

# **Appendix A**

**Initial Study, Notice of Preparation, and NOP Comments**



# INITIAL STUDY / NOTICE OF PREPARATION

FOR THE

## 5175 VINCENT AVENUE PROJECT

FEBRUARY 2020

*Prepared for:*

City of Irwindale  
Community Development Department  
Planning Division  
5050 North Irwindale Avenue  
Irwindale, CA 91706

*Prepared by:*

De Novo Planning Group  
1020 Suncoast Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 580-9818

D e N o v o P l a n n i n g G r o u p

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A Land Use Planning, Design, and Environmental Firm





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## Notice of Scoping Meeting and Preparation of a Draft Environmental Impact Report

**DATE OF NOTICE:** February 10, 2020

**To:** State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Organizations and Interested Persons

**SUBJECT:** Notice of Scoping Meeting and Preparation of a Draft Environmental Impact Report

**PROJECT TITLE:** 5175 Vincent Avenue Project

**PROJECT LOCATION:** 5175 Vincent Avenue, Irwindale, CA 91706

**LEAD AGENCY:** City of Irwindale

**LEAD AGENCY CONTACT:** Brandi Jones, Senior Planner  
City of Irwindale, Community Development Department  
Planning Division  
5050 North Irwindale Avenue  
Irwindale, CA 91706  
Phone: (626) 430-2260  
Email: [BJones@IrwindaleCA.gov](mailto:BJones@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 5175 Vincent Avenue 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 March 11, 2020. **Please send your comments, including a return address and contact name, via mail or email to the identified Lead Agency Contact.**

**SCOPING MEETING:** In accordance with CEQA Guidelines 15082, a public Scoping Meeting will be held on Thursday, February 20, 2020, at 6:00 PM at the Dan Diaz Recreation Center, located at 16053 Calle de Paseo, Irwindale, CA.

**PROJECT LOCATION:** The 5175 Vincent Avenue Project site (project site) is located north of a Los Angeles County-owned pit, east of Allen Drive, south of Arrow Highway, and west of Vincent Avenue in Irwindale, California. The project site totals approximately 26.05 acres and is comprised of two vacant parcels; one of which is an undeveloped, recently filled, former aggregate mine pit known as the Manning Pit. The Assessor's Parcel Numbers (APNs) for the project site are 8417-034-015 and 8417-034-016 (formally APNs: 8417-034-904, 8417-034-910, and 8417-034-911).

**PROJECT DESCRIPTION:** The City has received an application for the development of a 545,735 square feet (sf) high-cube industrial warehouse building. The building would be a concrete tilt-up; approximately 540,447 sf would be ground floor area and 5,000 sf would be mezzanine area. The site currently has two General Plan designations: "Residential" and "Industrial/Business Park". An additional application is required to change the 6.93-acre portion of the parcel from "Residential" to "Industrial/Business Park," which is consistent with the land use on the balance of the parcel. The application considers the development of the entire parcel as a single use industrial project. This amendment would designate the entire parcel as "Industrial/Business Park" per the General Plan and also consistent with the M-2 (Heavy Manufacturing) zoning designation.

A typical high-cube warehouse has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the high-cube warehouse. High-cube warehouses are generally grouped into five types: transload facility, short-term storage facility, fulfillment center, parcel hub, and cold storage facility. The proposed project, however, specifically excludes fulfillment center, parcel hub, and cold storage facility as a potential end user of the building. The applicant has expressly prohibited these three uses (fulfillment center, parcel hub, and cold storage facility), and has agreed to condition the project to further prohibit their use. Other end users could include light industrial or manufacturing uses.

There is not a specific end user/business established for the building at this time. There are a variety of possible businesses that could occupy the building, and operate their business out of the proposed building. As mentioned, there are certain uses that are prohibited from occupying the building. The uses for the proposed building may include any of the following: Manufacturing Warehouse, Light Industrial, High-Cube Short-term, and High-Cube Transload. These uses are allowed under the Industrial/Business Park General Plan Land Use Designation and M-2 (Heavy Manufacturing) zoning designation.

The project also includes circulation and parking improvements on-site. The proposed project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities.

The City of Irwindale is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA, Section 15050. The document will be used by the City of Irwindale to take the following actions:

- Adoption of the EIR;
- Adoption of the Mitigation Monitoring and Reporting Program (MMRP);
- Site Plan and Design Review (Discretionary Application) to approve the proposed site plan, which includes site and building configuration, design, location, and impact of the proposed use, and the compliance of the project with the established Zoning Code standard and the "City of Irwindale Commercial and Industrial Design Guidelines";
- General Plan Amendment to approve the change of the current General Plan designation from "Residential" to "Industrial/Business Park" for a portion of APN 8417-034-016; and
- Approval of the Lot Line Adjustment to combine APNs 8417-034-015 and 8417-034-016.

The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- Regional Water Quality Control Board (RWQCB) – Construction activities would be required to be covered under the National Pollution Discharge Elimination System (NPDES);
- RWQCB – The Storm Water Pollution Prevention Plan (SWPPP) would be required to be approved prior to construction activities pursuant to the Clean Water Act;
- South Coast Air Quality Management District (SCAQMD) – Construction activities would be subject to the SCAQMD permits, codes, and requirements.

**INITIAL STUDY:** An Initial Study has been prepared for this project. The Initial Study identifies environmental areas/issues that would result in No Impact or a Less than Significant Impact, and environmental areas/issues that would result in a Potentially Significant Impact. All Potentially Significant Impact areas/issues will be addressed in greater detail in the Draft EIR. Areas/issues that would result in No Impact or a Less than Significant Impact, as identified in the Initial Study, will not be addressed further in the Draft EIR.

A copy of the Initial Study, including additional information on the project proposal, is on the City's website at: <https://www.irwindaleca.gov/index.aspx?nid=400>.

**POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT:** The Draft EIR will examine some of the environmental areas contained in Appendix G of the State CEQA Guidelines. The topics to be addressed in the Draft EIR include: Aesthetics, Air Quality, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation, Cumulative Impacts, and Growth Inducing Impacts. The content of the Draft EIR will be subject to input received during the NOP comment period.

Date: 02/06/2020 Signature: 

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## INITIAL STUDY CHECKLIST

### **PROJECT TITLE**

5175 Vincent Avenue Project

### **LEAD AGENCY NAME AND ADDRESS**

City of Irwindale  
Community Development Department  
Planning Division  
5050 North Irwindale Avenue  
Irwindale, CA 91706

### **CONTACT PERSON AND PHONE NUMBER**

Brandi Jones, Senior Planner  
City of Irwindale  
Community Development Department  
Planning Division  
5050 North Irwindale Avenue  
Irwindale, CA 91706  
BJones@IrwindaleCA.gov  
(626) 430-2260

### **PROJECT SPONSOR'S NAME AND ADDRESS**

Mark Gabay  
Charles Company  
9034 West Sunset Boulevard  
West Hollywood, CA 90069

### **PROJECT LOCATION AND SETTING**

The 5175 Vincent Avenue Project site (project site) is located north of a Los Angeles County-owned pit, east of Allen Drive, south of Arrow Highway, and west of Vincent Avenue in Irwindale, California (Figures 1 and 2). The project site totals approximately 26.05 acres and is comprised of two vacant parcels; one of which is an undeveloped, recently filled, former aggregate mine pit known as the Manning Pit (Figure 3). The 2020 Assessor's Parcel Numbers (APNs) for the project site are 8417-034-015 and 8417-034-016 (formally APNs: 8417-034-904, 8417-034-910, and 8417-034-911) (Figure 4). The elevation of the site ranges from approximately 400 feet to 460 feet above mean sea level (MSL). The property is immediately adjacent to unincorporated Los Angeles County to the south and east.

### **HISTORICAL BACKGROUND**

The project site is the general location of the former Irwindale Pit No. 1 (Manning Brothers Pit) Project, which proposed reclamation of the historic mining pit. Mining of the Manning Pit began in the 1930s and was completed in the 1970s. During mining operations, the pit was excavated to a maximum depth of 240 feet above mean sea level (msl), which equates to approximately 230 feet below ground surface (bgs). A portion of the site was subsequently used to dispose of silt, clay, and sand wash products (fines) from an on-site aggregate processing facility. The volume of the fine materials disposed of is estimated at 352,000 cubic yards.

The City of Irwindale acquired the northern portion of the pit (approximately 37 acres) in the late 1980s from the County of Los Angeles, and the County retained the remainder (approximately 45 acres) which is currently used as a supplemental water recharge basin in conjunction with the Irwindale Recharge Basin, located just to the west.

After its acquisition, the City began backfilling the site with a variety of construction debris (e.g., soil, concrete, asphalt, rebar, bricks, and cinder blocks) and other inert materials. At that time, no Quality Assurance/Quality Control (QA/QC) Program was performed to assure that the backfilling operation met the geotechnical considerations for future development of the site. However, backfilling was stopped in 1992 when it was discovered that improper filling methods had been used by the contractor. There was an estimated 665,000 cubic yards of rubble material placed over the estimated 352,000 cubic yards of fine materials. Therefore, the total estimated backfill volume that had been placed within the pit was about 1,017,000 cubic yards.

At that time, the Project site was surface mapped to establish the overall nature of backfill within the area. Surface mapping of the site confirmed that the upper layer of the pit consisted of various construction rubble as well as large voids. In addition, portions of the perimeter slopes were underlain by non-engineered fill and talus material. The surface mapping also revealed that relatively small wedges of engineered fill were under the perimeter slopes in the northwest corner of the Project site.

In October 2005, the City contracted with GeoLogic Associates to perform a field exploration program to characterize the historical backfill on the Project site. The exploration consisted of drilling five borings through the backfill material to native soil at various locations along the bottom of the pit. The purpose of the borings was to determine:

- The nature and types of backfill present in the pit;
- The volume of backfill present in the pit; and
- The current groundwater level below the pit.

The results of the exploration program confirmed that two distinct layers of backfill material existed. The upper layer consisted of very coarse construction rubble and varied in depth from approximately 27 to 39 feet below the current bottom of the pit surface. The borings indicated that the upper layer was highly voided with little soil mixed in the construction rubble. The lower level consisted of aggregate mining waste (e.g., fine to very fine-grained sand, very fine sandy silt, and silt) from the processing plant operation and varied from about 7 to 43 feet in depth. These 2005 boring results were consistent with the findings of an earlier investigation performed by Greystone Environmental Consultants in 2000.

The highest groundwater elevation observed during borings was 283 feet above msl. This elevation appears to be the highest groundwater elevation, because it reflects the record rainfall of the preceding winter of 2004/2005. This groundwater elevation may also reflect water mounding from the Los Angeles County storage and recharge operations just south of the City's site. Therefore, it was determined that approximately 55 feet of backfill material lies below the reported high groundwater level.

The boring results indicated that the historical backfill materials at the mine did not meet engineered backfill requirements specified in the City of Irwindale's *Guidelines for Above Water Backfilling of Open-Pit Mines* (November 22, 2005) or the applicable Building Codes. Consequently, the City proposed to partially or completely remove the historic fill, reprocess the material, and recompact the historical backfill in accordance with the current City and County

requirements. The City determined that as future (clean soil) fill material is brought to the site, it would be required to meet these guidelines.

In response to the geotechnical data and conclusions from the testing, the City decided to reclaim the Project site in accordance with the City and County codes and guidelines. The mining waste under the construction rubble would be inspected by a Geotechnical Engineer who would determine suitability to be left in place. Native alluvium material would not be removed. After reclamation, the City would then consider development proposals.

In the process of backfilling and grading, non-engineered backfill material would be excavated and stockpiled on the site. Clean soil that meets the general particle size guidelines set by the City for disposal above and below the water table would then be imported to the site and placed as compacted backfill. On-site stockpiled backfill that contains materials restricted for disposal in groundwater (e.g., asphalt and other materials) would be set aside for subsequent placement in the above-groundwater portion of the pit area. Some of the imported backfill would be blended with the on-site backfill so that the composited materials meet City and County requirements. When on-site backfill is depleted, the remainder of the site would be backfilled using clean soil. Materials unsuitable for backfill use would be removed from the site and disposed of in accordance with the applicable federal and State laws.

Compaction and other regulations dealing with the backfill materials are covered in the City of Irwindale's Building Code and Backfilling Guidelines, which identify material specifications, testing requirements, and other conditions for backfilling and grading. General material specifications include:

- Proper moisture levels;
- Fill materials placed deeper than 40 feet are required to be compacted to at least 93 percent; and
- Fill materials placed within 40 feet are required to be compacted to at least 90 percent.

It was estimated that approximately five million cubic yards of additional backfill material would be needed to fill the pit to near street level. All of these incoming materials would need to be screened to make sure they were not contaminated and met backfill requirements. It was estimated that backfilling and grading of the pit would take approximately six to seven years to complete assuming an annual rate of approximately 840,000 cubic yards of backfill materials. Backfill was estimated to require approximately 200 truck trips to the site daily.

The operation plan established that the maximum operating hours for the pit would be from 7:00 am to 5:00 pm Monday through Friday, and from 7:00 am through 4:00 pm on Saturday. On-site equipment was estimated to consist of 972G and 980 (G or H) loaders; 2,000- and 4,000-gallon watering trucks; 320C, 345B, or 365B excavators; rock, asphalt, or concrete crushers; 824C, 823C, D8R, or D10R bulldozers; dump and haul trucks; and other assorted equipment.

In October 2007, the former Irwindale Community Redevelopment Agency approved a License Agreement for Windrow Earth Transport (WET), Inc. to perform remediation and grading of the Manning Pit Project. The following is a summary of the scope of work for this project:

- a. Remediate the existing uncertified rubble fill that was placed by K & K Contractor.
- b. Complete the grading of the site with clean soil fill to final surface design elevation.

- c. Pay for any required environmental and geotechnical oversight to ensure that all import and placed soil meets all regulatory guidelines and to provide all necessary certifications for a buildable site after the completion of the project.
- d. Mitigate the silt and mining waste products using acceptable methods approved by the City Engineer's office.
- e. Prepare final closure report to be submitted to State Regional Water Quality Control Board (RWQCB), as required by the Manning Pit Waste Discharge Requirements.

With the elimination of all redevelopment agencies in the State of California in 2012, the City Council approved the purchase of the Manning Pit from the Successor Agency to the Irwindale Community Redevelopment Agency in August 2014 in order to continue with the remediation and grading of the site. The Manning Pit Project was completed in January 2019. As required in the License Agreement, the operator submitted a request to the City to commence the process to close the project. According to the grading permit issued to the Windrow Earth Transport, Inc., the onsite drainage improvements and Storm Water Prevention measures were implemented in compliance with the current building code.

With the project acceptance by the City, a final closure package must be submitted to the State Regional Water Quality Control Board (RWQCB), as required by the Manning Pit Waste Discharge Requirements. In accordance with the License Agreement, the City Council approved the release of the project In Lieu Bond Fee in the amount of \$210,000 from the Manning Project Trust Fund deposit account, to be returned to the Special Mining Fund Balance upon receiving the final approval from RWQCB. The City Council also authorized a Lot Line Adjustment to release the southerly ten foot area that is a part of the engineered buttress fill across the property boundary between the City Manning Pit and the Los Angeles County Flood Control District owned portion of the Manning Pit to the current property owner for future operation and maintenance as required by the City County Cooperative Agreement.

## **PUBLIC OUTREACH**

On August 9, 2018, the Planning Division hosted a community meeting at the Irwindale Community Center. The purpose of the meeting was to provide an opportunity to review and comment on the proposed project, ask questions, and understand the process. Representatives from Five Points, LLC and City staff attended. The meeting was well attended and the primary areas of concern were current issues with dust and trucks, and the potential impact of the proposed project. Staff answered questions and made themselves available for assistance after the meeting via email and phone. Due to the project's speculative nature, staff indicated that there are many potential uses that are permitted by right due to the current zoning designation, but that certain uses would not be allowed or would be subject to a Conditional Use Permit; these uses would require Planning Commission approval and be subject to a set of Conditions of Approval. On January 30, 2019, the General Plan Amendment and Site Plan and Design Review (DA) applications were continued to a date uncertain. The public hearing was opened for the continued item, which allowed for public comment. During the public comment period, residents from the City of Irwindale and unincorporated Los Angeles County spoke about the item.

The City prepared an Initial Study (IS) for the proposed project in 2018 to evaluate the anticipated environmental impacts associated with development of the project site in accordance with the application. A proposed Mitigated Negative Declaration was subsequently submitted to the State Clearinghouse for review on December 20, 2018 (State Clearinghouse # 2018121056). Public review of the document occurred from December 20, 2018 through January 22, 2019.

During the public review period, twelve comment letters were received as follows: California Air Resources Board, California Department of Justice (Bureau of Environmental Justice), California Department of Transportation, California Environmental Protection Agency (Department of Resources Recycling and Recovery), County of Los Angeles Public Health (Environmental Health Division), County Sanitation District of Los Angeles County, Gabrieleño Band of Mission Indians (Kizh Nation), Golden State Environmental Justice Alliance, South Coast Air Quality Management District, California Department of Toxic Substances Control, California Department of Justice (Bureau of Environmental Justice), and California Governor's Office of Planning and Research (State Clearinghouse and Planning Unit). These comment letters raised concerns regarding a variety of CEQA topics, and several commenters specifically suggested that an EIR is warranted. The City of Irwindale, in consideration of the comments and suggestions provided throughout the public outreach process to date, decided to prepare an EIR to address those specific concerns raised by the comment letters.

## **PROJECT DESCRIPTION**

The proposed project is the development of 26.05 acres of land that was formerly used as a mining pit (Manning Pit) dating back to the 1930s. A reclamation process for the mine was completed and a closure report was approved by the City Council in January 2019 allowing for the development of the site for new development.

### *GENERAL PLAN AMENDMENT*

The City of Irwindale General Plan specifically addresses development of the Manning Pit, a portion of which is the project site. The General Plan notes that the City owned the northern portion of the pit, which contains two parcels: 8417-034-912 and 8417-034-16. The western parcel on the Manning Pit (8417-034-912) is approximately 10 acres and is designated Residential. The eastern parcel is the project site, and contains 19.12 acres of Industrial/Business Park and 6.93 acres of Residential. The entire 26.05 acres is zoned M-2 "Heavy Manufacturing." This inconsistency between the General Plan land use designation and the Zoning is associated with the 6.93 acres of Residential land use where the designation doesn't align with the parcel boundary. The inconsistency between the General Plan and the zoning requires an amendment to bring the allowed uses/zoning into consistency before the project could be developed in a way that meets the project objectives.

The City has received an application to change the 6.93-acre portion of the parcel from "Residential" to "Industrial/Business Park," which is consistent with the land use on the balance of the parcel. The application involves the development of the entire parcel as a single use industrial project. This amendment would make the entire parcel a single use. The parcel to the west of the subject property would remain designated Residential.

