

December 2021 | Initial Study

4416 AZUSA CANYON ROAD

City of Irwindale

Prepared for:

City of Irwindale

Contact: Brandi Jones, Senior Planner
5050 Irwindale Avenue
Irwindale, California 91706
626.430.2260

Prepared by:

PlaceWorks

Contact: JoAnn C. Hadfield, Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

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- Appendix B Health Risk Assessment
- Appendix C Cultural and Paleontological Resources Assessment Report
- Appendix D Geotechnical Investigation and Results of Infiltration Testing

Volume II

- Appendix E Phase I Environmental Assessment

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- Appendix F LID Report and Hydrology and Detention Report
- Appendix G Noise Background
- Appendix H Public Services and Utility Provider Responses
- Appendix I Transportation Analysis

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO _{2e}	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L _{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M _w	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons
MPO	metropolitan planning organization

Abbreviations and Acronyms

MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model
tpd	tons per day

Abbreviations and Acronyms

TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

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1.1 PROJECT OVERVIEW

The 4416 Azusa Canyon Road project (proposed project) involves the construction and operation of a new warehouse and manufacturing facility on a currently developed site. The warehouse and manufacturing businesses (prospective tenants are unknown at this time) would operate out of a proposed building that would encompass a total of 129,830 square feet, with 17,000 square feet of manufacturing space, 103,670 square feet of warehousing space, and 9,160 square feet of ancillary office space to support the industrial and warehousing tenant(s). The proposed project would also include 18 dock door positions within a secured truck court area on the southeastern side of the site. Other project components include vehicular and pedestrian access and circulation improvements, asphalt parking areas, utility and infrastructure improvements, and various hardscape and landscape improvements. Project development would require a site plan and design review permit from the City of Irwindale.

1.2 PURPOSE OF CEQA AND THE INITIAL STUDY

CEQA (California Environmental Quality Act; Public Resources Code Section 21000 et seq.) requires that before a lead agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about and consider the project's potential environmental impacts, inform the public about the project's potential environmental impacts, give them an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.¹

The City of Irwindale—in its capacity as lead agency pursuant to CEQA Guidelines Section 15050—is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions and subsequent development associated with the proposed project would have a significant impact on the environment. As part of the project's environmental review and in its capacity as lead agency, the City authorized the preparation of this Initial Study in accordance with the provisions of CEQA Guidelines Section 15063. Pursuant to Section 15063, purposes of an Initial Study are to:

- Provide the lead agency information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or negative declaration.
- Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration.
- Assist in the preparation of an EIR, if one is required.

¹ Pursuant to Public Resources Code Section 21067, lead agency refers to the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.

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- Facilitate environmental assessment early in the design of a project.
- Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine whether a previously prepared EIR could be used with the project.

As further defined by Section 15063, an Initial Study is prepared to provide the City with information to use as the basis for determining whether an EIR, Negative Declaration, or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the proposed project.

In its preparation of this Initial Study, the City determined that an MND is the most appropriate CEQA document for the proposed project. This Initial Study has been prepared to support the adoption of an MND, which is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines Section 15371). The CEQA Guidelines require preparation of an MND if the Initial Study prepared for a project identifies potentially significant effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the Lead Agency, that the project may have a significant effect on the environment. (CEQA Guidelines Section 15070[b]).

The City has considered the information contained in this Initial Study in its decision-making processes. The Initial Study was prepared with consultant support, but the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City.

1.3 PROJECT LOCATION

The approximately 5.89-acre project site is in the southeastern portion of Irwindale in Los Angeles County. The city is approximately 20 miles east of downtown Los Angeles, with neighboring cities of West Covina, Baldwin Park, the unincorporated area of Vincent, Azusa, Duarte, El Monte, North El Monte, and Monrovia (see Figure 1, *Regional Location*). As shown in Figures 2, *Local Vicinity*, and 3, *Aerial Photograph*, the project site is at the northeastern corner of the Azusa Canyon Road/Los Angeles Street intersection. It is bound by Big Dalton Wash to the north, Los Angeles County Metro (LA Metro) railroad and Los Angeles Street to the south, a railroad spur to the east, and Azusa Canyon Road to the west. The project site's Assessor's Parcel Number is 8417-004-006.

Regional access to the project site is from Interstate 10 (I-10), approximately 1.4 miles to the south via North Orange Avenue, West San Bernardino Road, and Azusa Canyon Road, and from I-605 approximately 2.5 miles to the northwest via Live Oak Avenue, Arrow Highway, and Azusa Canyon Road. State Route 39 (SR-39) also provides regional access to the project site and is approximately 2 miles east of the site. Local access to the project site is via Azusa Canyon Road and Los Angeles Street.

Figure 1 - Regional Location



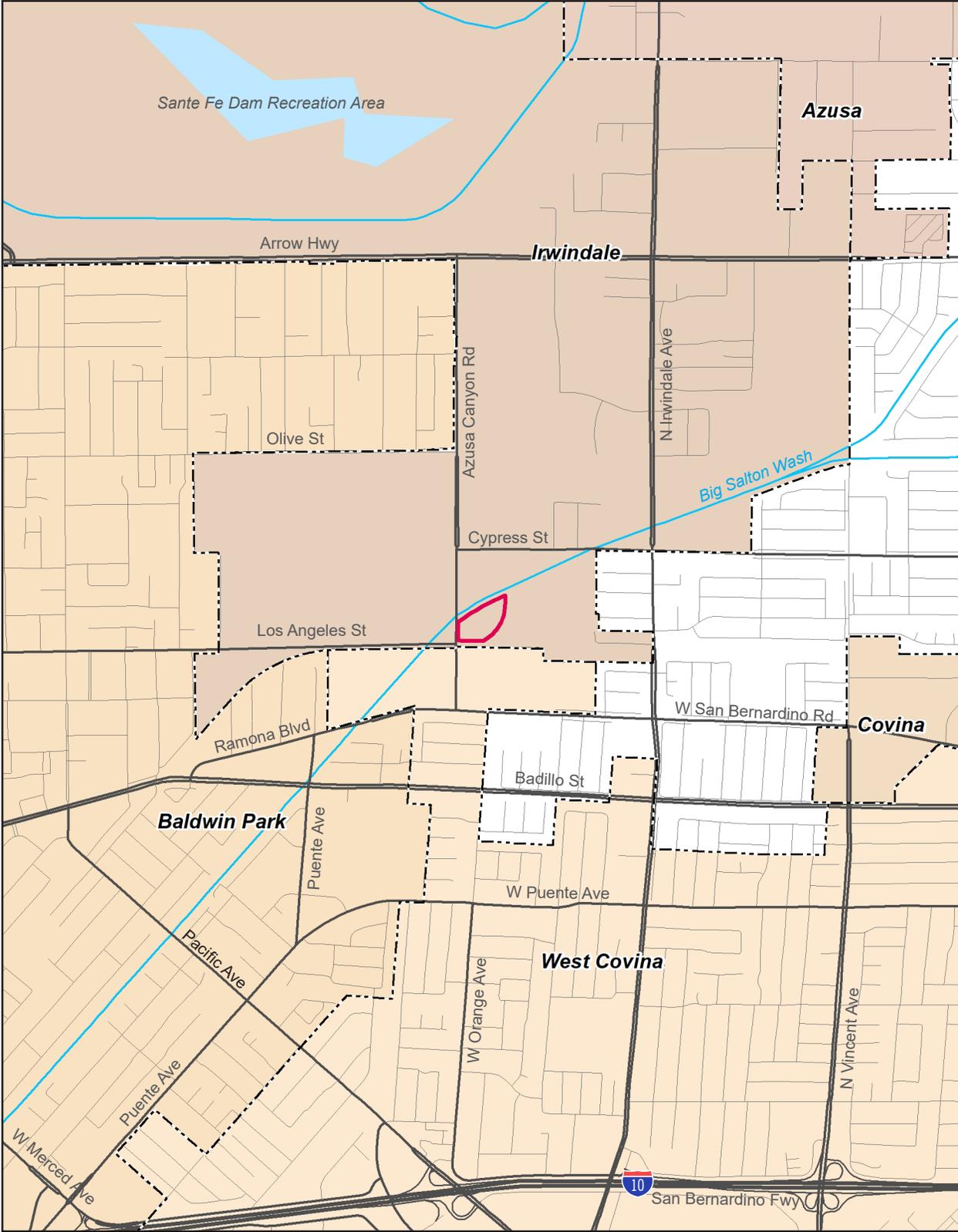
Note: Unincorporated county areas are shown in white.
Source: ESRI, 2021



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Figure 2 - Local Vicinity



— Project Boundary - - - - - City Boundary

0 2,000
Scale (Miles)



Note: Unincorporated county areas are shown in white.
Source: ESRI, 2021

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1.4 ENVIRONMENTAL SETTING

1.4.1 Existing Land Use

As shown in Figure 3, *Aerial Photograph*, and Figure 4, *Site Photographs*, the site is presently developed with one building of approximately 62,713 square feet in the western half of the site, a large metal shed north of the building, and a loading dock and large truck yard on the eastern portion of the site (LACOA 2021). The building is a single-story structure of concrete tilt-up construction on a concrete slab floor. The metal shed was part of the old truck wash area that is connected to the building by an overhang. The loading dock area is made of metal siding that is attached to the concrete building. The loading dock has a ramp for five trucks. The building was occupied by Pepsi Bottling Group. The bottling plant ceased operation in December 2020 and the site has remained vacant. The building is surrounded by concrete pavement in the parking and drive areas. The site includes 116 vehicle parking spots and 25 parking spots for trucks. The southeastern area of the site is vacant and undeveloped. The ground surface cover in this area consists of exposed soil with moderate to extensive native grass and weed growth. Several mature ornamental trees are at the entrance to the northern parking lot, along with a few shrubs.

The existing building is surrounded by either metal fencing or chain-link fences. On the south side of the site, near the southern gate, is evidence of former underground storage tanks. Heating and cooling systems are present at the site along with clarifiers—one clarifier at the north side of the building where the truck wash was located and another on the east side of the building within the loading bay. No catch basins were observed on the site. Drains on the site appeared to be stormwater drains. A public sidewalk runs along the entire stretch of the western site boundary. Current vehicular access to the project site is via driveways off Los Angeles Street and Azusa Canyon Road.

Based on a review of historical information, the project site appears to have been used as an orchard from at least 1928 until around 1952, when the site became vacant. The current main building was constructed in 1956 and was used by PepsiCo as a bottling plant up until December 2020. Underground storage tanks were on the southeast area of the site and were closed under the oversight of the Los Angeles County Fire Department.

1.4.2 Surrounding Land Use

As shown in Figure 3, *Aerial Photograph*, the project site is immediately surrounded by business and industrial uses to the north, east, and south. The Olive Pit mine site/sand and gravel quarry and the City Public Works yard are west of Azusa Canyon Road. Residential areas are within a 1,000-foot radius to the northeast, southeast, south, and southwest of the project site. The closest sensitive receptors are a single-family residence approximately 550 feet northeast on East Cypress Street and a mobile home park approximately 700 feet to the southwest.

1.5 ENVIRONMENTAL RESOURCES

The project site and its immediate surroundings are highly disturbed and/or developed, and there are no biological resources onsite or within the surrounding area. The project site contains no historic buildings,

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housing, scenic resources, mineral resources, notable trees, or water bodies. Additional information regarding environmental resources on the project site and its surroundings—or the lack of such resources—can be found in Section 3, *Environmental Analysis*, of this Initial Study under each respective environmental topic.

1.6 PROJECT DESCRIPTION

Following is a detailed description of the proposed project’s overall site plan and character and the various development features/elements and improvements that would be implemented as a part of the project.

1.6.1 Site Plan and Character

Rexford Industrial Realty (project applicant) proposes to develop the 5.89-acre project site with a stand-alone concrete tilt-up warehouse, office, and manufacturing facility at 4416 Azusa Canyon Road. The site’s development would involve demolition of the existing building on-site, currently occupied by the Pepsi Bottling Group, which ceased operation on December 5, 2020. The existing site features and improvements to be demolished and removed are shown in Figure 3, *Aerial Photograph*.

After clearing, the project site would be developed with the 4416 Azusa Canyon Road project (proposed project). Future uses/tenants are described as speculative, and the specific warehousing types have not been defined. Similarly, other industrial or potential manufacturing uses have not been specified. Prospective tenants would operate out of a proposed building with a footprint of 125,500 square feet. The total landscaped area on-site would be 27,979 square feet.

Building occupancy would include office, manufacturing, and warehouse uses, as shown in Table 1. The proposed project would also include 18 dock-door positions within a screened and secured truck court area on the southeastern side of the site.

Table 1 Floor Area Distribution for Proposed Use

Proposed Uses	Area (Square Feet)
Ground Floor Warehousing	103,670
Ground Floor Manufacturing	17,000
Ground Floor Office	4,830
Mezzanine Office	4,330
Total	129,830

Source: GAA 2021.

Figure 3 - Aerial Photograph



— Project Boundary
- - - City Boundary

0 750
Scale (Feet)

Source: Nearmap, 2021



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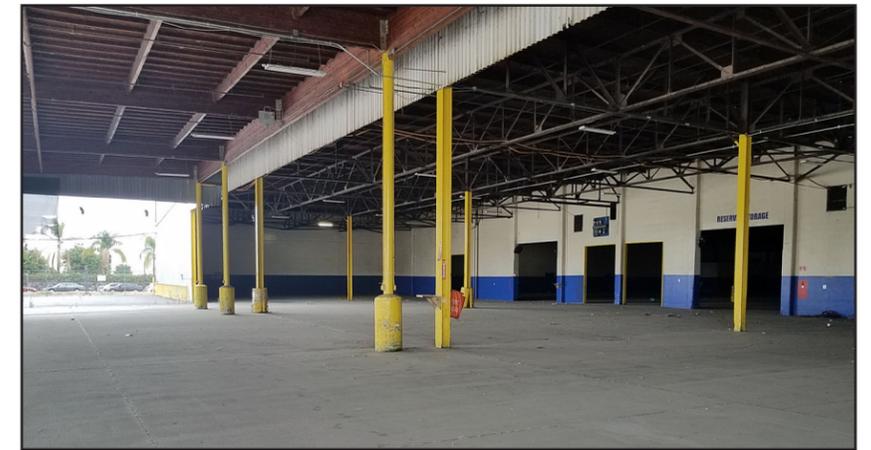
Figure 4 - Site Photos



①



②



③



④



Key Map

① Site Photo Locations and Directions (7)

Project Boundary



⑤



⑥



⑦

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Figure 5, *Conceptual Site Plan*, illustrates the proposed project's overall site design. The building would occupy the majority of the site, with the truck court area in the southeast portion of the site. Vehicle access to the site would be via a driveway off Azusa Canyon Road, a western driveway off Los Angeles Street, and a gated eastern driveway off Los Angeles Street. Truck access would only be from the eastern gated driveway off Los Angeles Street. Architecturally and functionally, the building would be designed and constructed as a single-story, painted concrete tilt-up industrial building (up to 37 feet in height) with a mezzanine and ample interior open-storage space and high ceilings, which is typical for warehouse and distribution facilities. Primary entrance to the building would be from the western end. Designated employee and visitor parking areas would be placed on all sides of the building. The northeast corner of the site would also include parking stalls. Refer to Section 1.6.4, *Access, Circulation, and Parking*, for further details regarding the proposed parking areas.

Other site structures and improvements include enclosures for solid waste and recycling bins in the southwest corner of the truck court area and stormwater infiltration and detention facilities. The solid waste enclosures would have six-foot-high, painted, concrete tilt-up walls; an enclosure roof; and double swing gates. No above- or underground storage tanks are proposed.

Other project features and improvements are discussed in detail below—such as architectural and landscape design and improvements; parking, vehicular access, and circulation improvements; infrastructure improvements; and business operations.

1.6.2 Architectural Design and Character

The building would be designed as a single-story, tilt-up industrial building (up to 37 feet in height) with a mezzanine and ample interior open-storage space and high ceilings. Figure 6, *Conceptual Building Elevations*, and Figures 7a and 7b, *Conceptual Building Renderings*, illustrate the conceptual elevations and architectural design and features of the proposed building. As shown in these figures, the proposed building would incorporate a modern architectural style and aesthetic. Building elements and materials include smooth and light-colored troweled stucco; metal, glass, brick, and stone; light, harmonious colors with accent color for trim; facades with depth of plane; recessed heavy doors; deeply recessed windows with planter boxes; custom ornamentation; arcades and columns for scale balance and rhythm; varied roof lines; and flat roofs behind detailed parapets. Furthermore, the proposed design aims to enhance the street corner at Azusa Canyon Road and Los Angeles Street, develop contemporary interpretation of a traditional concept, and encompass an authentic period style compatible with the city context. Final architectural design of the building is subject to review and approval by the City.

1.6.3 Landscaping, Walls, and Lighting

As shown in Figure 8, *Conceptual Landscape Plan*, the proposed project's landscape plan would feature street trees along Azusa Canyon Road and at the building's western entrance. Trees, ground cover, and shrubs would line most of the northeast, southeast, and southwest sides of the building. Additional trees, ground cover, and shrubs would be placed at the truck entrance. Screen shrubs would also be provided along the northeastern perimeter of the site.

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Approximately 11 percent of the project site would be landscaped. Landscape would include a variety of flowering accent trees, palm trees, parking lot shade trees, native trees, shrubs, and groundcover. No landscaping would be in the truck court area; however, landscaping would be provided in the employee/visitor parking areas. Project development would include the removal of eight trees on-site. However, the proposed project would provide a greater number of trees (68) than currently exist. The proposed project would be equipped with a low flow irrigation system consisting of a weather-based smart controller and low rotors, bubbler, or drip systems.

Various fences, walls, and gates would be provided along the site perimeter and internal to the site. A rolling gate with a perforated metal screen is proposed at the truck yard entrance off Los Angeles Street. Another similar gate is proposed to restrict access into the area along the northeast boundary of the building. Service gates would be manually operated with a Knox box. Additionally, a tube-steel fence (approximately eight feet in height) is proposed along the northeast, southeast, and southwest site boundaries. A tilt-up concrete screen wall (with a maximum height of eight feet) is proposed along the southern side of the trash enclosure and on either side of the gate at the truck entrance (see Figure 5, *Conceptual Site Plan*).

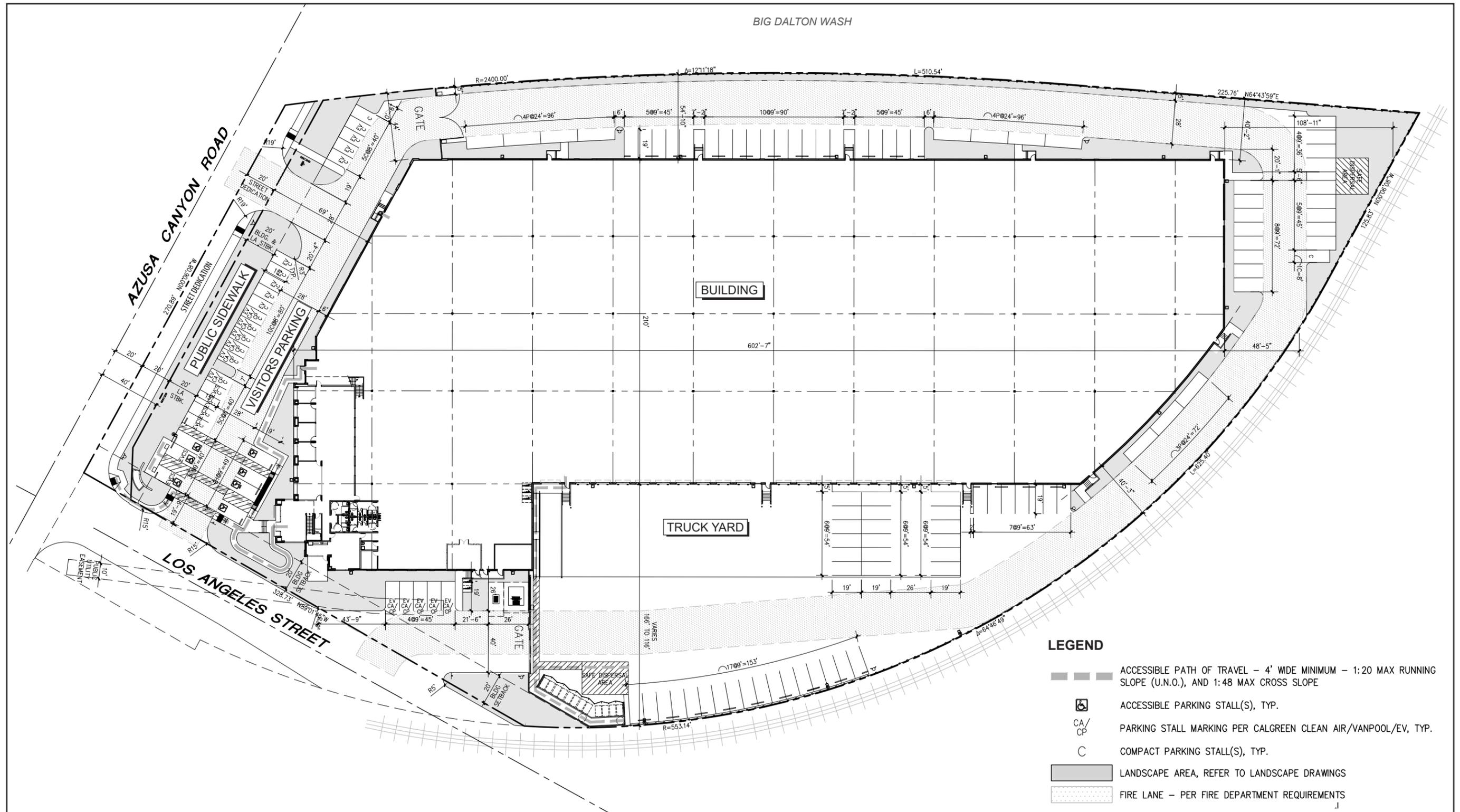
Site lighting would consist of exterior, building-mounted light fixtures; interior lighting; lighting for pedestrian walkways; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking and loading dock areas; and security lighting. Lighting design would limit upright and glare, and all street lighting along Azusa Canyon Road would be upgraded to LED fixtures.

1.6.4 Access, Circulation, and Parking

The proposed building would have one main entrance on the west side of the building with stairs and required handrails. Five smaller entrances with stairs and handrails would be on the northeast side of the building, and two would be on the southeast side to allow access from the parking areas. Three entrances with stairs and handrails would also be in the truck yard in addition to a main entryway and an overhead sectional door. An entrance to the electric room and two more entrances would be provided on the southwest side of the building.

As shown in Figure 5, *Conceptual Site Plan*, vehicular access for the project site would be provided via three driveways: one off Azusa Canyon Road and two off Los Angeles Street. The driveway off Azusa Canyon Road and the western driveway off Los Angeles Street would provide access for employee/visitor vehicles and lead directly into the on-site parking areas for these users. Both driveways would connect to an internal drive aisle, which would lead to a rolling security gate—the gate would restrict access into the parking areas along the northeast and southeast sides of the building and in the truck court area to employees only. The internal drive aisles would also function as fire access lanes and provide a minimum unobstructed width of 28 feet. Trailer trucks would be prohibited from using these driveways to access the truck yard; however, trailer trucks would use the eastern Los Angeles Street driveway to access the project site. The Los Angeles Street driveway would lead directly into the open yard via a rolling security gate. The driveway off Azusa Canyon Road would be restricted to right-out/left-in only access, and the driveways on Los Angeles Street would be full access.

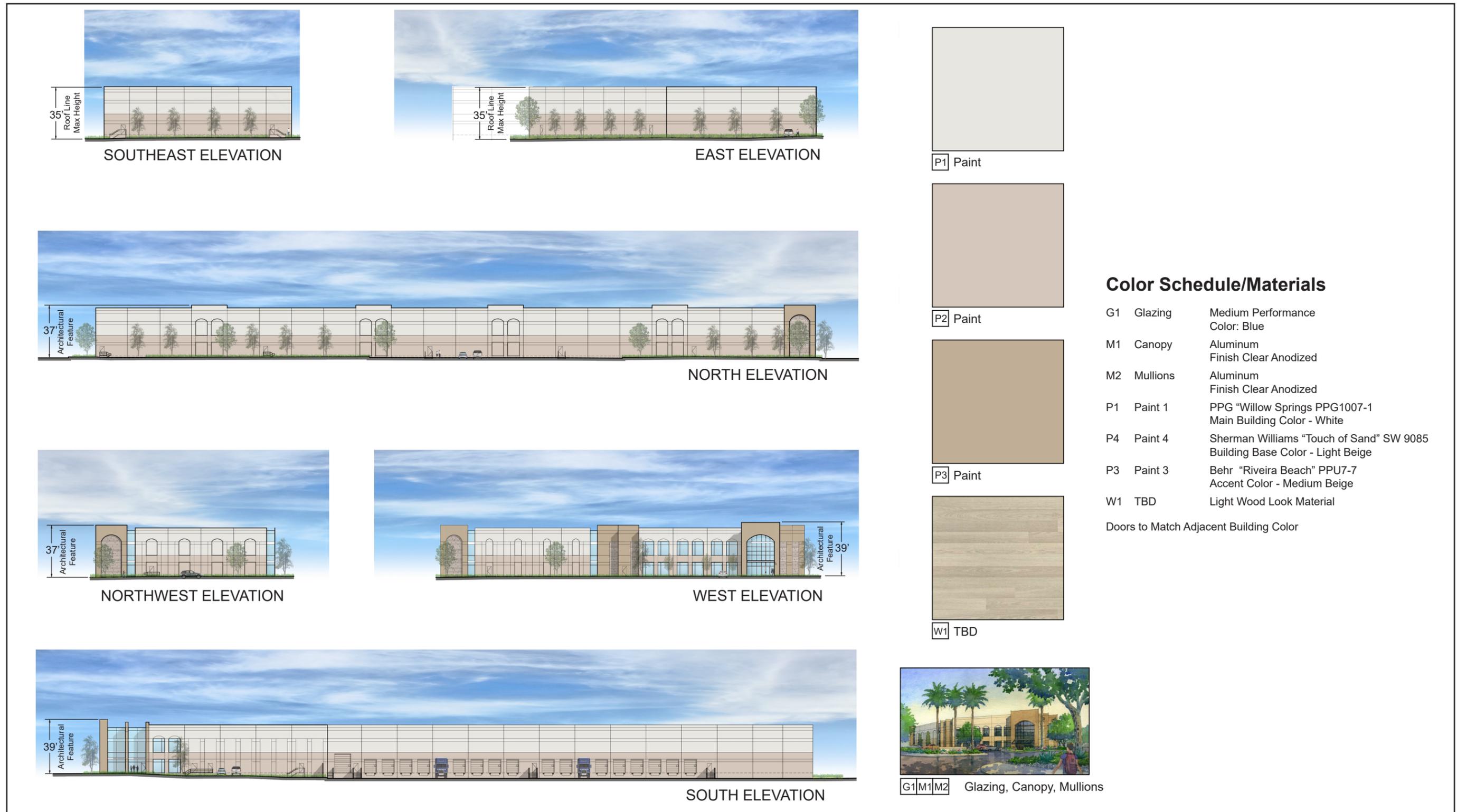
Figure 5 - Conceptual Site Plan



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Figure 6 - Conceptual Building Elevations



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Figure 7a - Conceptual Building Renderings



