is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance³ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd/technical_advisory_final.PDF.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study

³ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

(MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions, and that the Los Angeles County within the South Coast Air Basin has the greatest average cancer risk at 415 in one million⁴. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Thus, cumulative impacts from warehouse projects in communities with existing industrial sources should be evaluated and disclosed in the Draft EIR.

Trip Rates for High Cube Warehouse Projects

The Proposed Project will include, among others, construction of a 528,710-square-foot warehouse on 24.9 acres. South Coast AQMD staff recommends the use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in South Coast AQMD (i.e. 1.68 average daily vehicle trips per 1,000 square feet and 0.64 average daily truck trips per 1,000 square feet). Consistent with CEQA Guidelines, the Draft EIR for the Proposed Project may use a non-default trip rate if there is substantial evidence supporting another rate is more appropriate for the air quality analysis.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’S *CEQA Air Quality Handbook*. South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- California Air Pollution Control Officers Association (CAPCOA)’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Additional mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB’s adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year⁵ trucks (e.g.,

⁴ South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Accessed at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>

⁵ The CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter

material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks⁶. Include environmental analyses to evaluate, identify, and provide sufficient power and infrastructure available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. The Lead Agency should include the requirement of zero-emission or near-zero emission heavy-duty trucks in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)⁷. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, South Coast AQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, South Coast AQMD staff recommends that the Lead Agency require at least five percent of all vehicle parking spaces (including for trucks) include EV charging stations⁸. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.

requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

⁶ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁷ Southern California Association of Governments. Accessed at: <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.

⁸ City of Los Angeles. Accessed at:

http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the Proposed Project to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors.

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy including solar panels.
- Install the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility and/or EV charging stations.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Alternative

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and South Coast AQMD Rules

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the certified Final EIR will be the basis for permit conditions and limits. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD's webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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Control Number