The Industrial/Business Park General Plan land use designation allows for a variety of uses including: light industry, heavy industry, distribution, or commercial uses. The proposed project, however, is an industrial warehouse building, which is specifically allowed under the Industrial/Business Park land use and the M-2 "Heavy Manufacturing" zoning.

### *INDUSTRIAL WAREHOUSE BUILDING*

Using the maximum floor-area-ratio (FAR) for the Industrial/Business Park designation (1.0), the development of the site would allow for the construction of 1,134,738 square feet (sf) of industrial uses, 832,867 sf of which is located on the 19.12 acres that is currently designated Industrial/Business Park under the existing General Plan land use. The application received by the City of Irwindale does not propose a building anywhere close to the maximum FAR for the

project site. Instead, the application submitted to the City includes an industrial warehouse building totaling 545,735 sf, which is approximately 48% of the maximum FAR allowed for this General Plan land use.

The proposed project includes development of a 545,735 sf industrial warehouse building. The building would be a concrete tilt-up. Approximately 540,447 sf would be ground floor area and 5,000 sf would be mezzanine area. The proposed site plan is shown on Figure 5.

#### *POTENTIAL END-USERS/BUSINESSES*

A high-cube warehouse is a building that typically has at least 200,000 gross sf of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. Given that the proposed project includes an industrial warehouse building totaling 545,735 square feet, it is classified as a high-cube warehouse building.

A typical high-cube warehouse has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the high-cube warehouse. High-cube warehouses are generally grouped into five types: transload facility, short-term storage facility, fulfillment center, parcel hub, and cold storage facility. The proposed project, however, specifically excludes fulfillment center, parcel hub, and cold storage facility as a potential end user of the building. The applicant has indicated that these three uses (fulfillment center, parcel hub, and cold storage facility) are not proposed uses, and the applicant has agreed to conditions the project to prohibit the building from being used as such. Other end users could include light industrial or manufacturing uses.

There is not a specific end user/business established for the building at this time. There are a variety of possible businesses that could occupy the building, and operate their business out of the proposed building. As mentioned, there are certain uses that are prohibited from occupying the building. The uses for the proposed building may include any of the following: Manufacturing Warehouse, Light Industrial, High-Cube Short-term, and High-Cube Transload. These uses are allowed under the Industrial/Business Park land use designation and M-2 "Heavy Manufacturing" zoning designation.

#### *CIRCULATION AND TRANSPORTATION*

Regional access to the project area is provided by the I-605 Freeway to the west, I-10 Freeway to the south, and the I-210 Freeway to the north. Key north-south roadways providing local access include Irwindale Avenue, Vincent Avenue, and Lark Ellen Avenue. Key east-west roadways providing local access include Gladstone Street, Arrow Highway, and Cypress Street.

Access to the project site would be provided at two locations: one entrance off Vincent Avenue in the southeastern corner of the site, and another entrance off Vincent Avenue in the northeastern corner of the site. Each of these access points allow for emergency vehicle access. The site plan includes 199 standard parking stalls and 181 trailer stalls, which would be provided along the perimeter of the site.

The project area is served by Foothill Transit and Baldwin Park Transit. Foothill Transit Routes 185/272/492 and the Baldwin Park Teal Line provide transit service along parts of Live Oak Avenue, Baldwin Park Boulevard, Arrow Highway, and Irwindale Avenue. The nearest transit stop is Foothill Transit Route 492 located at the intersection of Vincent Avenue/Arrow Highway approximately 300 feet from the project site.

## *UTILITIES*

The proposed project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. Existing storm drain, sewer, water, and gas lines/pipes are currently located along Vincent Avenue and Allen Drive. Additionally, storm water facilities (i.e., storm drains and storm drain catch basins) currently exist at the existing industrial park area adjacent north of the site.

*Wastewater:* The Sanitation Districts of Los Angeles County provides all of Irwindale's sewer services. The great majority of the City is served by Sanitation District 22; with a small portion of its southwestern area served by District 15. It is anticipated that Sanitation District 22 will serve the proposed project. Wastewater for areas served by Sanitation District 22 is treated at the San Jose Creek Water Reclamation Plan (WRP). The District's trunk sewer lines extend throughout the City, with no under-served areas. The Los Angeles County Sewer Maintenance District, located in Alhambra, provides maintenance for the City's six miles of sewers on a contract basis, including emergency services on a 24-hour basis. The proposed project would connect to existing City infrastructure to provide sewer service. Existing sewer lines are currently located along Vincent Avenue and Allen Drive. The flow rates shown in the Sanitation Districts of Los Angeles County loadings table for District 22 were used. Assuming a flow rate of 25 gallons per day (gpd) per 1,000 sf, the project would generate a total wastewater flow of approximately 13,643 gpd. The design capacity of the San Jose Creek WRP is 100 million gallons per day (mgd). The WRP currently processes an average flow of 69.4 mgd. The total additional average wastewater flow increased by buildout of the project (13,643 gpd) would not exceed the design capacity of the San Jose Creek WRP.

*Storm Drainage:* The project site consists of two drainage sub-areas, 1A (12.83 acres) and 2A (12.62 acres), which roughly bisect the site. In order to meet the City of Irwindale and County of Los Angeles storm water quality requirements, biofiltration best management practices (BMPs) will be utilized to meet low impact development (LID)/storm water quality requirements. Planned biofiltration BMPs include Measure BIO-1 (biofiltration) of the County of Los Angeles Department of Public Works LID Standards Manual (February 2014).

Biofiltration systems use vegetation and soils or other filtration media to treat stormwater runoff. As stormwater runoff passes through the vegetation and the filtration media, the combined effects of filtration, adsorption, and biological uptake remove pollutants. In biofiltration systems, organic material in the soils retains water and promotes pollutant adsorption (i.e., dissolved metals, petroleum hydrocarbons) into the soil matrix. Plants use soil moisture, promote the drying of the soil through transpiration, and uptake pollutants in their roots and leaves. Plants with extensive root systems also help to maintain infiltration rates. Vegetation also decreases the velocity of flow and allows for particulates to settle. Biofiltration systems must be designed according to specifications outlined in the Biofiltration Fact Sheet (BIO-1) in Appendix E of the LID Standards Manual. Biofiltration systems with liners and underdrains will be located around the site perimeter, as well as proprietary high-flow devices that are approved for use by the County. An underground detention system will be required to mitigate peak flows, consistent with County requirements.

Any excess flow would be routed off-site via a 30-inch storm drain pipe prior to ultimately discharging to an existing 90-inch storm drain pipe which is owned and maintained by the Los Angeles County Flood Control District. The property owner will maintain the on-site drainage system, which would consist of catch basin, curb drains, and infiltration/detention system. The proposed storm drains and infiltration/detention system has been designed to convey the

required flow rates and will comply with the flood protection and storm water quality requirements of the City of Irwindale and County of Los Angeles.

*Water:* The City of Azusa Water Department, which owns the Azusa Light & Water (ALW), provides basic water 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. ALW's water supply consists of imported water, groundwater, and surface water. ALW distributes water to its 23,000 service customers through a 281-mile network of distribution mains ranging from two to 30 inches in size. It is estimated that the proposed project would generate between 15 and 250 employees, which is estimated to require between 2,937 gallons per day (3.3 acre-feet per year [AFY]) and 48,950 gallons per day (approximately 54.9 AFY). According to the ALW's 2015 UWMP, ALW can expect to meet the needs of its customers through 2040. The existing water system has sufficient capacity to handle the water demand from the proposed project.

*Solid Waste:* The City of Irwindale has an exclusive franchise agreement with Athens Services to provide mixed waste collection services and other available programs to its residents and business community. During operation of the project, the warehouse uses would produce solid waste that would be collected and transferred to the landfill system. Using CalRecycle's manufacturing/warehouse use solid waste generation rate of 1.42 pounds per 100 sf per day, the project is expected to produce approximately 7,749 pounds per day (1,414 tons of solid waste annually).

The City of Irwindale is required to maintain a 50 percent diversion rate as mandated by the state via the California Integrated Waste Management Act for all solid waste. The project is subject to this diversion rate for solid waste generated by the project. The solid waste generated by the project would place a minimal burden on the City's required diversion rate. The increase would not require additional landfill capacity.

*Natural Gas and Electricity:* Electricity would be provided by Southern California Edison and natural gas will be provided by the Southern California Gas Company.

### *PUBLIC SERVICES*

*Fire Protection:* Fire protection service would be provided by the Los Angeles County Fire Department (LACoFD). The City of Irwindale is served by two fire stations: Irwindale Station 48 (located at 15546 Arrow Highway in Irwindale) and Baldwin Park Station 29 (located at 14334 Los Angeles Street in Baldwin Park). Both of these stations are maintained by the LACoFD. The Irwindale Station is located 0.65 miles west of the project site.

Station 48 has a staff consisting 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 six minutes. Additional emergency resources are available from other California Division of Forestry (CDF) stations, the nearest being in Baldwin Park. The CDF equipment includes a snorkel truck and a triple pump. The City has an overall fire insurance rating 3 with the availability of alarm systems.

Funding for fire operations and services is derived from a combination of development impact fees, and a variety of annual taxes. The project applicant will pay development impact fees related to fire protection, and annual local taxes to fund fire protection services.

*Police Protection:* Police protection service would be provided by the Irwindale Police Department. The Irwindale Police Department consists of 28 full-time police officers, three reserve officers, and 12 civilian employees. Response times in most areas of the City are five minutes or less. A mutual aid contract with the Los Angeles County Sheriff's Department provides for special weapons teams when required, and other specialized equipment or services including homicide investigations. Air support services are provided through a contract with the Pasadena Police Department. Jail bookings are accomplished through a contract for services with the Glendora Police Department Jail Facility.

The City expands police protection service consistent with community needs and provides an adequate level of service based on demand. The project applicant will pay development impact fees related to police protection, and annual local taxes to fund police protection services.

## **GENERAL PLAN AND ZONING**

The project site is designated as "Industrial/Business Park" and "Residential" by the City's General Plan Land Use Map (Figure 6) and is zoned as M-2 "Heavy Manufacturing" (Figure 7). As shown in Figure 6 and discussed above, the project applicant is requesting a General Plan Amendment to change the current designation from "Residential" to "Industrial/Business Park" for a 6.93-acre portion of APN 8417-034-016. The project site is also subject to the Irwindale Commercial & Industrial Design Guidelines.

## **ALTERNATIVES**

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that meet most or all project objectives while reducing or avoiding one or more significant environmental effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6[f]). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

Alternatives that are evaluated in the EIR must be potentially feasible alternatives. However, not all possible alternatives need to be analyzed. An EIR must "set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines, Section 15126.6(f).) The CEQA Guidelines provide a definition for a "range of reasonable alternatives" and, thus limit the number and type of alternatives that need to be evaluated in an EIR. An EIR need not include any action alternatives inconsistent with the lead agency's fundamental underlying purpose in proposing a project. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1166.)

First and foremost, alternatives in an EIR must be potentially feasible. In the context of CEQA, "feasible" is defined as:

*... capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines 15364)*

The inclusion of an alternative in an EIR is not evidence that it is feasible as a matter of law, but rather reflects the judgment of lead agency staff that the alternative is potentially feasible. The final determination of feasibility will be made by the lead agency decision-making body through the adoption of CEQA Findings at the time of action on the Project. (Mira Mar Mobile Community

v. City of Oceanside (2004) 119 Cal.App.4th 477, 489 see also CEQA Guidelines, §§ 15091(a) (3) (findings requirement, where alternatives can be rejected as infeasible); 15126.6 ([an EIR] must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation”).) The following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (Section 15126.6 (f) (1)).

Equally important to attaining the project objectives is the reduction of some or all significant impacts, particularly those that could not be mitigated to a less-than-significant level.

## **PROJECT GOALS AND OBJECTIVES**

The principal objective of the proposed project is the approval and subsequent development of the 26.05-acre parcel for Industrial uses. The quantifiable objectives of the proposed project include the development of 26.05 acres with a 545,735 square-foot industrial warehouse building. The proposed project has developed the following objectives for the proposed project:

- **Quantified Development:** Development of land use densities and intensities at quantities that maximize the use of the land as a single development to meet the demands of the market while considering zoning and land uses restrictions. The quantifiable objectives include the development of approximately 26.05 acres with a 545,735 square-foot industrial warehouse that provides employment-generating development.
- **Economic Contribution:** Strengthen the City's economic base through project's job creation; development related investment; disposable income from future employees; and increased property, sales, and transient occupancy taxes.
- **Employment Opportunities:** Provide for local and regional employment opportunities that take advantage of the areas high level of accessibility, allow for the expansion of the City's economic base, help create a jobs/housing balance, and reduce the commute for local residents.
- **Public Facilities and Services:** Provide infrastructure and services that meet City standards, integrate with existing and planned facilities and connections and do not diminish services to existing residents of the City.
- **Marketable High Cube Warehouse:** Provide for the construction of a high-cube warehouse facility that could attract a variety of end users, including transload facility, short-term storage facility, light industrial, and/or manufacturing uses. The facility should be designed with efficient transportation access and circulation within the site, accessible loading bays on two sides of the building, and a high level of on-site automation and logistics management to enable highly-efficient processing of goods through the high-cube warehouse.
- **End User Restrictions:** Restrict the use of the warehouse building such that no business would be able to operate a fulfillment center, parcel hub, or cold storage facility. The intent of this restriction is to minimize the potential air quality impacts from such end users.
- **Buffer Surrounding Uses:** Provide a landscaped buffer with sound attenuation along Vincent Avenue to buffer neighboring uses.
- **Redevelopment of the Manning Pit:** Complete the remediation, closure, and redevelopment of the Manning Pit in accordance with the General Plan, such that the site can be converted into a use that provides jobs and provides a tax base for the community.

## ALTERNATIVES CONSIDERED

Alternatives to the proposed project were developed based on input from City staff and the project applicant. The alternatives developed include the following four alternatives:

- No Project (No Build) Alternative
- Maximum FAR Alternative
- Multiple Building Alternative

### *NO PROJECT (NO BUILD) ALTERNATIVE*

The CEQA Guidelines (Section 15126.6[e]) require consideration of a no project alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. For purposes of this analysis, the No Project (No Build) Alternative assumes that development of the project would not occur, and the project site would remain in its current undeveloped condition. It is noted that the No Project (No Build) Alternative would fail to meet the project objectives identified for the proposed project and is inconsistent with the goals of the General Plan for the development of the Manning Pit.

### *MULTIPLE BUILDING ALTERNATIVE*

Under this alternative, the project site would be developed with three separate industrial warehouse buildings: Building 1 (121,397 sf with 111 parking stalls); Building 2 (121,373 sf with 91 parking stalls); and Building 3 (301,713 sf with 194 parking stalls). As shown in Figure 8, Buildings 1 and 2 would be located along Vincent Avenue (on the eastern half of the site), and Building 3 would be located on the western half of the site. Buildings 1 and 2 would each contain two 5,000 sf office areas, and Building 3 would contain four 5,000 sf office areas. Automobile parking among the three buildings would not be shared and would be dedicated to each building. However, the trailer parking for the trucks would be shared. It is noted that this alternative results in approximately the same total square footage as the proposed project.

The following table summarizes the building area, parking, and lot coverage for each of the three buildings proposed under the Multiple Building Alternative:

	<i>Building Area (sf)</i>			<i>Lot Coverage (FAR %)</i>
	<i>Office</i>	<i>Warehouse</i>	<i>Total</i>	
Building 1	10,000	111,397	121,397	43.88
Building 2	10,000	111,373	121,373	46.42
Building 3	20,000	281,713	301,713	51.30
<i>Overall</i>	<i>40,000</i>	<i>504,483</i>	<i>544,483</i>	<i>47.2 (average)</i>

### *MAXIMUM FAR ALTERNATIVE*

Under this alternative, the project site would have the same footprint as the proposed project. This alternative assumes that the full 26.05 acres would be developed using this maximum floor-area-ratio (FAR) for the Industrial/Business Park designation (1.0). This alternative would result in a high cube warehouse that would total 1,134,738 square feet of industrial uses. This alternative would warrant a General Plan amendment for the 6.93 acres of residential land, because it would be a part of the development. The existing General Plan designation and zoning designation for the 6.93 acres would be reconciled through the General Plan amendment.

## **ALTERNATIVE CONSIDERED, BUT ELIMINATED**

### *ALTERNATIVE LOCATION*

CEQA Guidelines section 15126.6(f)(2) describes conditions under which consideration of alternative project location is appropriate. The key question to be considered is whether or not any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location and whether the proposed project, placed at an alternative location, is environmentally superior to the proposed project. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in an EIR.

The City of Irwindale considered locations for development throughout the City. The City's key considerations in identifying an alternative location were as follows:

- Is there an alternative location where significant effects of the project would be avoided or substantially lessened?
- Is there a site available within the City's Sphere of Influence with the appropriate size and characteristics such that it would meet the basic project objectives?

The City has reviewed maps and planning documents in their consideration of alternative locations for the project. The City has not found an alternative location that exists within the City's Sphere of Influence with the appropriate size and characteristics that would meet the basic project objectives. An alternative location would also specifically conflict with the objective of "Redevelopment of the Manning Pit." As such, an alternative location is not feasible.

### *REDUCED LAND AREA PROJECT ALTERNATIVE*

Under this alternative, the project site would be reduced by approximately 26.6 percent. This alternative assumes that the approximately 6.93 acres of land along the western boundary of the project site, which is currently designated Residential, would be removed from the development and would remain as undeveloped land. The balance of the parcel, the 19.12 acres of land making up the eastern portion of the project site, which is currently designated Industrial/Business Park, would be developed with a high cube warehouse building. This alternative would not warrant a General Plan amendment for the 6.93 acres of residential land, because it would not be a part of the development. The existing General Plan designation and zoning designation for the 6.93 acres would remain in conflict and would require reconciliation at some other time.

The City considered this alternative and found that the residual 6.93-acre parcel would be very difficult to develop by itself as either residential or industrial at some future time given its shape and size. The City found that there is a high likelihood that the 6.93 acres may end up being a residual undevelopable parcel, and that this alternative is in conflict with the project objectives which include strengthening the City's economic base through job creation, development related investment, increased property, sales, and transient occupancy taxes, and to generating local and regional employment opportunities." As such, the reduced land area alternative is not a feasible alternative.