PROJECT AERIAL 1 | NTS | 1



AZUSA CANYON RD. VIEW 1 | NTS | 2



AZUSA CANYON RD. VIEW 2 | NTS | 3



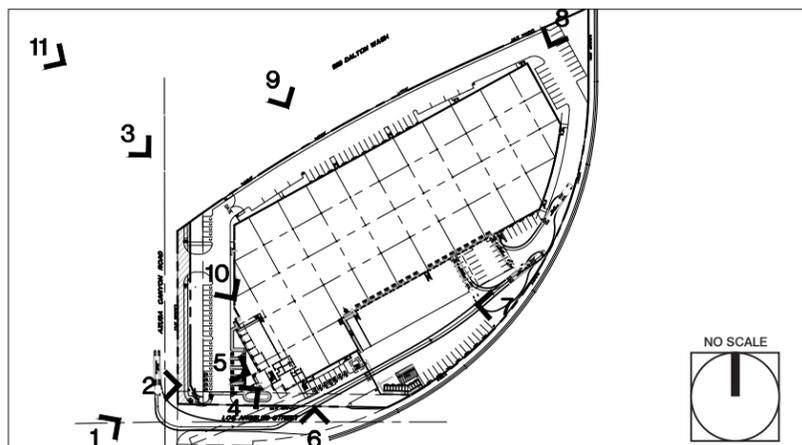
BLDG. ENTRANCE AERIAL | NTS | 4



BLDG. ENTRANCE PERSPECTIVE | NTS | 5



LOS ANGELES ST. VIEW | NTS | 6



SITE REFERENCE | NTS | 12

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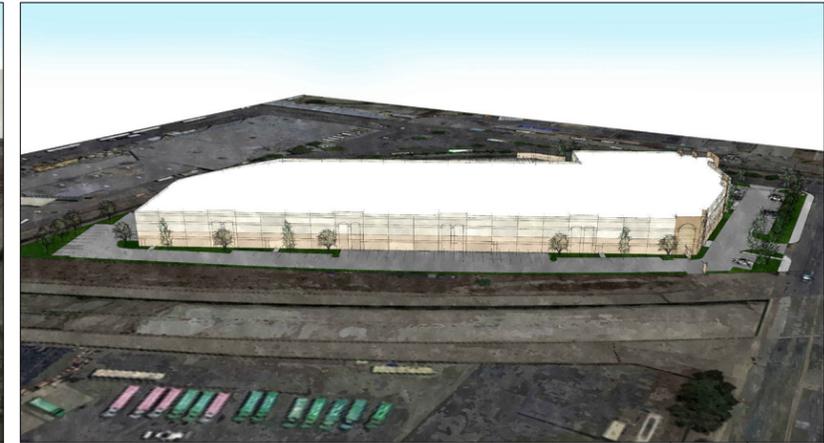
Figure 7b - Conceptual Building Renderings



DOCK AREA VIEW | NTS | 7



NORTHEAST BLDG. VIEW | NTS | 8



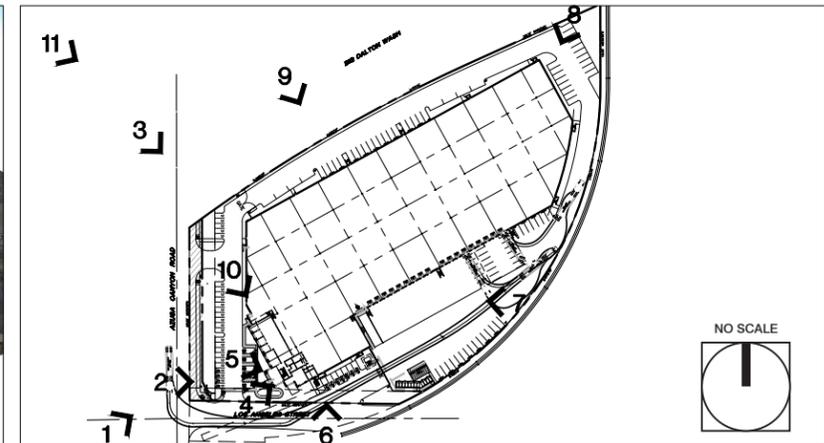
NORTH BUILDING WALL | NTS | 9



BLDG. WINDOW DETAIL VIEW | NTS | 10



PROJECT AERIAL 2 | NTS | 11

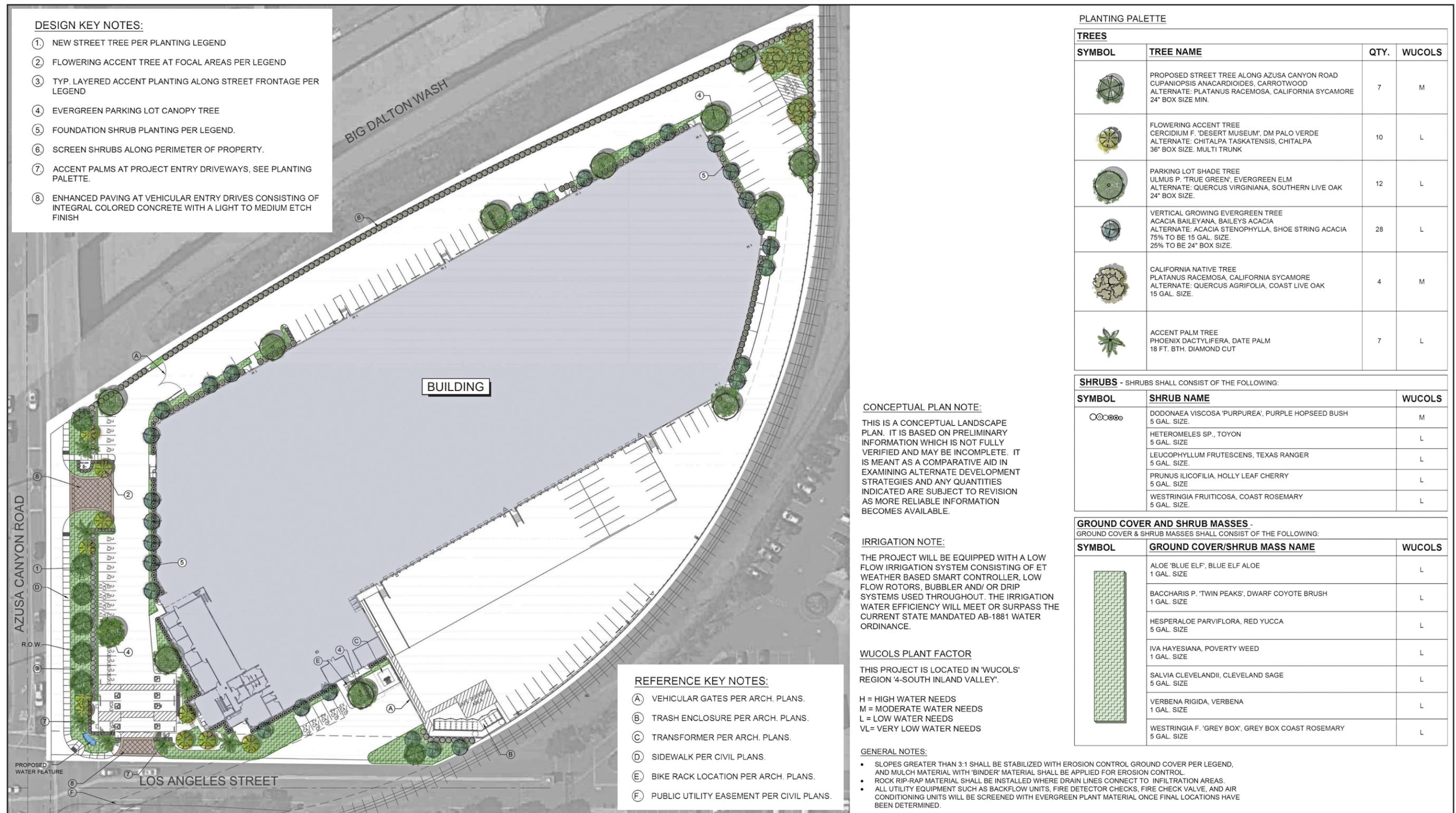


SITE REFERENCE | NTS | 12

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Figure 8 - Conceptual Landscape Plan



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As shown in Figure 5, *Conceptual Site Plan*, pedestrian access to the project site would be provided via a new concrete public sidewalk running parallel to Azusa Canyon Road along the western boundary of the site. The existing public sidewalk abutting the project site along this road would be demolished and replaced with a new sidewalk including curbs, gutters, and landscaping improvements as needed to facilitate site access along the proposed project's frontage, consistent with the City's standards. Since the property currently extends into Azusa Canyon Road, the proposed project would also include a 20-foot-wide street easement dedication along the western boundary of the site. The street easement dedication would be included as a Condition of Approval under the City's Department of Public Works Engineering Division. Additionally, internal walkways leading to the building's main entrance would be provided on-site and would connect to the new public sidewalk. Curb, gutter, sidewalk, and landscaping improvements along Los Angeles Street would also be constructed as needed to facilitate site access.

As shown in Figure 5, *Conceptual Site Plan*, designated employee/visitor parking areas would be at the entrance to the building; along the northeast, southeast, and southwest sides of the building; in the northeast corner of the site; and in the truck yard area. Parking spots at the main entrance to the building include 16 compact parking stalls and 7 handicap-accessible parking spots. This area would also include 6 electrical vehicle charging stations. There are 5 more standard parking spots that are adjacent to the truck entrance to the west of the gate. The parking area along the northeast side of the building would provide 28 standard parking spots for employees with an additional 18 parking stalls along the southeast side and in the northeast corner of the site. Three parking spots would line the southwest side of the building to the east of the truck yard, and 42 parking spaces would be in the truck yard. Total parking stalls on the site would be 123 stalls.

1.6.5 Operational Characteristics

Based on the proposed construction timeline (see Section 1.7.8, *Project Phasing and Construction*), it is anticipated that the proposed project would be operational in September 2022. The specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time. However, any prospective user must be either permitted by right or conditionally permitted under the Irwindale Zoning Code. For warehousing purposes, no cold storage uses would be allowed to operate on-site. Additionally, the building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the movement of truck trailers in the truck yard. Also, loading and unloading of truck trailers would be restricted to the exterior loading dock area.

The proposed operating hours of the potential business(es) that may occupy the building is 24 hours per day, seven days a week. Under a conservative scenario and based on employee figures from a report commissioned by the NAIOP Research Foundation (RPA 2010), the proposed project is anticipated to add approximately 72 jobs to the city based on a ratio of one employee per 1,800 square feet of floor area. However, the number of employees will ultimately depend on the business(es) and tenant(s) that operate out of the building.

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1.6.6 Infrastructure Improvements and Utility and Service Systems

Following is a discussion of the infrastructure improvements and utility and service systems needed to accommodate the proposed project. All proposed infrastructure and improvements would require approval from the City and, where necessary, from the utility/service provider also.

1.6.6.1 WATER SYSTEM

Valley County Water District (VCWD) would provide water delivery service to the project site. Under existing conditions, water service is provided to the project site via a 12-inch water main beneath Azusa Canyon Road. As a part of the proposed project, new on-site water lines would connect to this water main in Azusa Canyon Road. Separate water lines would be provided on-site for potable water and fire water. No off-site water line construction or upsizing would be required to accommodate the proposed project. However, Azusa Canyon Road would require some construction to make the necessary infrastructure connections to the water main. The proposed water system improvements would be designed and constructed in accordance with City and VCWD requirements and would require City and VCWD approval.

Additionally, fire hydrants would be installed at key locations on-site, as required by the Los Angeles County Fire Department to meet hose-pull requirements and provide adequate fire water access. The fire hydrants would connect to the new on-site water lines.

1.6.6.2 WASTEWATER SYSTEM

The City of Irwindale would provide wastewater collection and conveyance service to the project site. There is an 8-inch sewer main in Los Angeles Street. As a part of the proposed project, new on-site sewer lines would connect to the existing sewer main in Los Angeles Street. No off-site sewer line construction or upsizing would be required to accommodate the proposed project. However, the public right-of-way of Los Angeles Street would require some construction to make the necessary infrastructure connections to the existing sewer main. The City's sewer main connects to the Sanitation Districts of Los Angeles County's (LACSD) sewer trunk main in Azusa Canyon Road. The proposed wastewater system improvements would be designed and constructed in accordance with City and LACSD requirements and would require City and LACSD approval.

1.6.6.3 DRAINAGE SYSTEM

As shown in Figure 3, *Aerial Photograph*, the project site is developed with a 62,713-square-foot concrete building. The site also includes 116 vehicle parking spaces and 25 truck parking spaces. Currently, approximately 86 percent of the project site consists of impervious areas, and the remainder is pervious (NetGen 2021). The project site generally slopes downward to the southwest and displays a mild slope from 1.0 to 2.0 percent; overall, the site is generally flat (Southern California Geotechnical 2020).

Under existing conditions, stormwater generated on-site is handled by surface and subsurface drainage features without any run-on flows from off-site areas. A small part of the property on the north side drains to Big Dalton Wash through overland sheet flow. Stormwater from the rest of the property is collected by two on-site storm drains, with ultimate discharge into the existing 36-inch storm drain under Los Angeles Street.

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Under proposed conditions, stormwater runoff from the project site would be conveyed to seven new on-site storm drain inlets that divert runoff into the on-site storm drain system. All the grated inlets and curb openings would be fitted with Bio-Clean Catch Basin Filters, which can treat flows from a one-year, one-hour storm event, as required by the State Water Resources Control Board's Trash Policy. Runoff collected by the storm drain system and from sheet flow would eventually discharge into one of two Contech "CDS" hydrodynamic separators that screen, separate, and trap trash, debris, sediment, and hydrocarbons. The hydrodynamic separators would then convey runoff to two underground infiltration trench systems for final treatment. Preliminary percolation tests indicated that the site is conducive to infiltration stormwater treatment.

To meet the Los Angeles County requirement that 100-year storm event flow rates after development does not exceed the 50-year storm flow rates under existing conditions, the proposed project would also include two underground detention chambers. Any stormwater overflow that exceeds the runoff from the 50-year storm under existing conditions would be discharged into the existing 36-inch storm drain under Los Angeles Street. The proposed project eliminates on-site drainage to Big Dalton Wash.

Upon project completion, approximately 90 percent of the project site would consist of impervious areas (e.g., buildings, paving), and the remainder would be pervious (e.g., landscaping). The proposed drainage system improvements would be designed and constructed in accordance with City requirements and would require City approval.

1.6.6.4 SOLID WASTE SYSTEM

Solid waste generated by the proposed project would be collected and hauled away by Athens Services and transported to/disposed of at the Azusa Land Reclamation Landfill, El Sobrante Landfill, and Simi Valley Landfill. Enclosures with an enclosure roof and double swing gates would accommodate trash bins for solid waste and recyclable materials and would be provided in the southwest corner of the truck court area.

1.6.6.5 TELECOMMUNICATION SYSTEMS

Plans for utilities that would serve the proposed project would include electricity (Southern California Edison), natural gas (Southern California Gas Company), and telecommunications (various, including Frontier Communications and Charter Spectrum). All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets).

1.6.7 Green Building Standards

Green building is the practice of designing, constructing, and operating buildings to maximize occupant health and productivity, use fewer resources, reduce waste and negative environmental impacts, and decrease life cycle costs. The proposed project would be designed using green building practices, including those of the most current Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) and California Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11). The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. CALGreen is California's statewide "green" building code. Its purpose is to improve public health,

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safety, and general welfare by enhancing the design and construction of buildings using building concepts that have a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, water conservation and resource efficiency, and environmental quality. Some of the green building standards that would be incorporated into the proposed project include:

- “Clean Air” parking spaces would be provided on-site for carpools and fuel-efficient vehicles, for a minimum number of spaces proportional to the required vehicle parking per CALGreen.
- Lighting design would limit glare and uplight and comply with local codes and CALGreen.
- Plumbing fixtures would be 20 percent water conserving.
- Separate submeters or metering devices would be installed for outdoor potable water use for landscaped areas, and the irrigation system would have weather- or soil-moisture-based automatic controllers.
- A construction waste management plan would be developed demonstrating a minimum of 65 percent recycling and/or salvaging of nonhazardous waste.
- 100 percent of land-cleared soils and vegetation would be reused or recycled.
- All construction materials would comply with VOC and toxin limits per CALGreen Section 5.504.
- Smoking would be prohibited within 25 feet of building entries, air intakes, and operable windows.
- In buildings with over 10 tenants, secure, long-term bicycle enclosures or lockers would be provided on-site for a minimum of 5 percent of new tenant vehicular parking.
- Visitor bicycle parking racks would be provided within 200 feet of building entrances for a minimum of 5 percent of new vehicular parking.

1.6.8 Project Phasing and Construction

Upon City approval, project development is anticipated to be completed in four phases: demolition, site preparation, grading/trenching, and building construction/finishing. Overall project development is estimated to take approximately eight months, from April 2022 to December 2022. Construction activities, start and end dates, and equipment required are shown in Table 2. Construction would occur from 7:00 am to 4:00 pm Monday through Friday in compliance with Section 9.28.110, Construction of Buildings and Projects: Times Specified, of the City’s municipal code.²

² Construction hours are also in compliance with the requirements of Section 15-95, Construction and Building Projects, of the municipal code for the City of West Covina, which borders the project site to the south.

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Table 2 Construction Schedule and Equipment

Construction Activities	Phase Type	Start Date	End Date	Equipment Required
Building Demolition	Demolition	4/1/2022	5/16/2022	One Excavator One Skidsteer
Asphalt Demolition	Demolition	4/18/2022	5/2/2022	One Excavator One Skidsteer
Site Preparation	Site Preparation	5/18/2022	5/25/2022	One Dozer Truck
Building Construction	Building Construction	5/19/2022	11/20/2022	Three Forklifts Three Boomlifts
Rough Grading	Grading	5/22/2022	6/21/2022	Four Motor Scrapers One Motor Grader One Skip Loader Tractor One Water Tank
Utility Trenching	Trenching	6/18/2022	7/17/2022	Two Loader Backhoes
Fine Grading	Grading	9/2/2022	9/19/2022	One Skip Loader Tractor One Vibratory Roller
Architectural Coating	Building Construction	9/20/2022	10/18/2022	Three Boomlifts
Finishing/Landscaping	Finishing	10/19/2022	12/6/2022	One Skip Loader Tractors

Demolition of the existing structures on site would generate 323 tons of building debris and would require approximately 34 trip ends³ to be hauled off-site. Approximately 242 tons of building debris would be recycled. Additionally, 1,130 tons of asphalt would be demolished, and all of it would be hauled off-site and recycled. Export of the demolished asphalt would require approximately 114 trip ends.

It is anticipated that up to 14,933 cubic yards of soil would need to be imported during the grading phase to balance the site. Soil import is anticipated to require approximately 2,987 total trip ends. Although the sites from which soil would be imported is unknown, it is anticipated that they would be less than 25 miles from the project site. All construction staging activities would occur within the confines of the project site. Based on the proposed construction timeline, it is anticipated that the proposed project would be operational in October 2022.

1.6.9 General Plan and Zoning Designations

The prevailing planning and regulatory plans that govern development and use of the project site are the Irwindale General Plan, Irwindale Zoning Code (Title 17 [Zoning]), and Irwindale Commercial and Industrial Design Guidelines. The general plan land use designation of the project site is Industrial/Business Park, and the site is zoned Light Manufacturing (M-1). Land devoted to Industrial/Business Parks may range in size from 10 acres up to 100 acres, subdivided into smaller lots and developed with industrial buildings of varying sizes. This type of development typically includes office, manufacturing, and warehousing and is usually well landscaped, provides abundant parking, and has a uniform architectural design theme. The M-1 zone is a buffering zone applied to those areas located adjacent to neighboring cities and some of Irwindale's residential

³ Total trip ends represent the "to" and "from" trips between the soil import site and the project site.

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neighborhoods. Heavy industrial uses such as mining, petroleum refining, metal fabrication plants, mills, concrete and asphalt batch plants, and manufacturing of masonry products and preformed concrete products are not allowed in the M-1 zone. The proposed land uses are consistent with the general plan designation and zoning for the site. According to the Commercial and Industrial Design Guidelines, the City has established general design characteristics and a broad framework for the physical form and use of industrial buildings. The primary emphasis is the interrelationships of buildings and public spaces as they relate to building design, streetscape, focus, and pedestrian vitality.

1.6.10 Required Actions and Approvals

This Initial Study is intended to serve as the primary environmental document for all future actions and approvals associated with the proposed project, including all discretionary and nondiscretionary/ministerial actions and approvals requested or required to implement the proposed project.

1.6.11 Discretionary Actions and Approvals

A discretionary action is an action taken by a government agency that calls for an exercise of judgment in deciding whether to approve a project. Following is a discussion of the discretionary actions and approvals required by government agencies with oversight of the proposed project.

1.6.11.1 LEAD AGENCY

The City of Irwindale is the lead agency under CEQA and has the principal approval authority over the proposed project. Following is a list and discussion of the various discretionary actions and approvals required for project implementation.

- Adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program
- Site Plan and Design Review (DA)

Further, City review of the proposed project would result in the production of a comprehensive set of draft Conditions of Approval that will be available for public review prior to consideration of the proposed project for approval by the City. If approved, the proposed project would be required to comply with all imposed Conditions of Approval.

Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program

This Initial Study has been prepared to support the adoption of an MND. The MND and accompanying Initial Study are appropriate for providing the necessary environmental documentation and clearance for the proposed project and related subsequent activities.

A Mitigation Monitoring and Reporting Program (MMRP) that details the required mitigation measures to ensure that project-related environmental effects are reduced to less-than-significant levels has been prepared. As required by CEQA, the MMRP specifies the required timing for implementing each mitigation measure and the responsible parties for implementing and monitoring each mitigation measure.

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Site Plan and Design Review

The project site is zoned M-1 (Light Manufacturing) and designated Industrial/Business Park by the City’s General Plan. Project development is governed by the Irwindale Commercial and Industrial Design Guidelines. A Site Plan and Design Review (DA) permit would need to be issued for the proposed project to address site configuration, design, location, and impact of the proposed use. The permit would also ensure compliance of the proposed project with the City’s Zoning Code standards and the Commercial and Industrial Design Guidelines.

1.6.11.2 RESPONSIBLE AND TRUSTEE AGENCIES

A responsible agency is a public agency that proposes to carry out or approve a project for which a lead agency is preparing or has prepared an environmental document. For the purposes of CEQA, the term "responsible agency" includes all public agencies other than the lead agency that have discretionary approval power over the project. The term trustee agency means a state agency having jurisdiction by law over natural resources that are held in trust for the people of California and could be affected by a project. As shown in Table 3, there is only one agency identified as a responsible agency for this project.

Table 3 Responsible Agencies

Responsible Agencies	Action
Los Angeles Regional Water Quality Control Board	▪ Issuance of Construction General Permit Coverage

1.6.12 Incorporation by Reference

The information in this Initial Study is based, in part, on the following documents that include the project site or provide information addressing the general project area or use.

- **City of Irwindale General Plan.** The Irwindale General Plan gives long-range guidance and direction for decisions affecting the future character of Irwindale. It is the blueprint and official statement of the community’s physical development as well as its economic, social, and environmental goals. The Irwindale General Plan was used throughout this Initial Study as the fundamental planning document governing development on the project site.
- **City of Irwindale Zoning Code.** The Irwindale Zoning Code (Title 17 of the Irwindale Code of Ordinances), which is the regulating tool that the City uses to implement the Irwindale General Plan, establishes the basic regulations under which land in the City is developed and used. This includes regulations and controls for the design and improvement of development sites, allowable uses, building setback and height requirements, and other development standards. The zoning code’s basic intent is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of Irwindale. The Irwindale Zoning Ordinance was used throughout this Initial Study as a fundamental regulatory document governing development on the project site.

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- **Irwindale Commercial and Industrial Design Guidelines.** The City’s Commercial and Industrial Design Guidelines ensure the successful integration of both new and remodeled commercial and industrial projects to create a more aesthetically and functionally cohesive community. These guidelines form the basis and criteria for the evaluation of plans and specifications submitted to the City. Developers are required to follow all provisions of these guidelines as applicable to their specific projects. All development plans, landscape plans, and graphic designs must comply with these guidelines. The Irwindale Commercial and Industrial Design Guidelines were used throughout this Initial Study as a fundamental regulatory document governing development on the project site.

1.7 BASELINE CONDITIONS

The most recent operating conditions of the Pepsi Bottling Group facility have been used throughout this IS/MND as the “baseline conditions” to compare the impacts of the proposed project. The bottling facility started operations in 1956 and ceased operations in December 2020. The site has not been active since cessation of the bottling operations. As described with the legal precedent below, the long-term operations of the Pepsi Bottling plant were determined to be most representative for baseline conditions for environmental review. The IS/MND, therefore, analyzes the net impact of the proposed 4416 Azusa Canyon Road project in comparison to the Pepsi Bottling plant operations.

CEQA requires that when evaluating the potential impacts of a project, the analysis must examine impacts against the physical environmental conditions existing at the time the environmental analysis commences, or what is referred to as the environmental baseline. “This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant” (CEQA Guidelines Section 15125(a)). However, in *North County Advocates v. City of Carlsbad*, 241 Cal.App.4th 94, the court found that lead agencies are not compelled to select a frozen-in-time “snapshot” of the most recent conditions when substantial evidence of factors such as longstanding historical use, legal entitlement, and reasonable projections make the use of another baseline a reasonably accurate representation of real conditions at the project site. The alternate baseline cannot be based on merely hypothetical conditions. The court decision held that the EIR prepared for the Carlsbad Shopping Mall Renovation, which involved the renovation of a vacant department store, could include the store’s historical operational information in establishing the environmental baseline for the project’s traffic impact analysis under CEQA. In preparing the EIR’s traffic analysis for the project, the city applied an existing conditions environmental baseline that was premised on a fully occupied Robinsons-May building, even though the space had been vacant since 2006. The court of appeal affirmed the trial court’s ruling, finding that substantial evidence supported the city’s existing environmental conditions baseline because it was based on recent historical use and was consistent. Therefore, historical operational levels can be used to establish the existing environmental conditions baseline when they are supported with substantial evidence, such as actual entitlements for those historical levels, and demonstration that the use at those levels had previously occurred (Manatt 2015).

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** 4416 Azusa Canyon Road

2. **Lead Agency Name and Address:**

City of Irwindale
Planning Department
5050 Irwindale Avenue
Irwindale, California 91706

3. **Contact Person and Phone Number:**

Brandi Jones, Senior Planner
626.430.2260

4. **Project Location:**

The project site is at the northeastern corner of the Azusa Canyon Road/Los Angeles Street intersection—it is bounded by Big Dalton Wash to the north, Los Angeles County Metro (LA Metro) railroad and Los Angeles Street to the south, a railroad spur to the east, and Azusa Canyon Road and the Olive Pit mine site/sand and gravel quarry to the west.

5. **Project Sponsor's Name and Address:**

Rexford Industrial Realty
11620 Wilshire Boulevard, 10th Floor
Los Angeles, California 90025

6. **General Plan Designation:** Industrial/Business Park

7. **Zoning:** Light Manufacturing (M-1)

8. **Description of Project:**

Rexford Industrial Realty (project applicant) proposes to develop the 5.89-acre (gross) project site with a stand-alone concrete tilt-up warehouse, office, and manufacturing facility at 4416 Azusa Canyon Road. The warehouse and manufacturing businesses (prospective tenants are unknown at this time) would operate out of a proposed building that would encompass a total of 129,830 square feet, with 17,000 square feet of manufacturing space, 103,670 square feet of warehousing space, and 9,160 square feet of ancillary office space to support the industrial and warehousing tenant(s). The proposed project would also include 18 dock door positions within a secured truck court area on the southeastern side of the site. Other project components include vehicular and pedestrian access and circulation improvements, asphalt parking areas, utility and infrastructure improvements, and various hardscape and landscape improvements.