## **REQUESTED ENTITLEMENTS AND OTHER APPROVALS**

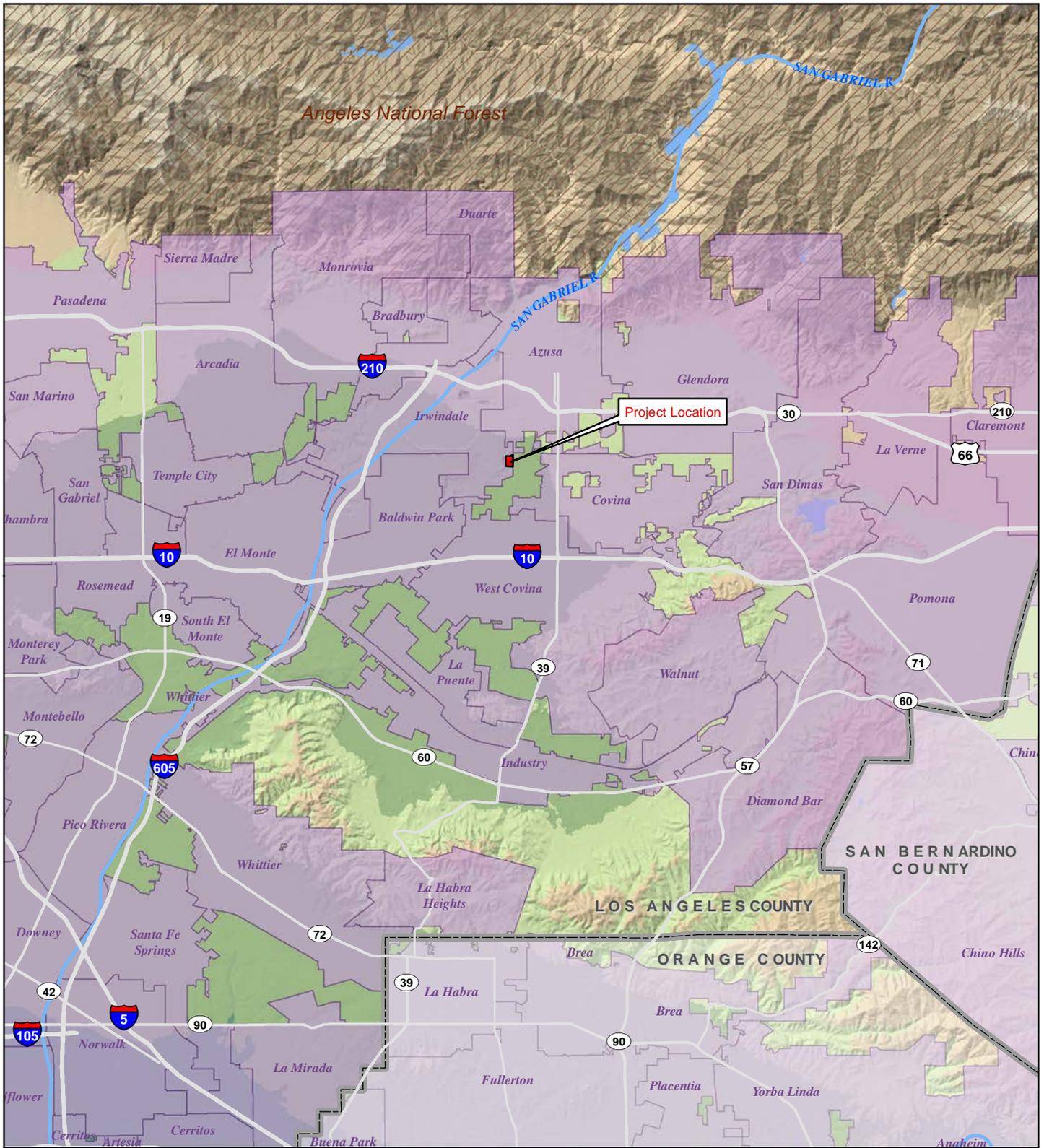
The City of Irwindale is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA, Section 15050.

This document will be used by the City of Irwindale to take the following actions:

- Adoption of the Environmental Impact Report (EIR);
- Adoption of the Mitigation Monitoring and Reporting Program (MMRP);
- Site Plan and Design Review (Discretionary Application) to approve the proposed site plan, which includes site configuration, design, location, and impact of the proposed use, and the compliance of the project with the established Zoning Code standard and the "City of Irwindale Commercial and Industrial Design Guidelines";
- General Plan Amendment to approve the change of the current General Plan designation from "Residential" to "Industrial/Business Park" for a portion of APN 8417-034-016; and
- Approval of the Lot Line Adjustment to combine APNs 8417-034-015 and 8417-034-016.

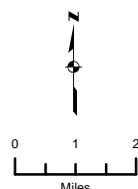
The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- Regional Water Quality Control Board (RWQCB) – Construction activities would be required to be covered under the National Pollution Discharge Elimination System (NPDES);
- RWQCB – The Storm Water Pollution Prevention Plan (SWPPP) would be required to be approved prior to construction activities pursuant to the Clean Water Act;
- South Coast Air Quality Management District (SCAQMD) – Construction activities would be subject to the SCAQMD permits, codes, and requirements.



**Legend**

- Project Boundary
- City Areas
- County Boundary
- National Forest

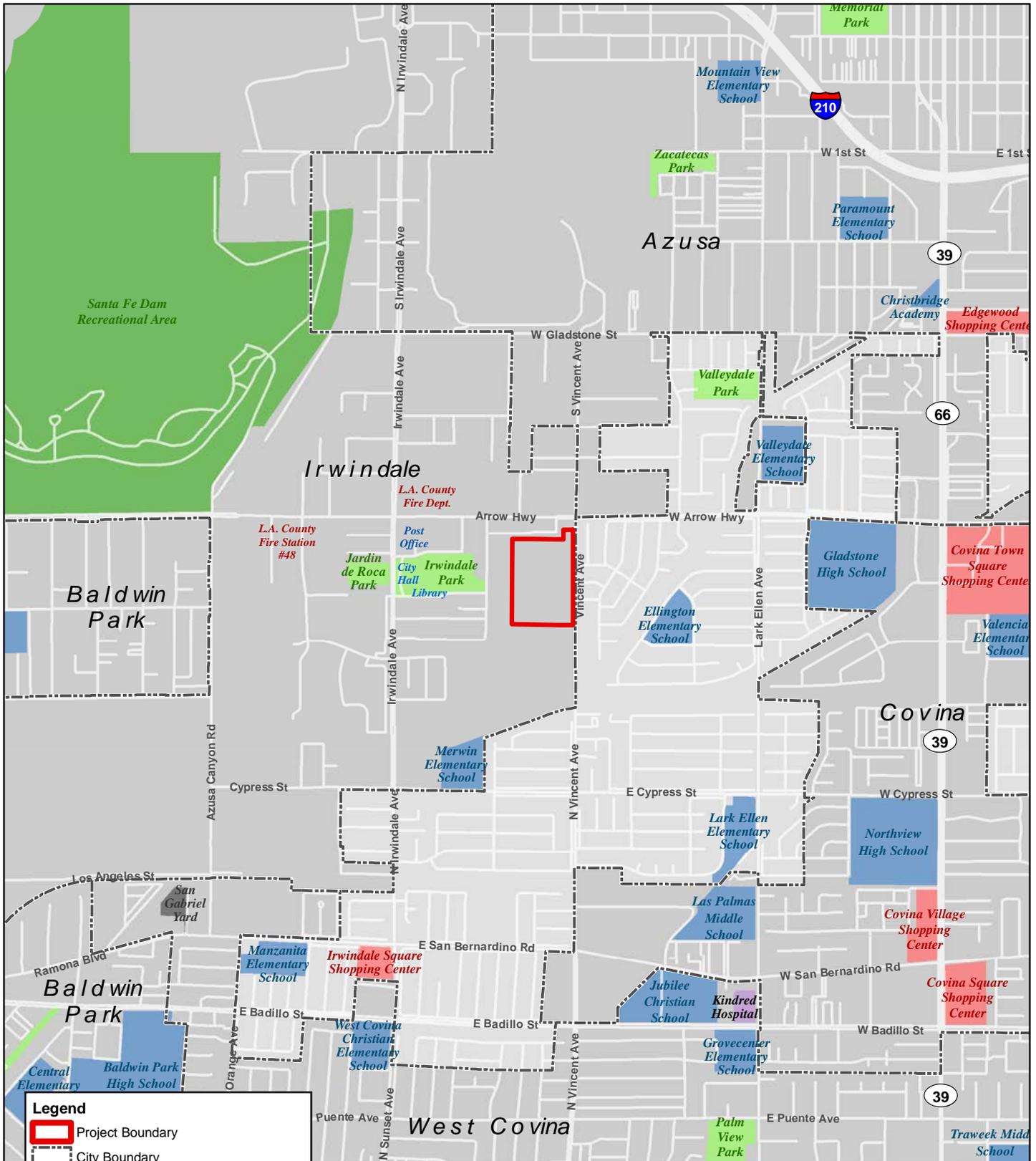


**CITY OF IRWINDALE**  
**5175 VINCENT AVENUE**

**Figure 1. Regional Location Map**

Sources: CalAtlas; Los Angeles County; Orange County; San Bernardino County. Map date: May 14, 2018.

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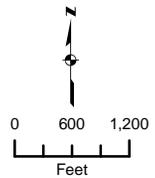


**Legend**

- Project Boundary
- City Boundary

**Area Features**

- Natural Areas and Wildlife Sanctuaries
- Parks and Gardens
- Education - Schools
- Municipal Services
- Hospitals
- Shopping Centers



**CITY OF IRWINDALE**  
**5175 VINCENT AVENUE**  
 Figure 2. Project Vicinity

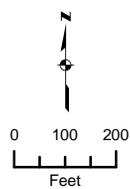
Source: Los Angeles County EGIS. Map date: May 15, 2018.

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**Legend**

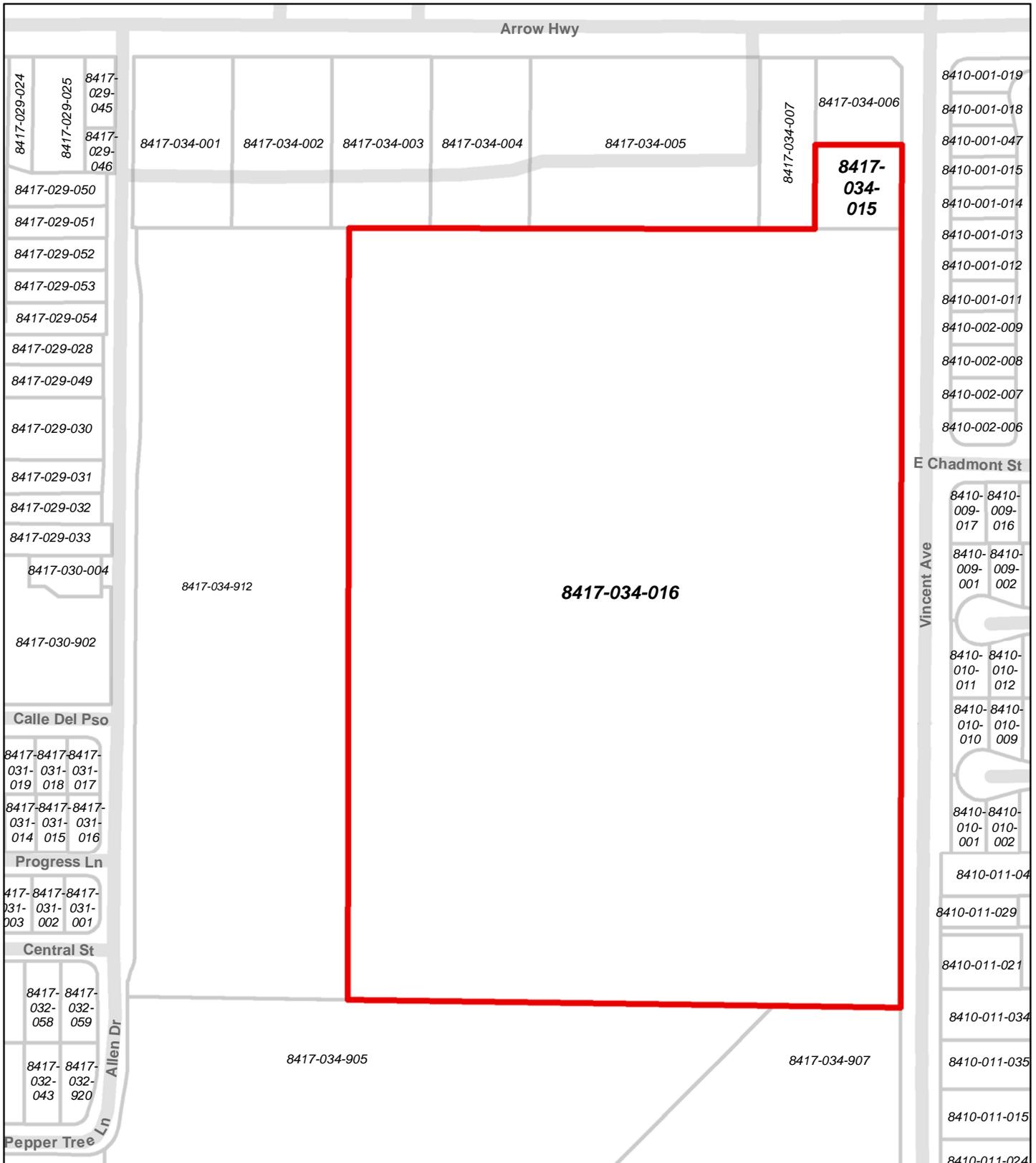
 Project Boundary



**CITY OF IRWINDALE**  
**5175 VINCENT AVENUE**  
**Figure 3. Aerial View of Project Site**

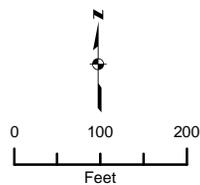
Source: Los Angeles County; ArcGIS Online World Imagery Map Service. Map date: May 14, 2018.

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**Legend**

- Project Boundary
- Assessor Parcel Boundary

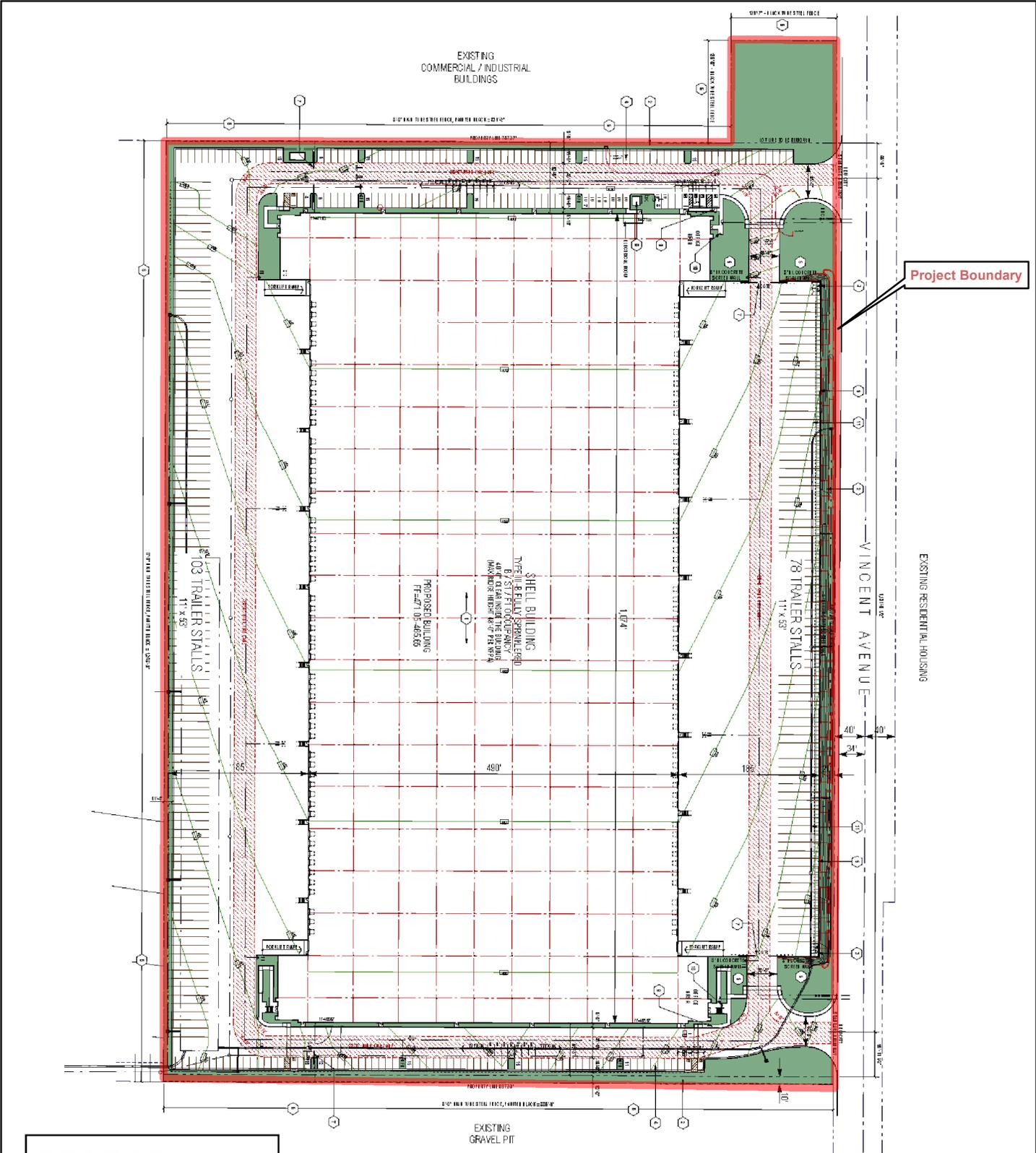


**CITY OF IRWINDALE  
5175 VINCENT AVENUE**

**Figure 4. Assessor's Parcel Map**

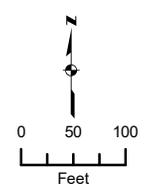
Source: Los Angeles County EGIS; Office of the Assessor, County of Los Angeles. Map date: May 14, 2018.

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**SITE LEGEND:**

	ON-SITE LANDSCAPED AREA
	OFF-SITE LANDSCAPED AREA
	SITE PROPERTY LINES
	CITY CURB AND GUTTER
	LINES STREET CENTERLINES
	ON-SITE CURB LINES
	ON-SITE PARKING

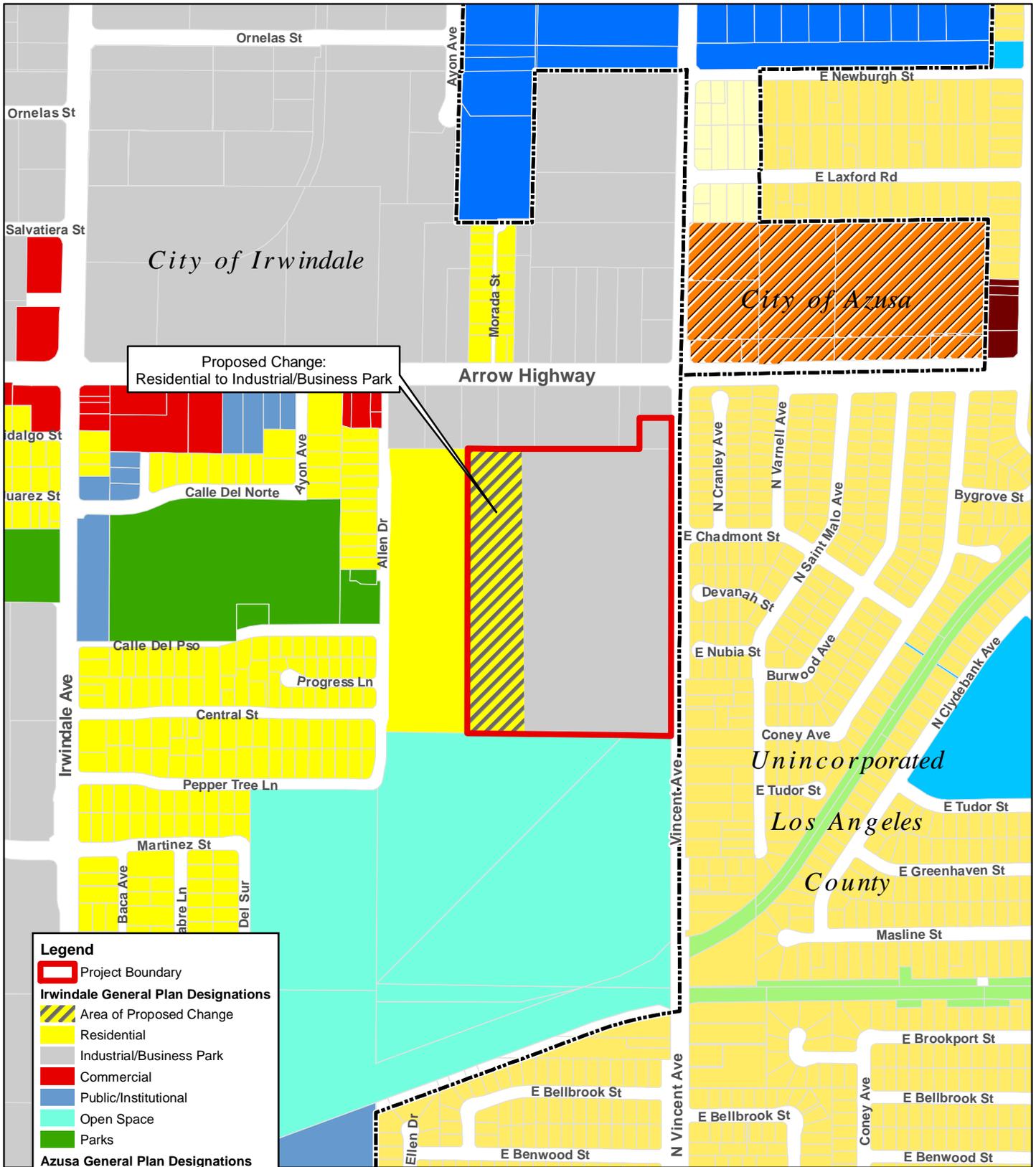


**CITY OF IRWINDALE**  
5175 VINCENT AVENUE

Figure 5. Site Plan

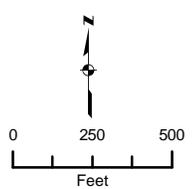
Source: RGA Office of Architectural Design, Site Plan-Warehouse Use. Map date: May 15, 2018.

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**Legend**

- Project Boundary
- Irwindale General Plan Designations
  - Residential
  - Industrial/Business Park
  - Commercial
  - Public/Institutional
  - Open Space
  - Parks
- Azusa General Plan Designations
  - Low Density Residential
  - Commercial Mixed Use
  - Industrial
- LA County Land Use Designations
  - Residential
  - Commercial
  - Public/Semi-Public
  - Open Space

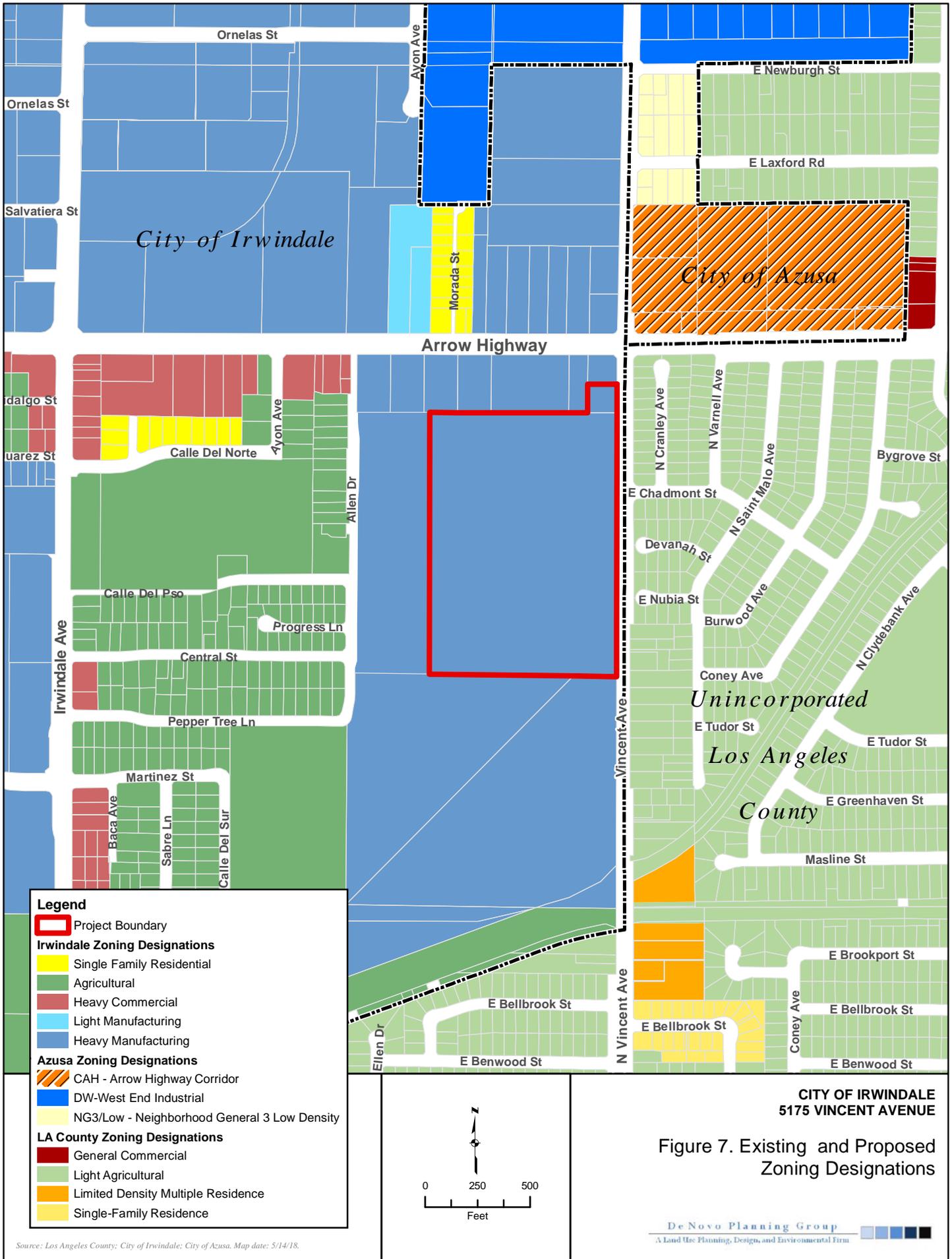


**CITY OF IRWINDALE**  
**5175 VINCENT AVENUE**

Figure 6.  
 Existing and Proposed General Plan  
 Land Use Map

Source: Los Angeles County; Irwindale General Plan; Azusa General Plan. Date: 5/14/18.

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Source: Los Angeles County; City of Irwindale; City of Azusa. Map date: 5/14/18.

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## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

## DETERMINATION

On the basis of this initial evaluation:

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## EVALUATION INSTRUCTIONS

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

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

## EVALUATION OF ENVIRONMENTAL IMPACTS

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- **Potentially Significant Impact.** This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- **Less than Significant With Mitigation Incorporated.** This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- **Less than Significant Impact.** A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- **No Impact.** These issues were either identified as having no impact on the environment, or they are not relevant to the project.

## ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 21 environmental topic areas.

### I. AESTHETICS

<i>Except as provided in Public Resources Code Section 21099, would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?	X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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 the applicable zoning and other regulations governing scenic quality?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			

#### *Responses to Checklist Questions*

**Responses a, c-d)** The proposed project includes development of a 545,735 sf industrial warehouse building, which would alter the existing condition of the former mining pit and introduce new sources of light and glare to the site. The project site is located in an urbanized area. According to the City’s General Plan, there are no scenic vistas within the project area. The San Gabriel Mountains, located to the north of the project site, is an important part of the local scenery. Additionally, existing views in this urban and developed area are limited. Nevertheless, based on concerns raised by public comment, it has been determined that the potential impacts on aesthetics caused by the proposed project will require a detailed analysis in the EIR. Consequently, the lead agency will examine three of the environmental issues listed in the checklist above (a, c, and d) in the EIR and will decide whether the proposed project has the potential to have a significant impact on aesthetics. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

The EIR will include a visual analysis that presents the methodology, thresholds of significance, a consistency analysis, a cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts on aesthetics. The analysis will look at foreground, middleground, and background views from public vantage points along the perimeter of the project site. The analysis will include visual simulations of the proposed building and the Multiple Building Alternative, photographs from public vantage points,

architectural elevations of the buildings, an evaluation of the building materials for reflective values/glare, lighting and the potential for light pollution offsite, and visual simulations from the public view. We will compare the proposed project to applicable zoning and other regulations related to scenic qualities.

**Response b):** The project site is not located within view of a state scenic highway. The nearest highway subject to this program is State Route (SR) 2, an Officially Designated State Scenic Highway, located approximately 4.0 miles north of the project site. Therefore, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Implementation of the proposed project would have *no impact* relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

## II. AGRICULTURE AND FORESTRY RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

### *Responses to Checklist Questions*

**Response a):** The project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site does not contain prime farmland, unique farmland, or farmland of statewide importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The proposed project would result in the conversion of undeveloped land which contains a former mine pit to non-agricultural use. Implementation of the proposed project would have **no impact** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response b):** The project site is not zoned for agricultural use nor is it under a Williamson Act contract. The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Implementation of the proposed project would have **no impact** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response c):** The project site is not forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526). The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. Implementation of the proposed project would have **no impact** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response d):** The project site is not forest land. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Implementation of the proposed project would have **no impact** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response e):** The project site does not contain agricultural land or forest land. The project site totals approximately 26.05 acres and is comprised of two vacant parcels; one of which is an undeveloped, recently filled, former aggregate mine pit (commonly known as the Manning Pit). None of the land within the City of Irwindale is designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The lands adjacent to the site contain residential and industrial uses. The proposed project does not involve 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. Implementation of the proposed project would have ***no impact*** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

### III. AIR QUALITY

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
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?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	X			

#### *Responses to Checklist Questions*

**Responses a-d):** Based on air quality concerns raised by public comment, it has been determined that the potential impacts on air quality caused by the proposed project will require a detailed analysis in the EIR. Consequently, the lead agency will examine each of the four environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on air quality. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered ***potentially significant*** until a detailed analysis is prepared in the EIR.

The EIR will include an air quality analysis that presents the methodology, thresholds of significance, a consistency analysis, a cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts on air quality. The project may result in toxic air contaminants, short-term construction-related emissions, and long-term operational emissions, primarily attributable to emissions from vehicle trips and from energy consumption by the commercial uses. The proposed project is located within the Southern California Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). We will consult with the SCAQMD regarding the project's potential to cause impacts, and the applicability of the SCAQMD's Rules and Regulations. We will also consult with the California Air Resources Board (CARB). The air quality analysis will include the following:

- A description of regional and local air quality as well meteorological conditions that could affect air pollutant dispersal or transport in the vicinity of the project site. Applicable air quality regulatory framework, standards, and significance thresholds will be discussed.
- An analysis of the proposed project's potential to conflict with or obstruct implementation of SCAQMD's 2016 Air Quality Management Plan (AQMP), and any other applicable air quality plans.
- An analysis of the SCAQMD Rules and Regulations that are applicable to the proposed project.
- Short-term (i.e., construction) increases in regional criteria air pollutants will be quantitatively assessed. The latest version of the CARB-approved California Emissions Estimator Model (CalEEMod) computer model will be used to estimate regional mobile

source and particulate matter emissions associated with the construction of the proposed project.

- Long-term (operational) increases in regional criteria air pollutants will be quantitatively assessed for area source, mobile sources, and stationary sources. The CARB-approved CalEEMod computer model will be used to estimate emissions associated with the proposed project. Modeling will be provided for the worst-case proposed project land use scenario.
- Exposure to odorous or toxic air contaminants during the project's operational phase will be assessed through an air toxics health risk assessment, utilizing AERMOD and HARP-2 risk modeling software, following guidance as provided by the SCAQMD and the CARB. Incremental cancer risk for residents and workers, and chronic and acute hazards will be assessed.
- Localized Significance Thresholds (LST) analysis will be conducted to determine the localized air quality impacts during construction, following SCAQMD guidance. The most recent LST lookup tables provided by the SCAQMD will be utilized for this analysis.
- Local mobile-source (carbon monoxide) (CO) concentrations will be assessed through a CO screening method as recommended by the SCAQMD. If the screening method indicates that modeling is necessary, upon review of the traffic analysis, CO concentrations will be modeled using the California Department of Transportation (Caltrans)-approved CALINE4 computer model.
- The potential for the proposed project to generate objectionable odors on neighboring sensitive receptors will be assessed qualitatively following CARB recommendations.

#### IV. BIOLOGICAL RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

#### *Responses to Checklist Questions*

##### **Response a):**

##### **Special Status Plants**

A records search revealed that there are 36 special status plant species (federal/state listed, and/or CNPS List 1B or 2) documented within the nine-quadrangle region search of the project site. The nine-quadrangle region includes the following U.S. Geological Survey (USGS) quadrangles: Mt. Wilson, Azusa, Glendora, El Monte, Baldwin Park, San Dimas, Whittier, La Habra, and Yorba Linda. The records search was generated from the CNDDDB, USFWS IPAC report, and CNPS inventory (2018). The 36 special status plant species documented within the nine-quadrangle region search for the project site include the following:

- San Gabriel manzanita
- Braunton's milk-vetch
- Parish's brittlescale
- Nevin's barberry
- thread-leaved brodiaea

- slender mariposa-lily
- Plummer's mariposa-lily
- intermediate mariposa-lily
- lucky morning-glory
- southern tarplant
- Parry's spineflower
- California saw-grass
- Peruvian dodder
- slender-horned spineflower
- San Gabriel River dudleya
- San Gabriel Mountains dudleya
- many-stemmed dudleya
- hot springs fimbristylis
- San Gabriel bedstraw
- mesa horkelia
- California satintail
- Coulter's goldfields
- Robinson's pepper-grass
- San Gabriel linanthus
- California muhly
- prostrate vernal pool navarretia
- California Orcutt grass
- Rock Creek broomrape
- Brand's star phacelia
- white rabbit-tobacco
- Parish's gooseberry
- southern mountains skullcap
- chaparral ragwort
- San Bernardino aster
- Greata's aster
- Sonoran maiden fern

The project site has been highly disturbed over the last approximately 90 years. The project site is the general location of the former Irwindale Pit No. 1 (Manning Brothers Pit) Project, which proposed reclamation of the historic mining pit. Mining of the Manning Pit began in the 1930s and was completed in the 1970s. After acquisition of the pit by the City of Irwindale in the late 1980s, the City began backfilling the site with a variety of construction debris. At the end of 2017, approximately 4.45 million cubic yards of material has been imported to fill both the site and construct the southern boundary slope. Approximately 590,000 cubic yards of material is needed to complete both the grading operations and the construction of the southern boundary slope. The backfilling project is anticipated to be completed in the summer or fall of 2018.

The project site is devoid of sensitive habitat and does not contain any special status plants that are documented in the region. Therefore, the proposed project would have a *less than significant* impacts on special-status plants.

### Special Status Animals

A records search reveals that there are 44 special status animal species (federal/state listed) within the nine-quadrangle region search of the project site. Of the 44 species, 19 are bird species,

12 are amphibian or reptile species, 10 are mammal species, and three are fish species. The records search came from the CNDDDB, and USFWS IPAC report (2018). The 44 special status animal species documented within the nine-quadrangle region search for the project site include the following:

- Cooper's hawk
- tricolored blackbird
- southern California rufous-crowned sparrow
- grasshopper sparrow
- arroyo toad
- pallid bat
- California glossy snake
- long-eared owl
- coastal whiptail
- burrowing owl
- Swainson's hawk
- coastal cactus wren
- Santa Ana sucker
- western yellow-billed cuckoo
- Townsend's big-eared bat
- red-diamond rattlesnake
- black swift
- southwestern willow flycatcher
- western pond turtle
- large-blotched salamander
- California horned lark
- western mastiff bat
- merlin
- arroyo chub
- yellow-breasted chat
- western red bat
- western yellow bat
- California black rail
- San Diego black-tailed jackrabbit
- pocketed free-tailed bat
- big free-tailed bat
- desert bighorn sheep
- coast horned lizard
- coastal California gnatcatcher
- southern mountain yellow-legged frog
- Santa Ana speckled dace
- bank swallow
- coast patch-nosed snake
- yellow warbler
- western spadefoot
- Coast Range newt
- American badger
- two-striped gartersnake

- least Bell's vireo

The highly disturbed project site does not contain suitable habitat for special status animal species. For example, because the site does not contain aquatic habitat, the species which require streams, wetlands, vernal pools, or similar water features would not be found on the project site. Additionally, because the project site does not contain grassland habitat, foraging habitat for special status bird species is not present.

Due to the past use of the site, the majority of the project site does not contain any trees. However, some landscape trees are located along the perimeter of the project site. While none of the special-status bird species have been documented on the project site, each nesting cycle (year) brings new potential for nesting. Any delay in construction into a future year would present a new potential for impacts to nesting birds. Implementation of the following mitigation measure would ensure that the project site is evaluated prior to the commencement of construction if it were to occur during the nesting season. Additionally, the following mitigation measure provides certain protections for nesting birds if they were found during the preconstruction survey. Given the absence of observations of, or appropriate habitat for, special status animals, impacts on special-status animals as a result of the proposed project would be ***less than significant with mitigation***.