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9. Surrounding Land Uses and Setting:

The project site is immediately surrounded by business and industrial uses to the north, east, and south. The Olive Pit mine site/sand and gravel quarry and City Public Works yard are west of Azusa Canyon Road. Residential areas are within a 1,000-foot radius to the northeast, southeast, south, and southwest of the project site. The closest sensitive receptors are a single-family residence approximately 550 feet north on East Cypress Street and a mobile home park approximately 700 feet to the southwest.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

- Los Angeles Regional Water Quality Control Board (construction stormwater runoff permit)
-

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The following California Native American tribes are on the City of Irwindale's notification list pursuant to AB 52:

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

2. Environmental Checklist

The City notified these tribes on May 10, 2021, and received three responses. The Gabrielino/Tongva Indians of California Tribal Council requested that the tribe be notified if prehistoric materials or burial remains are found during construction. If burial remains are found, the tribe wants to engage in formal consultation. The Gabrieleno Band of Mission Indians–Kizh Nation provided tribal archive information identifying the high cultural sensitivity of the project site. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities the tribe provided the City with measures to mitigate or avoid a significant effect on tribal cultural resources. The Santa Rosa Band of Cahuilla Indians responded that the tribe did not have any comments.

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2.2 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.

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

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.

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

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would 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.
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 Analyses 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.

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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:
- the significance criteria or threshold, if any, used to evaluate each question; and
 - the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				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 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			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		
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				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 Wildlife or U.S. 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
V. CULTURAL RESOURCES. Would the project:				
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 dedicated cemeteries?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			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		
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		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		

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 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
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			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 a 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 or 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	
XI. LAND USE AND PLANNING. Would the project:				
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	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a 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
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			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
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines § 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	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or 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 waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			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	
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		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		

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Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

a) **Have a substantial adverse effect on a scenic vista?**

No Impact. For purposes of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. Some scenic vistas are officially designated by public agencies or informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, a large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

The City's physical setting in the Los Angeles River Basin region and generally flat topography afford distant scenic views of the San Gabriel Mountains, the Montebello Hills, and Puente Hills from certain vantage points throughout the City. The San Gabriel River traverses the central portion of Irwindale from northeast to southwest. The San Gabriel Mountains are approximately four miles to the north of the project site and are an important part of the local scenery. However, views of the San Gabriel Mountains from the project site are limited, obstructed by surrounding urban development. Therefore, project development would not result in a substantial adverse effect on a scenic vista because there are no such vistas offered from the project site or its surroundings.

Additionally, as shown in Figure 3, *Aerial Photograph*, the project site and surrounding area are in a highly urbanized area of the City. The project area is dominated by commercial and industrial uses with some residential uses within a 1,000-foot radius to the northeast, southeast, south, and southwest. The urban landscape character and features of the project site and surrounding area are consistent with and typical of urbanized areas of the City. The project site and surrounding area do not exhibit any significant visual resources or scenic vistas.

Overall site topography can be characterized as mostly flat, with no notable change in elevation. The overall site topography slightly slopes downward to the southwest at a gradient of 1 to 2 percent. There are no visible landforms (e.g., mountains, hills, creeks) from the project site or surrounding area, and no landforms are on or in proximity to the project site. Also, there are no designated open space resources on-site or in the site vicinity;

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an open-space designation is typically used to determine the value of certain public vistas and gauge adverse effects.

Based on the preceding, no impact to scenic vistas would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. A scenic highway is generally considered a stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency. The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality.

The project site is in a highly urbanized area of the city and is not on or near a state-designated scenic highway as designated on Caltrans's California Scenic Highway Mapping System. The project site is not visible from the nearest state-designated scenic highway (SR-39), which is approximately 2.8 miles to the northeast (Caltrans 2021). Furthermore, the project site does not contain unique or locally important scenic resources. There are no rock outcroppings, significant vegetation, or historic buildings on-site, as shown in Figure 3, *Aerial Photograph*. The Pepsi Bottling Group building is not of historic significance, as substantiated in Section 3.5.a.

Therefore, no impact to scenic resources is expected to occur due to project development.

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

Less Than Significant Impact. The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refers to the identification of visual resources and their quality as well as an overall visual perception of the environment. A project is generally considered to have a significant aesthetic impact if it substantially changes the character or quality of the project site so that the site becomes visually incompatible with or visually unexpected in its surroundings.

The project site is in a highly urbanized area of the City and currently developed with a bottling plant, a large metal shed north of the main building, and a loading dock and large truck yard on the eastern part of the site. The building is a single-story structure of concrete tilt-up construction, and the loading dock is along a portion of the southeast building wall. The buildings are surrounded by concrete pavement in the parking and drive areas. The site is mainly surrounded by a mix of commercial and industrial uses, with the Olive Pit mine site/sand and gravel quarry and the City Public Works yard west of Azusa Canyon Road. The urban landscape character and features of the project site and surrounding area are consistent with and typical of urbanized areas of the City.

Potential impacts to the visual character or quality of the project site and its surroundings could result from the construction and operational phases of the proposed project.

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Project Construction Phase

Project implementation would result in construction activities that would temporarily change the visual character of the project site and its surroundings. Construction activities would involve demolition, site clearing, grading, building, and site improvements. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a generally “disturbed site,” which may be perceived by some as a visual impact.

However, these effects would be typical of any site in the City that undergoes development or redevelopment. Project development is anticipated to be completed in three phases—clearing and demolition, grading, and construction. Overall construction is estimated to take approximately eight months, with project completion anticipated in September 2022. Construction activities may be unsightly during the site preparation and construction phases, but they are not considered significant because they are temporary. Construction fencing would be erected to help shield the construction areas, but would also be temporary.

Therefore, project-related construction activities would not have a significant effect on the existing visual character or quality of the site and its surroundings. Impacts would be less than significant, and no mitigation measures are necessary.

Project Operation Phase

Site development would involve demolition of the single-story building and other structures on-site (e.g., hardscape improvements, open-air asphalt-paved storage/parking area). Project development also requires demolition and removal of other site features and improvements, such as concrete pads/slabs, chain-link fencing, and landscape improvements at the western entrance. Site features and improvements, which would be demolished and removed, are shown in Figure 3, *Aerial Photograph*.

Upon clearing, the project site would be developed with the proposed project, that is, the construction and operation of a new industrial and manufacturing facility on the site. The prospective tenants would operate out of a building that would encompass a total of 129,830 square feet. The proposed project would also feature a truck yard and loading docks; other components such as vehicular and pedestrian access, circulation improvements, asphalt parking areas, and utility and infrastructure improvements; and landscape improvements.

Figure 5, *Conceptual Site Plan*, illustrates the proposed project’s overall site design. The elongated building would occupy most of the site, with the truck court area in the southeast portion of the site. Architecturally and functionally, the building would be designed and constructed as a single-story, painted, concrete tilt-up industrial building (up to 37 feet in height) with a mezzanine and ample interior open-storage space and high ceilings, which is typical for warehouse and distribution facilities. The southwest side of the building, which would face the site’s truck yard, would feature a loading dock with 18 dock doors. Designated employee and visitor parking areas would be placed along all sides of the building and in the northeast corner of the site.

Figure 6, *Conceptual Building Elevations*, and Figures 7a and 7b, *Conceptual Building Renderings*, illustrate the conceptual elevations and architectural design and features of the proposed building. The building has been designed to have multiple-feature elements on all façades. As shown in these figures, the proposed building

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would incorporate a modern architectural style and include a variety of building elements and materials, including smooth and lightly colored troweled stucco; metal, glass, brick, and stone; light harmonious colors with accent color for trim; facades with depth of plane; recessed heavy doors; deeply recessed windows with planter boxes; custom ornamentation; arcades and columns for scale, balance, and rhythm; varied roof lines; and flat roofs behind detailed parapets. Building pop-outs, offsets, overhangs, recesses, and variations in building materials and colors would be added to offset the building's massing, provide a more human scale, and give relief to and variation in the building form and style. The mixture of colors, textures, and materials of the building would also help balance the intended permanence of the building with the scale of the surrounding buildings and uses. The proposed architectural style and building design elements, features, and materials would be complementary and would not detract from the visual character or quality of the surrounding area or uses.

Additionally, the provisions of the City's municipal code, Commercial and Industrial Design Guidelines, and development review process would help ensure that the proposed project is designed and implemented to provide visual cohesiveness and compatibility not only within the project site, but along the site frontages and with its surroundings. The proposed project would be designed and constructed in accordance with the applicable provisions of these regulatory documents, including those related to landscaping, screening, and building height, massing, and setbacks.

Furthermore, the overall project design and site layout promotes a visually strong and active street frontage along Azusa Canyon Road, which forms the proposed project's western site boundary. This is accomplished through the incorporation of various project features, including multiple-feature elements on all façades; a new parkway-separated public sidewalk; a meandering walkway; and a landscaped parking area featuring trees and ground cover.

Project development would also provide similar and compatible uses to the existing commercial and industrial uses surrounding the project site. For example, the proposed building (including building massing and height, up to 37 feet) would be compatible with the surrounding commercial and industrial uses, which include buildings that are similar to the height and massing of the proposed building. Additionally, parking areas, trash enclosures, and outdoor equipment would be screened in accordance with Chapter 3.2, Site Design, of the Commercial and Industrial Design Guidelines. All mechanical, heating, air-conditioning, refrigeration, or similar devices maintained and operated on the exterior of buildings would be enclosed and designed, installed, operated, and maintained to eliminate unsightliness per Section 17.52.020 of the municipal code.

Overall, project development would enhance and strengthen the visual character of the project site and its surroundings through new architecture, landscaping, hardscape, and other improvements on-site and along the project site's street frontages. The proposed architectural and landscape elements and design would ensure that the proposed project is not detrimental to the visual character or quality of the surrounding area or uses. The building masses, landscaping, and various hardscape and landscape improvements proposed throughout the project site would be designed to create a sense of cohesiveness on- and off-site and along the project site boundaries. Although newer than the surrounding area's uses, the proposed building, landscaping, and other site improvements would complement and not detract from the visual character of the site and surrounding area. Once complete, the proposed project would make a substantial visual improvement over the existing conditions.

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Furthermore, the General Plan land use designation of the project site is Industrial/Business Park. Development and operation of the proposed project would not conflict with the General Plan designation of the project site because the proposed warehouse and distribution facility is a permitted use under the Industrial/Business Park land use designation. Through the City's development review process—which includes the Planning Commission and City Council review and consideration of the proposed project—the City would ensure that approval of the proposed project would not conflict with any of the City's applicable land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect.

According to the City's zoning map, the project site is zoned M-1 (Light Manufacturing). Development and operation of the proposed project would not conflict with the zoning of the project site because the proposed warehouse and manufacturing facility is a permitted use in the M-1 zone. Though the specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time, any prospective user must be either permitted by right or conditionally permitted under the Irwindale Zoning Code.

Based on the preceding reasons, project development would not substantially degrade the visual character or quality of the site and its surroundings and would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Lighting effects are associated with the use of artificial light during the evening hours. There are two primary sources of light emanating from building interiors and passing through windows and openings, and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Excessive light and/or glare can impair vision, cause a nuisance, affect sleep patterns, and generate safety hazards for drivers. Uses such as residences, elderly care facilities, schools, and hotels are considered light sensitive because occupants have expectations of privacy during evening hours and may be disturbed by bright light. Light spill or trespass is considered a nuisance and is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on surfaces of buildings or objects, including highly polished surfaces such as glass windows or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation experienced by a person as they look directly into a light source. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior façades largely or entirely composed of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Daytime glare can also be generated by light reflecting off passing or parked cars. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the day and

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year. Excessive glare not only impedes visibility, but increases the ambient heat reflectivity in a given area. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

As shown in Figure 3, *Aerial Photograph*, the mostly developed project site is in a highly urbanized area of the city and is mainly surrounded by a mix of commercial and industrial uses, which are not considered light sensitive. The closest light-sensitive receptors to the project site include mobile homes approximately 700 feet to the southwest. Nighttime lighting emanated from the single-story metal building on the project for decades and until the facility's closure in December 2020. The operational bottling facility is considered the baseline condition for this analysis (see Section 1.7, *Baseline Conditions*).

Following is a discussion of the potential day- and nighttime light and glare impacts in the project area related to the development of the proposed project.

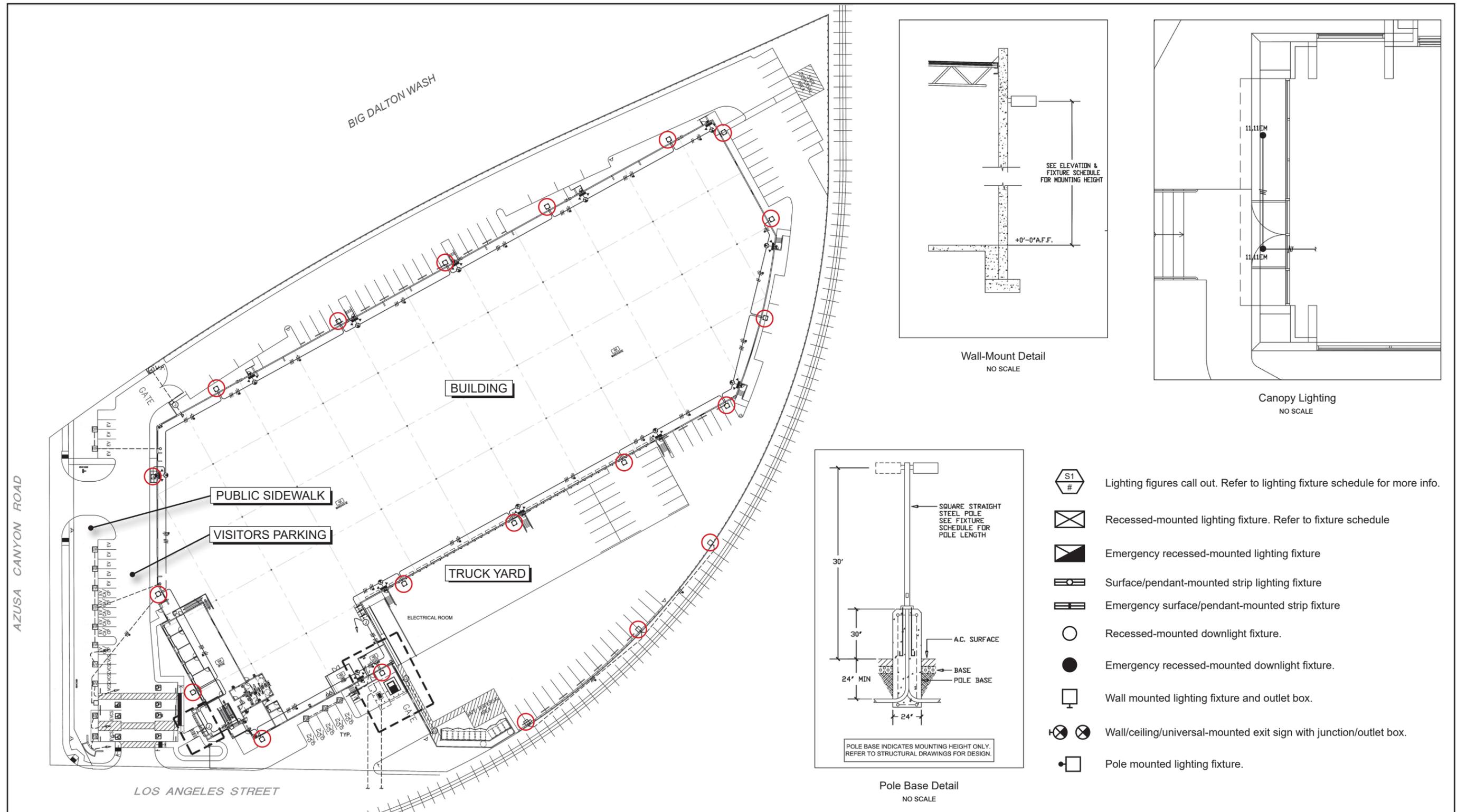
Nighttime Lighting and Glare

Project development would introduce sources of artificial light to the project site and surrounding area similar to the Pepsi Group Bottling plant. Nighttime site lighting would include exterior building-mounted light fixtures; interior lighting for the new building; lighting for pedestrian walkways; ground-mounted decorative lighting for landscape and architectural features; lighting for the new parking and loading dock areas; and security lighting. Outdoor lighting fixtures are shown on Figure 9, *Site Lighting*. Lighting design would limit uplight and glare and comply with local regulations and the requirements of CALGreen. All street lighting along Azusa Canyon Road would be upgraded to LED fixtures. Since the proposed project would have a larger footprint than the existing building, these sources of artificial lighting could have the potential to slightly increase nighttime light and glare in the project area as well as create off-site light spill or trespass that could result in a nuisance. Nighttime lighting and glare from the project site would be visible from the surrounding land uses and roadways.

Although project development may increase artificial light sources to the surrounding area, the proposed light sources would be similar to the light sources of the surrounding industrial and commercial uses and roadways. Considering the existing sources of lighting in the surrounding vicinity and on-site, the amount and intensity of nighttime lighting proposed would not be substantially greater or different than existing lighting. It is unlikely that conventional lighting and illuminated operations realized under the proposed project would discernibly, much less adversely, affect ambient light conditions.

Additionally, as shown in Figure 8, *Conceptual Landscape Plan*, project implementation would include planting street trees, flowering accent trees, evergreen parking lot canopy trees, and accent palms along Azusa Canyon Road and at the building's western entrance. Trees, ground cover, and shrubs would also line most of the northeast, southeast, and southwest sides of the building. There are existing street trees along the southern side of Los Angeles Street fronting the proposed project's south boundary. The proposed and existing trees would help shield lighting that would emanate from the project site onto Azusa Canyon Road, Los Angeles Street, and the land uses beyond. The proposed location and length of the proposed building (see Figure 6, *Conceptual Building Elevations*) would also shield motorists from any light emanating from the interior truck yard.

Figure 9 - Site Lighting



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Furthermore, project development would be required to comply with California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), which outlines mandatory provisions for lighting control devices and luminaires. For example, the project's exterior lighting sources would be required to be installed in accordance with the provisions of Section 110.9, Mandatory Requirements for Lighting Control Devices and Systems, Ballasts, and Luminaires.

Compliance with the lighting provisions of the municipal code, Commercial and Industrial Design Guidelines, and the Building Energy Efficiency Standards would ensure that the proposed project does not result in significant light impacts. With these requirements, the type and location of lighting would prevent spillover onto adjoining property, streets, or skyward. This includes properties and streets in West Covina and Vincent. Compliance with these provisions is ensured through the City's development review and building plan check process. Therefore, nighttime light and glare impacts related to the proposed project would be less than significant.

Daytime Glare

The proposed project includes building materials and architectural treatments that could cause daytime glare, but not to such an extent that they would result in a significant impact. For example, the architectural treatments of the proposed building would include building materials such as painted concrete walls, glazing (glass windows and doors), brick, stone, metal elements, and other decorative elements (see building elevations and renderings in Figure 6, *Conceptual Building Elevations*, and Figures 7a and 7b, *Conceptual Building Renderings*). With the exception of the glass windows and doors, the building materials and architectural treatments are not reflective and would therefore not create substantial day or nighttime glare. As illustrated in the figures, the use of glazing is limited compared to the amount of nonreflective building materials (less than 5 percent of the building façades). The proposed building materials are also similar to building materials used on other similar industrial buildings in the surrounding vicinity.

Additionally, the proposed glazing could increase sources of glare because it would reflect some level of sunlight during certain times of the day. In addition, vehicles parked on-site would increase the potential for reflected sunlight during certain times of the day. However, glare from these sources is typical of the site and surrounding area and would not increase beyond what is expected for an urban area.

Therefore, daytime glare impacts from project-related architectural treatments and building materials would be less than significant, and no mitigation measures are necessary.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range

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Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The project site has no agricultural or farm uses, nor are there agricultural or farm uses in its immediate vicinity. No project-related farmland conversion impact would occur. The project site is zoned M-1 (Light Manufacturing). It is listed as Urban and Built-Up Land and is not mapped as important farmland by the Division of Land Resource Protection (DLRP 2016). Therefore, no impact would occur.

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

No Impact. The zoning designation for the project site is M-1 (Light Manufacturing). The proposed project would not conflict with agricultural zoning or a Williamson Act contract because the site is not zoned for agricultural use. Williamson Act contracts restrict the use of privately owned land for agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. Since the project site is zoned M-1 (Light Manufacturing), there is no Williamson Act contract in effect on-site. Therefore, no impact would occur.

- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

No Impact. Forest land is defined as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (Public Resources Code Section 12223 [g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (Public Resources Code Section 4526). Project development would not conflict with existing zoning for forestland, timberland, or timberland production because the project site is zoned M-1 (Light Manufacturing). Therefore, no impact would occur.

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

No Impact. The project site is paved and contains ornamental trees. Project construction would not result in the loss or conversion of forest land. Therefore, no impact would occur.

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

No Impact. Maps from the Division of Land Resource Protection indicate that there is no important farmland or forest land on the project site or in the surrounding vicinity (DLRP 2016). Project development would not directly cause conversion of such land to nonagricultural or nonforest use. Therefore, no impact would occur.

3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A. The Health Risk Assessment for the proposed project is in Appendix B.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2021a).

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

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

Less Than Significant Impact. South Coast AQMD adopted the 2016 Air Quality Management Plan on March 3, 2017. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of general plans, specific plans, and significant projects.

Section 15206(b) of the CEQA Guidelines states that a proposed project is of statewide, regional, or area-wide significance if a proposed industrial, manufacturing, processing plant, or industrial park employs more than 1,000 persons, occupies more than 40 acres of land, or encompasses more than 650,000 square feet of floor space. The proposed project would develop a total of 129,830 square feet of warehousing and manufacturing space, which would result in an overall net of 67,117 square feet of these uses with removal of the existing use. The proposed project is anticipated to add approximately 72 new jobs, so it is not considered a project of

3. Environmental Analysis

statewide, regional, or areawide significance that would require intergovernmental review under Section 15206 of the CEQA Guidelines. As discussed in Section 3.11.b of this Initial Study, the proposed project would not conflict with the Industrial/Business Park General Plan land use designation for the project site, nor would it conflict with the M-1 (Light Manufacturing) zoning designation. Therefore, the project would not have the potential to substantially affect SCAG’s demographic projections. Also, as demonstrated below, the regional emissions that would be generated by the operational phase of the proposed project would be less than the South Coast AQMD regional emissions thresholds and would therefore not be considered a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. The proposed project would not affect the regional emissions inventory or conflict with strategies in the air quality management plan, and impacts would be less than significant.

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

Less Than Significant Impact. The following describes regional impacts from short-term construction activities and long-term operation of the proposed project.

Regional Short-Term Construction Impacts

The proposed project would result in construction of 129,830 square feet of warehousing and manufacturing space over an eight-month duration. Construction of the proposed project would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from demolition, site preparation, grading, building construction, utilities trenching, architectural coating, and finishing/landscaping. The proposed project’s construction-related emissions, shown in Table 4, are quantified using California Emissions Estimator Model, Version 2020.4.0 (CalEEMod), and are based on the construction duration and equipment mix for the project provided by the applicant. As shown in the table, the maximum daily emissions for VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant.

Table 4 Maximum Daily Regional Construction Emissions

Construction Phase	Criteria Air Pollutant Emissions (lbs/day) ^{1,2,3}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Building Demolition	<1	3	4	<1	<1	<1
Building Demolition & Asphalt Demolition	1	10	9	<1	2	1
Site Preparation	<1	4	3	<1	<1	<1
Site Preparation & Building Construction	1	13	18	<1	2	1
Site Preparation, Building Construction, & Rough Grading	7	89	57	<1	8	4
Building Construction & Rough Grading	6	85	54	<1	8	3
Building Construction, Rough Grading, & Utility Trenching	6	88	57	<1	8	4
Building Construction & Utility Trenching	1	11	18	<1	2	1
Building Construction	1	9	14	<1	2	1

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Table 4 Maximum Daily Regional Construction Emissions

Construction Phase	Criteria Air Pollutant Emissions (lbs/day) ^{1,2,3}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Building Construction & Fine Grading	1	11	17	<1	2	1
Building Construction & Architectural Coating	60	12	21	<1	2	1
Building Construction & Finishing/Landscaping	1	10	16	<1	2	1
Finishing/Landscaping	<1	1	2	<1	<1	<1
Maximum Daily Emissions	60	89	57	<1	8	4
South Coast AQMD Regional Significance Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.0

Notes: Totals may not equal 100 percent due to rounding.

¹ Construction phasing and equipment are based on the preliminary information for the project provided by the applicant. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment and phasing for comparable projects.

² The proposed project may start construction in April 2022. While the emissions modeling is based on a February 2022 start date, a later start date in April 2022 would result in either the same emissions results or slightly lower emissions than what is shown in this table. In general, on-road and off-road emissions data utilized in CalEEMod decrease with each passing calendar year to account for stricter emissions standards and/or replacement of older vehicles and equipment with newer and cleaner units.

³ Includes implementation of fugitive dust control measures under South Coast AQMD Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

Regional Long-Term Operation-Phase Impacts

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The proposed project would result in warehousing and manufacturing space, which would replace the existing industrial use on-site. It is anticipated that the proposed uses could generate a total of up to 65 truck trips per day consisting of 28 trips from 2- and 3-axle trucks and 37 trips from 4-axle trucks. The net increase in truck trips could be up to 43 trips consisting of 17 trips from 2 and 3-axle trucks, and 26 trips from 4-axle trucks (see Appendix I). Furthermore, modeling accounts for the use of 5 diesel-powered forklifts and 10 diesel-powered yard trucks at 7 hours per unit per day.⁴ As shown in Table 5, the proposed project would not generate net operation-related emissions that would exceed the South Coast AQMD regional operation-phase significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

⁴ Based on information provided by the project applicant. It is assumed the proposed uses would be in operation 24 hours per day and 7 days a week. However, while forklifts and yard trucks would be available and on standby for use during operating hours, it is not anticipated that these pieces of equipment would operate continuously throughout the entirety of the 24-hour/7-day operating hours. Thus, the equipment operating hours of 7 hours per day per unit represent the total cumulative hours each piece of off-road equipment would be in use per day.

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Table 5 Maximum Daily Regional Operation Emissions

Source	Pollutants (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Former Land Use Emissions						
Area	1	<1	<1	<1	<1	<1
Energy ¹	<1	<1	<1	<1	<1	<1
Mobile – Passenger Vehicles ²	<1	<1	4	<1	1	<1
Mobile – Trucks ³	<1	5	1	<1	1	<1
Total Maximum Daily Emissions	2	5	5	<1	2	1
Proposed Project Emissions						
Area	3	<1	<1	0	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile – Passenger Vehicle ⁴	1	1	8	<1	2	<1
Mobile – Trucks ⁵	<1	16	4	<1	3	1
Off-Road Equipment ⁶	1	6	36	<1	<1	<1
Total Maximum Daily Emissions	5	23	48	<1	5	2
Net Change						
Total Maximum Daily Emissions	3	18	43	<1	3	1
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.0. Highest winter or summer emissions report.

Notes: lbs: Pounds.

¹ For purposes of this analysis, the default CalEEMod historical energy rates, which are based on the 2005 Building Energy Standards, are utilized.

² Based on trip generation data provided by Urban Crossroads (see Appendix I) and CalEEMod default calendar year 2021 emissions data and trip lengths.

³ Based on trip generation data provided by Urban Crossroads (see Appendix I) and CalEEMod default calendar year 2021 emission rates. Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

⁴ Based on CalEEMod default calendar year 2022 emissions data and trip lengths.

⁵ Based on CalEEMod default calendar year 2022 emission rates. Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

⁶ Based on operation of 5 diesel-powered forklifts and 10 diesel-powered yard trucks at 7 hours per unit per day. Utilizes OFFROAD2017 v 1.0.1 calendar year 2022 emissions data for a 100-horsepower forklift and 175-horsepower yard tractor.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The following describes changes in localized impacts from short-term construction activities and long-term operation of the proposed project.

Construction

Localized Construction Impacts

A project could expose sensitive receptors to elevated pollutant concentrations during construction activities if it would cause or contribute significantly to elevated levels. Unlike the mass of construction emissions shown in the regional emissions analysis in Table 4, which is described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu\text{g}/\text{m}^3$) and can be correlated to potential health effects. The screening-level localized significance thresholds (LST) are the amount of project-related emissions at which localized concentrations (ppm or $\mu\text{g}/\text{m}^3$) could exceed the California AAQS for criteria air pollutants

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for which the SoCAB is designated nonattainment; they are based on the proposed project site size and distance to the nearest sensitive receptor. The California AAQS are the most stringent AAQS to provide a margin of safety in the protection of the public health and welfare. The screening-level LSTs are designed to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 6 shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs. As shown in the table, the construction of the proposed project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Therefore, impacts would be less than significant.