***Mitigation Measure Bio-1:*** *Prior to any permit issuance for grubbing, grading, tree trimming/removal or prior to engaging in such activities that would occur between the breeding season for native birds (February 15 through July 31), the project applicant shall retain the services of a qualified ornithologist to conduct an ornithological survey of the construction zone. The City will require the developer to submit a copy of the executed contract for such services prior to the issuance of any grading permits. The ornithological survey shall occur not more than seven days prior to the initiation of those grading/construction activities. If the ornithologist detects any occupied nests of native birds within the construction zone or in close proximity to, they shall be mapped on construction plans and the project applicant will fence off the area(s) supporting bird nests with temporary construction fencing, providing a minimum buffer of 200 feet between the nest and limits of construction. (This buffer zone shall be at least 500 feet for raptors until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project.) The construction crew will be instructed to avoid any activities in the zone until the bird nest(s) is/are no longer occupied, per a subsequent survey by the qualified ornithologist. Alternatively, the project applicant will consult as appropriate with the USFWS to discuss the potential loss of nests of native birds covered by the MBTA to obtain the appropriate permit from the USFWS.*

### **Indirect Effects on Special Status Species**

Construction activities have a potential to result in indirect effects either to habitat or species occupying areas outside the project site. Indirect effects involve the potentially harmful effects associated with noise generated by construction equipment and dust created by the grading and site alteration activities.

Given the distance from the project site to the nearest habitat area, noise and dust generated by construction activities would not result in any significant indirect effects on special status species located in the revegetation area. Construction activities would be subject to measures that are intended to minimize noise and dust impacts (i.e. construction equipment fitted with mufflers, dust control measures such as regular watering during grading). As a result, no significant indirect impacts to special status species will occur. A SWPPP will be implemented during construction to ensure that there are no indirect impacts to water bodies from storm water runoff. This would, in effect, minimize any potential indirect effect on aquatic special status species located off-site. Therefore, the proposed project would have a ***less than significant***

indirect impact on special-status species. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Responses b-c):** Riparian habitat is found in the interface between land and a river or stream. This habitat is significant in ecology, environmental management, and civil engineering because of their role in soil conservation, their habitat biodiversity, and the influence they have on fauna and aquatic ecosystems, including grassland, woodland, wetland or even non-vegetative.

Sensitive natural communities are those that are considered rare in the region, support special-status plant or wildlife species, or receive regulatory protection (i.e., §404 and 401 of the Clean Water Act, the CDFG §1600 et seq. of the California Fish and Game Code, and/or the Porter-Cologne Act). In addition, the California Natural Diversity Data Base (CNDDDB) has designated a number of communities as rare; these communities are given the highest inventory priority (Holland 1986, CDFG 2003e). There were nine communities documented within the CNDDDB nine quadrangle search. These included: California Walnut Woodland. Canyon Live Oak Ravine Forest. Open Engelmann Oak Woodland. Riversidian Alluvial Fan Sage Scrub. Southern California Arroyo Chub/Santa Ana Sucker Stream. Southern Coast Live Oak Riparian Forest. Southern Sycamore Alder Riparian Woodland. Southern Willow Scrub. Walnut Forest. None of these habitat types are located within the project site.

The project site does not support any riparian habitat or sensitive natural communities. Sensitive natural communities are not located on the project site. Therefore, implementation of the proposed project would have a **no impact** relative to this issue. These topics do not warrant additional analysis and will not be addressed further in the EIR.

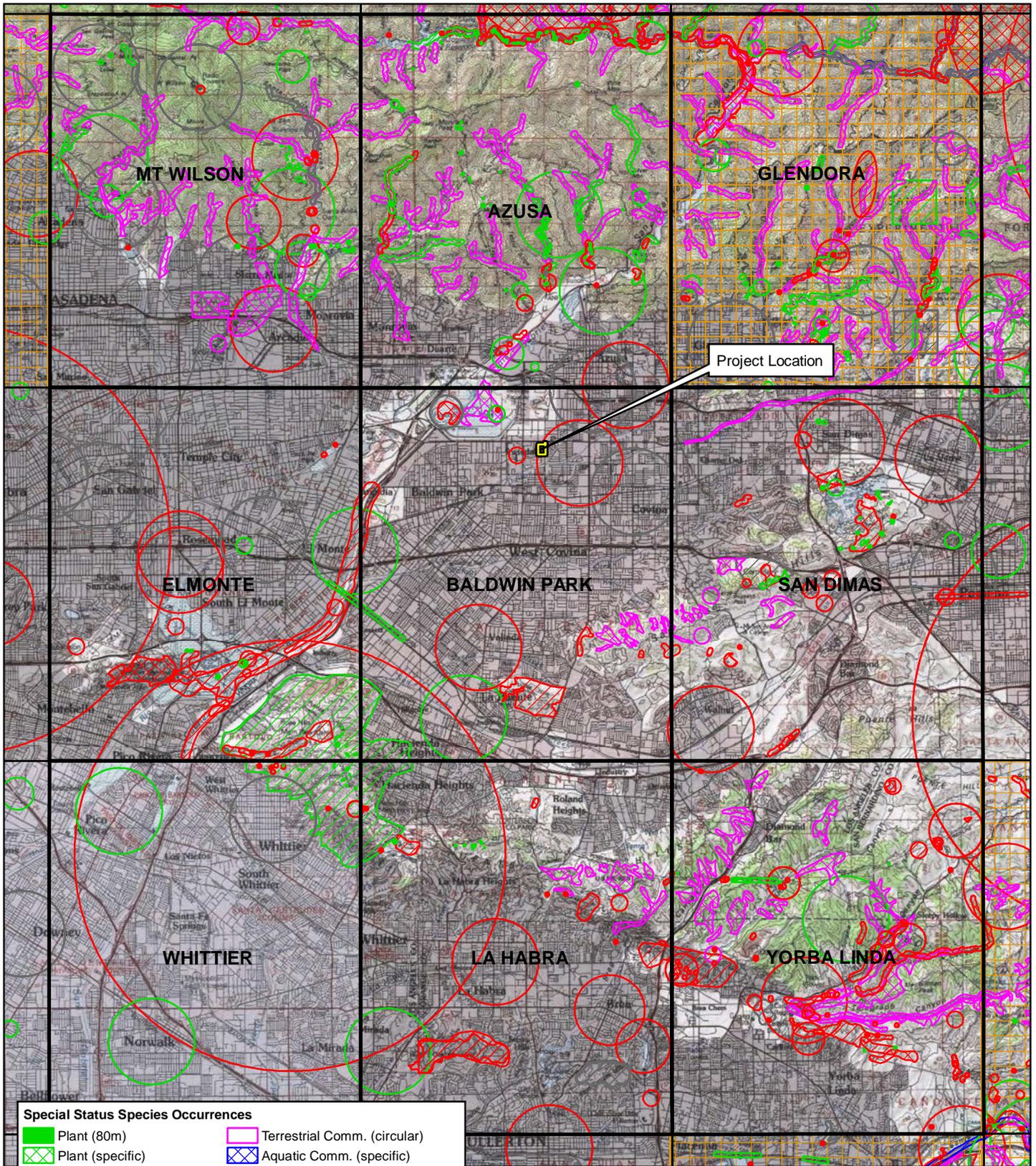
**Response d):** The project site is currently undeveloped and does not serve as a wildlife corridor, or nursery site. Movement of wildlife through the project site is currently limited by existing development and roadways. For example, an existing property located to the south of the site is a flood control and recharge basin, which is also currently used as a silt deposit, and residential and industrial uses are located to the north, east, and west of the project site. The proposed project would not 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. Implementation of the proposed project would result in a **less than significant** impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response e):** The project would not conflict with any local policies or ordinances protecting biological resources. The City's General Plan includes several resources management element policies, the majority of which do not apply to the project due to the existing and past site conditions of the site. The project would be potentially inconsistent with the mining and reclamation issue area policies as they relate to biological resources based on impacts identified in Mitigation Measure Bio-1.

With implementation of Mitigation Measure Bio-1, any potential conflict to resource preservation issue area policies and the mining and reclamation issue area policies would be fully mitigated. Therefore, implementation of the proposed project would have **no impact** relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

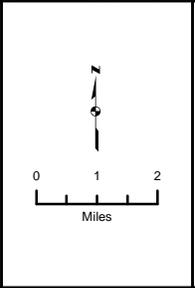
**Response f):** The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, implementation of the proposed project would have **no impact** relative to this

issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.



**Special Status Species Occurrences**

Plant (80m)	Terrestrial Comm. (circular)
Plant (specific)	Aquatic Comm. (specific)
Plant (non-specific)	Aquatic Comm. (non-specific)
Plant (circular)	Multiple (80m)
Animal (80m)	Multiple (specific)
Animal (specific)	Multiple (non-specific)
Animal (non-specific)	Multiple (circular)
Animal (circular)	Sensitive EO's (Commercial only)
Terrestrial Comm. (specific)	



**CITY OF IRWINDALE**  
 5175 VINCENT AVENUE  
  
 Figure 9.  
 California Natural Diversity Database  
 9-Quad Search

A Land Use Planning, Design, and Environmental Firm

CNDDDB version 05/2018. Please Note: the occurrences shown on this map represent the known locations of the species listed here as of the date of this version. There may be additional occurrences or additional species within this area which have not been surveyed and/or mapped. Lack of information in the CNDDDB about a species or an area can never be used as proof that no special status species occur in an area. Basemap: ArcGIS Online Topographic Map Service. Map date: May 8, 2018. Revised 5/15/18.

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## V. CULTURAL RESOURCES

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

### *Responses to Checklist Questions*

**Response a-c):** The City of Irwindale General Plan and subsequent EIR does not identify the site as having prehistoric period cultural resources. Additionally, there are no known unique cultural, historical, paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site. Furthermore, the site is not designated as a historical resource as defined by Public Resources Code § 21084.1, or listed in, or eligible for listing in the California Register of Historical Resources.

The site has previously been used for mining uses and, as such, has been subject to substantial soil disturbance. No instances of cultural resources or human remains have been unearthed on the project site. The site has been filled with engineered materials which are known to not contain archaeological, historic, or paleontological resources, or human remains. Because the fill material has been placed on the site recently and the material is well documented, there is effectively zero chance of finding a cultural resource on the site.

It is also noted that, although extremely unlikely given that the site has been filled with engineered soils at significant depths, the project would be subject to Public Resources Code § 5097, which has specific stop-work and notification procedures to follow in the event that human remains are inadvertently discovered during project implementation, as well as California Health and Safety Code § 7050.5, which has specific procedures in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery.

In letters dated September 10, 2018, the City sent tribal consultation letters to tribal organizations, including Gabrieleno Band of Mission Indians - Kizh Nation. In the letters, the City provided the tribal organizations with information regarding the proposed project and requested that the tribal organizations supply any information they might have concerning prehistoric sites or traditional use areas within the project site.

The Gabrieleno Band of Mission Indians - Kizh Nation submitted a written request for a consultation meeting, pursuant to SB 18, Government Code Section 65352.3. The consultation meeting occurred on December 6, 2018. Upon further review of the project location and prior ground disturbance and fill activities, and the fact that there will be no ground disturbance outside of this footprint, the Gabrieleno Band of Mission Indians - Kizh Nation concluded that the project has a low potential to impact Tribal Cultural Resources (TCR) and therefore additional mitigation for monitoring for TCR's is not necessary. The consultation efforts have been deemed complete. Implementation of the proposed project would have **no impact** relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**VI. ENERGY**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X			

*Responses to Checklist Questions*

**Responses a-b):** Appendix F of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix F of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The proposed project includes the construction of a 545,735 sf industrial warehouse building. The amount of energy used at the project site would directly correlate to the size of the proposed warehouse, the energy consumption of associated technology, machinery, and appliances, and outdoor lighting. Other major sources of proposed project energy consumption include fuel used by vehicle trips generated during project construction and operation, and fuel used by off-road construction vehicles during construction.

Due to the size of the proposed warehouse building, the potential impacts on energy caused by the proposed project will require a detailed analysis in the EIR. Consequently, the lead agency will examine each of the two environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on energy resources. The EIR will include a discussion and analysis that provides calculated levels of energy use expected for the proposed project, based on commonly used modelling software (i.e. CalEEMod v.2016.3.2 and the CARB’s EMFAC2014). At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

**VII. GEOLOGY AND SOILS**

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	X			
ii) Strong seismic ground shaking?	X			
iii) Seismic-related ground failure, including liquefaction?	X			
iv) Landslides?	X			
b) Result in substantial soil erosion or the loss of topsoil?		X		
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?	X			
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?	X			
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?		X		
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

*Responses to Checklist Questions*

**Responses a.i-aiiv), c), d):** The project site is within the City of Irwindale, Los Angeles County. Mapped earthquake faults exist within the City and region, although none cross the project site. All of Southern California, including the project site, is considered to be a seismically active region. Seismic hazards that may affect the site include ground shaking, liquefaction, and dynamic settlement.

Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement,

oscillation, loss of bearing capacity, landsliding, and the buoyant rise of buried structures. The majority of liquefaction hazards are associated with sandy soils, silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction. In general, liquefaction hazards are most severe within the upper 50 feet of the surface, except where slope faces or deep foundations are present.

Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion is dependent on many factors. Soil expansion can damage structures by cracking foundations, causing settlement and distorting structural elements. Expansion is a typical characteristic of clay-type soils. Expansive soils shrink and swell in volume during changes in moisture content, such as a result of seasonal rain events, and can cause damage to foundations, concrete slabs, roadway improvements, and pavement sections.

The on-site soils are engineered fill and import fill. The more clayey, critically expansive surface soil and fill materials will be subjected to volume changes during seasonal fluctuations in moisture content. The soils encountered at the site consist of Pits and Quarries (24.51 acres) Urban land-Soboba complex, zero to five percent slopes (0.67 acres), and Urban land, commercial-Soboba complex, zero to five percent slopes (0.87 acres).

Due to the past site uses and the seismic activity of the region, out of an abundance of caution, the lead agency will examine each of these six environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact pertaining to earthquake faults, ground shaking, liquefaction, and landslides. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered *potentially significant* until a detailed analysis is prepared in the EIR.

The EIR will include a geology and soils analysis that presents the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts on geology and soils. The project site is located in a geologically active region. The geology and soils analysis will include the following:

- A description of the local and regional geologic faults located near the project site that could affect the project.
- An assessment of the project's design standards requirements and consistency with California Building Code.
- An assessment of the proposed project's hazards related to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), and landslides.
- A discussion of how the previous soil analysis and management plans that have been prepared for the project site over the last 10 years, including an Excavation Management Plan for the Manning Pit – North Portion of Manning Pit, developed by The Source Group (2009) and a Grading Progress Report, developed by Tetra Tech BAS Geosciences (2015). The Excavation Management Plan was prepared in order to comply with the requirements of both the RWQCB and the SCAQMD.
- An analysis of the project site's soils shrink-swell characteristics, and a determination of whether the on-site soil would become unstable as a result of the proposed project.

**Response b):** Construction activities including grading could temporarily increase soil erosion during and shortly after project construction if not properly managed. Construction-related

erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

The RWQCB requires a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area one acre or larger. The SWPPP includes project specific best management measures that are designed to control drainage and erosion. The proposed project includes detailed project specific drainage plan that control storm water runoff and erosion, both during and after construction. This plan is subject to the review and approval of the City through the improvement plan process.

A Hydrology/Best Management Practices (BMPs)/LID Exhibit was prepared for the project. The Exhibit provides the hydrologic and hydraulic basis of design for the proposed stormwater control features. The SWPPP, project-specific Hydrology/BMPs/LID Exhibit, and associated improvements will manage storm water and reduce the potential for erosion. Mitigation Measure Geo-1 requires submittal of a SWPPP. Impacts associated with soil erosions as a result of the proposed project would be ***less than significant with mitigation***.

***Mitigation Measure Geo-1:*** *The project applicant shall submit a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) to the RWQCB in accordance with the NPDES General Construction Permit requirements. The SWPPP shall be designed to control pollutant discharges utilizing Best Management Practices (BMPs) and technology to reduce erosion and sediments. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater runoff from the project site. Measures shall include temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) that will be employed to control erosion from disturbed areas. Final selection of BMPs will be subject to approval by the City and the RWQCB. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB and City.*

**Response e):** The proposed project would not require the use of septic tanks or alternative waste water disposal systems for the disposal of waste water. Implementation of the proposed project would result in ***no impact*** relative to this topic.

**Response f):** As noted previously, the site has previously been used for mining uses and, as such, has been subject to substantial soil disturbance. No instances of cultural resources or human remains have been unearthed on the project site. The site has been filled with engineered materials which are known to not contain archaeological, historic, or paleontological resources, or human remains. Because the fill material has been placed on the site recently and the material is well documented, there is effectively zero chance of finding a paleontological resource on the site. Implementation of the proposed project would have ***no impact*** relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**VIII. GREENHOUSE GAS EMISSIONS**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	X			

*Responses to Checklist Questions*

**Responses a), b):** Implementation of the proposed project could generate greenhouse gases (GHGs) from a variety of sources, including but not limited to vehicle trips, electricity consumption, water use, and solid waste generation. There could also be additional GHGs generated from stationary sources, such as industrial processes and/or diesel generators. It has been determined that the potential impacts from GHG emissions by the proposed project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact from GHG emissions. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

The EIR will include a GHG emissions analysis pursuant to the requirements of the California Governor’s Executive Order S-3-05 and The Global Warming Solutions Act of 2006 (AB 32), Senate Bill 375 (SB 375), and Senate Bill 32 (SB 32). The analysis will follow the California Air Pollution Control Officers Association (CAPCOA) white paper methodology and recommendations presented in “Climate Change and CEQA”, which was prepared in coordination with the CARB and the Governor’s Office of Planning and Research (OPR) as a common platform for public agencies to ensure that GHG emissions are appropriately considered and addressed under CEQA. Also, a GHG emissions analysis using the SCAQMD’s CEQA Air Quality Analysis Handbook will be performed. These analyses will consider a regional approach toward determining whether GHG emissions are significant, and will present mitigation measures to reduce any potential impacts. The discussion and analysis will include quantification of GHGs generated by the project using the CalEEMod computer model as well as a qualitative discussion of the project’s consistency with any applicable state and local plans to reduce the impacts of climate change.

*IX. HAZARDS AND HAZARDOUS MATERIALS*

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
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?	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	X			
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?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	X			
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	X			

*Responses to Checklist Questions*

**Responses a-g):** The proposed high-cube industrial warehouse and existing land use and zoning designations would conditionally permit a number of industrial and commercial uses that may store, use, and possibly generate a variety of hazardous materials (e.g., manufacturers, vehicle and equipment repair, dry cleaners). These types of uses are subject to a Conditional Use Permit issued by the City of Irwindale. There is a risk of release of these materials into the environment if they are not stored and handled in accordance with best management practices. There is a wide variety of hazardous materials that could be used within industrial and commercial facilities/business within the proposed warehouse building. Additionally, the project site is located within ¼-mile of an existing school, Alice Ellington Elementary School.

For the above reasons, it has been determined that the potential impacts on hazards and hazardous materials caused by the proposed project will require a detailed analysis in the EIR. Consequently, the lead agency will examine each of the seven environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on hazards and hazardous materials. At this point, a definitive impact

conclusion for each of these environmental topics will not be made. Rather, all are considered ***potentially significant*** until a detailed analysis is prepared in the EIR.