Table 6 Maximum Daily On-Site Localized Construction Emissions

Construction Activity	Pollutants (lbs/day) ^{1,2}			
	NO _x	CO	PM ₁₀ ³	PM _{2.5} ³
South Coast AQMD ≤1.00-Acre Screening-Level LST	89	623	62	18
Building Demolition	3	4	<1	<1
Building Demolition & Asphalt Demolition	6	8	2	<1
Site Preparation	4	3	<1	<1
Site Preparation & Building Construction	10	13	1	<1
Building Construction & Utility Trenching	9	13	<1	<1
Building Construction	7	10	<1	<1
Building Construction & Fine Grading	9	13	<1	<1
Building Construction & Architectural Coating	10	15	<1	<1
Building Construction & Finishing/Landscaping	8	12	<1	<1
Finishing/Landscaping	1	2	<1	<1
Exceeds Screening-Level LST?	No	No	No	No
South Coast AQMD 5.00-Acre Screening-Level LST	203	1,733	91	29
Site Preparation, Building Construction, & Rough Grading	58	46	4	2
Building Construction & Rough Grading	54	42	3	2
Building Construction, Rough Grading, & Utility Trenching	9	13	<1	<1
Exceeds Screening-Level LST?	No	No	No	No

Source: CalEEMod Version 2020.4.0, and South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment occurring on the project site are included in the analysis. For the project site in Source Receptor Area (SRA) 9, NO_x and CO screening-level LSTs are based on a reference distance of 82 feet (25 meters) to the nearest nonresidential receptor, and PM₁₀ and PM_{2.5} screening-level LSTs are based on a reference distance of 550 feet (168 meters) to the nearest residential receptor because employees would not be in office 24 hours per day.

¹ Based on information provided by the applicant. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

² The proposed project may start construction in April 2022. While the emissions modeling is based on a February 2022 start date, a later start date in April 2022 would result in either the same emissions results or slightly lower emissions than what is shown in this table. In general, on-road and off-road emissions data utilized in CalEEMod decrease with each passing calendar year to account for stricter emissions standards and/or replacement of older vehicles and equipment with newer and cleaner units.

³ Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

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Health Risk

The South Coast AQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The Office of Environmental Health Hazard Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments in March 2015 (OEHHA 2015). It has also developed a cancer risk factor and noncancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The South Coast AQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The proposed project would be developed over approximately eight months. The relatively short duration when compared to a 30-year time frame would limit exposures of on-site and off-site receptors. In addition, exhaust emissions from off-road vehicles associated with overall project-related construction activities would not exceed the screening-level LSTs. For these reasons, it is anticipated that construction emissions would not pose a threat to off-site receptors near the proposed project, and project-related construction health impacts would be less than significant.

Operation

Localized Operation-Phase Impacts

Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from South Coast AQMD include industrial land uses such as chemical processing and warehousing operations where substantial truck idling could occur on-site. Manufacturing uses associated with the proposed project would not include chemical processing but would involve trucking operations that utilize diesel fuel. The 65 total average daily truck trips associated with the proposed project would result in truck idling on-site.⁵ Furthermore, the proposed project would operate 10 diesel-powered yard trucks and 5 diesel-powered forklifts as part of the daily operations of the proposed uses.⁶ In addition, operation of the proposed project would use standard on-site mechanical equipment such as heating, ventilation, and air conditioning units and occasional use of landscaping equipment for property maintenance, all of which would generate area source emissions. Emissions of NO₂, CO, PM₁₀, and PM_{2.5} generated at the project site (off-site mobile-source emissions are not included in the LST analysis) from on-site area sources, truck idling, and off-road equipment could expose sensitive receptors to substantial concentrations of criteria air pollutants. Table 7 shows localized maximum daily operational emissions. As shown in this table, maximum daily on-site operational emissions would not exceed the screening-level LSTs. Thus, operational criteria air pollutant emissions would not exceed the California AAQS, and project operation would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

⁵ Since specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time, trip generation rates are based on modeling defaults specified in the Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition (2017) and 10th Edition Supplement (2020).

⁶ Since specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time, off-road equipment use is based on generalized equipment use associated with comparably sized warehouse buildings.

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Table 7 Localized On-Site Operational Emissions

Source	Pollutants (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	<1	<1	<1	<1
Truck Idling ¹	1	1	<1	<1
Off-Road Equipment ²	6	36	<1	<1
Maximum Daily On-Site Operation Emissions	8	37	<1	<1
South Coast AQMD Screening-Level LST	203	1,733	23	8
Exceeds Screening-Level LST?	No	No	No	No

Source: CalEEMod Version 2020.4.0; South Coast AQMD 2008.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment on the proposed project site are included in the analysis. Operational NO_x and CO LSTs are based on nonresidential receptors within 82 feet (25 meters) in SRA 9. Operational PM₁₀ and PM_{2.5} LSTs are based on residential receptors within 550 feet (168 meters) in SRA 9.

¹ Based on EMFAC2017 Version 1.0.3 calendar year 2022 emission rates for a diesel-powered heavy-heavy duty truck (HHDT) and assumes 30 minutes of idling per truck.

² Based on operation of 5 diesel-powered forklifts and 10 diesel-powered yard trucks at 7 hours per unit per day. Utilizes OFFROAD2017 v 1.0.1 calendar year 2022 emissions data for a 100-horsepower forklift and 175-horsepower yard tractor.

Health Risk

The South Coast AQMD requires an analysis of toxic air contaminants when the project generates emissions proximate to sensitive receptors in order to ensure that the proposed project does not expose sensitive receptors to substantial pollutant concentrations. Land uses that generate more than 100 truck trips per day have the potential to substantially increase toxic air contaminants (TAC) concentrations and health risks at off-site sensitive land uses within 1,000 feet of the facility (CARB 2005). The proposed project would generate an average of only about 65 medium- and heavy-duty truck trips per day. However, as recommended under the guidelines of “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” prepared by the Office of the Attorney General of California, an operational health risk assessment (HRA) was conducted to evaluate potential health risk impacts to the nearby surrounding sensitive receptors from project-related truck trips and other project-related sources of TACs (OAG 2021).

Overall, operation of the proposed project would generate TAC emissions from off-site truck travel along surface streets (e.g., Los Angeles Street and Azusa Canyon Road) and on-site diesel truck activity (truck maneuvering and idling) and diesel-fueled off-road equipment (i.e., forklifts and yard trucks) in proximity to the nearby sensitive receptors (i.e., residents surrounding the project site and students at Manzanita Elementary School). The EPA AERMOD air dispersion modeling program and CARB’s Hotspots Analysis and Reporting Program (HARP2) Risk Assessment Standalone Tool (CARB 2021b) were used to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the nearest sensitive receptors. The results of the unmitigated operational HRA are provided in Table 8. The HRA report is included in Appendix B.

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Table 8 Operational HRA Results

Receptor	Cancer Risk ¹ (per million)	Chronic Hazard Index
Maximum Exposed Receptor – Resident ¹	1.4	<0.001
Maximum Exposed Receptor – Student ²	0.04	<0.001
South Coast AQMD Threshold	10	1.0
Exceeds Threshold?	No	No

Source: HARP2, Risk Assessment Standalone Tool.

Note: Cancer risk calculated using 2015 OEHHA Guidance Manual.

¹ Calculated for the 30-yr residential scenario.

² Manzanita Elementary School cancer risk calculated for 7-year student scenario (ages 4 to 10).

As shown in the table, cancer risks from all sources for the residential maximum exposed receptor would be 1.4 in a million and 0.04 in a million for the student maximum exposed receptor. In comparison to the significance threshold of 10 in a million, carcinogenic risks for both receptors are below the threshold value for residents in vicinity of the project. For noncarcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for residents and students. Thus, chronic noncarcinogenic hazards are below the significance threshold, and the project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions during project operation. Impacts would be less than significant.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The SoCAB has been designated attainment under both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—to generate a significant CO impact (BAAQMD 2017). Operation of the proposed project would generate up to 35 PM peak hour trips, which would be minimal compared to the screening levels (see Appendix I). Also, the former Pepsi bottling plant generated 11 PM peak hour trips. Therefore, implementation of the proposed project would result in a net increase of only 24 PM peak hour trips. Overall, the project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site, and impacts would be less than significant.

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

Less Than Significant With Mitigation Incorporated. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would develop and operate warehousing and manufacturing uses. Under the M-1 zoning designation, fiberglass manufacturing is a permitted use. Thus, the proposed project could result in the generation of odors that could affect a substantial number of people. However, implementation of Mitigation Measure AQ-1, which would require preparation of an odors management plan for land uses that could generate objectionable odors, would minimize any potential odor impacts. Therefore, project-related operational odor impacts would be less than significant with incorporation of mitigation.

During the development of the proposed project, emissions from construction equipment, such as diesel exhaust, may generate odors. However, these odors would be low in concentration, temporary, disperse rapidly, and are not expected to affect a substantial number of people. Any odors produced during the construction phase are not expected to be significant or highly objectionable and would be in compliance with South Coast AQMD Rule 402. Therefore, impacts would be less than significant with regard to construction-related odors.

Mitigation Measure

AQ-1 Prior to issuance of a business license, if a prospective business tenant has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the prospective business tenant, subject to review and approval by the City of Irwindale Community Development Department or Planning Commission. Types of uses that have the potential to generate nuisance odors include, but are not limited to:

- Wastewater treatment plants
- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

The odor management plan shall show compliance with the SCAQMD's Rule 402 for nuisance odors. The odor management plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including

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appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility.

3.4 BIOLOGICAL RESOURCES

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. Sensitive biological resources are habitats⁷ or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. As shown in Figure 3, *Aerial Photograph*, the project site is occupied by the Pepsi Bottling Group bottling plant. The southeast portion of the site is vacant and undeveloped. The ground cover in this area consists of exposed soil with moderate to extensive native grass and weed growth. Several mature ornamental trees and a few shrubs are at the entrance to the northern parking lot. The site is in a highly urbanized area of the City and is surrounded by a mix of commercial and industrial uses.

A review of the California Department of Fish and Wildlife (CDFW) California Natural Biodiversity Database Bios Viewer found six threatened or endangered species in the Baldwin Park Quadrangle, which is the project site's quadrangle (CDFW 2021). The six species are the coastal California gnatcatcher, the willow flycatcher, the least Bell's vireo, the bank swallow, the western yellow-billed cuckoo, and the Santa Ana sucker.

Based on the existing conditions of the project site and its surroundings, there is no riparian or native habitat within or in the vicinity of the project site, and no natural biological resources or communities exist on, adjacent to, or near the project site. There are only limited ornamental trees, a few shrubs, native grass, and weeds on the site. Therefore, the proposed project would not result in 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. No impact would occur.

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

No Impact. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. Riparian habitats are along the banks of rivers and streams. As demonstrated in Sections 3.4.a and 3.4.c, project development would not result in an impact on any riparian habitat or other sensitive natural community. No impact would occur.

⁷ Per the California Department of Fish and Wildlife, habitat is where a given plant or animal species meets its requirements for food, cover, and water in both space and time (CDFW 2015).

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as streams, swamps, marshes, and bogs. No wetlands regulated by the US Army Corps of Engineers, US Fish and Wildlife Services (USFWS), CDFW, or Los Angeles Regional Water Quality Control Board (RWQCB) exist on the project site. The adjacent Big Dalton Wash is mapped as a Riverine habitat on the USFWS National Wetlands Mapper⁸ (USFWS 2020). However, the channel consists of concrete bed and banks and therefore does not support wetland resources such as saturated soil or wetland vegetation. Project development would not impact wetlands directly or indirectly. Therefore, no impact would occur.

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

Less Than Significant Impact. There are no corridors valuable for overland wildlife movement or migration on, adjacent to, or in proximity to the project site. The project site and surroundings are in an urbanized area and not available for overland wildlife movement. Big Dalton Wash, which passes a few feet north of the northern site boundary, is a flood control channel that consists of concrete bed and banks. Project development would take place within the boundaries of the project site and would not impact the Big Dalton Wash. Furthermore, the project site is mostly developed except for the southeastern area of the site, which consists of native grass and weed growth. Several mature ornamental trees and shrubs are at the entrance to the northern parking lot (see Figure 3, *Aerial Photograph*). It is unlikely that the trees, shrubs, grasses, and weeds on-site would provide suitable habitat for any native resident or wildlife species. Therefore, no impact would occur.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, the project site is void of vegetation except for ornamental trees and shrubs at the western entrance and native grass and weed growth in the southeast area of the site. Project development would include the removal of approximately eight trees onsite—types and common names of these trees are unknown at this time. Although project development would involve removal of trees, there are no trees or other biological resources on-site that could be subject to any City policies or ordinances protecting such resources, including Irwindale Municipal Code Section 12.10.030. This section governs the planting, maintenance, and removal of trees and landscaping in the public right-of-way. All trees on-site are on private property and not in the public right-of-way—there are no trees along the Azusa Canyon Road or Los Angeles Street right-of-way fronting the project site. Furthermore, the proposed project would provide many more trees (approximately 68) than currently exist. Therefore, no impact would occur.

⁸ Riverine habitat includes all wetlands and deep-water habitats in a channel (USFWS 2020).

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f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The project site is in a highly urbanized area of the city and surrounded by industrial and commercial uses (see Figure 3, *Aerial Photograph*). It is not in a habitat conservation plan or natural community conservation plan (USFWS 2016; CDFW 2019). The San Gabriel Canyon Significant Ecological Area (SEA #19) is the closest protected SEA, approximately 0.9 miles north of the project site (DRP 2019). Project development would take place within the boundaries of the project site and is not anticipated to impact the SEA in any way. Therefore, no impact is expected to occur.

3.5 CULTURAL RESOURCES

The analysis in this section is based partly on the following technical study, which is included as Appendix C to this Initial Study:

- *Cultural and Paleontological Resources Assessment Report for the 4416 Azusa Canyon Road Project*, Cogstone, July 2021.

Would the project:

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

No Impact. California, through the State Historic Preservation Office, maintains an inventory of sites and structures that are considered historically significant. State historic preservation regulations include the statutes and guidelines in CEQA and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, that is historically or archaeologically significant. The state regulations that govern historic resources and structures include PRC Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). According to PRC Section 5024.1(c):

- (c) A resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:
 - (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
 - (2) Is associated with the lives of persons important in our past.
 - (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
 - (4) Has yielded, or may be likely to yield, information important in prehistory or history.

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Additionally, the U.S. Department of the Interior has established specific federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past; with the lives of people who were important in the past; or represents significant architectural, landscape, or engineering elements.

Irwindale established a historic preservation ordinance in 2009 that allows for the designation of individual landmarks. The City has not yet conducted a citywide survey of historic resources. The "Cultural and Historic Resources" section in the City's General Plan lists "Existing Historic Resources in Irwindale" by identifying three sites of historical significance (LAC 2020).

As shown in Figure 3, *Aerial Photograph*, the site is presently developed with the Pepsi Bottling Group bottling plant, a large metal shed north of the building, and a loading dock and large truck yard on the eastern portion of the site. The project site appears to have been used as an orchard from at least 1928 until around 1952 when the site was vacant. The current main building was constructed in 1956.

Project development would involve demolition of the existing building and other site improvements. The state-recommended threshold under which buildings may be considered historic resources is a construction age of 50 years (California Code of Regulations Section 4852.d.2). Although the building has been standing for approximately 65 years, it is not considered historic. No historical events have occurred on-site or in the building, and no persons of significance have resided or currently reside on-site. Additionally, the building does not exhibit any unique architectural style or features; it is a common industrial-style building design found throughout the city and greater Los Angeles County. The building does not include architectural elements or features to suggest unique design or construction. Neither the building nor project site meet any of the state or federal criteria of a historic resource identified above (Appendix C).

Additionally, as a part of the cultural resources assessment for the project site, Cogstone conducted an archaeological and historic records search of the California Historic Resources Inventory System from the South Central Coastal Information Center on April 9, 2021 (Appendix C). The records search covered the project site and a one-half mile radius from the site. The search found that five previous studies were completed within one-half mile of the proposed project area, but none within the project site. The records search also found one previously recorded resource within the search radius 0.25 to 0.5 mile from the project site (the Mojave Road, a multicomponent resource that started as a Native American trail), but none on-site.

Furthermore, the project site is not identified on any federal or state historic registers or sources, including the National Register of Historic Places the California Register of Historic Resources, the California Built Environment Resources Directory, the California Historical Landmarks, and the California Points of Historical Interest. Since project development would occur within the confines of the project site, there would be no expected impact to historical resources.

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

Less Than Significant Impact with Mitigation Incorporated. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 3, *Aerial Photograph*, the project site is in a highly urbanized area of the City, and most of the site has already been disturbed due to grading and construction activities associated with current and past uses of the site. Furthermore, to implement the proposed project, it is anticipated that up to 14,933 cubic yards of soil would be imported during the grading phase to balance and raise the grade of the site. Therefore, no soil export would occur.

Based on the preceding factors, the on-site pedestrian survey, the cultural records from the South Central Coastal Information Center, and the negative results of the Sacred Lands File (SLF) search results,⁹ the project is assessed to have low sensitivity for prehistoric resources.

However, Cogstone reviewed US Geological Survey (USGS) topographic quadrangle maps and historical US Department of Agriculture (USDA) aerial photographs and assessed that the project site has low to moderate sensitivity for buried historic archaeological resources because the building type and related information is not known for two buildings that were seen on the 1953 Baldwin Park USGS topographic quadrangle map but are no longer present in the 1956 USDA aerial photograph. Therefore, an inadvertent discovery of archeological remains may occur during excavation. With the implementation of Mitigation Measure CUL-1, impacts would be reduced to a less than significant level.

Mitigation Measures

CUL-1 If construction personnel, including the Native American monitor, identify cultural resources during ground-breaking activities, they shall inform the site construction superintendent who shall notify the City and project applicant. The project applicant shall then contact a qualified archaeologist and all work must halt within 50 feet of the find until the archaeologist can determine the significance. No soil shall be exported from within the 50-foot buffer around the find until a determination of significance is made. The qualified archaeologist will also determine if archaeological monitoring is warranted.

If the qualified archaeologist determines that the find qualifies as a significant cultural resource, the archeologist shall make recommendations on the treatment and disposition of the deposits, which shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. If significant cultural resources are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan. The archaeologist shall prepare a final report describing monitoring methods and results that includes a catalog of all cultural resources identified for submission to the City. The City shall determine

⁹ Cogstone requested a SLF search from the Native American Heritage Commission (NAHC) on April 13, 2021. On April 27, 2021 the NAHC responded that the project area was negative for any known sacred sites or resources (Appendix B).

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disposition of collected cultural resources, which may include return to landowner/applicant, transfer to a consulting Native American group, donation to school or museum, or long-term curation at an approved curation facility. The applicant shall be financially responsible for costs associated with cultural resources monitoring, including artifact curation, up to the limits imposed by Public Resources Code Section 21083.2.

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

Less than Significant Impact. There are no known human remains or cemeteries on or near the project site. The nearest cemetery to the site is Turner and Stevens Live Oak Mortuary and Memorial Park, approximately 3.8 miles northwest of the project site. Project development would not result in direct or indirect impacts to these cemeteries.

As shown in Figure 3, *Aerial Photograph*, the project site is in a highly urbanized area of the City and most of the site has already been disturbed due to grading and construction activities associated with the bottling plant that occupied the site. Most of the surrounding vicinity has also experienced substantial ground disturbance associated with the development of existing buildings, roadways, and other urbanized land uses. The project site is largely flat, and the proposed warehouse building would be above ground level, with no subterranean floors or basements. Accordingly, little ground disturbance would be required to implement the proposed project. Therefore, the likelihood that human remains would be discovered during site clearing and grading activities is considered extremely low.

However, development of the proposed project could have the potential to disturb previously undiscovered subsurface human remains. For example, the proposed project would involve grading and some excavation activities over the entire project site. In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the Los Angeles County Coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in PRC Section 5097.98. The coroner is required to make a determination within two working days of being notified of the remains' discovery. If the coroner determines that the remains are not subject to his or her authority or has reason to believe the human remains to be those of a Native American tribe, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) so that the NAHC can contact the most likely descendant. The descendant shall be provided access to the discovery and provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in PRC Sections 5097.94 and 5097.98, Section 7050.5 of the California Health and Safety Code, and CEQA Guidelines Section 15064.5.

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels.

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3.6 ENERGY

Would the project:

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

Less Than Significant Impact. The following discusses the potential energy demands from activities associated with the construction and operation of the proposed project.

Short-Term Construction Impacts

Construction of the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions.

Electrical Energy

Construction of the proposed project would not require electricity to power most construction equipment. Electricity use during construction of the proposed project would vary during different phases of construction. The majority of construction equipment would be gasoline or diesel powered. Later construction phases could use electrical equipment for interior construction and architectural coatings. However, it is anticipated that the majority of electrical construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Also, such equipment would be used on an as-needed basis. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

Transportation Energy

Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as during demolition and grading, would be gas or diesel powered. The use of energy resources by these vehicles would fluctuate according to the phase of construction. Energy consumption during construction (year 2022) was calculated using the CalEEMod (v. 2020.4.0) computer model and data from the EMFAC2017 (v. 1.0.3) and OFFROAD2017 (v. 1.0.1) databases. The results are shown in Table 9.

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Table 9 Construction-Related Fuel Usage

Project Component	Gas ¹		Diesel ¹		Electricity ¹	
	VMT	Gallons	VMT	Gallons	VMT	kWh
Construction Worker Commute	310,553	10,953	2,276	52	4,813	1,583
Construction Vendor Trips	2,957	587	33,079	4,148	N/A	0
Construction Truck Haul Trips	66	16	76,903	11,665	N/A	0
Construction Off-Road Equipment	N/A	475	N/A	20,606	N/A	0
Total	313,576	12,031	112,258	36,470	4,813	1,583

Source: CalEEMod v. 2020.4.0; EMFAC2017 v. 1.0.3; OFFROAD2017 v. 1.0.1.

Notes: VMT=vehicle miles traveled; kWh=kilowatt hour

¹ The proposed project may start construction in April 2022. While the energy modeling is based on a February 2022 start date, a later start date in April 2022 would result in either the same fuel usage results or slightly lower usage than what is shown in this table. In general, on-road and off-road fuel usage data shows a decrease with each passing calendar year to account for stricter efficiency standards and/or replacement of older vehicles and equipment with newer and more efficient units.

To limit wasteful and unnecessary energy consumption from transportation, the construction contractors would minimize nonessential idling of construction equipment in accordance with the California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449, which limits nonessential idling of diesel-powered off-road equipment to five minutes. In addition, construction trips would not result in unnecessary use of energy since the project site is served by numerous regional freeway systems that provide the most direct routes from various areas of the region (e.g., Interstates 10, 210, and 605). Moreover, all construction equipment would cease operating upon completion of project construction. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of the proposed project would generate new demand for electricity, natural gas, and transportation energy on the project site.

Electrical Energy

Operation of the proposed project would consume electricity for various purposes, including but not limited to heating, cooling, and ventilation of buildings; operation of electrical systems; lighting; and use of on-site equipment and appliances. Electrical service to the proposed project would be provided by Southern California Edison (SCE) through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 10, implementation of the proposed project would result in net increase of 310,585 kilowatt hours (kWh) of electricity use per year.

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Table 10 Electricity Consumption

Land Use	Electricity (kWh/year)
Former Pepsi Bottling Plant	
Warehousing	286,598
Parking Lot	26,644
Total	313,242
Proposed Project	
Warehousing	432,139
Manufacturing	184,620
Parking Lot	7,068
Total	623,827
Net Change	
Former Pepsi Bottling Plant	313,242
Proposed Project	623,827
Net Change	310,585

Source: CalEEMod Version 2020.4.0.
Note: kWh = kilowatt hour

Though the proposed project would result in electricity demand, it would be consistent with the requirements of the Building Energy Efficiency Standards and CALGreen. Compliance with these standards would contribute to minimizing inefficient energy use in the proposed building. Therefore, operation of the proposed project would not result in wasteful or unnecessary electricity demands and would result in a less than significant impact related to electricity.

Natural Gas Energy

Operation of the proposed project would consume natural gas for heating. The potential natural gas consumption for the project site is shown in Table 11. As shown in the table, implementation of the proposed project would generate a net average natural gas demand of 337,131 kilo British thermal units (kBtu) per year. Though the proposed project would result in natural gas demand, it would be consistent with the requirements of the Building Energy Efficiency Standards and would not result in wasteful or unnecessary natural gas demands. Therefore, operation of the proposed project would result in less than significant impacts with respect to natural gas usage.

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Table 11 Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)
Former Pepsi Bottling Plant	
Warehousing	65,222
Total	65,222
Proposed Project	
Warehousing	97,033
Manufacturing	305,320
Total	402,353
Net Change	
Former Pepsi Bottling Plant	65,222
Proposed Project	402,353
Net Change	337,131

Source: CalEEMod Version 2020.4.0.
Note: kBTU = kilo British thermal units

Transportation Energy

The proposed project would consume transportation energy during operations from the use of motor vehicles, which include both on-road vehicles and off-road equipment. The efficiency of these motor vehicles, such as the average miles per gallon, is unknown. Estimates of transportation energy use for on-road vehicles are based on the overall vehicle miles traveled (VMT) and its associated transportation energy use. As shown in Table 12, the proposed project would result in a net increase in annual VMT, which would also result in a net increase in fuel consumption. However, as discussed in Section 3.17.b of this Initial Study, the proposed project would have a less than significant impact with regard to VMT because it would not generate the threshold number of daily passenger vehicle trips. In addition, as discussed in Section 3.14.a, it is anticipated that long-term and short-term (i.e., construction) jobs would be absorbed by the local and regional labor force, which would contribute to minimizing passenger vehicle VMT. The proposed project would provide bicycle racks and long-term bicycle enclosures or lockers on-site in accordance with the provisions of CALGreen. The racks would be placed in a designated area near the parking area east of the gate to the truck yard. Inclusion of the proposed bicycle racks and long-term bicycle lockers would encourage employees to take more-active transit options (e.g., bicycle to work), which would reduce VMT and fuel consumption. Overall, it is expected that operation-related fuel usage associated with the proposed project would not be inefficient, wasteful, or unnecessary. Impacts would be less than significant with respect to operation-related fuel usage.

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Table 12 Project Annual Operation-Related Fuel Usage

	Gasoline		Diesel		Electricity	
	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual kWh
Former Pepsi Bottling Factory						
Passenger Vehicles ¹	363,903	13,900	8,698	342	5,584	1,836
Trucks ²	0	0	321,294	39,637	0	0
Total	363,903	13,900	329,992	39,979	5,584	1,836
Proposed Project						
Passenger Vehicles ¹	821,437	31,377	19,634	771	12,606	4,112
Trucks ²	0	0	949,175	120,819	0	0
Off-Road Equipment ^{3,4,5}	0	0	N/A	99,173	N/A	334,705
Total	821,437	31,377	968,809	220,763	12,606	338,817
Net Change						
Former Pepsi Bottling Factory	363,903	13,900	329,992	39,979	5,584	1,836
Proposed Project	821,437	31,377	968,809	220,763	12,606	338,817
Net Change	457,534	17,476	638,817	180,785	7,021	336,981

Notes:

¹ Based on calendar year 2022 EMFAC2017 v.1.0.3 fuel consumption data, CalEEMod default trip lengths, and trip generation data provided by Urban Crossroads (Appendix I).

² Based on calendar year 2022 EMFAC2017 v.1.0.3 fuel consumption data and trip generation data provided by Urban Crossroads (Appendix I). Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

³ Diesel and electricity consumption is based on operation of 5 diesel-powered forklifts and electric-powered forklifts and 10 diesel-powered yard trucks and electric-powered yard trucks at 7 hours per unit per day.