The EIR will include a hazards and hazardous materials analysis that presents the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts on hazards and hazardous materials. The hazards and hazardous materials analysis will include the following:

- A description of the applicable hazards-related federal, state, and local statutes, regulations, and programs that the proposed project would be required to comply with (during project construction and operation).
- An assessment of the existing Recognized Environmental Conditions (RECs) identified for the project site.
- A disclosure of the past uses of the site and recent remediation efforts completed by the City of Irwindale.
- The potential for soil contamination or unknown underground facilities (i.e., underground wells, septic systems, etc.) in the project site.
- An analysis of the types of uses that could be permitted on the project site, and what hazardous materials could be used by the proposed project based on the existing and proposed land use and zoning designations (including what would be allowed under conditional permitting).
- A discussion of the potential impacts on schools within ¼-mile from the project site.
- An analysis of the nearby hazardous materials sites compiled pursuant to Government Code § 65962.5, including the Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites located on, or in the vicinity of the project site.
- An analysis of the potential for the project to be 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, which would result in a safety hazard or excessive noise for people residing or working in the project area.
- An analysis of the potential for the proposed project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- An analysis of the potential for the proposed project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including whether the project is located in an area prone to high risk of wildfire.

## X. HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	X			
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	X			
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	X			
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	X			
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or	X			
(iv) impede or redirect flood flows?	X			
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	X			
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	X			

### *Responses to Checklist Questions*

**Response a-e):** Flood hazards can result from intense rain, snowmelt, cloudbursts, or a combination of all three, or from failure of a water impoundment structure, such as a dam. Human activities have an effect on water quality when chemicals, heavy metals, hydrocarbons (auto emissions and car crank case oil), and other materials are transported with storm water into drainage systems. Construction activities can increase sediment runoff, including concrete waste and other pollutants. Based on concerns raised by the public related to hydrology and water quality, it has been determined that the EIR will require a detailed analysis of this topic. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on hydrology and water quality. At this point a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered ***potentially significant*** until a detailed analysis is prepared in the EIR.

This section of the EIR will provide an analysis including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts associated with hydrology and water quality.

The EIR will present the existing Federal Emergency Management Agency (FEMA) flood zones and risk of flooding in the project site and general vicinity. The project's hydrology and hydraulic calculations under existing and proposed conditions will be presented. The EIR will also evaluate the potential construction and operational impacts of the proposed project on water quality, including surface water and groundwater. This section will describe the surface drainage patterns of the project site and adjoining areas. The potential for substantial erosion on-site will be analyzed. The potential for the proposed project to substantially decrease groundwater supplies or interfere with groundwater recharge will also be analyzed. This section will also identify 303(D)-listed impaired water bodies in the vicinity of the project site. Conformity of the proposed project to water quality regulations and the project site's potential to be inundated by seiche or tsunami will also be discussed. Mitigation measures will be developed to incorporate BMPs, consistent with the requirements of the Hydrology/BMPs/LID Exhibit previously prepared for the proposed project, and any other applicable local, state, and federal requirements to reduce the potential for site runoff.

**XI. LAND USE AND PLANNING**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?			X	
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?			X	

*Responses to Checklist Questions*

**Response a):** The proposed project includes development of a high-cube industrial warehouse on an undeveloped, disturbed site that is surrounded by residential and industrial uses. The site is located on the eastern edge of the Irwindale city limits. The site was previously used for mining purposes, which is an industrial use. Additionally, the project site is considered infill development. Infill development refers to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas.<sup>1</sup> The proposed warehouse would be consistent with the existing industrial land uses to the north of the project site. Because the project is considered infill development within an existing community, the project would not physically divide an established community. Implementation of the proposed project would have a *less than significant* impact relative to this topic.

**Response b):** The key planning documents that are directly related to, or that establish a framework within which the proposed project must be consistent, include:

- City of Irwindale Commercial and Industrial Design Guidelines;
- City of Irwindale General Plan; and
- City of Irwindale Zoning Ordinance.

The project site is designated as "Industrial/Business Park" and "Residential" by the City's General Plan Land Use Map and is zoned as M-2 "Heavy Manufacturing". The project applicant is requesting a General Plan Amendment to change the current designation from "Residential" to "Industrial/Business Park" for a portion of APN 8417-034-016. The Industrial/Business Park designation allows light industry, heavy industry, distribution, or commercial uses. The proposed high-cube industrial warehouse is consistent with the Industrial/Business Park designation. The maximum floor-area-ratio (FAR) for this category is 1.0 to 1.0. The proposed warehouse would be below the maximum FAR.

The Site Plan and Design Review process would address the site and building configuration, design, location, and impact of the proposed use, and the compliance of the project with the established Zoning Code standard and the "City of Irwindale Commercial and Industrial Design Guidelines". Therefore, impacts to land use compatibility would be *less than significant*.

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<sup>1</sup> California Governor's Office of Planning and Research. Infill Development webpage. Available at: <http://opr.ca.gov/planning/land-use/infill-development/>.

**XII. MINERAL RESOURCES**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
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?				X

*Responses to Checklist Questions*

**Response a-b):** The project site is the general location of the former Irwindale Pit No. 1 (Manning Brothers Pit) Project, which proposed reclamation of the historic mining pit over ten years ago. Mining of the Manning Pit began in the 1930s and was completed in the 1970s. Mineral resources of value to the region have not been mined at the site for over 40 years. The mine closure was completed in January 2019. There is no existing mineral extraction possible at the property. Additionally, there are no oil and gas extraction wells within or near the property. Implementation of the proposed project would have **no impact** relative to this issue.

*XIII. NOISE*

<i>Would the project result in:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generation of a 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?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			
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?				X

*Responses to Checklist Questions*

**Response a-b):** Based on concerns raised from the public regarding noise impacts, it has been determined that the potential impacts from noise caused by the proposed project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the three environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact from noise. At this point a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered ***potentially significant*** until a detailed analysis is prepared in the EIR.

The EIR will identify sensitive receptors, land use compatibility, noise impacts, and attenuation of noise related impacts. The noise study will also include an assessment of construction noise and vibration impacts. The noise analysis will identify the noise level standards contained in the City of Irwindale 2020 General Plan Noise Element and Municipal Code (Noise Ordinance, Chapter 9.28), as well as any germane state, and federal standards. Continuous (24-hour) and short-term noise measurements will be performed in the project site and in the project vicinity in order to quantify existing ambient noise levels from existing community noise sources.

The EIR will provide an estimate of existing traffic noise levels adjacent to the project site roadways through application of accepted traffic noise prediction methodologies. Noise sources from the project will be quantified through noise level measurements. Proposed on-site mobile and stationary noise sources will be evaluated. This will include noise generating equipment, such as HVAC systems, generators, etc., as well as mobile noise sources such as truck loading/docking/idling. The EIR will include thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts associated with noise.

**Response c)** The project has been determined to not be 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. The closest airport is the El Monte Airport approximately six miles southwest of the project site. As such, there is ***no impact*** related to this topic and it will not be addressed further in the EIR.

**XIV. POPULATION AND HOUSING**

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

*Responses to Checklist Questions*

**Response a):** According to the 2016 US Census population estimates, the population in Irwindale is 1,422 people. The proposed project would result in the construction of a high-cube industrial warehouse that would generate additional employment opportunities. The additional employees may come from Irwindale or surrounding communities. The project would not directly introduce new residents to the City.

The proposed project would not include upsizing of offsite infrastructure or roadways. The installation and sizing of new infrastructure would be limited to the needs of the proposed uses. The proposed project would not induce substantial population growth in an area, either directly or indirectly. Implementation of the proposed project would have a **less than significant** impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response b):** The project site is currently undeveloped and does not contain housing. The proposed project would not displace housing or people. Implementation of the proposed project would have **no impact** relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

*XV. PUBLIC SERVICES*

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	
Other public facilities?			X	

*Responses to Checklist Questions***Response a):****Fire Protection**

Fire protection service would be provided by the LACoFD. The City of Irwindale is served by two fire stations: Irwindale Station 48 (located at 15546 Arrow Highway in Irwindale) and Baldwin Park Station 29 (located at 14334 Los Angeles Street in Baldwin Park). Both of these stations are maintained by the LACoFD. The Irwindale Station is located 0.65 miles west of the project site.

According to the City of Irwindale General Plan EIR, Station 48 has a staff consisting 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 six minutes. Additional emergency resources are available from other California Division of Forestry (CDF) stations, the nearest being in Baldwin Park. The CDF equipment includes a snorkel truck and a triple pump. The City has an overall fire insurance rating 3 with the availability of alarm systems.

The City and County expand fire protection services as growth and development occurs to meet the adopted fire response time as a general guideline. As noted in the City of Irwindale General Plan, the City shall regularly review the adequacy of law enforcement services and fire protection and emergency services in the City. This review effort shall be a component of the annual budget review of the contract with the Fire Department, and the City shall work with the Fire Department to correct any identified deficiencies. Local law enforcement officials and Fire Department representatives shall also continue their review of any proposed development plans. Annual reports concerning each Department will be submitted to the City Council for consideration.

Funding for fire operations and services is derived from a combination of development impact fees and the City's budget. Additionally, the project applicant would be required to pay development impact fees related to fire protection to enable the expansion of fire protection facilities, addition of fire protection personnel, and the acquisition of additional fire equipment, as needed and determined annually by the City to maintain their performance standards.

Compliance with City goals, policies, and performance standards would ensure that the proposed building would include adequate fire detection and suppression systems to allow for fires to be

quickly contained and would ensure that the fire department maintains an adequately sized staff and equipment in order to meet any additional demands generated by the project. Compliance with such regulations would reduce the burden on existing fire stations serving the project area, and would ensure that the LACoFD has adequate equipment, staff, and station space to provide fire protection and emergency services to the project area and the City.

The proposed project would not result in a need to construct a new fire station or physically alter an existing fire station. The LACoFD would receive development impact fees from the project for capital improvements and infrastructure costs even though a new facility would not be created. The fair share funds are intended to pay for project financial impacts on fire protection service. The proposed project's environmental impact to fire service is considered *less than significant*. This topic does not warrant additional analysis and will not be addressed further in the EIR.

### **Police Protection**

Police protection service would be provided by the Irwindale Police Department. According to the City of Irwindale General Plan EIR, the Irwindale Police Department consists of 28 full-time police officers, three reserve officers, and 12 civilian employees. The department's enforcement tools include a, stolen vehicle tracking devices, and one motor unit. 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. These activities include stock car and drag racing at the Irwindale Speedway, City Park events, and various task force opportunities that combat illegal street racing, seat belt usage, and DUI violations.

The Department has jurisdiction over the City's 9.5 square miles of land that bike paths along the riverbed. A mutual aid contract with the Los Angeles County Sheriff's Department provides for special weapons teams when required, and other specialized equipment or services including Homicide investigations. Air Support services are provided through a contract with the Pasadena Police Department. Jail bookings are accomplished through a contract for services with the Glendora Police Department Jail Facility.

The City expands police protection service consistent with community needs and provides an adequate level of service based on demand. The proposed project would be required to pay development impact fees which would allow the police department to add additional staff to provide services to accommodate this growth. These fees are used to fund the direct impact on increased demand for police facilities and equipment.

The proposed project would not result in a need to construct a new police station or physically alter an existing police station. As previously stated, the development impact fees for capital improvements and infrastructure costs would be collected. The fair share funds are intended to pay for project financial impacts on police protection service. The proposed project's environmental impact to police service is considered *less than significant*. This topic does not warrant additional analysis and will not be addressed further in the EIR.

### **Schools**

The proposed project would result in the construction of a high-cube industrial warehouse that would generate additional employment opportunities. The additional employees may come from Irwindale or surrounding communities. The project would not directly introduce new residents to the City.

Funding for new school construction is provided through state and local revenue sources. Local school districts levy school fees on new development in accordance with SB 50. The project would be subject to these developer school fees.

The proposed project would not result in a need to construct a new school or physically alter an existing school. The proposed project would be subject to SB 50 impact fees, which would mitigate the financial impacts of the proposed project on school facilities. The proposed project's environmental impact to schools is considered *less than significant*. This topic does not warrant additional analysis and will not be addressed further in the EIR.

### **Parks**

City parks and recreation facilities are provided by the City of Irwindale and operated and maintained by the Recreation Department. The City's parks system consists of existing parks and other facilities, such as the Irwindale Park, Dan Diaz Recreation Center, Irwindale Swimming Pool, etc.

The project would result in the construction of a high-cube industrial warehouse. The project would not directly introduce new residents to the City, and therefore would not substantially increase demand for public park facilities to the extent that modification of existing facilities or construction of new park facilities would be necessary. As such, the proposed project would have a *less than significant* impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

### **Other Public Facilities**

The proposed project would not result in a need for other public facilities that are not addressed above. Implementation of the proposed project would have a *less than significant* impact relative to this issue. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**XVI. RECREATION**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

*Responses to Checklist Questions*

**Response a):** The project would result in the construction of a high-cube industrial warehouse building. An open space area would be provided at the northeastern corner of the project site, adjacent to Vincent Avenue. This open space area would include picnic tables and benches and would not be available to the general public.

The proposed project would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Implementation of the proposed project would have a **less than significant** impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response b):** The proposed project includes the construction of a small employee lounge area in the northeastern corner of the site. Development of the project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Implementation of the proposed project would have a **less than significant** impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

*XVII. TRANSPORTATION*

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

*Responses to Checklist Questions*

**Response a-d):** Based on concerns raised by the public regarding traffic/transportation, it has been determined that traffic impacts will require a detailed analysis in the EIR. As such, the City of Irwindale will examine each of the four environmental issues listed in the checklist above in the EIR and will determine whether the proposed project has the potential to have a significant impact from traffic. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is conducted in the EIR.

The EIR will include a Traffic Impact Analysis (TIA) to address the impacts of the proposed project on the surrounding transportation system including the roadways, transit service, pedestrian facilities, and bicycle facilities. The TIA will be conducted to address compliance with the City's General Plan and other requirements under CEQA. It will be prepared following applicable guidelines of the City of Irwindale, Los Angeles County, and Caltrans, as applicable, using the applicable level of service (LOS) standards. The EIR will describe existing and future traffic conditions and will identify the trips that will be generated by the project and the projected distribution of those trips on the roadway system. The EIR will analyze total passenger vehicle and heavy-duty truck trips that are modeled to be generated by the proposed project. Potential impacts associated with site access, on-site circulation, and consistency with CEQA Guidelines section 15064.3, subdivision (b) will also be addressed in the EIR.

The TIA will include an evaluation of existing conditions, cumulative conditions, cumulative plus project conditions, access and circulation, and project alternatives. Future conditions will be evaluated with the use of the applicable travel model. Significant impacts will be identified in accordance with the established criteria, and mitigation measures will be identified to lessen the significance of any potential impacts.

The EIR will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with transportation.

**XVIII. TRIBAL CULTURAL RESOURCES**

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

*Responses to Checklist Questions*

**Responses a-b):** The City has initiated tribal consultation in accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18. In letters dated September 10, 2018, the City sent tribal consultation letters to the following tribes: Barbareño/Ventureño Band of Mission Indians, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Tribe, Gabrieleño Band of Mission Indians - Kizh Nation, Gabrielino/Tongva Nation, Kern Valley Indian Community, Kitanemuk & Yowlumne Teion Indians, LA City/County Native American Indian Commission, San Manuel Band of Mission Indians, Santa Ynez Band of Chumash Indians, Fernandeño Tataviam Band of Mission Indians, and Soboba Band of Luiseño Indians. In the letters, the City provided the tribes with information regarding the proposed project and requested that the tribes supply any information they might have concerning prehistoric sites or traditional use areas within the project site.

As of this writing, response letters have been received from the following tribes: San Manuel Band of Mission Indians (September 20, 2018), Gabrieleño Band of Mission Indians – Kizh Nation (September 17, 2018), and the Fernandeño Tataviam Band of Mission Indians (September 13, 2018). The San Manuel Band of Mission Indians and the Fernandeño Tataviam Band of Mission Indians noted that the project site is outside of the respective ancestral territory boundaries. The Gabrieleño Band of Mission Indians - Kizh Nation submitted a written request for a consultation meeting, pursuant to SB 18, Government Code Section 65352.3. The consultation meeting occurred on December 6, 2018. Upon further review of the project location and prior ground disturbance and fill activities, and the fact that there will be no ground disturbance outside of this footprint, the Gabrieleño Band of Mission Indians - Kizh Nation has concluded that the project has a low potential to impact Tribal Cultural Resources (TCR) and therefore additional mitigation for monitoring for TCR's is not necessary. The consultation efforts have been deemed complete.

The site has been filled with engineered materials which are known to not contain archaeological, historic, or paleontological resources, or human remains. Because the fill material has been

placed on the site recently and the material is well documented, there is effectively zero chance of finding a cultural resource on the site. Implementation of the proposed project would have ***no impact*** relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**XIX. UTILITIES AND SERVICE SYSTEMS**

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projects projected demand in addition to the providers existing commitments?			X	
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 reductions goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

*Responses to Checklist Questions*

**Responses a), b) and e):** The Sanitation Districts of Los Angeles County provide all of Irwindale’s sewer services. The great majority of the City is served by Sanitation District 22; with a small portion of its southwestern area served by District 15. Wastewater for areas served by Sanitation District 22 is treated at the San Jose Creek Water Reclamation Plan (WRP). The District’s trunk sewer lines extend throughout the City, with no under-served areas. The Los Angeles County Sewer Maintenance District, located in Alhambra, provides maintenance for the City’s six miles of sewers on a contract basis, including emergency services on a 24-hour basis.

The proposed project would connect to existing City infrastructure to provide sewer service. Existing sewer lines are currently located along Vincent Avenue and Allen Drive. To determine the potentially impact on sanitary sewer facilities, the flow rates shown in the Sanitation Districts of Los Angeles County loadings table for District 22 were used. Assuming a flow rate of 25 gallons per day (gpd) per 1,000 sf, the project would generate a total wastewater flow of approximately 13,643 gpd. The design capacity of the San Jose Creek WRP is 100 million gallons per day (mgd). The WRP currently processes an average flow of 69.4 mgd.<sup>2</sup> The total additional average wastewater flow increased by buildout of the project (13,643 gpd) would not exceed the design capacity of the San Jose Creek WRP.

The existing sewer system has sufficient capacity to handle effluent from the proposed project. The proposed project would be reviewed by the City of Irwindale, as applicable, as well as the

<sup>2</sup> City of Duarte. City of Hope Campus Plan Draft EIR, Wastewater Analysis. November 2017.

Sanitation Districts of Los Angeles County. Therefore, implementation of the proposed project would have a *less than significant* impact. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response c):** Development on the project site would place impervious surfaces on the project site. Development of the project site would potentially increase local runoff and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

A Hydrology/BMPs/LID Exhibit was prepared for the project. The project site consists of two drainage sub-areas, 1A (12.83 acres) and 2A (12.62 acres), which roughly bisect the site. In order to meet the City of Irwindale and County of Los Angeles storm water quality requirements, biofiltration BMPs will be utilized to meet LID/storm water quality requirements. Planned biofiltration BMPs include Measure BIO-1 (biofiltration) of the County of Los Angeles Department of Public Works LID Standards Manual (February 2014), as proprietary high-flow devices that are approved for use by the County. An underground detention system will be required to mitigate peak flows, consistent with County requirements.