⁴ Diesel-powered fuel consumption based on OFFROAD2017 v 1.0.1 fuel consumption data for a 100-horsepower forklift and 175-horsepower yard tractor.

⁵ Electricity consumption for electric-powered forklifts is based on a consumption rate of 8.7 kWh per hour per unit (kWh/yr/unit) (EPRI 2021). Electricity consumption for electric-powered yard truck based on a consumption rate of 8.75 kWh/hr/unit (Transpower 2015).

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

No Impact. The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill (SB) 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for publicly owned facilities and retail sellers must be 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also set a new RPS requirement of 50 percent by 2026. It established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies

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by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SCE, which would provide all of electricity needs for the proposed project. The compliance of SCE in meeting the RPS goals would contribute to the State meeting its objective of transitioning to renewable energy.

The proposed project also would comply with the latest 2019 Building Energy Efficiency Standards. Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy and energy efficiency, and no impact would occur.

3.7 GEOLOGY AND SOILS

The analysis in this section is based partly on the following technical study, which is included as Appendix D to this Initial Study:

- *Geotechnical Investigation, Proposed Warehouse Building, 4116 Azusa Canyon Road*, Southern California Geotechnical, February 14, 2020.
- *Results of Infiltration Testing Proposed Warehouse – Infiltration 4416 Azusa Canyon Road*, Southern California Geotechnical, February 13, 2020.
- *Response to Third-Party Geotechnical Review, Proposed Warehouse 4416 Azusa Canyon Road*, Southern California Geotechnical, August 30, 2021.

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults to minimize the hazard of surface rupture of a fault to people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

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The project site is not within or near an established Alquist-Priolo Earthquake Fault Zone and is not in a “Zone of Required Investigation” (CGS 2015a, 2015b). The nearest mapped active fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)—is the Raymond Fault approximately 6.7 miles to the northwest (CGS 2015a). Due to the distance to the active fault, the potential for surface rupture of a fault on-site is considered very low. Therefore, project development would not subject people or structures to hazards arising from surface rupture of a known active fault. Impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The most significant geologic hazard to the design life of the proposed project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. As with other areas in southern California, it is anticipated that the project site will likely be subject to strong ground shaking due to earthquakes on nearby faults.

As noted above, the Raymond Fault is approximately 6.7 miles to the northwest of the site. This and other faults in the region—Newport-Inglewood-Rose Canyon fault zone (north Los Angeles basin section), approximately 26 miles southwest of the project site, and San Andreas Fault, approximately 35 miles northeast of the site (CGS 2015a)—are considered capable of producing strong shaking at the project site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. Earthquakes along these faults are generally capable of generating ground shaking of engineering significance to the project site. The intensity of ground shaking on the project site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the project site.

However, the project site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, California regulates development in the state through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The project structures would be designed and constructed in accordance with California regulations. For example, structures for human occupancy would be required to meet or exceed the most current California Building Code (CBC; California Code of Regulations, Title 24, Part 2) standards for earthquake resistance. The CBC is adopted by reference in Chapter 1, Title 26, “Building Code,” of the Los Angeles County Code of Ordinances. The Los Angeles County Building Code is adopted by reference in Chapter 15.04 of the Irwindale Municipal Code. The CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards; it has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with a specified probability of occurring on the project site. The proposed development would be required to adhere to the provisions of the CBC, which are enforced by the City during the development review and building plan check process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Furthermore, requirements for geotechnical investigations are included in CBC Appendix J, Section J104.3, Geotechnical Reports. The project applicant prepared a preliminary geotechnical report pursuant to the

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CBC and would prepare a final report prior to the issuance of grading permits. The preparation of a final report would be imposed by the City as a condition of project approval. The geotechnical report would include calculations of seismic design parameters that must be used in the design of proposed buildings and structures. For example, testing samples from subsurface investigations (such as from borings or test pits) would be undertaken as a part of the geotechnical report. The soil samples would be analyzed to, among other factors, evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness. Also, CBC Section 1705.6 sets forth requirements for inspection and observation during and after grading. Compliance with the provisions of the CBC and design recommendations outlined in the geotechnical report would be ensured through the City's development review and building plan check process.

In summary, compliance with the provisions of the CBC and required implementation of the recommended design recommendations outlined in the final geotechnical report prepared pursuant to the CBC would reduce hazards arising from strong seismic ground shaking. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater; 2) low density noncohesive (granular) soils; and 3) high-intensity ground motion. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer.

Maps of seismic hazard zones are issued by the California Geological Survey (CGS) in accordance with the Seismic Hazards Mapping Act enacted in April 1997. The intent of the Seismic Hazards Mapping Act is to provide for a statewide seismic hazard mapping and technical advisory program to assist cities and counties in developing compliance requirements to protect the public health and safety from the effects of strong ground shaking, liquefaction, landslides or other ground failure, and other seismic hazards caused by earthquakes.

The Seismic Hazards Map for the Baldwin Park, California 7.5 Minute Quadrangle, published by the CGS, indicates that the subject site is not located within a designated liquefaction hazard zone. In addition, the subsurface conditions encountered at the site are not considered to be conducive to liquefaction. Based on the mapping performed by CGS and the conditions encountered at the trenches analyzed on-site, liquefaction is not considered a significant design concern for the proposed project.

Additionally, project site grading, design, and construction would conform with the recommended design parameters of the required geotechnical report. Preparation of the final geotechnical report would be required prior to the issuance of grading permits. Compliance with the design parameters of the geotechnical report would be ensured through the City's building plan check and development review process.

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Therefore, impacts associated with liquefaction would be less than significant.

iv) Landslides?

Less Than Significant Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The overall site topography can be characterized as relatively flat, with no notable change in elevation. The site generally slopes downward to the southwest at a gradient of 1 to 2 percent. However, a few hundred feet east of the site, beyond Azusa Canyon Road and Big Dalton Wash, is the Olive Pit mine site/sand and gravel quarry, which began operations in 1925 and ceased operations in the mid-1970s. The bottom of the Olive Pit mine site/sand and gravel quarry excavation is approximately 200 feet below the adjacent street grades and contains side slopes ranging from approximately 50 percent to 100 percent.

Based on the results of the geotechnical analysis and in accordance with Section 111 of the Los Angeles County Building Code, the proposed development would not be subject to landslides and would not adversely affect the geologic stability of the adjacent properties. The proposed structure would consist of a new warehouse building of concrete tilt-up construction supported on conventional shallow foundations. Based on the anticipated foundation loads, the lateral extent of foundation influence will not significantly extend beyond the area of the proposed structure. Because the proposed structure will be more than 100 feet from the Olive Pit mine site/sand and gravel quarry, and the Big Dalton wash culvert is between the site and the quarry, the proposed project would have no significant hazard related to the mining quarry. The west side of the culvert is partially within a required zone of investigation for earthquake-induced landslides due to the mining quarry, but the area of investigation does not extend past the mainline of the culvert. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earth-moving activities if erosion control measures are not used.

Following is a discussion of the potential erosion impacts resulting from the proposed project's construction and operational phases.

Construction Phase

Project development would involve demolition, excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and tracking off-site by vehicles. These activities could result in soil erosion. However, development on the project site is subject to local and state codes and requirements for erosion control and grading during construction. For example, project development is required to comply with SCAQMD Rules 402, Nuisance, and 403, Fugitive Dust, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that it does not remain visible in the

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atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques to prevent dust and soil erosion from creating a nuisance off-site. For example, control measures to reduce erosion during grading and construction activities include stabilizing fill materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board, effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.10, *Hydrology and Water Quality*. The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction. Types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls:** Cover and/or bind soil surface to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- **Sediment controls:** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- **Tracking controls:** Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence with local and state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

As shown in Figure 3, *Aerial Photograph*, most of the project site is developed. The overall site topography generally slopes downward to the southwest at a gradient of 1 to 2 percent. There are no steep hills or bluffs on or adjacent to the project site.

After project completion, the project site would be developed with a new warehouse and manufacturing facility and associated hardscape and landscape improvements. All landscaped areas would be required to comply with the provisions of the Model Water Efficient Landscape Ordinance and Chapter 15.30, "Water Efficient Landscape Standards and Guidelines," of the Irwindale Municipal Code. For example, the proposed landscaping would be water conserving and enable soil stabilization and minimize erosion. Upon project completion, the potential for soil erosion or the loss of topsoil would be expected to be extremely low.

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Furthermore, in accordance with the City's initial requirements for development projects, the project applicant prepared a preliminary low impact development (LID) plan for City review (Appendix F). BMPs specified for the proposed project in the LID plan would also minimize sediment pollution of stormwater. BMPs are discussed further in Section 3.10, *Hydrology and Water Quality*. Implementation of the BMPs would help ensure that soil erosion would not occur during the proposed project's operation phase. BMP implementation would be ensured through the City's building plan check and development review process.

Therefore, soil erosion impacts from the proposed project's operation phase would be less than significant.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Less Than Significant Impact. Hazards from liquefaction are addressed in Section 3.7.a.iii, and landslide hazards are addressed in Section 3.6.a.iv. As concluded in these sections, impacts would be less than significant.

Following is a discussion of the potential erosion impacts resulting from other site geologic and soil conditions.

Lateral Spreading

Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of nonliquefied soil materials. Due to the low risk of liquefaction on the project site, lateral spreading is not considered a hazard to the site, and no impacts are expected to occur.

Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The project site is not mapped in an area of subsidence by the US Geological Survey (USGS 2021), and the proposed project does not propose any groundwater withdrawal that would create or worsen ground subsidence. Additionally, minor ground subsidence is expected due to settlement and machinery working. The subsidence is estimated to be about 0.1 feet. Therefore, impacts associated with subsidence would be less than significant.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or subjected to a load. Based on the presence of fine to coarse gravel, cobbles, and boulders at the project site, the near-surface native alluvial soils possess high relative densities and low void ratios.¹⁰ Furthermore, during subsurface exploration, no apparent porosity in the native alluvium was encountered in the test pits.¹¹ Based on these considerations, the collapse potential of the near surface native alluvium at the site is relatively low. Any artificial fill materials that may possess some potential for collapse would be removed from the proposed building area and replaced by compacted structural fill.

¹⁰ Relative density is the measure of compactness of cohesionless soil. Void ratio is the ratio of empty space to solids in the soil.

¹¹ Porosity is a measure of the empty spaces in a material.

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Additionally, the project applicant has prepared a preliminary site-specific geotechnical investigation pursuant to the CBC. A final geotechnical investigation would be required prior to the issuance of grading permits and would be imposed by the City as a condition of project approval. The geotechnical investigation includes a detailed assessment of the suitability of site soils for supporting the proposed structures and other site improvements, and it provides needed design recommendations for remedial grading and for foundation design to minimize hazards from unsuitable soils. Site grading, design, and construction of the proposed project would conform to the design recommendations of the geotechnical report.

Further, CBC Section 1705.6 sets requirements for inspection and observation during and after grading. Compliance with the provisions of the CBC and design recommendations outlined in the geotechnical report would be ensured through the City's development review and building plan check process.

Therefore, project development would not cause substantial hazards arising from collapsible soils. Impacts would be less than significant.

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?

No Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. The near-surface soils on the project site generally consist of silty sands and gravelly sands with only trace amounts of clay nodules present in the fill soils. These materials are classified as very low to nonexpansive. Therefore, no design considerations related to expansive soils are considered warranted for the site. Additionally, project site grading, design, and construction would conform with the recommended design parameters of the geotechnical report. Therefore, no impact is expected to occur.

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?

No Impact. The proposed project would include construction of sewer laterals to existing sewers in surrounding roadways. The proposed project would not involve the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact is expected to occur.

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

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources are fossils, that is, the recognizable remains or evidence of past life on earth such as bones, shells, leaves, tracks, burrows, and impressions.

As shown in Figure 3, *Aerial Photograph*, the project site is in a highly urbanized area of the City, and most of the site has already been disturbed due to grading and construction activities associated with current and past uses of the site. The project site is mapped as late Pleistocene to Holocene young alluvial fan deposits. The paleontological records search revealed that all the fossils previously recovered within an 18-mile radius of the project site were a minimum of two feet deep in deposits mapped as Pleistocene at the surface. Sediments with a Holocene component, such as those on the project site, produced fossils starting at 24 feet deep. Therefore,

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sediments less than 20 feet below the surface within the boundaries of the project site are assigned a low potential for fossils, and deeper deposits are assigned a moderate potential. Sediment disturbance associated with the development of the proposed project is expected to reach a maximum of 12 feet for grading and utilities. Even though construction activities on-site have a low potential to produce fossils of significance, potential impacts could occur to paleontological resources during excavation. However, with the implementation of Mitigation Measure GEO-1, impacts would be reduced to a less than significant level.

Furthermore, to implement the proposed project, it is anticipated that up to 14,933 cubic yards of soil would be imported during the grading phase to balance the site and complete the ground improvement surcharge program. No soil export would occur.

Based on these factors, impacts to paleontological resources would be less than significant with the implementation of Mitigation Measure GEO-1.

Mitigation Measures

GEO-1 If construction personnel, including the Native American monitor, identify paleontological resources during ground-disturbing activities, they shall inform the site construction superintendent who will notify the City and project applicant. The project applicant shall then contact a qualified paleontologist and all ground-disturbing activity shall cease in the immediate area of the find (within a 50-foot buffer) until the paleontologist can evaluate the find.

If the discoveries are determined to be significant, full-time paleontological monitoring will be recommended for the remainder of ground disturbance for the project. Paleontological monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Monitoring efforts can be reduced or eliminated at the discretion of the project paleontologist.

Upon completion of fieldwork, all significant fossils collected shall be prepared in a properly equipped paleontology laboratory to a point ready for curation. Preparation shall include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossil specimens shall be identified to the most specific taxonomic level possible, cataloged, analyzed, and delivered to the Natural History Museum of Los Angeles County for permanent curation and storage. The cost of curation is assessed by the repository and shall be the responsibility of the project applicant. At the conclusion of laboratory work and museum curation, a final Paleontological Monitoring Report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project area geology and paleontology, a list of taxa recovered, an analysis of fossils recovered and

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their scientific significance, and recommendations. A copy of the report shall be submitted to the Natural History Museum of Los Angeles County.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the Intergovernmental Panel that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.^{12, 13}

This section analyzes the project's contribution to global climate change impacts in California through an analysis of project-related GHG emissions. Information on manufacture of cement, steel, and other "life cycle" emissions as a result of the project is not applicable and not included in this analysis.¹⁴ Black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived pollutant in the state's AB 32 inventory but treats it separately (CARB 2017a).¹⁵ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the proposed project:

¹² Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

¹³ Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not yet include black carbon due to ongoing work resolving its precise global warming potential. Guidance for CEQA documents does not yet include black carbon.

¹⁴ Life-cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of its particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions, found that life-cycle analysis was not warranted for project-specific CEQA analysis in most situations for a variety of reasons, including lack of control over some sources and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials is not known, calculation of life-cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

¹⁵ Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a).

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

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

Project-related construction and operation-phase GHG emissions are shown in Table 13. As shown in the table, the proposed project would generate GHG emissions from project vehicle trips (e.g., employees and truck trips), use of off-road equipment for daily operations, energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), area sources (e.g., landscaping equipment used on-site, consumer products, coatings), water/wastewater generation, and waste disposal. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. Overall, development and operation of the proposed project would generate overall net annual GHG emissions equivalent to 2,223 metric tons of carbon dioxide per year (MTCO_{2e}/yr) and would not exceed the SCAQMD bright-line threshold of 3,000 MTCO_{2e} per year (SCAQMD 2010). Therefore, the proposed project’s cumulative contribution to GHG emissions would be less than significant.

Table 13 Net Project-Related Operation GHG Emissions

Source	GHG (MTCO _{2e} /Year)	Percentage of Total Emissions
Former Pepsi Bottling Plant		
Area	<1	<1%
Energy ¹	76	10%
Mobile – Passenger Vehicles ²	127	17%
Mobile – Trucks ³	445	61%
Solid Waste	82	11%
Water	1	<1
Total	731	100%
Proposed Project		
Area	<1	<1%
Energy	166	6%
Mobile – Passenger Vehicles ⁴	280	9%
Mobile – Trucks ⁵	1,306	44%
Diesel Off-Road Equipment ⁶	945	32%
Electric Off-Road Equipment ^{7,8}	78	3%
Solid Waste	162	5%

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Table 13 Net Project-Related Operation GHG Emissions

Source	GHG (MTCO ₂ e/Year)	Percentage of Total Emissions
Water	2	<1%
Amortized Construction Emissions ^{9,10}	15	1%
Total	2,954	100%
Net Change		
Former Pepsi Bottling Plant Total	731	N/A
Proposed Project Total	2,954	N/A
Net Change	2,223	N/A
South Coast AQMD Bright-Line Threshold	3,000 MTCO ₂ e/Yr	
Exceeds Bright-Line Threshold?	No	

Source: CalEEMod, Version 2020.4.0. Summation of the individual sources may not equal the total shown due to rounding.

Notes: MTons: metric tons; MTCO₂e: equivalent to a metric ton of carbon dioxide

¹ For purposes of this analysis, the default CalEEMod historical energy rates, which are based on the 2005 Building Energy Standards, are utilized.

² Based on trip generation data provided by Urban Crossroads (Appendix I) and CalEEMod default calendar year 2021 emissions data and trip lengths.

³ Based on trip generation data provided by Urban Crossroads (Appendix I) and CalEEMod default calendar year 2021 emission rates. Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

⁴ Based on trip generation data provided by Urban Crossroads (Appendix I) and CalEEMod default calendar year 2022 emissions data and trip lengths.

⁵ Based on trip generation data provided by Urban Crossroads (Appendix I) and CalEEMod default calendar year 2022 emission rates. Utilizes an average trip length of 39.9 miles per trip, which is derived from the SCAG's Heavy-Duty Truck Regional Travel Demand model and represents the average class 8 truck trip distance within the SoCAB (South Coast AQMD 2021).

⁶ Based on operation of 5 diesel-powered forklifts and 10 diesel-powered yard trucks at 7 hours per unit per day. Utilizes OFFROAD2017 v 1.0.1 calendar year 2022 emissions data for a 100-horsepower forklift and 175-horsepower yard tractor.

⁷ Based on operation of 5 electric-powered forklifts and 10 electric-powered yard trucks at 7 hours per unit per day.

⁸ Based on a power consumption rate of 8.70 kWh per hour per unit (kWh/yr/unit) for an electric forklift with a lift capacity of 6,000 pounds (EPRI 2021). Electricity consumption for electric-powered yard truck based on a consumption rate of 8.75 kWh/hr/unit (Transpower 2015).

⁹ Total construction emission are amortized over a 30-year project lifetime according to recommended South Coast AQMD methodology (South Coast AQMD 2009).

¹⁰ The proposed project may start construction in April 2022. While the emissions modeling is based on a February 2022 start date, a later start date in April 2022 would result in either the same emissions results or slightly lower emissions than what is shown in this table. In general, on-road and off-road emissions data utilized in CalEEMod decrease with each passing calendar year to account for stricter emissions standards and/or replacement of older vehicles and equipment with newer and cleaner units.

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include the California Air Resources Board's (CARB) Scoping Plan and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

The CARB Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by AB 32, which is to return to 1990 emission levels by year 2020, and SB 32, which is to reduce emissions 40 percent below 1990 levels by 2030 (CARB 2017b). The Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

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Since adoption of the Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32 and SB 32. Also, new buildings are required to comply with the current Building Energy Efficiency Standards and California Green Building Code. Although measures in the Scoping Plan apply to state agencies and not the proposed project, the project's GHG emissions would be reduced by regional implementation and compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project would not obstruct implementation of the CARB Scoping Plan.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal found that land use strategies focusing on new housing and job growth in areas rich with destinations and mobility options are consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020a). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region. The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers.

As discussed in Section 3.17.b of this Initial Study, the proposed project would have a less than significant impact with regard to VMT because it would not generate the threshold number of daily passenger vehicle trips. As discussed in Section 3.14.a, long-term and short-term (i.e., construction) jobs would likely be absorbed by the local and regional labor force, which would contribute to minimizing passenger vehicle VMT.

VMT associated with heavy duty trucks involved in goods movement is outside the realm of the RTP/SCS, which primarily focuses on VMT associated with passenger vehicles. Under Connect SoCal, the focus remains on improving freight mobility in the region and transitioning to near-zero and zero-emissions technology. The following list of Connect SoCal goods-movement strategies are applicable to the proposed project and could provide benefits from a regional and larger scale:

- **Clean Freight Corridor System / East-West Freight Corridor.** Establish a freight corridor system to connect the San Pedro ports and industrial cluster areas in Los Angeles and the Inland Empire.

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- **Truck Bottleneck Relief Strategy.** Relieve the top 57 truck bottlenecks. Strategies include ramp metering, extension of merging lanes, ramp and interchange improvements, capacity improvements, and auxiliary lane additions.
- **Truck Climbing Lanes.** Install dedicated truck climbing lanes along key corridors, such as Interstate 5 (I-5), I-10, I-15, State Route 57 (SR-57) and SR-60, to enable other vehicles to move at a faster pace, thereby reducing congestion.
- **Goods Movement Environmental Strategy and Technology Advancement Plan.** Reduce environmental impacts by supporting the deployment of commercially available low-emission trucks and advancing technologies to implement a zero- and near-zero-emission freight system.

In addition, as discussed in Section 3.11.b of this Initial Study, the uses proposed under the project would be consistent with the overall Connect SoCal Plan Goods Movement strategy, which identifies the large demand for warehouse space in the SCAG region. Overall, the proposed project would not conflict or interfere with implementation of the Connect SoCal Plan.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based partly on the following technical study, which is included as Appendix E to this Initial Study.

- *Phase I Environmental Assessment*, PlaceWorks, July 6, 2021.

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated. The term “hazardous material” can be defined in different ways. For purposes of this environmental document, the definition of “hazardous material” is the one outlined in the California Health and Safety Code, Section 25501:

Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

“Hazardous waste” is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

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Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through but not limited to the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Following is a discussion of the proposed project's potential to create a significant hazard to the public or the environment through the routine use, storage, transport, or disposal of hazardous materials during the operational and construction phases.

Project Operation

Specific end users for the proposed building have not been established at this time. For warehousing purposes, cold storage uses would not be allowed to operate on-site.¹⁶ Manufacturing uses on-site would be uses allowed under the Industrial/Business Park land use designation and M-1 (Light Manufacturing) zone and would not include heavy industrial uses such as petroleum refining, metal fabrication plants, mills, or batching plants. The ultimate end user would risk release of hazardous 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 as part of light industrial and warehousing operations in the proposed building.

The building is designed so that business operations would be conducted inside the enclosed building, except for traffic movement, parking, and the movement of truck trailers in the truck yard. Also, loading and unloading of truck trailers would be restricted to the exterior loading dock area.

The use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the EPA, US Department of Transportation, California Division of Occupational Safety and Health, Los Angeles County Department of Public Health, and the Los Angeles County Fire Department (LACFD), which includes the Health Haz Mat Division.¹⁷ For example, the future building tenant would be required to comply with the EPA's Hazardous Materials Transportation Act, Title 42, Section 11022 of the US Code and Chapter 6.95, "Hazardous Materials Release Response Plans and Inventory," of the

¹⁶ Cold storage warehouse means a storage warehouse used to store fresh and/or frozen perishable fruits or vegetables, meat, seafood, dairy products, or fowl, or any combination thereof, at a desired temperature to maintain the quality of the product for orderly marketing. Cold storage warehouses employ transport refrigeration units (TRUs). TRUs are a refrigeration system installed on cargo trailers, straight trucks, intermodal shipping containers, and rail cars used in transporting temperature sensitive goods.

¹⁷ The Health Haz Mat Division of LACFD is the Certified Unified Program Agency (CUPA) for the City; the CUPA administers and enforces several state and federal regulations governing hazardous materials and hazardous waste.

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California Health and Safety Code, which requires the reporting of hazardous materials when used or stored in certain quantities. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. The City of Irwindale also requires a Conditional Use Permit for hazardous material storage, use, sale, and transport.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project are not projected to occur. Impacts would be less than significant.

Project Construction

Construction activities would involve the use of hazardous materials, excavation and handling of on-site soils, and handling of demolition debris.

Construction Hazardous Materials

Construction activities would involve use of hazardous materials such as cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings, including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the proposed project's construction phase. Project construction workers would be trained in safe handling and hazardous materials use. All spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. As with project operation, the use, storage, transport, and disposal of construction-related hazardous materials would conform to existing laws and regulations, and impacts would be less than significant.

On-Site Contaminated Soils

The ASTM E 1527-13 Standard defines a recognized environmental condition (REC) in part as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” RECs were not identified for the project site.

The ASTM E 1527-13 Standard defines a historical REC as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).” The project site had three 10,000-gallon underground storage tanks (UST) that were installed in 1975 and removed in 1995, and one 12,000-gallon diesel UST that was installed in 1990 and removed in 2013. The three 10,000-gallon USTs were removed

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under the oversight of the Los Angeles County Underground Storage Tank Program and the RWQCB. The 12,000-gallon UST was removed under the oversight of the LACFD. The former USTs are considered historical RECs.

Based on the lack of closure documentation from the regulatory agencies for the 12,000-gallon UST, there is a small chance for the potential release of petroleum products, and a vapor risk may be present at the site. Therefore, potential impacts could occur as a result of excavation and handling of on-site soils. However, with the implementation of Mitigation Measure HAZ-1, impacts would be reduced to a less than significant level.

Based on the records review, it is unlikely that a potential source of vapor migration currently exists beneath the site from off-site properties. No contamination from chlorinated volatile organic carbons and no underground storage tanks were identified adjacent or within 30 feet of the project site.

The site was occupied by agricultural orchards from at least 1928 to the early 1950s when the project site was developed. There is a slight potential for residual organochlorine pesticides in the soil. However, since the site would be developed for warehousing and manufacturing uses with limited exposed areas of soil, testing is not needed, and impacts are less than significant.

Therefore, compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of potentially contaminated soils and mitigation measure HAZ-1 would ensure that impacts would be less than significant.

Demolition Debris

Based on the age of the building, it is possible that asbestos-containing materials and lead-based paint are present in the building materials at the site. Any project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos or lead would be conducted in accordance with applicable regulations, including, but not limited to:

- South Coast Air Quality Management District's Rule 1403
- California Health and Safety Code (Section 39650 et seq.)
- California Code of Regulations (Title 8, Section 1529)
- California Occupational Safety and Health Administration Regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])
- Code of Federal Regulations (Title 40, Part 61 [asbestos], Title 40, Part 763 [asbestos], and Title 29, Part 1926 [asbestos and lead])

Compliance with these regulations would ensure impacts would be less than significant.

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Mitigation Measures

HAZ-1 Any subsurface materials exposed during construction activities that appear suspect for contamination, either from visual staining or odors, shall require immediate cessation of excavation activities. Soils suspected of contamination shall be tested for potential contamination. If contamination is found to be present per the Department of Toxic Substances Control Screening Levels for industrial/commercial land use (DTSC-SLi) and the EPA Regional Screening Levels for industrial/commercial land use (EPA-RSLi), contaminated soils shall be transported and disposed of per state regulations to an appropriately permitted landfill.

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

Less Than Significant Impact with Mitigation Incorporated. See response to Section 3.9.a. As concluded in that section, hazards to the public or the environment arising from the routine use of hazardous materials during project operation and construction phases would be less than significant with mitigation measure HAZ-1 incorporated. Additionally, the proposed project consists of the development of a warehouse and manufacturing facility, which would not generate air toxics requiring an SCAMQD permit. Strict adherence to all emergency response plan requirements by the LACFD would also be required throughout the duration of the project.

It is unlikely that operation of the proposed project would cause the release of hazardous materials into the environment. However, while highly unlikely due to the proposed use, in the event of a hazardous materials spill of greater amount or toxicity than on-site personnel could safely contain and clean up, assistance would be requested from the LACFD hazmat team.

Therefore, compliance with applicable laws and regulations and mitigation measure HAZ-1 would ensure that impacts would be less than significant.

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

Less than Significant. The Mazanita Elementary School is approximately 1,075 feet southeast of the site. As substantiated in Sections 3.9.a and 3.9.b, project operation would not emit hazardous substances or hazardous wastes in quantities posing substantial hazards to the public or the environment. Additionally, the use of hazardous materials during the project's construction phase would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the proposed project's construction phase. Further, the use, storage, transport, and disposal of hazardous materials during the proposed project's construction and operation phases would be required to conform to existing laws and regulations.

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- 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?**

Less Than Significant Impact with Mitigation Incorporated. The site was identified on the State Water Resources Control Board's Leaking Underground Storage Tank Information System as a leaking UST (or LUST) site. The project site is listed due to a leak of gasoline reported on July 22, 1991. Currently, the case is listed as completed. The RWQCB indicates case closure for the three former 10,000-gallon USTs, but documentation of agency closure was not found on the RWQCB or Los Angeles County websites for the 12,000-gallon diesel UST that was installed in 1990.

Based on the lack of closure documentation from the regulatory agencies for the 12,000-gallon UST, there is a small chance for the potential release of petroleum products, and a vapor risk may be present at the site. However, compliance with applicable laws and regulations and implementation of mitigation measure HAZ-1 would reduce impacts to a less than significant level.

- 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?**

No Impact. The nearest public-use airport to the project site is the San Gabriel Valley Airport, approximately 5.2 miles to the west. The Airport Land Use Compatibility Plan for the San Gabriel Airport, adopted in 2015, sets safety zones where land uses are regulated to minimize air crash hazards to people on the ground. The project site is outside of these safety zones (AECOM 2015). Therefore, no impact would occur.

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

No Impact. The California Code of Regulations, Title 19, Division 2, Section 2443, requires compliance with the Standardized Emergency Management System to "be documented in the areas of planning, training, exercise, and performance." Irwindale has prepared an emergency operations plan (EOP) for emergency response within the City. The EOP meets the Emergency Management System requirements of state law. The City also complies with the Los Angeles County Emergency Management Plan and has a hazard mitigation plan (HazMit).

The City's EOP outlines responsibilities and procedures the City would follow in the event of an emergency or citywide disaster. Specific emergency functions and operations, available resources (fire stations, emergency shelters, hospitals and clinics, resource persons, etc.), and mutual aid agreements are described in the EOP.

The City's HazMit was prepared in response to the Disaster Mitigation Act of 2000 (DMA 2000). DMA 2000 (Public Law 106-390) requires state and local governments to prepare mitigation plans to document their mitigation planning process and identify hazards, potential losses, mitigation needs, goals, and strategies. This type of planning supplements the City's comprehensive emergency management program (Irwindale 2012).

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The proposed project involves development of a warehouse and manufacturing facility and is expected to have no impact on emergency response or evacuation plans. During the construction and operation phases, the proposed project would not interfere with any of the daily operations of LACFD or the Irwindale Police Department, which support the emergency planning and response efforts of Irwindale. All construction activities would be performed according to the City's and LACFD's standards and regulations. As part of the project review process, the LACFD would review the site plans to confirm adequate emergency access. The project proposes a fire lane with a minimum unobstructed width of 28 feet surrounding the proposed warehouse building. Access points would be provided off Azusa Canyon Road and Los Angeles Street. The appropriate turning radiuses have been planned to accommodate fire trucks on-site in the event of an emergency. Additionally, the proposed project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases.

The proposed project would be required to go through the City's development review and permitting process and to incorporate all applicable design and safety standards and regulations in the CBC and LACFD's Fire Code to ensure that project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on these factors, implementation of the proposed project (both the construction and operational phases) is not expected to impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, no impact is expected to occur.

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

No Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. As shown in Figure 3, *Aerial Photograph*, the project site is in a highly urbanized area of the city and is surrounded by commercial and industrial development. The project site has good access and would be served by adequate water infrastructure. There is no combustible wildland vegetation on or near the site. Additionally, the project site is not in or near a Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection (CAL FIRE 2021). Therefore, no impact is expected to occur.

3.10 HYDROLOGY AND WATER QUALITY

The analysis in this section is based partly on the following technical studies, which are included as Appendix F of this Initial Study:

- *Preliminary Low Impact Development (LID) Report*, G4 Group Consulting Engineers, October 1, 2021.
- *Hydrology and Detention for 4416 Azusa Canyon Rd.*, NextGen Engineering, October 4, 2021.

Would the project:

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

Less Than Significant Impact. The project site is in the San Gabriel watershed (CDFW 2021). The San Gabriel River receives drainage from 689 square miles of eastern Los Angeles County; its headwaters originate in the San Gabriel Mountains. The watershed consists of extensive areas of undisturbed riparian and woodland habitats in its upper reaches. The upper watershed also contains a series of flood control dams. Further downstream, toward the middle of the watershed, are large spreading grounds used for groundwater recharge. Land use in the middle and lower parts of the watershed are primarily urban land and highly developed (SWRCB 2021).

Water quality in Irwindale is regulated by the Los Angeles RWQCB and its Water Quality Control Plan (Basin Plan), which contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters. The Basin Plan also includes water quality criteria and standards necessary to support the beneficial uses consistent with federal and state water quality laws. All runoff from the project site is ultimately tributary to the San Gabriel River by way of the Big Dalton Wash, which borders the project site to the north.

A development project generally affects the quality of receiving waters over three different phases:

- During the earthwork and construction phase the potential for erosion, siltation, and sedimentation would be the greatest.
- Following construction and before the establishment of ground cover, the erosion potential may remain relatively high.
- Following project completion, impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Following is a discussion of the potential water quality impacts resulting from urban runoff that would be generated during the construction and operational phases of the proposed project.

Project Construction

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or from storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). The proposed project's construction phase may cause deterioration in the quality of downstream receiving waters if construction-related sediments or pollutants wash into the existing storm drain system and facilities in the area.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment-related pollutants are also of concern and generally include construction materials (e.g., paint and stucco);

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chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues. Construction-related activities of the proposed project would generate pollutants that could adversely affect the water quality of downstream receiving waters if appropriate and effective stormwater and non-stormwater management measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Construction projects of one acre or more are regulated under the Construction General Permit (CGP), Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ. Projects obtain coverage by developing and implementing a SWPPP estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 14.

Table 14 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind.	Scheduling, preserving existing conditions, mulch, soil binders, geotextiles, mats, hydroseeding, earth dikes, swales, velocity dissipating devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization.
Sediment Controls	Traps soil particles after they have been detached and moved by rain, flowing water, or wind.	Barriers such as silt fences, straw bales, sandbags, fiber rolls, and gravel bag berms; sediment basins; sediment traps; check dams; storm drain inlet protection; compost socks and berms; biofilter bags; manufactured linear sediment controls; and cleaning measures such as street sweeping and vacuuming
Wind Erosion Controls	Minimizes dust nuisances.	Applying water or other dust palliatives to prevent or minimize dust nuisance, reducing soil-moving activities during high winds, and installing erosion control BMPs for temporary wind control.
Tracking Controls	Prevents or reduces the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits and entrance/outlet tire wash.
Non-Storm Water Management Controls	Prevents pollution by limiting or reducing potential pollutants at their source or eliminating off-site discharge. Prohibits illicit connections or discharges.	Water conservation practices, BMPs specifying methods for: dewatering operations; temporary stream crossings; clear water diversions; pile driving operations; temporary batch plants; demolition adjacent to water; materials over water; potable water and irrigation; paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.

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Table 14 Construction Best Management Practices

Category	Purpose	Examples
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Proper material delivery and storage and material use, spill prevention and control, stockpile management, contaminated soil management, and management of solid, concrete, sanitary/septic, liquid, and hazardous wastes.

Source: CASQA 2019.

The proposed project’s construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 14, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Project construction activities would also implement the requirements of Chapter 8.28, Storm Water and Urban Runoff Pollution, of the City’s municipal code.

Adherence to the BMPs in the SWPPP and City’s municipal code requirements would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous materials,¹⁸ etc.; and nutrients. Based on the preceding, water quality and waste-discharge impacts from project demolition, grading, and construction activities would be less than significant, and no mitigation measures are necessary.

Project Operation

Operational-related activities of the proposed project (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Standards governing discharges to stormwater from project operation are in the Municipal Stormwater (MS4) Permit for Los Angeles County in the jurisdiction of the Los Angeles RWQCB (Order No. R4-2021-0105). The County of Los Angeles issued an LID (Low Impact Development) Standards Manual on developing water quality management plans for projects and selecting stormwater control and source control BMPs in addition to other LID strategies.

LID is a stormwater management and land development strategy that combines a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID techniques mimic the site predevelopment hydrology by using site design techniques that store, infiltrate, evapotranspire, biofilter, or detain runoff close to its source. Source control BMPs reduce the potential for pollutants to enter runoff and are classified in two categories—structural and nonstructural.

¹⁸ Bituminous materials are materials resembling or containing bitumen; bitumen = any of various viscous or solid impure mixtures of hydrocarbons that occur naturally in asphalt, tar, mineral waxes, etc.; used as a road surfacing and roofing material.

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Structural source control BMPs have a physical or structural component, such as inlet trash racks, trash bin covers, and an efficient irrigation system, to prevent pollutants from contacting stormwater runoff. Nonstructural source control BMPs are procedures or practices used in project operation, such as stormwater training or trash management and litter control practices.

According to the LID Plan, the proposed project is a priority project defined as a new development project that will create more than 5,000 SF of new impervious surface with more than 25 new parking spaces. Priority projects are required to retain 100 percent of the Stormwater Quality Design Volume (SWQDV)¹⁹ on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof.

To meet the requirements of the MS4 permit and the LID Standards Manual, and in accordance with Chapter 8.28, Storm Water and Urban Runoff Pollution, of the City's municipal code, the project applicant prepared a LID Plan for City review (Appendix F). The LID Plan specifies BMPs that would be implemented to minimize water pollution from the project site during the operation phase. BMPs identified in the LID Plan include source control measures and stormwater quality control measures. A detailed list of the BMPs and discussion of how they were selected based on their effectiveness to address and mitigate the proposed project's pollutants of concern are provided in the LID Plan. The final BMPs to be implemented for the proposed project would be determined through the City's review of the final LID Plan during the City's development review and building plan check process.

The project site is developed land and heavily disturbed except for the southeastern area of the site which is vacant and undeveloped. The ground surface cover in this area consists of exposed soil with moderate to extensive native grass and weed growth. The site is relatively flat with gentle southerly slopes. Presently, a small portion on the north side of the property (Subarea A-1) drains to Big Dalton wash through overland sheet flow (see Figure 10, *Existing Hydrology Map*). Runoff from the remaining portion of the property concentrates at two locations and ultimately discharge to the existing 36-inch storm drain under Los Angeles Street. Two drainage subareas (Subareas B-2 and B-3) discharge to two on-site points as shown in Figure 10, *Existing Conditions Hydrology Map*. There are no off-site run-on flows.

The proposed project would include seven new onsite storm drain inlets that collect all the on-site stormwater. For pretreatment of stormwater runoff, the proposed project would use catch basin filters and continuous deflective separator (CDS) units. Catch basin filters are insertable systems designed to capture fine to coarse sediments, floatable trash, debris, total suspended solids, nutrients, metals, and hydrocarbons conveyed in stormwater runoff. The catch basin filters would be installed in the proposed on-site curb opening and grated type catch basins and would treat the Stormwater Quality Design Flow (SWQDf).²⁰ The catch basin filters also meet the full capture requirement for flows from a 1-year, 1-hour storm event, as directed in the California State Water Resources Control Board Trash Policy, Resolution No. 2015-0019.

Once the initial flows pass through the filters, runoff would be directed into two proposed CDS units prior to discharging into two on-site infiltration trenches. The CDS units separate suspended solids, hydrocarbons, and

¹⁹ The design storm, from which the Stormwater Quality Design Volume is calculated, is defined as the greater of the 0.75-inch, 24-hour rain event; or the 85th percentile, 24-hour rain event.

²⁰ For flow-based treatment BMPs, the Stormwater Quality Design Flow (SWQDf) is used.

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trash from stormwater runoff and are sized to treat the SWQDf. Final treatment would be accomplished with the proposed infiltration trenches. To determine the feasibility of the use of stormwater infiltration BMPs, percolation testing was performed on the project site. The results indicated that infiltration of stormwater was feasible and recommended for the proposed project (see Appendix F). As shown in Figure 11, *Proposed Condition Hydrology Map*, the project site would include two treatment trains.²¹ The proposed project eliminates on-site drainage to Big Dalton wash.

Table 15 shows the required SWQDv for the proposed project and the provided SWQDv. As shown in the table, the BMPs are adequately sized to treat on-site runoff per the MS4 permit and the County’s LID Standards Manual.

Table 15 Proposed Development Infiltration BMPs

Treatment Control BMP	Required SWQDv	Provided SWQDv	Provided Infiltration Area
Western Infiltration Trench	8,941 cubic feet	13,044 cubic feet	3,725 square feet
Eastern Infiltration Trench	9,570 cubic feet	13,377 cubic feet	4,060 square feet

Source: The G4 Group 2021

Additionally, the proposed project was designed to minimize the amount of impermeable coverage possible while maximizing the amount of permeable landscape area. Source control BMPs, as shown in Section IV of the LID Plan (see Appendix F) would also be implemented, and a separate Operation & Maintenance Plan has been prepared for the project, a copy of which would remain on-site and in the possession of the designated responsible maintenance individual. All proposed drainage system improvements would require City approval.

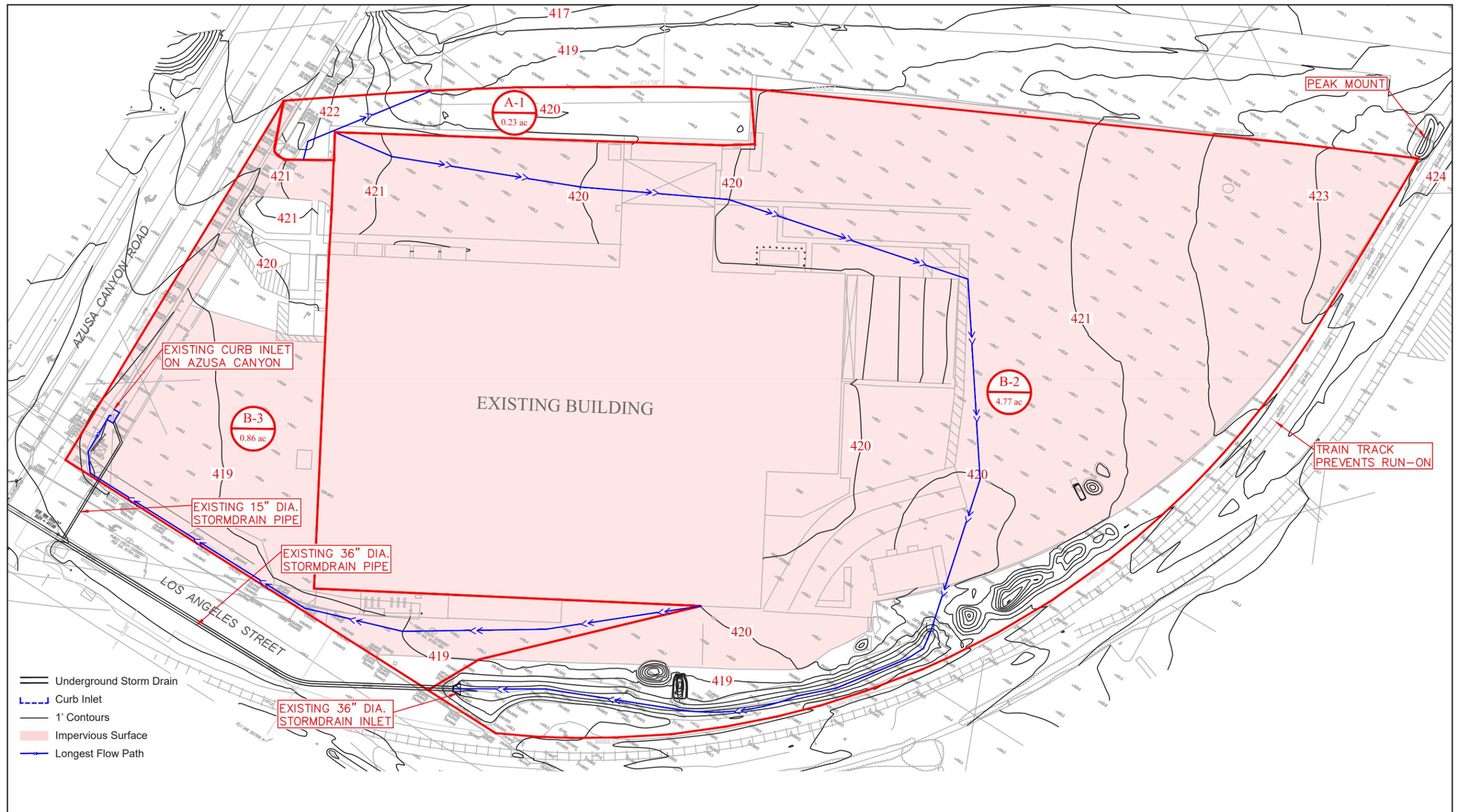
Based on the preceding, no significant water quality and waste-discharge impacts from project operation activities would occur, and no mitigation measures are necessary.

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

Less Than Significant Impact. The project site is over the Main San Gabriel Valley Groundwater Basin. The Valley County Water District would provide potable water to the project site. The VCWD’s water sources include groundwater from the Main San Gabriel Groundwater Basin, the Covina Irrigating Company (CIC), and imported water from the Metropolitan Water District of Southern California (MWD). Groundwater has historically accounted for approximately 93 percent of the City’s overall water supplies (VCWD 2017), but it has accounted for 100 percent of the VCWD’s overall water supplies in the past five years (Mortenson 2021).

²¹ A treatment train is a series of stormwater BMPs that maximize the removal of pollutants.

Figure 10 - Existing Hydrology Map



- Underground Storm Drain
- - - Curb Inlet
- 1' Contours
- Impervious Surface
- Longest Flow Path

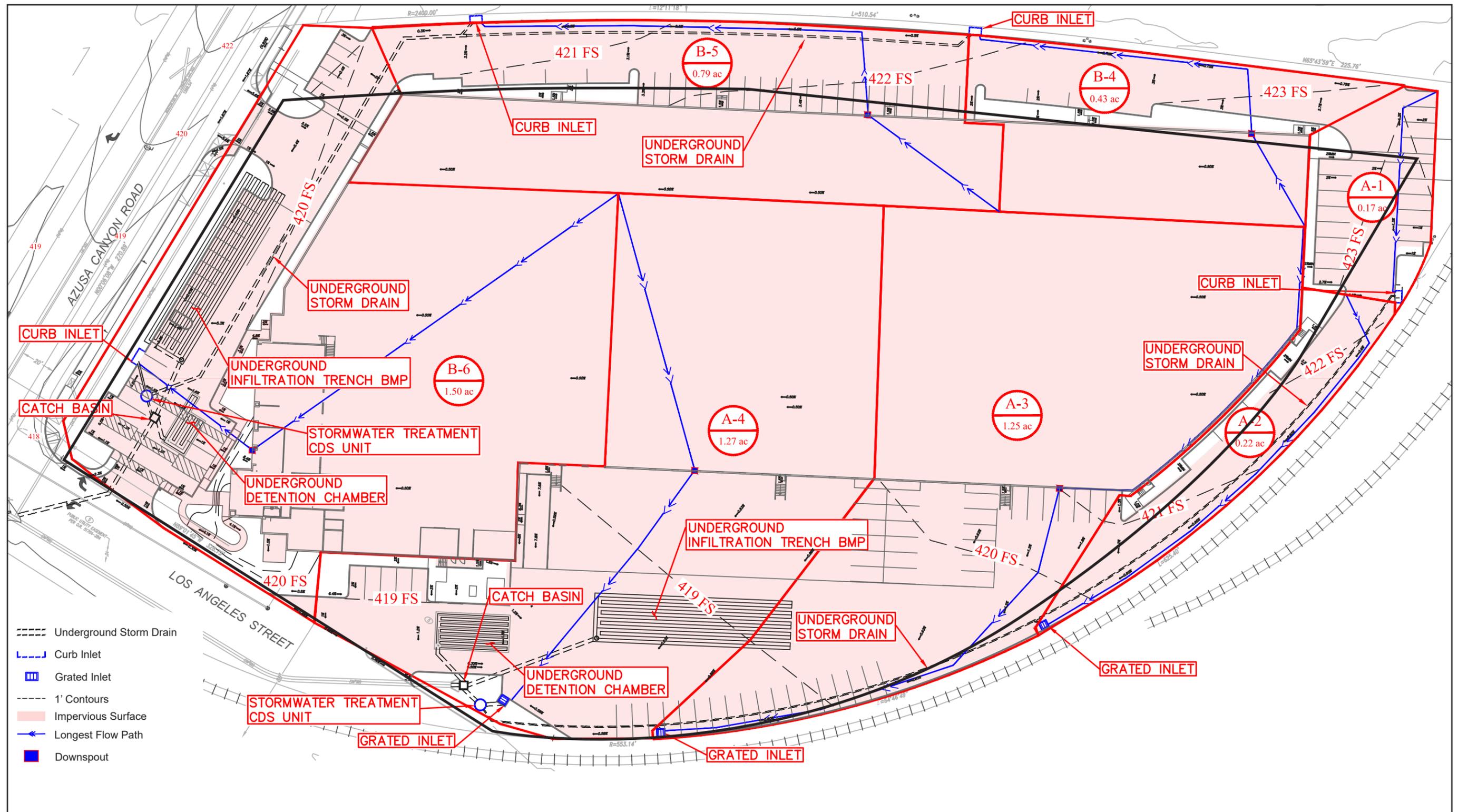
0 75
Scale (Feet)



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Figure 11 - Proposed Hydrology Map



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VCWD estimates that water demands in its service area for normal years would increase from approximately 8,996 acre-feet per year (afy) in 2020 to approximately 9,614 afy in 2040. VCWD forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiple dry years. Projected populations in VCWD's service area were based on projections obtained from the US Census, American Community Survey, and the California Department of Finance data. These sources incorporate demographic trends, existing land use, and general plan land use policies. Therefore, project development would have been accounted for in the VCWD's estimates of future water demands since it is consistent with the General Plan land use designation for the site, and water demands would not substantially deplete groundwater supplies.

Additionally, as stated in the geotechnical investigation report prepared for the proposed project (see Appendix D), groundwater was not encountered during the on-site investigation. The onsite geotechnical investigation included exploration trenches that were nine feet deep. Based on the lack of any water in the exploration trenches and the moisture content of the recovered soil samples, the static groundwater table is considered to be at a depth of more than nine feet below existing site grades. Historically, groundwater levels were 130 feet below the ground surface. No excavation on-site would intersect the groundwater at these levels.

Furthermore, the project site is not in or near a groundwater recharge area/facility, nor does it represent a source of groundwater recharge.

Therefore, the proposed project would not substantially interfere with groundwater supplies or recharge. Impacts to groundwater supplies would be less than significant.

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 a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Erosion and siltation impacts potentially resulting from the proposed project's alteration of the drainage pattern would, for the most part, occur during the project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil, and wind and rainfall characteristics. Siltation is most often caused by soil erosion or sediment spill. Following is a discussion of the potential erosion and siltation impacts that could occur during the construction and operational phases of the proposed project.

Project Construction

As discussed in Section 3.10.a, the project construction contractor would be required to prepare and implement a SWPPP pursuant to the CGP during grading and construction. The SWPPP would specify erosion- and sediment-control BMPs that the project construction contractor would implement prior to and during grading and construction to minimize erosion and siltation impacts on- and off-site. Erosion-control BMPs are designed to prevent erosion, and sediment controls are designed to trap or filter sediment once it has been mobilized. BMPs that would be implemented during the proposed project's construction

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phase are discussed in detail in Section 3.10.a. For example, BMPs would include installation of perimeter silt fences, installation of silt fences around stockpiles, covering of stockpiles, and stabilization of disturbed areas with erosion controls when construction ceases for a determined period of time (e.g., one week).

Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. The construction-phase BMPs would also ensure effective control of sediment discharge and pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides).

Therefore, project-related construction activities would not result in substantial erosion or siltation on- or off-site. Construction-related impacts would be less than significant.

Project Operation

As shown in Figure 3, *Aerial Photograph*, most of the project site is developed. Under the proposed project, there would be no bare or disturbed soil on-site at project completion that would be vulnerable to erosion or siltation. All areas would either be buildings, paved, or landscaped. Under proposed conditions, all stormwater runoff from the project site would be conveyed to the public storm drain in Los Angeles Street.

The proposed project would not substantially alter the existing drainage pattern of the site area and would not alter the course of a stream or a river. The proposed project would be implemented in accordance with the LID plan and abide by the requirements of the MS4 permit and the LID Standards Manual. For example, project design and operation would include implementation of BMPs specified in the LID plan, which would minimize runoff and soil erosion and siltation into stormwater and thus minimize sedimentation downstream.

Project development would also comply with the standards of Chapter 8.28 “Storm Water and Urban Runoff Pollution” of the City’s Municipal Code, which prohibits the discharge of specific pollutants into storm drains, regulates connections to the storm drain system, requires development projects to implement permanent BMPs on individual sites to reduce pollutants in the stormwater, and requires construction sites to manage runoff through SWPPPs.

Therefore, development of the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or off-site. Operation-related impacts would be less than significant, and no mitigation measures are necessary.

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

Less Than Significant Impact. As shown in Figure 3, *Aerial Photograph*, the site is currently occupied by the Pepsi bottling plant. The building is a single-story structure of concrete tilt-up construction. A loading dock is located along a portion of the northeast building wall, and a large metal shed is located north of the warehouse building. The buildings are surrounded by concrete pavement in the parking and drive areas. The site includes 116 vehicle parking spots and 25 parking spots for trucks. The southeastern area of the site is vacant and undeveloped.

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The current drainage condition displays a mild slope across the terrain that ranges from 1 to 2 percent. A small portion on the north side of the property (Subarea A-1) drains to Big Dalton Wash through overland sheet flow. Runoff from the remaining portion of the property concentrates at two locations and ultimately discharges to the existing 36-inch storm drain under Los Angeles Street. Two drainage subareas (Subareas B-2 and B-3) discharge to two on-site points, as shown in Figure 10, *Existing Conditions Hydrology Map*. There are no off-site run-on flows. For the proposed project, runoff would ultimately discharge into the storm drain under Los Angeles Street at the same location as existing conditions; however, there would be no flow to Big Dalton Wash. The existing and proposed flow rates for the 100-year and 50-year storm events are shown in Table 16.

Table 16 Existing and Proposed Runoff Flows

	Q50 (cfs)	Q100 (cfs)
Existing Conditions		
Big Dalton Wash	0.72	0.83
Storm Drain in Los Angeles Street	16.01	18.23
Proposed Conditions		
Big Dalton Wash	0	0
Storm Drain in Los Angeles Street	20.46	22.97

Source: NextGen 2021.

Notes: Q50 = flow from the 50-year storm event; Q100 = flow from the 100-year storm event; cfs = cubic feet per second

Per Los Angeles County requirements, post-development flow from the 100-year peak discharge (Q100) should not exceed the existing conditions 50-year peak discharge (Q50). As noted in Table 16, the post-development Q100 for the storm drain in Los Angeles Street (22.97 cubic feet per second) is greater than the Q50 for existing conditions (16.01 cubic feet per second). To mitigate for peak flow conditions, two detention chambers are proposed for the site (see Figure 11, *Proposed Conditions Hydrology Map*). The hydrologic analysis determined that a detention volume of 1,702 cubic feet is required to ensure that the 100-year proposed conditions peak flow is equal to the 50-year existing condition peak flow. The proposed project includes two detention chambers with a total storage capacity of 1,861 cubic feet, approximately 459 cubic feet more than required. Additionally, to ensure that the detention chambers provide the desired flow mitigation, outflow control is needed at the outflow of the chambers to control discharge into the public storm drain. Flow restriction orifices are provided at the two outflow culverts designed to limit the proposed Q100 to the existing Q50.