Any excess flow would be routed off-site via a 30-inch storm drain pipe prior to ultimately discharging to an existing 90-inch storm drain pipe which is owned and maintained by the Los Angeles County Flood Control District. The property owner will maintain the on-site drainage system, which would consist of catch basin, curb drains, and infiltration/detention system. The proposed storm drains and infiltration/detention system has been designed to convey the required flow rates and will comply with the flood protection and storm water quality requirements of the City of Irwindale and County of Los Angeles.

The owner of the property will privately maintain the on-site drainage system, which would consist of catch basin, curb drains, and infiltration/detention system. The proposed storm drains and infiltration/detention system has been designed to convey the required flow rates and will comply with the flood protection and storm water quality requirements of the City of Irwindale and County of Los Angeles.

The construction of the stormwater conveyance and detention system would ensure that the project is consistent with all applicable plans and regulations related to stormwater conveyance and detention as required by the City, and would ensure that offsite, or onsite flooding does not occur during storm events.

The construction of drainage facilities falls within the project "footprint" and the environmental impacts associated with each topic have been addressed throughout this environmental document. Implementation of the proposed project would have a *less than significant* impact. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response d):** The City of Azusa Water Department provides basic water 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. The City of Azusa Water Department would provide water to the project site.

From 1899 to 1993, the City of Azusa's water system served only the City of Azusa. In 1993, the City of Azusa purchased the Azusa Valley Water Company (AVWC), which expanded the City of Azusa's service area. Upon integration with AVWC, the City of Azusa's water system became

known as Azusa Light & Water (ALW). ALW's water supply consists of imported water, groundwater, and surface water. ALW distributes water to its 23,000 service customers through a 281-mile network of distribution mains ranging from two to 30 inches in size.

According to the ALW's 2015 Urban Water Management Plan (UWMP), the average per capita water use within ALW's service area between 1996 and 2015 is 195.8 gallons per capita per day (gpcd). The total number of employees that the proposed project would generate is unknown at this time because the exact uses and tenants of the warehouse are unknown. Generally, the project would generate between 15 and 250 employees. The project's water demand was calculated using the 195.8 gpcd average shown in the UWMP. Using this rate, the proposed project would require between 2,937 gallons per day (3.3 acre-feet per year [AFY]) and 48,950 gallons per day (approximately 54.9 AFY).

According to the ALW's 2015 UWMP, based on the current capacity of ALW's supply infrastructure, ALW can expect to meet the needs of its customers through 2040. As population and land-use densities increase, ALW understands the need to discover and support local water supply projects in order to continue its independency of imported water. According to the ALW's 2015 UWMP, the ALW had 23,997 acre-feet of available water supply in 2010. The proposed project water demand would not cause the ALW to exceed their available supply. Based on the current capacity of ALW's supply infrastructure, ALW can expect to meet the needs of its customers through 2040. Additionally, ALW's supply reliability in the near future is expected to increase through continued upgrades to its groundwater facilities, expansion of the Joseph F. Hsu Filtration Plant (from 12 to 16 mgd), continued access to imported water, and through the future potential use of recycled water.

The existing water system has sufficient capacity to handle the water demand from the proposed project. Therefore, implementation of the proposed project would have a ***less than significant*** impact. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Responses f), g):** The City of Irwindale has an exclusive franchise agreement with Athens Services to provide mixed waste collection services and other available programs to its residents and business community. According to the City's General Plan EIR, significant impacts associated with solid waste disposal would not occur as a result of buildout of the General Plan. Development of the project site for industrial uses is assumed in the City's General Plan EIR.

Project construction activities would generate solid waste, including excess construction materials and material removed during site clearing. However, the site is vacant, and construction would not require demolition of existing structures or removal of large quantities of waste. City Ordinance No. 713 requires that 65% of the debris from demolition and construction is recycled. It is anticipated that compliance with the construction waste requirements in CALGreen and the existing City ordinance would be sufficient to minimize solid waste generation during construction. As a result, construction impacts associated with the proposed project would be ***less than significant***.

During operation of the project, the warehouse uses would produce solid waste that would be collected and transferred to the landfill system. Using CalRecycle's manufacturing/warehouse use solid waste generation rate of 1.42 pounds per 100 sf per day, the project is expected to produce approximately 7,749 pounds per day (1,414 tons of solid waste annually).

The City of Irwindale is required to maintain a 50 percent diversion rate as mandated by the state via the California Integrated Waste Management Act for all solid waste. The project is subject to this diversion rate for solid waste generated by the project. The solid waste generated by the project would place a minimal burden on the City's required diversion rate. The increase would not require additional landfill capacity. The project is not anticipated to cause an adverse impact to either solid waste collection service or the landfill disposal system. Implementation of the proposed project would have a ***less than significant*** impact relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**XX. WILDFIRE**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
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?			X	
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?			X	

*Existing Setting*

The California Department of Forestry and Fire Protection (Cal Fire) has designated the northern edge of the City as a Local Responsibility Area (LRA), which is within the Very High Fire Hazard Severity Zone (FHSZ); however, this rating does not extend to the project site. Additionally, the proposed project is not located within a State Responsibility Area (SRA). Although this CEQA topic only applies to areas within an SRA or Very High FHSZ, out of an abundance of caution, these checklist questions are analyzed below.

*Responses to Checklist Questions*

**Response a):** The project site will connect to an existing network of City streets. The project includes a 28-foot-wide fire lane around the perimeter of the proposed warehouse building. The appropriate turning radiuses have been planned to accommodate fire trucks on-site. The proposed circulation improvements would allow for greater emergency access relative to existing conditions. Moreover, the proposed project will require building construction to meet the fire code requirements, and will have fire hydrants consistent with the standards of the City, and such fire hydrants will assist with fire suppression efforts if a fire was to occur. Therefore, impacts from project implementation would be considered *less than significant* relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response b):** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The project site is located in an area that is predominately urban and industrial, which is not considered at a

significant risk of wildlife. Development of the project would not exacerbate fire risks. Therefore, impacts from project implementation would be considered *less than significant* relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response c):** The project includes development of infrastructure (water, sewer, and storm drainage). As noted above, the proposed project will require fire hydrants consistent with the standards of the City, and such fire hydrants will assist with fire suppression efforts if a fire was to occur. The proposed infrastructure improvements would allow for decreased fire risk relative to existing conditions. Therefore, impacts from project implementation would be considered *less than significant* relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**Response d):** Landslides include rockfalls, deep slope failure, and shallow slope failure. Factors such as the geological conditions, drainage, slope, vegetation, and others directly affect the potential for landslides. One of the most common causes of landslides is construction activity that is associated with road building (i.e. cut and fill). The project site is relatively flat; therefore, even if wildfire were to occur impact the project site, the potential for a landslide in the project site is essentially non-existent. Additionally, since the project site would be covered by impervious surface, the potential for downstream flooding as a result of runoff, post-fire slope instability, or drainage changes would be greatly limited. Therefore, impacts from proposed project implementation would be considered *less than significant* relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

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

*Responses to Checklist Questions*

**Responses a-c):** It has been determined that the proposed project will not 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 periods of California history or prehistory. As such, these topics do not warrant additional analysis and will not be addressed further in the EIR

It has been determined that the potential for the proposed project to: degrade the quality of the environment; create cumulatively considerable impacts; or adversely affect human beings will require more detailed analysis in an EIR. As such, the City of Irwindale will examine each of these environmental issues in the EIR and will decide whether the proposed project has the potential to have significant impacts on these environmental issues. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

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## **NOP Comments**

**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.*

March 11, 2020

Brandi Jones, Senior Planner  
City of Irwindale  
Community Development Department  
5050 North Irwindale Avenue  
Irwindale, CA 91706

RE: 5175 Vincent Avenue Project –  
Notice of Preparation (NOP)  
SCH # 2018121056  
GTS # 07-LA-2019-03156-RA-  
NOP  
LA-210/PM: 37.846 – 39.835  
LA-605/PM: 23.527 – 23.987  
LA-10/PM: 36.31 – 36.678

Dear Brandi Jones:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Notice of Preparation (NOP). The proposed project includes development of a concrete tilt-up, high-cube industrial warehouse building of approx. 545,735 sf (540,447 sf of ground floor area and 5,000 sf of mezzanine area), associated parking (included 199 standard parking stalls and 181 trailer stalls), and utility and landscaping improvements. The proposed project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. Existing storm drain, sewer, water, and gas lines/pipes are currently located along Vincent Ave and Allen Dr. Additionally, storm water facilities (i.e., storm drains and storm drain catch basins) currently exist at the existing industrial park area adjacent north of the site.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact "Vehicle Miles Traveled (VMT). Therefore, we are moving towards replacing LOS with 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 Vehicle Miles Traveled (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. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project to consider the use of

Brandi Jones  
March 11, 2020  
Page 2 of 2

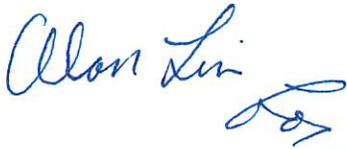
methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Per Caltrans' phone conversation with the City of Irwindale's Traffic Engineer, on March 11<sup>th</sup>, 2020, City will take recommendations referencing Caltrans' previous comment letter, dated January 23, 2019 to prepare the traffic study analysis.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-LA-2019-03156-RA-NOP

Sincerely,

A handwritten signature in blue ink that reads "Alon Lin" with a stylized flourish at the end.

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

Attachment

**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.*

January 23, 2019

Brandi Jones  
Senior Planner  
Community Development Department  
City of Irwindale  
5050 North Irwindale Avenue  
Irwindale, CA 91706

RE: 5175 Vincent Avenue Project – Mitigated  
Negative Declaration  
GTS # 07-LA-2019-02131  
SCH# 2018121056  
Vic. LA-210/PM 37.846 - 39.835  
LA 605/PM 23.527 - 23.987  
LA-10/PM 36.31 - 36.678

Dear Ms. Jones:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes development of a concrete tilt-up, high-cube industrial warehouse building of approximately 545,735 square feet (540,447 square feet of ground floor area and 5,000 square feet of mezzanine area), associated parking (included 199 standard parking stalls and 181 trailer stalls), and utility and landscaping improvements. The proposed project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. Existing storm drain, sewer, water, and gas lines/pipes are currently located along Vincent Ave and Allen Drive. Additionally, storm water facilities (i.e., storm drains and storm drain catch basins) currently exist at the existing industrial park area adjacent north of the site.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact "Vehicle Miles Traveled (VMT). Therefore, we are moving towards replacing LOS with 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 Vehicle Miles Traveled (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. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project to consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Caltrans has reviewed the Mitigated Negative Declaration and Initial Study (MND/IS) and has the following comments:

- On page 53 of the Revised Traffic Impact Analysis (TIA) dated December 12, 2018, the project references the "...Freeway agreement executed in October 2013 and updated December 2015 between LADOT and California Department of Transportation - District 7...". This agreement does not apply to the City of Irwindale because the agreement is between Caltrans and LADOT. In addition, this agreement has also expired. Please consult with Caltrans if the City has any traffic analysis methodology and significant threshold proposal for State facilities in the future.
- On Figure 14 of the Traffic Impact Analysis, "Project Evening Peak Hour Intersection Turning Movement Volumes", projected volumes do not add up correctly for Intersections 12 and 11. Intersection 12 anticipates 56 trips northbound, but these trips cannot be found at Intersection 11, please justify this calculation. Similarly, Figure 13, location 11 has 8 missing northbound trips between Intersection 12 and 11.
- On Figure 13 of the Traffic Impact Analysis, "Project Morning Peak Hour Intersection Turning Movement Volumes", Intersection 12 (Interstate 210 Eastbound offramp onto Irwindale Ave.) is anticipated to have 64 trips utilizing the off-ramp, however, Figure 14 ("Project Evening Peak Hour Intersection Turning Movement Volumes") anticipates zero returning trips at Intersection 11 on-ramp (Interstate 210 Westbound onramp onto Irwindale Ave). Please justify this conclusion.
- Please include queuing analysis and the impact to, the Interstate 210 Westbound ramp onto Azusa Avenue in the TIA. Figure 13 of the Traffic Impact Analysis, "Project Morning Peak Hour Intersection Turning Movement Volumes", indicates Intersection 30 would experience 59 Southbound Morning Peak Trips. Caltrans assumes these trips are from the westbound on Interstate 210 because there is 30% truck assignment and 15% car assignment per Figure 11 & 12. Analysis of the Intersection between Azusa Avenue and the Interstate 210 Westbound Ramps is needed to assess the impact to this facility.
- Please include queuing analysis for the Interstate 210 on/off ramps associated with Vernon Avenue in the TIA. Based on Caltrans experience and observations, many drivers may use the Interstate 210 offramp on to Vernon Ave. for quick access to the project site instead of Irwindale Ave.

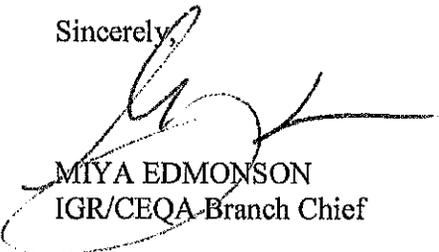
Ms. Jones  
January 23, 2019  
Page 3 of 3

- Caltrans has concurred the traffic mitigation and Project Fair Share Contribution on Table 12. Per phone conversation between both agencies on Friday, 1/18/19, the City will condition the project approval on Caltrans' request of the above queuing analysis and potential traffic mitigation measures, if any.
- For this project, an off-ramp queuing analysis should utilize the Highway Capacity Manual (HCM) queuing analysis methodology. The project consultant may use a 95 percentile to obtain queue length. The capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with some safety factor such as 85% (Caltrans recommendation) or any other justified methods. Caltrans recommend that any queuing attributable to the project beyond 85% (for example) of this total length be considered a significant impact. The analyzed result may need to be calibrated with actual signal timing when necessary. Caltrans also requests that the City determine whether the existing, existing plus project, and existing plus project plus cumulative traffic impacts are expected to cause long queues on off-ramps. We have attached a queuing analysis template for your reference.

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.

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at [reece.allen@dot.ca.gov](mailto:reece.allen@dot.ca.gov) and refer to GTS# 07-LA-2019-02131

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

Attachment

Cc: City of Azusa, State Clearinghouse

March 10, 2020

Brandi Jones  
Senior Planner  
City of Irwindale  
5050 North Irwindale Avenue  
Irwindale, California 91706

Dear Brandi Jones:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the 5175 Vincent Avenue Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2018121056. The Project consists of the construction and operation of approximately 545,735 square feet of high-cube industrial warehouse space. The Project is proposed within the City of Irwindale (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes. Implementation of the Project would require a change to the existing land use designation from "Residential" to "Industrial/Business Park".

Freight facilities, such as warehouse facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.<sup>1</sup> CARB has reviewed the NOP and is concerned about the air pollution and health risk impacts that would result should the City approve the Project, and the land-use change from "Residential" to "Industrial/Business Park", to build the proposed high-cube industrial warehouse building.

### **I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities**

The Project, if approved, will expose nearby disadvantaged communities to elevated air pollution. Residences are located south, east, and west of the Project site, with the closest residences situated approximately 85 feet from the Project's eastern boundary. In addition to residences, four schools (Alice M. Ellington Elementary School, Merwin Elementary School, Northview High School, and Las Palmas Middle School), two daycare centers (Covina KinderCare and Kiddie Cove Daycare) and a senior center (Irwindale Senior Center) are located within 1 mile of the Project. The community is

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<sup>1</sup> With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial uses and vehicular traffic along Interstate 210 (I-210), Interstate 605 (I-605), and Interstate 10 (I-10). Due to the Project's proximity to residences, schools, daycare centers, and a senior center already disproportionately burdened by multiple sources of air pollution, CARB 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 PM 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 industrial uses, and traffic on I-210, I-605, and I-10.

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). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 5 percent for Pollution Burden<sup>2</sup> and is considered a disadvantaged community; therefore, CARB urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

## **II. The DEIR Should Quantify and Discuss the Potential Cancer Risks at Residential and Other Sensitive Receptors in the Vicinity of the Proposed Industrial Building**

The Project, as proposed in the NOP, will not include refrigerated storage. The operation of cold storage warehouses would include trucks with transportation refrigeration units (TRU)<sup>3</sup> that emit significantly higher levels of toxic diesel emissions, oxides of nitrogen (NO<sub>x</sub>), and greenhouse gases than trucks without TRUs. To ensure TRUs will not operate within the Project site, CARB urges the City to include one of the following design measures in a revised DEIR:

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<sup>2</sup> Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

<sup>3</sup> TRUs are refrigeration systems powered by diesel internal combustion engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property, unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

If the City chooses to allow TRUs within the Project site, CARB urges the City to model air pollutant emissions from on-site TRUs, as well as prepare a health risk assessment (HRA) that shows the potential health risks. The DEIR should also include the air pollutant reduction measures listed in Attachment A.

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.

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),<sup>4</sup> and the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook.<sup>5</sup> 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.

### **III. Conclusion**

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<sub>x</sub> emission exposure to all neighboring communities, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to

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<sup>4</sup> 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/cnr/2015guidancemanual.pdf>.

<sup>5</sup> SCAQMD's 1993 Handbook can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

Brandi Jones  
March 10, 2020  
Page 4

implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB 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](mailto:stanley.armstrong@arb.ca.gov).

Sincerely,



Richard Boyd, Chief  
Risk Reduction Branch  
Transportation and Toxics Division

Attachment

cc: See next page.

Brandi Jones  
March 10, 2020  
Page 5

cc: State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812

Morgan Capilla  
NEPA Reviewer  
U.S. Environmental Protection Agency  
Air Division, Region 9  
75 Hawthorne Street  
San Francisco, California 94105

Carlo De La Cruz  
Senior Campaign Representative  
Sierra Club  
714 West Olympic Boulevard, Suite 1000  
Los Angeles, California 90015

Lijin Sun  
Program Supervisor  
CEQA Intergovernmental Review  
South Coast Air Quality Management District  
[lsun@aqmd.gov](mailto:lsun@aqmd.gov)

Andrea Vidaurre  
Policy Analyst  
Center for Community Action and Environmental Justice  
P.O. Box 33124  
Riverside, California 92519

Stanley Armstrong  
Air Pollution Specialist  
Risk Analysis Section  
Transportation and Toxics Division



## ATTACHMENT A

### Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

The California Air Resources Board (CARB) 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 recommended by CARB, 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 on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site 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<sub>x</sub> standard starting in the year 2022.<sup>1</sup>

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<sup>1</sup> In 2013, CARB adopted optional low-NO<sub>x</sub> emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO<sub>x</sub> emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model year 2010 and later. CARB's optional low-NO<sub>x</sub> 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 on site.
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 in lease agreements.<sup>2</sup>
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, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

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<sup>2</sup> 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](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,<sup>3</sup> Periodic Smoke Inspection Program (PSIP),<sup>4</sup> and the Statewide Truck and Bus Regulation.<sup>5</sup>
9. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site.
10. Include contractual language in tenant lease agreements that limits on-site 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.