Additionally, the proposed project would also comply with Chapter 8.28, Storm Water and Urban Runoff Pollution, of the City's municipal code. Compliance with LACDPW standards and the City's municipal code and implementation of the requirements of the Hydrology and Detention Report would ensure that the flow rate would not exceed the allowable flow rate to the storm drain system under the 100-year storm event.

3. Environmental Analysis

Based on the preceding, project development would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are necessary.

iii) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The following describes the proposed project's potential impacts related to storm drainage systems and runoff.

Capacity of Stormwater Drainage Systems

Project impacts on the capacity of storm drainage systems would be less than significant, as substantiated in Section 3.10.c.ii. No mitigation measures are necessary.

Polluted Runoff

Project stormwater pollution impacts would be less than significant, as substantiated in Section 3.10.a. No mitigation measures are necessary.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is not in a 100-year flood hazard zone (FEMA 2008). However, the project site is within the flood inundation area of the Santa Fe Dam. The Santa Fe Dam is a flood control structure on the San Gabriel River, in the City of Irwindale. The dam is owned and operated by the Army Corp of Engineers (Corps 2021). The City of Irwindale has never been impacted by dam failure due to the Santa Fe Dam (Irwindale 2012).

Dams in California are monitored and inspected annually by the California Division of Safety of Dams (DSOD). In addition, dam owners are required to maintain Emergency Action Plans (EAPs) that include procedures for damage assessment and emergency warnings. An EAP identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. EAPs contain procedures and information that instruct dam owners to issue early warning and notification messages to downstream emergency management authorities. Additionally, the State of California Dam Safety Act requires dam owners to submit inundation maps for those dams whose total failure would cause loss of life or personal injury. The City periodically reviews the inundation maps for the Santa Fe Dam to ensure these issues are considered as part of on-going planning efforts (Irwindale 2012). Therefore, no impact to flood flows is expected to occur and no mitigation measures are necessary.

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

Less than Significant Impact. As noted in Section 3.10.c.iv, the project site is not in 100-year flood zone but is within the flood inundation area of the Santa Fe Dam. However, impacts from dam failure are less than significant.

3. Environmental Analysis

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Santa Fe Reservoir is approximately 1.2 miles south of the site and would not pose a flood hazard to the site due to a seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The proposed project is approximately 30 miles inland from the Pacific Ocean. Therefore, the site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding reasons, the proposed project would not risk release pollutants as the result of floods, tsunami, or seiche. Therefore, impacts would be less than significant.

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

Less than Significant Impact. Water quality in Irwindale is regulated by the Los Angeles RWCQB and its Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The Basin Plan contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters and the water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws. As substantiated in Section 3.10.a, the proposed project would not violate any water quality standards and therefore would not obstruct the implementation of the Basin Plan. A less than significant impact would occur.

Additionally, the project site is in the Main San Gabriel Groundwater Basin, which is categorized as a low priority basin. The Sustainable Groundwater Management Act requires only medium- and high-priority basins to form groundwater sustainability agencies, develop groundwater sustainability plans, and manage groundwater for long-term sustainability. The Main San Gabriel Groundwater Basin does not require a groundwater sustainability plan. And as substantiated in Sections 3.10.b, the proposed project would not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, impacts would be less than significant.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. As shown in Figure 3, *Aerial Photograph*, the mostly developed project site is surrounded by industrial and commercial uses. The proposed project includes development of a warehouse and manufacturing facility in a highly urbanized area of the city and would be compatible with the surrounding land uses. It would

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not introduce a new land use that would disrupt existing land use patterns, nor would it introduce a physical barrier that would separate land uses that are not already separated.

Though established residential neighborhoods lie to the northeast, southeast, south, and southwest, project development would not physically divide those neighborhoods in any way because it would be developed within the confines of the project site and would not introduce roadways or other infrastructure improvements that would bisect or transect those neighborhoods. Access to the existing residential neighborhoods would not be interrupted or cut off as a result of project development because residents of those communities do not have to cross the project site to access their community. The proposed project would not physically change the surrounding neighborhood street patterns or otherwise impede movement through the neighborhoods, and no impact would occur.

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?

Less Than Significant Impact. The prevailing adopted planning and regulatory plans that govern development and use of the project site are the Irwindale General Plan, Irwindale Zoning Code (Irwindale Code of Ordinances Title 17), and the Irwindale Commercial and Industrial Design Guidelines. The development and design standards in the Zoning Code and Irwindale Commercial and Industrial Design Guidelines, which implement the Irwindale General Plan, constitute the regulations that govern development of the project site. Following is an analysis of the proposed project's consistency with these land use regulations. Also provided, though not required, is an analysis of the proposed project's consistency with the Southern California Association of Governments' 2020-2045 RTP/SCS.

General Plan and Zoning Consistency

The General Plan land use designation of the project site is Industrial/Business Park. According to the City's zoning map, the project site is zoned M-1 (Light Manufacturing).

General Plan

Pursuant to the Irwindale General Plan Land Use Element, developed sites in the City designated Industrial/Business Park range in size from 10 acres to 100 acres, subdivided into smaller lots, and developed with industrial buildings of varying sizes. Business parks are characterized by more storefront units and more variety in smaller leasable spaces. This type of development is usually well landscaped and provides abundant parking and a uniform architectural design theme. These developments typically include office, manufacturing, and warehousing (Irwindale 2008).

Development and operation of the proposed project would not conflict with the General Plan designation of the project site because the proposed warehouse and distribution facility is a permitted use under the Industrial/Business Park land use designation. According to the General Plan, the maximum floor-to-area ratio for the Industrial/Business Park category is 1.0. The floor-to-area ratio for the proposed project is approximately 0.52. The proposed project would also help implement and further a number of goals and policies of the General Plan. For example, the proposed project would be consistent with and help implement the following goals of the General Plan.

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Community Development Element

- **Policy 5.** The City of Irwindale will continue to promote comprehensive development consistent with this General Plan as opposed to piecemeal and incremental planning.
- **Policy 7.** The City of Irwindale will continue to promote economic development through the use of redevelopment.
- **Policy 10.** The City of Irwindale will promote development that will benefit the community as a whole in terms of both jobs and revenue generation.
- **Policy 12.** The City of Irwindale will continue to promote quality design in the review and approval of commercial and industrial development through the application of the Commercial and Industrial Design Guidelines.
- **Policy 13.** The City of Irwindale will continue to employ a design theme in the review of future commercial and industrial development and in the rehabilitation of existing commercial and industrial uses.

Additionally, as shown in Figure 3, *Aerial Photograph*, the project site is in an urbanized area of the City and is mainly surrounded by a mix of commercial and industrial uses. Project development would not change land use patterns or be inconsistent with adopted land use plans. Furthermore, project development does not include or require any amendments to the Irwindale General Plan.

Finally, through the City's development review process—which includes a recommendation by the Planning Commission to the City Council for review and consideration of the proposed project—the City would ensure that approval of the proposed project would not conflict with any of the City's applicable land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Therefore, project implementation would not conflict with the Irwindale General Plan. No land use conflict related to General Plan consistency is expected to occur.

Zoning

Development and operation of the proposed project would not conflict with the zoning of the project site because the proposed warehouse and manufacturing facility is a permitted use in the M-1 zone. Though the specific business(es) and/or tenant(s) that would ultimately occupy the proposed building are unknown at this time, any prospective user must be either permitted by right or conditionally permitted under the Irwindale Zoning Code.

Project development would not require the approval of a Zone Code Amendment (text and/or map); nor would it require a Zone Variance or any adjustments from the City's zoning standards, which help ensure that development projects in the City are designed and implemented in a manner that is not detrimental to the project site or its surroundings. The proposed project has been designed and would be developed in accordance with all applicable development and design standards of the Irwindale Zoning Code, including those related to building height and setbacks, walls and screening, building and site plan design, landscaping, and parking.

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Compliance with the applicable development and design standards would be ensured through the City's development review process.

Also, through the City's development review process—which includes a recommendation by the Irwindale Planning Commission to the City Council for review and consideration of the proposed project—the City would ensure that approval of the proposed project would not conflict with any of the City's applicable land use plan, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Therefore, project implementation would not conflict with the Irwindale Zoning Code. No land use impact related to zoning consistency is expected to occur.

Irwindale Commercial and Industrial Design Guidelines Consistency

The City's Commercial and Industrial Design Guidelines establish design principles, detailed design guidelines, and a design review process to ensure that commercial and industrial projects in the City contribute to an aesthetically and functionally cohesive community. These guidelines form the basis and criteria for the evaluation of plans and specifications submitted for review and approval to the City of Irwindale. Developers are required to follow all provisions of these guidelines as applicable to their specific projects. All development plans, landscape plans, and graphic designs shall comply with these guidelines. The proposed project is designed for an industrial warehouse use. It would be required to conform with the City's Commercial and Industrial Design Guidelines and the provisions of the Site Plan and Design Review Permit to address the site configuration, design, location, and impact of the proposed use and compliance with established Zoning Code standards.

Therefore, project implementation would not conflict with the Irwindale Commercial and Industrial Design Guidelines. No land use impact related to zoning consistency is expected to occur.

SCAG Regional Transportation Plan/Sustainable Communities Strategy Consistency

The SCAG is a joint powers authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated a metropolitan planning organization and under state law is a regional transportation planning agency and a council of governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans, including sustainable community strategies and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and other plans for the region.

As the metropolitan planning organization and a public agency, SCAG develops transportation and housing plans that transcend jurisdictional boundaries and affect the quality of life for Southern California as a whole. SCAG's 2020-2045 RTP/SCS (or Connect SoCal) includes an appendix titled "Goods Movement" that is applicable to the proposed project because it proposes an industrial building in the SCAG region that could provide for a variety of light industrial, distribution warehousing, and logistics tenants. The Goods Movement

3. Environmental Analysis

appendix states that the SCAG region hosts one of the largest clusters of logistics activity in North America. Logistics activities and the jobs that accompany them depend on a network of warehousing and distribution facilities, highway and rail connections, and intermodal rail yards. To that end, the Goods Movement appendix of the RTP/SCS sets out regional strategies to achieve an efficient movement of goods. The strategy is based on the fact that the SCAG region has a large demand for warehouse space and the demand will continue into the foreseeable future, resulting in a large unmet demand by the year 2045 (SCAG 2020a).

Based on these factors, and since the proposed project is a warehousing/industrial building that would further the goals of SCAG's Goods Movement strategies, project implementation would not conflict with SCAG's RTP/SCS. Therefore, land use impacts related to RTP/SCS consistency would be less than significant.

3.12 MINERAL RESOURCES

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?**

Less than Significant. The project site is classified by the CGS as a Mineral Resource Zone 2 (MRZ- 2), indicating that significant mineral deposits are likely to be present (CGS 2010). However, mining is not a permitted use in the M-1 (Light Manufacturing) zone. A mining pit is located west of Azusa Canyon Road where mining is conditionally permitted in the Q (Quarry Overlay) zone. Mining activities at this pit are ongoing. The project site is also not in an area with active mineral extraction operations, nor does it support such operations.

No oil or energy extraction and/or generation activities exist on the project site. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no oil or energy wells on-site (DOGGR 2021).

Therefore, the project is not expected to result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state and impacts are expected to be less than significant.

- 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?**

No Impact. Areas classified by the CGS as areas containing regionally significant mineral deposits in accordance with the Surface Mining and Reclamation Act (SMARA) are designated under the Quarry Overlay Zone (Q) designation in the City's General Plan. The proposed project is zoned Light Manufacturing (M-1). Therefore, there would be no loss of availability of a locally important mineral resource recovery site delineated in the General Plan and no impact would occur.

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3.13 NOISE

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are in Appendix G.

Environmental Setting

As shown in Figure 3, *Aerial Photograph*, the project is in a predominantly industrial area surrounded by business suppliers, warehouses, and wholesalers. The project site is adjacent to Azusa Canyon Road, Los Angeles Street, and a rail line. The dominant noise sources in the project area are traffic and rail noise and noise from neighboring industrial uses.

Existing conditions were established via traffic noise modeling using the Federal Highway Administration (FHWA) traffic noise prediction model (FHWA 2006). Model inputs (average daily traffic volumes, vehicle mix, and day, evening, and night percentage splits) were provided by Urban Crossroads. Table 17 shows the existing roadway CNEL noise level at 50 feet from the centerline of the nearest travel lane.²²

²² Community Noise Equivalent Level (CNEL) is the energy average of the A-weighted sound levels during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. See Appendix G for more information.

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Table 17 Existing Traffic Noise Levels

Roadway Segment	Existing Daily Volumes ¹	dBA CNEL at 50 feet
Azusa Canyon Road - north of Cypress Street	16,723	68.1
Azusa Canyon Road - south of Cypress Street	17,181	68.2
Cypress Street - east of Azusa Canyon Road	15,744	69.1
Azusa Canyon Road - north of Los Angeles Street	12,010	66.7
Azusa Canyon Road - south of Los Angeles Street	10,416	66.0
Los Angeles Street - east of Azusa Canyon Road	1,181	55.0
Los Angeles Street - west of Azusa Canyon Road	10,341	69.7
Azusa Canyon Road - north of San Bernardino Road	10,416	65.9
San Bernardino Road - east of Azusa Canyon Road	20,862	70.4
San Bernardino Road - west of Azusa Canyon Road	11,054	67.6
Azusa Canyon Road - north of Arrow Highway	2,083	59.0
Azusa Canyon Road - south of Arrow Highway	11,919	66.6
Arrow Highway - east of Azusa Canyon Road	48,946	76.6
Arrow Highway - west of Azusa Canyon Road	49,428	76.6
Azusa Canyon Road - north of Olive Street	11,919	66.6
Azusa Canyon Road - south of Olive Street	16,723	68.1
Olive Street - west of Azusa Canyon Road	8,947	65.3

Source: Urban Crossroads, 2021.

See Appendix I for daily roadway segment volumes and modeling calculations.

¹ The site was previously occupied by the Pepsi bottling plant, which is the existing baseline site use.

According to the Governor's Office of Planning and Research, the project site is within the "Normally Acceptable" conditions for industrial and manufacturing land uses (75 dBA CNEL or less) (OPR 2017a). However, due to the *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (No. S 213478) ruling issued December 17, 2015, noise compatibility for on-site sensitive receptors is generally no longer the purview of CEQA. As a result, though noise from existing sources is taken into account as part of the baseline, the direct effects of exterior noise from nearby noise sources relative to land use compatibility of a future project is typically no longer a required topic for impact evaluation under CEQA. Generally, no determination of significance is required with the exception of certain school projects, projects affected by airport noise, and projects that would exacerbate existing conditions (i.e., projects that would have a significant operational impact).

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors to the project

3. Environmental Analysis

site are single-family residences to the northeast, south, and southeast, mobile homes to the southwest, and Manzanita Elementary School to the south. The single-family homes and school to the south are approximately 950 feet away, the mobile homes are approximately 700 feet to the southwest, and the single-family home to the northeast is approximately 550 feet away.²³ Additional residences are further to the east. Manzanita Elementary School is in Vincent, a census-designated place in Los Angeles County. The single-family homes to the south and mobile homes to the southwest are in West Covina, and the single-family home to the northeast is in Irwindale.

Applicable Standards

Local Noise Regulations

City of Irwindale Municipal Code

Exterior Noise Standards

Section 9.28.030 in Chapter 9.28, Noise Regulation, establishes daytime (7:00 am to 10:00 pm) and nighttime (10:00 pm to 7:00 am) ambient base noise levels (exterior noise standards). The daytime noise standard for residential zones is 50 dBA and the nighttime standard is 45 dBA. Any noise that exceeds the ambient or the ambient base level, whichever is greater, by more than 10 dBA, when measured at any boundary line of the property from which the noise emanates, is in violation.^{24,25}

Mechanical Equipment

Subsection 9.28.100, Machinery, Equipment, Fans, and Air Conditioning, states that it is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus, or similar mechanical device in any manner so as to create any noise that would cause the noise level at any boundary line of any property from which such noise emanates to exceed the ambient or ambient base level of 50 dBA (daytime) and 45 dBA (nighttime), whichever is greater, by more than 10 dB.

Construction

Section 9.28.110, Construction of Building and Projects, states that it is unlawful for any person within a residential zone or within a radius of five hundred feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist, or other construction-type device on a development requiring a City permit, in such a manner that noise is produced that would constitute a violation of Section 9.28.040, unless beforehand authorization has been duly obtained from the building inspector. Construction shall be limited to the hours of 7:00 am to 7:00 pm. There are no residential receptors in Irwindale that are within a 500-foot radius of the project site.

²³ As measured from the edge of the project site to the sensitive receptor property line.

²⁴ Ambient base level: means reasonable and representative ambient noise levels in various land use categories in the city and at various times as established by the planning commission.

²⁵ Ambient noise level means the all-encompassing noise associated with a given environment, usually being a composite of sounds with many sources excluding the alleged offensive noise at the location and approximate time at which a comparison with the alleged offensive noise is to be made.

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City of West Covina Municipal Code

Construction

Section 15-95, Construction and Building Projects, states that it is unlawful for any person within a residential zone or within a 500-foot radius of a residential zone to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, steam shovel, pneumatic hammer, derrick, steam or electric hoist, or other construction-type device in such manner as to create any noise that causes the noise level at the property line to exceed the ambient by more than 5 decibels between the hours of 8:00 pm to 7:00 am. There are no residential receptors in West Covina within a 500-foot radius of the project site.

County of Los Angeles Code of Ordinances

Exterior Noise Standards

Neither the City of West Covina nor Vincent (unincorporated Los Angeles County) have exterior noise standards. Therefore, the County’s exterior noise standards are applied to receptors in those areas, as summarized in Table 18.

Table 18 County of Los Angeles Residential Exterior Noise Standards

Zone	Time Period	Exterior Noise Level, dBA ^{1,2}				
		L ₅₀	L ₂₅	L ₈	L ₂	L _{max}
Noise Zone 1: Other Noise-sensitive area	Anytime	45	50	55	60	65
Noise Zone 2: Residential properties	10:00 pm–7:00 am	45	50	55	60	65
	7:00 am–10:00 pm	50	55	60	65	70

Source: Los Angeles County Code, Section 12.08.390.

¹ According to Section 12.08.390, if the ambient noise levels exceed the exterior noise standards above, then the ambient noise level becomes the noise standard. Per Section 12.08.410, if the source of noise emits a pure tone or impulsive noise, the exterior noise levels limits shall be reduced by 5 decibels.

² If the measurement location is on a boundary property between two different zones, the noise limit shall be the arithmetic mean of the maximum permissible noise level limits of the subject zones; except as provided for above. When an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level shall be the daytime exterior noise level for the subject receptor property.

Construction Noise

The County prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between the hours of 7:00 pm and 7:00 am on weekdays or at any time on Sundays or holidays except for emergency work of public service utilities or by Variance. The County Code does not specify hours of construction for Saturdays. It is assumed that the weekday hours also apply to Saturdays. All mobile and stationary internal-combustion-powered equipment or machinery must be equipped with suitable exhaust and air intake silencers in proper working order.

Construction is anticipated to last for approximately eight months. Maximum noise levels for long-term construction (10 days or more) are summarized in Table 19.

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Table 19 County of Los Angeles Stationary Construction Equipment Noise Limits

Time Period	Single-Family Residential	Multifamily Residential	Semiresidential/ Commercial
Daily, except Sundays and legal holidays, 7 am to 8 pm ¹	60 dBA	65 dBA	70 dBA
Daily, 8 pm to 7 am and all-day Sunday and legal holidays ¹	50 dBA	55 dBA	60 dBA

Source: Los Angeles County Code, Section 12.08.440. For repetitively scheduled and relatively long-term operations of 10 days or more.

¹ Note that this table shows this is a discrepancy in allowable construction hours between Section 12.08.440 (A) and 12.08.440(B). To be conservative and for the purposes of this analysis, the allowable hours will be 7:00 am to 7:00 pm from sub section A.

Vibration Annoyance

The Los Angeles County Code Section 12.08.560 prohibits the operation of any device that creates vibration above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property. The perception threshold is 0.01 inches/second (in/sec), which is equivalent to 80 VdB (root-mean-square vibration decibel level).

Federal Transit Administration

Neither the City of Irwindale, West Covina, nor the County of Los Angeles have quantified thresholds for potential vibration damage. Therefore, to determine impact significance, the following Federal Transit Administration (FTA) criteria are used in this analysis.

A vibration impact would occur if:

- Vibration levels would exceed 0.20 inches/second (in/sec) peak particle velocity (PPV) at the façade of a nonengineered timber and masonry structure (e.g., wood-frame residential).
- Vibration levels would exceed 0.30 in/sec PPV at the façade of a concrete and masonry buildings (no plaster) (e.g., commercial/industrial buildings). (FTA 2018)

Would the project result in:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact.

Construction Noise

The total duration for project construction is anticipated to be approximately eight months, with a tentative start date of April 2022. Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul; and (2) stationary-source noise from use of construction equipment.

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Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site-access roadways. Individual construction worker and vendor vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{\max} at 50 feet. However, these occurrences would generally be infrequent and short-lived.²⁶

Worker and vendor trips would total a maximum of 161 daily trips during overlapping site preparation, building construction, and rough grading phases. Maximum daily haul truck trips would be 136 during demolition debris haul and import of soil for rough grading. Site access would be through Azusa Canyon Road. Existing average daily traffic along the study roadway segments range from 1,181 to 49,428.²⁷ The addition of construction trips and haul trips would result in a temporary noise increase of up to 1 dBA CNEL, which would not be substantial or permanent. Therefore, construction-vehicle noise impacts would be considered less than significant.

Construction Equipment

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

Construction is performed in distinct steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. Table 20 lists various construction equipment noise levels at a reference distance of 50 feet based on the Federal Highway Administration Roadway Construction Noise Model. Construction activities are anticipated to take place between the hours of 7:00 a.m. and 4:00 p.m. Monday through Friday. No blasting, rock crushing, or pile driving is proposed. Noise levels at a distance of 50 feet could vary between 68 dBA L_{eq} and 84 dBA L_{eq} .²⁸

²⁶ Maximum Sound Level (L_{\max}). The highest RMS sound level measured during the measurement period (see Appendix G).

²⁷ Average daily traffic provided by Urban Crossroads 2021.

²⁸ Equivalent Continuous Noise Level (L_{eq}); also called the Energy-Equivalent Noise Level. The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the L_{eq} metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.

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Table 20 Construction Equipment Noise Emission Levels

Construction Equipment	Typical Max Noise Level (dBA L _{eq}) ¹	Construction Equipment	Typical Max Noise Level (dBA L _{eq}) ¹
Auger Drill Rig	77	Jackhammer	76
Backhoe	74	Man Lift	80
Bar Bender	73	Mounted Impact Hammer (hoe)	82
Boring Jack Power Unit	80	Pavement Scarafier	68
Chain Saw	77	Paver	83
Clam Shovel (dropping)	80	Pickup Truck	83
Compactor (ground)	76	Pneumatic Tools	74
Compressor (air)	74	Pumps	71
Concrete Batch Plant	75	Refrigerator Unit	82
Concrete Mixer Truck	75	Rivet Buster/chipping gun	78
Concrete Pump Truck	74	Rock Drill	73
Concrete Saw	83	Roller	72
Crane	73	Scraper	74
Dozer	78	Slurry Plant	78
Drill Rig Truck	72	Slurry Trenching Machine	77
Drum Mixer	77	Soil Mix Drill Rig	77
Dump Truck	73	Tractor	80
Front End Loader	77	Vacuum Excavator (Vac-truck)	81
Generator	70	Vacuum Street Sweeper	72
Gradall	75	Ventilation Fan	79
Grader	78	Vibrating Hopper	84
Grapple (on backhoe)	79	Vibratory Concrete Mixer	73
Horizontal Boring Hydr. Jack	81	Warning Horn	70
Hydra Break Ram	83	Welder / Torch	70

Source: FHWA Roadway Construction Noise Model.

¹ Measured 50 feet from the source.

The nearest noise-sensitive receptors—measured from the acoustical center of the project site—are to the northeast, south, southeast, and east in various jurisdictions—Irwindale, West Covina, and Vincent in unincorporated Los Angeles County.

City of Irwindale

As stated under the heading “Applicable Standards,” above, according to Section 9.28.110 of the Irwindale Municipal Code, it is unlawful for any person in a residential zone, or within a radius of 500 feet therefrom, to

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operate construction equipment in such a manner that noise is produced which would constitute a violation of Section 9.28.040. The nearest receptor in Irwindale is 550 feet from the edge of the project site property line (single-family residence to the northeast), and is therefore outside of the 500-foot screening distance. Impacts would be less than significant.

City of West Covina

As stated under the heading “Applicable Standards,” above, according to Section 15-95, Construction and Building Projects, of the West Covina Municipal Code, it is unlawful for any person within a residential zone or within a 500-foot radius of a residential zone to operate construction equipment. The nearest receptors in West Covina are 700 feet and 950 feet from the edge of the project site property line, and are therefore outside of the 500-foot screening distance. Impacts would be less than significant.

Vincent

For the receptors in the unincorporated area of Vincent, noise levels from typical construction equipment would attenuate to 56 dBA or less. This is a conservative estimate that does not factor in acoustical shielding from existing buildings between the project site and the sensitive receptors. Construction noise would not exceed the County’s long-term construction standard of 60 dBA. Therefore, impacts would be less than significant.

Operational Noise

Mobile Noise

A project will normally have a significant noise impact on the environment if it will substantially increase the ambient noise levels at adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the Federal Aviation Administration, are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increase would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher.
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL.
- 5 dBA in ambient noise environments of less than 60 dBA CNEL.

Traffic noise increases were modeled using a version of the FHWA Traffic Noise Prediction Model RD-77-108. Model inputs such as roadway daily segment volumes; vehicle mix; and day, night, and evening splits were provided by Urban Crossroads. In addition, Urban Crossroads “Existing” baseline includes the previously occupied Pepsi bottling plant operations. Speeds and numbers of lanes were based on Google Earth data. Table 21 shows estimates of project-related and cumulative traffic noise increases along study roadway segments. Traffic noise increases would not be greater than 1.5 dBA CNEL along any study roadway segment. Therefore, impacts would be less than significant.

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Table 21 Project and Cumulative Traffic Noise Increases

Roadway Segment	dBA CNEL				Increase in dBA CNEL	
	Existing Without Project	Existing Plus Project	Cumulative Without Project	Cumulative Plus Project	Project Noise Increase	Cumulative Increase
Azusa Canyon Road - north of Cypress Street	68.1	68.2	68.5	68.5	0.1	0.4
Azusa Canyon Road - south of Cypress Street	68.2	68.3	68.6	68.7	0.1	0.5
Cypress Street - east of Azusa Canyon Road	69.1	69.1	69.5	69.5	0.0	0.4
Azusa Canyon Road - north of Los Angeles Street	66.7	66.8	67.8	67.8	0.1	1.1
Azusa Canyon Road - south of Los Angeles Street	66.0	66.2	66.8	66.8	0.2	0.8
Los Angeles Street - east of Azusa Canyon Road	55.0	55.0	55.7	56.0	0.0	1.0
Los Angeles Street - west of Azusa Canyon Road	69.7	69.7	70.8	70.9	0.0	1.2
Azusa Canyon Road - north of San Bernardino Road	65.9	66.1	66.7	66.7	0.2	0.8
San Bernardino Road - east of Azusa Canyon Road	70.4	70.5	70.8	70.8	0.1	0.4
San Bernardino Road - west of Azusa Canyon Road	67.6	67.7	68.1	68.1	0.1	0.5
Azusa Canyon Road - north of Arrow Highway	59.0	59.0	59.3	59.3	0.0	0.3
Azusa Canyon Road - south of Arrow Highway	66.6	67.1	67.0	67.1	0.5	0.5
Arrow Highway - east of Azusa Canyon Road	76.6	76.9	77.1	77.1	0.3	0.5
Arrow Highway - west of Azusa Canyon Road	76.6	76.9	77.1	77.1	0.3	0.5
Azusa Canyon Road - north of Olive Street	66.6	67.1	67.0	67.1	0.4	0.5
Azusa Canyon Road - south of Olive Street	68.1	68.2	68.5	68.5	0.1	0.4
Olive Street - west of Azusa Canyon Road	65.3	65.4	65.7	65.7	0.2	0.4
				Max Increase	0.5	1.2

Daily segment volumes used to generate CNEL provided by Urban Crossroads 2021.
Notes: See Appendix I for daily roadway segment volumes and modeling inputs.