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<sup>3</sup> 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>.

<sup>4</sup> 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>.

<sup>5</sup> The regulation requires that newer heavier trucks and buses must meet particulate matter filter 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. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.





State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



March 10, 2020

Brandi Jones  
City of Irwindale  
5050 North Irwindale Avenue  
Irwindale, CA 91706  
[BJones@IrwindaleCA.gov](mailto:BJones@IrwindaleCA.gov)

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for 5175 Vincent Avenue Project, SCH #2018121056, Los Angeles County**

Dear Ms. Jones:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for 5175 Vincent Avenue Project (Project).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & Game Code, § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

**Project Location:** The Project site is located north of a Los Angeles County-owned pit, east of Allen Drive, south of Arrow Highway, and west of Vincent Avenue in Irwindale, California. The Project site totals approximately 26.05 acres and is comprised of two vacant parcels; one of which is an undeveloped, recently filled, former aggregate mine pit known as the Manning Pit. The Assessor's Parcel Numbers (APNs) for the Project site are 8417-034-015 and 8417-034-016.

**Project Description/Objectives:** The proposed Project includes development of a concrete tilt-up, high-cube industrial warehouse building of approximately 545,735 square feet (sf; 540,447 sf of ground floor area and 5,000 sf of mezzanine area), associated parking (including standard parking stalls and trailer stalls), and utility and landscaping improvements. The proposed Project would connect to existing infrastructure to provide water, sewer, and storm drainage utilities.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Irwindale in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### Specific Comments

- 1) Lake and Streambed Alteration Agreement (LSA): Figure 3 (Aerial View of Project Site), the United States Geological Survey - The National Map, and historic aerial photography indicate that the Project activities could impact the bank of a perennial lake/pond directly adjacent to the southern Project boundary.
  - a) As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an Agreement for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA (available at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600)).
  - b) The Project area is directly adjacent to areas that support aquatic, riparian, and wetland habitats; therefore, CDFW recommends an investigation of the site for possible surface drainages to the surrounding areas that may feed into this lake/pond. A preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service (USFWS) wetland definition adopted by the CDFW (Cowardin et al. 1970). Some wetland and riparian

habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' section 404 permit and Regional Water Quality Control Board section 401 Certification.

- c) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR.
  - e) As part of the LSA Notification process, CDFW requests the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 2) Nesting Birds. As stated in the Initial Study, "some landscape trees are located along the perimeter of the Project site." These trees may provide potential nesting habitat and Project activities may impact nesting birds. CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 3) Landscaping. Figure 5 (Site Plan) indicates that landscaping will occur in various areas of the Project site. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, including pepper trees (*Schinus* genus) and fountain grasses (*Pennisetum* genus), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>.
- 4) Tree Replacement: Figure 3 (Aerial View of Project Site) and aerial photography indicate the presence of trees on the western boundary of the Project site. In addition, Mitigation Measure Bio-1 indicates Project activities will include tree removal. To compensate for any

loss of trees, CDFW recommends replacing all non-native trees removed as a result of the proposed work activities at least a 1:1 ratio with native trees. CDFW recommends replacing native trees at least a 3:1 ratio with a combination of native trees and/or appropriate understory and lower canopy plantings. CDFW recommends that any loss of oaks should be replanted at a minimum 10:1 ratio.

Replacement oaks should come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.

- 5) Biological Baseline Assessment and Impact Analysis. Figure 3 (Aerial View of Project Site) and aerial photography indicate that the west border of the Project site contains trees and other vegetation. In addition, the area south of the Project site is shown to contain groundwater dependent vegetation identified as Riversidean alluvial scrub on the Natural Communities Commonly Associated with Groundwater (NCCAG) Dataset (USDAFS, 2014). CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts, as referred in General Comment 3 and 4. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's California Natural Diversity Data Base (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at [http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp);
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
- f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

### General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
  - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
  - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 2) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or State-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the

Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 3) Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
  - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
  - b) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & Game Code, § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
  - c) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
  - d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 4) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition

and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

- 5) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 6) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation are the processes of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.
- 7) Moving out of Harm's Way. The proposed Project is anticipated to result in impacting natural habitats on and/or adjacent to the Project site that may support species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity shall obtain all appropriate state and federal permits.

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City of Irwindale in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 430-0098 or by email at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov).

Sincerely,



Erin Wilson  
Environmental Program Manager I

ec: CDFW  
Erinn Wilson – Los Alamitos  
Victoria Tang – Los Alamitos  
Andrew Valand – Los Alamitos  
Felicia Silva – Los Alamitos  
Audrey Kelly – Los Alamitos  
CEQA Program Coordinator – Sacramento

State Clearinghouse

## References

Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

US Department of Agriculture Forest Service. 2014. Existing Vegetation South Coast, 2002-2010, v2 [ESRI File Geodatabase]. McClellan, CA. Accessed June 2016.



5175 VINCENT AVENUE

PUBLIC SCOPING MEETING AGENDA

THURSDAY, FEBRUARY 20, 2020 - 6:00 PM

1. **Registration Period:** Attendees will sign in and give his/her name, association, address, and email. This information will be put on a mailing list for future mailings.
2. **Format:** Short Presentation and Open House
  - a. **Brief Presentation:** 6:00-6:15pm - A brief presentation will be provided at the beginning of the meeting. The presentation will provide an overview of the project, the purpose of the meeting, and opportunities for community input/participation during the environmental review process.
  - b. **Open House:** 6:15-7:00pm - Maps and information will be available. The intent is to provide you with an opportunity to review some materials, ask some questions, and provide some comments if desired.
3. **Questions/Comments:** De Novo Planning Group and City of Irwindale staff will accept questions and comments concerning the project and scope of the EIR. The intent is to record comments/concerns so they can be addressed within the Draft EIR.

Please write any comment or concern regarding this project in the space provided below.

Veronica Vanmarckce  
4851 Sabine Lane  
Irwindale, CA  
vguzman94@hotmail.com

I'd like information on future meetings.  
Also, the meeting on 2/2/20 was never  
announced to the Irwindale residents.  
Social Media like Twitter, Instagram and  
FB should be utilized... we're in the year  
2020!

I will write an email with  
specific concerns.

Thank you



5175 VINCENT AVENUE  
PUBLIC SCOPING MEETING AGENDA  
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Please write any comment or concern regarding this project in the space provided below.

TRAFFIC AND ASSOCIATED NOISE/POLLUTION IS MY MAIN CONCERN. NOT ONLY ON VINCENT, BUT ARROW, CYPRESS AND IRVINGDALE AVE WILL ALL BE AFFECTED. THE EIR SHOULD CONSIDER ALL TRAFFIC CONCERNS FROM ALL POSSIBLE FREEWAY EXITS TO THE PROJECT.

VINCENT AVE HAS TO BE WIDE ENOUGH FOR THE POLICE DEPARTMENT TO CONDUCT COMMERCIAL ENFORCEMENT WITHOUT BACKING UP TRAFFIC EVEN MORE.

NOTIFICATIONS OF ALL FUTURE MEETINGS AND HEARINGS SHOULD BE MAILED TO EACH RESIDENCE, JUST LIKE WHEN WE RECEIVE THE BAND LINE UP FOR MUSIC AT THE PARK OR A PART-TIME RECREATION AIDE OPENING AT THE REC. DEPARTMENT,

# De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm



RECEIVED

MAR 02 2020

CITY OF IRWINDALE  
CITY CLERKS DEPT.

## 5175 VINCENT AVENUE PUBLIC SCOPING MEETING AGENDA

THURSDAY, FEBRUARY 20, 2020 - 6:00 PM

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Please write any comment or concern regarding this project in the space provided below.

Should this project be approved, and run at capacity, my property will be subjected to noise, diesel fumes, traffic problems. The backup sirens on tractor trucks are very loud. One warehouse design has approximately 125 bays to back into for these vehicles. Can you imagine the combined siren and diesel engine noise should this project run at capacity?? This noise, as proposed, would be ongoing 24/7! The amount of trucks idling like that would pollute the air. The prevailing westerly wind would carry the pollution to my property. With the substantial increase in truck traffic, the residents of Vincent County area have only two points to enter and exit, one of which is Chadmont Street. Currently there can be enough cars backed up so I cannot exit my driveway in the morning. Should this project be enacted it would cause this problem to happen anytime.

We are already suffering the ill effects of thousands of trucks hauling dirt to fill the Manning Pit. We suffer from chronic coughs and headaches which a doctor has said could be attributed from the project.

Due to the ongoing drought, we are unable to keep both the inside and outside of our home clean. The dirt continues to clog our pool filter and equipment. Would you want to live like this?

We were told that the economic consequence of this project was not a factor. However, talking to a realtor we find that this project could potentially decrease our property value exponentially. This should be taken into account because this is where we live, this IS our environment.

Edward + Margaret Curren  
16508 E. Chadmont Street  
Corina, Ca. 91722-1011

626-332-5067 (Home)



MAR 10 2020

A Land Use Planning, Design, and Environmental Firm

RECEIVED

5175 VINCENT AVENUE  
PUBLIC SCOPING MEETING AGENDA  
THURSDAY, FEBRUARY 20, 2020 - 6:00 PM

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Please write any comment or concern regarding this project in the space provided below.

To: Brandi Jones, Senior Planner.

All questions are on the attached sheets.

Thank You.

I expect all my questions to be answer in writing in the next meeting.

March 9, 2020

To: Brandi Jones, Senior Planner

These are the questions and commons concerning the Notice of Scoping Meeting and Preparation of a Draft Environmental Impact Report on February 10, 2020 on the numerous bay trucking company on Vincent Avenue.

1. We noticed that the following agencies were listed as "may be required" to issue a permit: Regional Water Quality Control Board (RWQCB), Storm Water Pollution Prevention Plan (SWPPP), and South Coast Air Quality Management District (SCAQMD). These need to be a "Must" not a "may be". There are three cities in this county that is within the 500 feet parameter of this site: Irwindale, Azusa, and Covina.
2. Why were the above mentioned agencies not at the meeting?
3. Did the SCAQMD okay the project?
4. Who on the governing board of SCAQMD okayed the project?
5. Do you have a SCAQMD permit?
6. Who is going to monitor the air standard emissions of these areas?
  - Residential area east (Covina) and west (Irwindale)
  - Ellington Elementary (Covina)
  - Irwindale Community Park
7. Can you mandate non-polluting trucks to be used?
8. Is there going to be to be charging stations on site for electric vehicles?
9. Because this is a new facility, solar panels should be required to reduce the load off of the grid. All new houses are required to have solar panels, this is a new building, and it should have it to.
10. What are the working operations of this facility? 24/7, 9 to 5?
11. As residents living within 500 feet of the new trucking company, we request the working operations to be limited.
12. We were told in the meeting on February 20<sup>th</sup> 2020 that our property value will increase with the new trucking company that is being built within 500 feet to our front door. Can you show us where this has happened before and what percentage of increase are we planning to see?
13. Because we are live in Covina incorporated county of Los Angeles and the new trucking facility project is planning to be built on Irwindales side of Vincent Avenue in Los Angeles County, has Los Angeles County Department of Public Works Building and Safely been notified or participating in this study?
14. Is the County Supervisor of Los Angeles District 1, Hilda Solis, been notified or participating in this study?
15. Who in Los Angeles County Traffic and Road Division is going to inspect and okay the extra traffic on Vincent Avenue when the new trucking company beings operation?
16. Who is going to daily clean Vincent Avenue of dust, dirt, and debris?

Thank you,

James Trenkamp

[Trenkamp@hotmail.com](mailto:Trenkamp@hotmail.com)

626-587-6201

Charlotte Santos

[Charwebb1@mac.com](mailto:Charwebb1@mac.com)

626-290-5149

# De Novo Planning Group



A Land Use Planning, Design, and Environmental Firm

NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
Isabel & Jose Marín (Residents)	16148 Central St Irwindale CA 91706	626-857-5636	themarínconnect@gmail.com
Royan Rodriguez	5107 Allen Dr Irwindale, Ca. 91706	(626) 324-4325	r-rodriguez_07@yahoo.com
Rudy Rodriguez	16058 Central St	(626) 833-7615	
Tony Morago	5121 1/2 Allen Dr.	626-641-5983	ymotm2007@gmail.com
Gary Strobehn	5121 Allen Dr	626 430 0252	gstrobehn@gmail.com

# De Novo Planning Group



A Land Use Planning, Design, and Environmental Firm

NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
Beatriz Robles	16503 E. Chadmont St.	(626) 6175436.	
Veronica Vanmarcke			
Jenny + Becky			
Olivia M. Hernandez	4809 Calle Del Sur Irw.	(626) 664-6142	<del>omireles.hdz1@gmail.com</del> omireles.hdz1@gmail.com
Gary Strobehn	5121 Allen Dr.	626 430 6252	gstrobehn@gmail.com
Cynthia Rodriguez	5121 Allen Dr Irwindale	626 430 6252	Garyeric24@gmail.com
Larry Burrola	4824 Sabnehan Irwindale	—	—

# De Novo Planning Group



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NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
RICHARD HIRSCH	16014 PEPPER TREE LANE IRWINDALE 91706	CELL 562-544-4404	rhr4usc@DNV.com
DIANA DIAZ	16121 PEPPER TREE IRWINDALE 91706	510 292-5771	
Maria Rodriguez	16058 calle de Paseo Irwindale ca 91706	626 373-3013	mrs shontie47@gmail.com

# De Novo Planning Group



A Land Use Planning, Design, and Environmental Firm

NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
Sam Reynolds	16604 E. Chadmont St.	(626) 332-6530	
LINDA STROBEL	5121 N. Allen Dr	626 960 5898	
GARY STROBEL	4833 Calle Delson		
Camille Diaz	16121 Peppertree Ln	626 3372591	
Robert Diaz	2408 S Mountain Ave	626 359-5517	
Fred Barbosa	16189 Calle de Paseo	(626) 222-7815	fredbarbosa@hotmail.com

# De Novo Planning Group



A Land Use Planning, Design, and Environmental Firm

NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
Charlotte Santos	5148 Cranley Concord CA.	626-967-7863	
Fred Barboza	16164 Calde de Poso	(626) 222-7815	
Lydia Bravo	5056 N. Vincent Ave	(626) 824-9415	
Marilyn Simpson	5050 Irwindale Ave	6/430-2209	
Ester Tapia	16109 Central St.	626 483-6865	
STEVE HAGER	16518 Chadmont	626 977-4129	
Jerry Robles	16503. Chadmont St.	(626) 806 3262	

# De Novo Planning Group



A Land Use Planning, Design, and Environmental Firm

5175 VINCENT AVENUE  
 PUBLIC SCOPING MEETING SIGN-IN SHEET  
 THURSDAY, FEBRUARY 20, 2020 - 6:00 PM

NAME/ASSOCIATION	ADDRESS	PHONE	EMAIL
SR ROBERT T. ESCOBEDO	5253 N. MORADA ST	626-905-4145	
EDWARD CURREN	16508 E. CHADWORTH ST.	626 332-5067	
DENA ZEPEDA	4658 FRAYO	626 622 8953	
RICHARD NICO	16134 Calle De Pase	909 322 4800	
BILL QUILSEN BERRY	EL MONTE 4399 N. Santa Anita	626-374-7140	
JIM IRENKAMP	5148 Crawley	626-967-7863	



## GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Project Name: 5175 Vincent Avenue Project located at 5175 Vicente Avenue, Irwindale, CA 91706

Dear Brandi Jones,

Thank you for your letter dated February 10, 2020 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail.

Please contact us at your earliest convenience. ***Please Note: AB 52, "consultation" shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).***

Thank you for your time,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)



*Converting Waste Into Resources*

**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](http://www.lacsd.org)

March 11, 2020

Ref. DOC 5565799

Ms. Brandi Jones, Senior Planner  
Community Development Department  
City of Irwindale  
5050 North Irwindale Avenue  
Irwindale, CA 91706

Dear Ms. Jones:

**NOP Response for 5175 Vincent Avenue Project**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on February 12, 2020. The proposed project is located within the jurisdictional boundary of District No. 22. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge directly to the Districts' Joint Outfall H Unit 8K Relief Trunk Sewer, located in Vincent Avenue at the east side of the project site. The Districts' 21-inch diameter trunk sewer has a capacity of 9.9 million gallons per day (mgd) and conveyed a peak flow of 4.8 mgd when last measured in 2015. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit, issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at (562) 908-4288, extension 1205.
2. 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.
3. The expected average wastewater flow from the project site, described in the notice as a 545,735 square-foot high-cube industrial warehouse, is 13,643 gallons per day. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link.
4. 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](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. 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.

5. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of District 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 District 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 District 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 District intends 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 District 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:ar

cc: A. Schmidt  
A. Howard



# South Coast Air Quality Management District

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

SENT VIA USPS AND E-MAIL:

March 10, 2020

[BJones@IrwindaleCA.Gov](mailto:BJones@IrwindaleCA.Gov)

Brandi Jones, Senior Planner  
City of Irwindale, Community Development Department  
Planning Division  
5050 North Irwindale Avenue  
Irwindale, CA 91706

## **Notice of Preparation of a Draft Environmental Impact Report for the Proposed 5175 Vincent Avenue Project<sup>1</sup>**

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 files<sup>2</sup>. 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 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](http://www.caleemod.com).

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<sup>1</sup> The Proposed Project consists of construction of a 545,735-square-foot warehouse on 26.05 acres.

<sup>2</sup> 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. Guidance<sup>3</sup> 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](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

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<sup>3</sup> 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 has the greatest cancer risk at 415 in one million, and individual communities could have higher risks than the average if they are located near emission sources<sup>4</sup>. 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.

### **Trip Rates for High Cube Warehouse Projects**

The Proposed Project will include, among others, construction of a 545,735-square-foot warehouse on 26.05 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

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<sup>4</sup> 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>

vendors, contractors, and/or haul truck operators commit to using 2010 model year<sup>5</sup> trucks (e.g., 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 trucks<sup>6</sup>. Include environmental analyses to evaluate and identify sufficient power 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 on-road haul 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.

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. 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.
- 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)<sup>7</sup>. 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 5% of all vehicle parking spaces

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<sup>5</sup> 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 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>.

<sup>6</sup> 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/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

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

(including for trucks) include EV charging stations<sup>8</sup>. 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.

- 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 nearby 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 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 to power 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.

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<sup>8</sup> City of Los Angeles. Accessed at: [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).

**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) 396-2001. 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](mailto: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