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Mechanical Equipment Noise

Heating, ventilation, and air conditioning (HVAC) systems would be installed at the proposed buildings. Typical HVAC equipment generates noise levels ranging up to 72 dBA at three feet. The nearest residential receptor property line to the proposed warehouse building is approximately 550 feet to the northeast. Noise levels from HVAC noise at 550 feet would be 27 dBA or less, which would not exceed the nighttime standard of 45 dBA in any of the jurisdictions. In addition, the HVAC equipment would be new and replace the older mechanical equipment from the existing Pepsi Bottling Group building. HVAC noise would be less than significant.

Loading Docks

In addition to stationary mechanical equipment noise sources, there would be noise sources associated with truck loading and unloading. Reference noise levels from a similar warehouse project were used to assess impacts from the project. The noise measurements accounted for the major noise sources associated with one truck, such as use of an electric pallet for loading and unloading, truck engine idling, transport refrigeration unit idling, and other noise events. The project proposes one loading bay with 18 dock doors. The project would not include TRU's, and therefore, for a conservative evaluation, the reference noise level with TRU's is used and the single-truck reference level was adjusted to account for all 18 docks loading/unloading at the same time.

The nearest noise-sensitive receptor property line to the loading area is approximately 660 feet to the northeast in Irwindale. To the south, at approximately 1,300 feet, are the single-family homes along East San Bernardino Road (in West Covina), and Manzanita Elementary School (in Vincent) is approximately 1,650 feet away. As shown in Table 22, noise levels at these distances would attenuate to 45 dBA or less. The modeling accounts for partial acoustical shielding of at least 3 dBA provided by the proposed building itself and surrounding existing buildings. Project loading operations would not exceed the County of Los Angeles (West Covina and Vincent) and Irwindale residential exterior noise standards. Therefore, impacts would be less than significant.

Table 22 Truck Loading Dock Noise, dBA L₅₀

Reference Level 1 Truck at 20 feet	66	
Adjusted Reference Level for 18 Trucks at 20 feet	78	
Single Family Home 660 feet northeast, Irwindale	45	
Mobile Homes 850 feet to southwest, West Covina	42	
Single-Family Home 1,300 feet south, West Covina	39	
Manzanita Elementary 1,650 feet south, Vincent	37	
County of Los Angeles and Irwindale Residential Exterior Noise Standards	Daytime	50
	Nighttime	45
Exceeds standards?	No	

Source: Reference noise levels from PlaceWorks 2019.

Notes: Detailed calculation results are in Appendix G.

Distances measured from the loading area to the receptor property line.

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

Less Than Significant Impact.

Operational Vibration

The proposed project would include truck movement activity at the proposed project site. These movements would generally be low speed (i.e., less than 15 miles per hour) and would occur over new, smooth surfaces. For perspective, Caltrans has studied the effects of propagation of vehicle vibration on sensitive land uses and notes that “heavy trucks, and quite frequently buses, generate the highest earth borne vibrations of normal traffic.” Caltrans further notes that the highest traffic-generated vibrations are along freeways and state routes. Their study finds that “vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 inches per second, with the worst combinations of heavy trucks and poor roadway conditions (while such trucks were moving at freeway speeds). This level coincides with the maximum recommended safe level for ruins and ancient monuments (and historic buildings)” (Caltrans 2013). Since the project’s truck movements would be a low speed (not at freeway speeds) and would be over smooth surfaces (not under poor roadway conditions), project-related vibration associated with truck activity would not result in excessive groundborne vibrations; no vehicle-generated vibration impacts would occur. In addition, there are no sources of substantial groundborne vibration associated with the project, such as railways or subways. The proposed project would not create or cause any vibration impacts due to operations.

Construction Vibration

Vibration Damage

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

The nearest structures to the project site are the surrounding industrial buildings to the east and south in Irwindale. The Cities of Irwindale and West Covina do not have quantified thresholds for vibration damage, and therefore FTA criteria is used to determine impact significant. For reference, a vibration level of 0.3 in/sec PPV is used as the limit for engineered concrete and masonry buildings and a level of 0.20 in/sec PPV for nonengineered timber and masonry buildings is used to determine impact significance (FTA 2018). To determine potential vibration-induced architectural damage, the distance from the vibration source (construction equipment) to the nearest off-site structure is measured from the edge of the construction site to the nearest building façade. The nearest industrial buildings are directly north, east, and south of the project site, and the nearest residential structure is approximately 550 feet to the northeast.

Table 23 shows vibration levels for typical construction equipment at a reference distance of 25 feet and at various nearby receptors. As shown, vibration levels would not exceed FTA criteria of 0.30 in/sec PPV for

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concrete and masonry structures or 0.20 in/sec PPV for nonengineered timber and masonry structures at the nearest off-site receptors. Therefore, impacts would be less than significant.

Table 23 Vibration Damage Levels for Typical Construction Equipment

Equipment	PPV (in/sec)			
	FTA Reference at 25 feet	Industrial building to east at 115 Feet	Industrial building to south at 140 Feet	Residential 550 feet
Vibratory Roller	0.21	0.021	0.016	0.002
Large Bulldozer	0.089	0.009	0.007	0.001
Caisson Drilling	0.089	0.009	0.007	0.001
Loaded Trucks	0.076	0.008	0.006	0.001
Jackhammer ²	0.035	0.004	0.003	<0.001
Small Bulldozer	0.003	0.000	0.000	<0.001

Source: FTA 2018.

Note: Distances measured from the edge of construction site to structure façade.

Vibration Annoyance

The receptors that are subject to the County Code are those in the unincorporated area of Vincent that, as stated above in *Environmental Setting*, include Manzanita Elementary and single-family homes to the east. The County of Los Angeles has a vibration annoyance standard of 80 VdB. The center of the construction site is the appropriate location from which to measure to the nearest sensitive receptor because equipment would move across the construction site throughout the day. Table 24 shows vibration levels for typical construction equipment at a reference distance of 25 feet and at various receptors. As shown, the nearest sensitive receptors are hundreds of feet away, and vibration levels would attenuate well below 80 VdB. Therefore, impacts would be less than significant at all nearby sensitive receptors.

Table 24 Vibration Annoyance Levels for Typical Construction Equipment

Equipment	VdB		
	FTA Reference at 25 feet	Residential Uses to the East 1,550 feet	Manzanita Elementary School to South at 1,450 feet
Vibratory Roller	94	40	41
Large Bulldozer	87	33	34
Caisson Drilling	87	33	34
Loaded Trucks	86	32	33
Jackhammer ²	79	25	26
Small Bulldozer	58	4	5

Source: FTA 2018.

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

No Impact. The nearest airport to the project site is the San Gabriel Valley Airport, approximately 5.2 miles west. The project would not expose people working in the project area to excessive aircraft noise levels. No impact would occur.

3.14 POPULATION AND HOUSING

Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

No Impact. No residential development is proposed; therefore, the proposed project would not directly induce population growth in the area. The proposed warehouse and manufacturing facility would be developed to serve the warehousing and manufacturing needs of the region.

Additionally, as discussed in Section 3.19, *Utilities and Service Systems*, adequate infrastructure and utilities are available to serve the project site, and the proposed project would not require new infrastructure or extension of existing infrastructure that could indirectly induce population growth nearby. The new utility lines on-site would not extend into undeveloped areas nor result in unplanned growth. The project site is also provided with adequate road access, and project development would not require extension of roadways.

Regarding employment, under a conservative scenario and based on employee figures from a report commissioned by NAIOP Research Foundation (RPA 2010), the proposed project is anticipated to add approximately 72 jobs to the City's workforce based on a ratio of one employee per 1,800 square feet of floor area. However, the number of employees will ultimately depend on the tenant(s) that operate out of the building. Project construction would also generate some temporary employment. According to the Demographic and Growth Forecast Appendix of SCAG's 2020-2045 RTP/SCS, Irwindale is projected to add approximately 1,400 new jobs through the year 2045 (SCAG 2020b). According to the California Employment Development Department, the City's current unemployment rate is 13.1 percent (EDD 2021). The number of new jobs that would be created by the proposed project is within the employment generation estimated by SCAG for the City. Also, the proposed project's operation- and construction-related employment generation is expected to be absorbed from the local and regional labor force and would not attract new workers into the City or region.

Therefore, no impact to population and housing would occur.

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

No Impact. No housing exists or is proposed to be developed on the project site (see Figure 3, *Aerial Photograph*). Therefore, project development would not displace housing or people. No impact would occur.

3.15 PUBLIC SERVICES

The analysis in this section is based partly on the service provider questionnaire responses, which are included as Appendix H to this Initial Study.

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

a) Fire protection?

Less Than Significant Impact. LACFD provides fire protection and emergency services to the entire City, including the project site from two fire stations: Irwindale Station 48 (15546 Arrow Highway in Irwindale) and Baldwin Park Station 29 (14334 Los Angeles Street in Baldwin Park). The nearest and first response station is Station 48, which is about 0.9 miles to the north.

Project implementation would result in a slight increase in calls for fire protection and emergency medical service. However, considering the existing firefighting resources available in and near the City, project impacts on fire protection and emergency services (including response times) are not expected. In the event of an emergency at the project site that requires more resources than Station 48 could provide, LACFD would direct resources to the site from other stations in nearby cities.

Implementation of the proposed project is not anticipated to increase LACFD's response times to either the project site or the surrounding vicinity. The project site is a developed site that was already served by LACFD, so the proposed project would not expand LACFD's service area.

The City involves LACFD in the development review process to ensure that the necessary fire prevention and emergency response features are incorporated into development projects. For example, fire hydrants would be installed at key locations on-site to meet hose-pull requirements and provide adequate fire access. The proposed building would include a monitored fire sprinkler system, and Knox boxes would be placed where necessary (i.e., automated security rolling gates) to provide access for emergency personnel. The security gates would be installed and operated in accordance with standards of the Underwriters Laboratories (UL 325) and American

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Society for Testing Materials International (ASTM F220).²⁹ The final method of gate control would be subject to review and approval by LACFD during the City's and LACFD's development review process.

Emergency access to the project site would be via three driveways (one off Azusa Canyon Road and two off Los Angeles Street) that connect to internal drive aisles and the truck yard. The internal drive aisles would serve as fire access lanes and become part of the on-site fire access path of travel. All site and building improvements proposed as a part of the proposed project would be subject to review and approval by the City and LACFD prior to building permit and certificate of occupancy issuance.

Finally, project development is required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACFD, which impose design standards and requirements to minimize and mitigate fire and emergency response risk. Compliance with these codes and standards is ensured through the City's and LACFD's development review and building permit process.

Based on the preceding, the proposed project is not expected to adversely affect the LACFD's ability to provide adequate service and or require new or expanded fire facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. The Irwindale Police Department (PD) provides police protection services to the entire City (including the project site) and operates out of its station at 5050 North Irwindale Avenue, approximately 0.75 miles northeast of the project site.

Project implementation could result in an increase in calls for police protection service when compared to the former operations at the Pepsi Bottling Plant since it is anticipated that goods handled and stored on site might be of higher monetary value when compared to the Pepsi Bottling Plant. Due to the speculative nature of the proposed tenants, police service demands cannot be anticipated, especially when considering other planned projects in the area (Fraijo 2021). However, the City expands police protection services 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 of \$759 per worker that would allow the police department to add additional staff to provide services to accommodate this growth (Willdan 2018). These fees are used to fund the direct impact of increased demand for police facilities and equipment. Additionally, if a new or physically altered PD station is required, the proposed development must comply with CEQA. CEQA requires that significant environmental impacts are considered and all feasible mitigation measures to substantially reduce significant impacts are adopted in the event a project causes significant or potentially significant effects on the environment.

Furthermore, proposed physical project features and improvements would help minimize impacts on police services. For example, the project site would be enclosed with a combination of walls, security gates, fences, and buildings. It would also include a monitored alarm system. Installation of these features would enhance the

²⁹ ASTM F2200 provides guidance to ensure that the mechanical components of a gate are designed and installed in such a way to prevent risk to people in "entrapment zones." UL 325 (Standard for Safety: Door, Drapery, Gate, Louver and Window Operators and Systems) is the standard to which vehicular gate operators are designed, tested, and manufactured.

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security and safety of the site during and after business hours. They would help prevent loitering or trespassing on the site and help prevent the need for calls for police services. The City also involves the PD in the development review process in order to ensure that the necessary police protection features are incorporated into development projects. All site and building improvements proposed under the proposed project would be subject to review and approval by the Irwindale PD. Finally, in the event of an emergency at the project site that requires more resources than the Irwindale PD could provide, the PD would request assistance from other nearby police departments.

Based on the preceding, the proposed project would not adversely affect Irwindale PD's ability to provide adequate service and would not require new or expanded police facilities that could result in adverse environmental impacts. Impacts would be less than significant.

c) Schools?

No Impact. The increase in student generation and the need for new or the expansion of existing school facilities is tied to population growth. No residential development is proposed under the proposed project, and project development is not expected to generate an increase in the student population in the area.

Additionally, the need for additional school services and facilities is addressed by compliance with school impact assessment fees per Senate Bill 50, also known as Proposition 1A. SB 50—codified in California Government Code Section 65995—enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts. The project applicant would be required to pay school impact fees to reduce any impacts to the school system, in accordance with SB 50. These fees are collected by school districts at the time of issuance of building permits. However, the project is not expected to impact school services.

Therefore, no impacts to schools would occur.

d) Parks?

No Impact. See response to Section 3.16.a. As substantiated in this section, no impacts would occur.

e) Other public facilities?

No Impact. The need for new or the expanded library services and facilities is tied to population growth. No residential development is proposed under the proposed project, and project development is not expected to generate a need for new or additional library services or facilities. Therefore, no impact to libraries would occur.

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3.16 RECREATION

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

No Impact. The proposed project would not increase the use of existing neighborhood or regional parks, because demands for parks are generated by an increase in population or housing in the park's service areas. Though daytime workforce populations could contribute to park usage, the increase would be minimal. The project would not increase residential population and would not significantly increase the use of parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur.

- 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?**

No Impact. The project as planned does not include recreational facilities, nor require the construction or expansion of recreational facilities. Therefore, no impact would occur.

3.17 TRANSPORTATION

The analysis in this section is based partly on the following technical study, which is included as Appendix I to this Initial Study:

- *Azusa Canyon Road Warehouse Transportation Analysis*, Urban Crossroads, July 24, 2021.

Would the project:

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Less Than Significant Impact with Mitigation Incorporated. Following is a discussion of the proposed project's potential impacts on programs, plans, ordinances, or policies addressing the circulation system.

Impact to Roadway Facilities

The proposed project is anticipated to generate 262 two-way trips per day on a typical weekday, with 29 AM peak hour trips and 35 PM peak hour trips—a mixture of passenger car and truck trips. The former Pepsi bottling plant was estimated to generate 110 trip-ends per day, with 10 AM peak hour trips and 11 PM peak hour trips and a mixture of passenger car and truck trips. The net increase due to the proposed project is 152 two-way trips per day on a typical weekday, with 19 AM peak hour trips and 24 PM peak hour trips.

The City's General Plan Infrastructure Element Policy 3 promotes the continued development and enhancement of existing streets and intersections in the City. Policy 4 strives to ensure that all new developments implement a fair share of infrastructure improvements to offset potential adverse impacts

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associated with additional traffic. The goal of these policies is to improve safe and efficient circulation in the City.

A transportation analysis was performed to evaluate the potential deficiencies to traffic and circulation associated with the development of the proposed project and to recommend improvements to meet the City's applicable thresholds. The study followed the City of Irwindale's "Policy Guidelines for Traffic Impact Reports." The transportation analysis report found that improvements were needed at two intersections—Azusa Canyon Road/Los Angeles Street and Azusa Canyon Road/Arrow Highway—to provide an acceptable level of service at these locations. The recommendations include contributions on a fair-share basis to address existing deficient operations (see Appendix I). The proposed signal control, lane stripping modification, through lanes, and right turn overlap signal would be consistent with Policies 3 and 4 of the Infrastructure Element. Additionally, mitigation measure T-1 is recommended to address any potentially significant safety impacts to motorists and pedestrians in line with the City's Infrastructure Element policies to improve safe and efficient circulation in the City. Therefore, the proposed project would not conflict with the General Plan goals and policies addressing traffic and circulation.

Impact to Alternate Modes of Transportation Facilities

Pedestrian Facilities

The proposed project would include an accessible path of travel between the building, ADA parking spaces, and the curb at the intersection of Los Angeles Street and Azusa Canyon Road; it would also update intersection features on the northeast corner of the intersection. The existing public sidewalk abutting the project site along Azusa Canyon Road would be demolished and replaced with a new sidewalk and driveway. The sidewalk would be temporarily closed to pedestrians. However, upon completion of the sidewalk and driveway, pedestrian access along the public sidewalk would be restored. Also, it is anticipated that upon completion, the driveway would be used by construction personnel. Project construction would involve construction equipment and trucks crossing the sidewalk along the east side of Azusa Canyon Road. The project construction contractor would use standard safety measures—such as fencing and flag persons—to ensure that crossings would not pose a substantial hazard to pedestrians on that sidewalk.

The City of Irwindale prepared an Active Transportation Plan (ATP) in January 2021 to develop pedestrian and bicycle infrastructure and programs in Irwindale. The adopted ATP includes design guidelines for pedestrian and bicycle facilities that ensure that development of the bicycle and pedestrian network would use national best practices and reflect the City's unique history and character. The ATP proposes pedestrian improvements that include a new Class I Shared-Use Path³⁰ adjacent to the Big Dalton Wash (Irwindale 2021). The implementation of the proposed project would not interfere with these proposed improvements.

In conjunction with traffic signal implementation, Mitigation Measure T-1 is recommended to address any potentially significant safety impacts to motorists and pedestrians. Implementation of this mitigation measure would reduce impacts to less than significant.

³⁰ Class I Shared-Use Paths are separated completely from motor vehicle traffic and shared between bicyclists and pedestrians.

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Bicycle Facilities

There is no bicycle lane or facility on the east side of Azusa Canyon Road or the north side of Los Angeles Street or within proximity of the project site. However, the project applicant would provide bicycle racks and long-term bicycle enclosures or lockers on-site in accordance with the provisions of CALGreen; the racks would be placed in a designated area near the parking area east of the gate to the truck yard. Additionally, Section 21100(h) of the California Vehicle Code allows bicyclists to ride on sidewalks, and they are also allowed to ride on roads.

The ATP includes a proposed bikeway network that includes a Class IV Separated Bikeway³¹ running along Azusa Canyon Road and a Class I Shared-Use Path adjacent to the Big Dalton Wash (Irwindale 2021). The implementation of the proposed project would not interfere with any of these proposed facilities, and impacts would be less than significant.

Transit Facilities

As an alternative to automobile travel, the Foothill Transit Agency (FTA) and Los Angeles County Metropolitan Transportation Authority (Metro) provide public bus service in Irwindale. The following routes operate in the vicinity of the project site:

- **FTA Route 492** extends from the El Monte Station to the Montclair Plaza. Route 492 travels on Arrow Highway in the vicinity of the project site. During the weekday AM and PM commute periods, Route 492 provides headways of approximately 30 minutes (2 buses per hour) in both directions.
- **FTA Route 185** extends from the intersection of Colima Road and Manor Gate Road to the intersection of Azusa Avenue and 9th Street. Route 185 travels on North Irwindale Avenue in the vicinity of the project site. During the weekday AM and PM commute periods, Route 185 provides headways of approximately 30 minutes in both directions.
- **LA Metro Route 190/194** extends from the El Monte Station to the Temple and Pomona intersection. Route 190/194 travels on San Bernardino Road in the vicinity of the project site. During the weekday AM commute period, Route 190/194 provides headways of approximately 20 minutes (3 buses per hour) in both directions. During the weekday PM commute period, Route 120 provides headways of approximately 45 minutes (1.3 buses per hour) in both directions.

The closest FTA bus stop to the project site is at the San Bernardino Road and Orange Avenue intersection, approximately 0.17 mile south of the site. The closest Metro bus stop to the project site is at the San Bernardino Road and Azusa Canyon Road intersection, approximately 0.17 mile south of the site.

The proposed project has been designed to provide convenient access to public transit offered by FTA and Metro. For example, future workers and visitors of the project site would be within walking distance of the aforementioned bus stops as well as others in the project vicinity. Safe access to the bus stops from and to the

³¹ Class IV Bikeways are within or adjacent to a roadway and separated from traffic by a physical barrier such as bollards, on-street parking, or planters. This design allows an exclusive right-of-way for bicycle travel.

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project site would be available via the new public sidewalk proposed along Azusa Canyon Road as well as the existing sidewalks beyond these roadways.

The number of person trips that would be generated by the proposed project was calculated according to the LA County Congestion Management Program guidelines, which recommend estimating the number of person trips by multiplying the project's peak hour vehicle trip estimate by 1.4.³² The proposed project's peak hour estimate is 34 trips, and the Pepsi Bottling Group bottling plant generated 13 trips during peak hour traffic.³³ Therefore, the net increase is 21 vehicle trips, which would equal 29 person trips (21 x 1.4). The number of transit trips generated would be 3.5 percent of the total person trips, so the proposed project would generate approximately 1 transit trip (29 x 0.035) during the AM peak hour. Because the number of transit trips generated by the proposed project would be minimal, it is anticipated that the existing transit service in the project area would be able to accommodate the project-generated transit trips. The existing public transit system would not be impacted by the proposed project.

The proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the alternate mode of transportation facilities with the implementation of mitigation measure T-1.

Mitigation Measures

- T-1 Prior to the issuance of occupancy permits, the project applicant shall provide the following improvements at the intersection of Azusa Canyon Road and Los Angeles Street:
- A new crosswalk on the east leg of the intersection.
 - A new crosswalk on the west leg of the intersection.
 - Restrict on-street parking on the south side of Los Angeles Street, east of Azusa Canyon Road, within 150 feet of the intersection.
 - Restrict on-street parking on the east side of Azusa Canyon Road, north of Los Angeles Street, within 150 feet of the intersection.
 - Review sight distance and other safety considerations prior to finalization of the proposed driveways.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. With adoption of Senate Bill 375, the state signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and contribute to the reduction of GHG, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill 32 [AB 32]). Additionally, AB 1358 (Complete Streets Act) requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

³² The peak hour traffic estimate is the total peak hour passenger car trips and the peak hour passenger car equivalent truck trips.

³³ Refer to Table 4-2 and Table 4-4 of the proposed project's transportation analysis (Appendix H).

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On September 27, 2013, SB 743 started a process that fundamentally changed transportation impact analysis as part of CEQA compliance. Changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). As part of the updated CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (PRC Section 21099(b)(1)). On January 20, 2016, the Governor’s Office of Planning and Research (OPR) released revisions to the CEQA guidelines for the implementation of SB 743. Final review and rulemaking for the new guidelines were completed in December 28, 2018, when the Natural Resources Agency certified and adopted the CEQA Guidelines update package, including guidelines implementing Senate Bill 743. OPR allowed agencies an opt-in period to adopt the guidelines, but they became mandatory on July 1, 2020.

VMT corresponds to number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, $VMT = \text{daily trips} \times \text{average trip length}$.

Under SB 743, a city can decide to screen out certain projects from needing a complete VMT analysis. OPR has advised that certain projects could be cleared from further analysis based on size, type, location, and/or proximity to a major transit stop or high-quality transit. The City of Irwindale adopted its VMT thresholds on November 11th, 2020. Since the City of Irwindale’s VMT thresholds do not include screening criteria, the County of Los Angeles’ Guidelines were used. The County requires VMT analysis for development projects that are estimated to generate a net increase of 110 or more daily vehicle trips. The State’s Technical Advisory include the same requirement. Daily vehicle trips are specifically related to on-road passenger vehicles (cars and light trucks). Heavy trucks are not included in a VMT traffic impact analysis.

The passenger car trip generation for the proposed project is 197 daily trips, but the estimated trip generation for the Pepsi bottling plant is 88 daily trips. Therefore, the net increase in the proposed project’s passenger car trip generation is 109 vehicles per day, just under the threshold of 110 vehicles per day (see Table 25). Therefore, proposed project would not require further VMT analysis and would have a less than significant impact.

Table 25 Former and Proposed Trip Generation Summary

Land Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Former Pepsi Bottling Plant							
Warehousing	7	2	9	3	7	10	88
Proposed Project							
Warehousing	12	4	16	5	13	18	156
Manufacturing	5	1	6	2	5	7	41

Source: Urban Crossroads, 2021.

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

Less than Significant Impact. The proposed project would introduce several new on-site vehicular access and circulation improvements. As shown in Figure 5, *Conceptual Site Plan*, vehicular access for the project site would be provided via three entryways: one off Azusa Canyon Road and two off Los Angeles Street. The Azusa Canyon Road and western Los Angeles Street entryways would provide access for employee/visitor vehicles and lead directly into the on-site parking areas for these users. Both entryways would connect to an internal drive aisle, which would lead to an automated rolling security gate in the northern portion of the site—the gate would restrict access into the truck yard to employees only. Trailer trucks would only be allowed to use the eastern driveway off Los Angeles Street to access the project site. The driveway off Azusa Canyon Road would be restricted to right-out/left-in only access, and the driveways on Los Angeles Street would be constructed with full access.

The City and LACFD have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the City's engineering standards and LACFD's design standards, which are imposed on development projects during the City's development review and building plan check process. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a review of the proposed site plan (see Figure 5, *Conceptual Site Plan*) and Google Earth maps, there are no restrictions blocking views from the proposed location of the Azusa Canyon Road entryway and north- and southbound traffic on this roadway, and sufficient sight distance would be provided. There are also no restrictions blocking views from the proposed entryways on Los Angeles Street and east- and westbound traffic on this roadway. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site.

Furthermore, the proposed project would provide a network of low-speed internal drive aisles that would be safe and walkable for pedestrians while maintaining an efficient circulation system for trucks and vehicles. The proposed project would not include incompatible uses such as farm equipment on area roadways.

Therefore, impacts resulting from hazards due to design features or incompatible uses are expected to be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. As outlined in Section 3.17.c, the proposed project would introduce several new improvements to on-site vehicular access and circulation. To address emergency and fire access needs, the improvements would be designed in accordance with all applicable LACFD design standards for emergency access. For example, internal drive aisles would be designed to meet the minimum 28-foot width requirements of LACFD to allow the passing of emergency vehicles.

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The proposed project would be required to incorporate all applicable design and safety requirements in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of Irwindale and LACFD, such as those in Chapter 15.12, Fire Code, of the Irwindale Municipal Code. Compliance with these standards is ensured through the City's and LACFD's development review and building plan check process.

During the development review and building plan check processes, the City would coordinate with LACFD and the Irwindale PD to ensure that the necessary fire prevention and emergency response features are incorporated into the proposed project and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided in the traffic and circulation components of the proposed project. Knox boxes would also be required at pedestrian and vehicular gated entries to provide access for emergency personnel. All site and building improvements proposed under the project would be subject to review and approval by the City, LACFD, and Irwindale PD.

Finally, implementation of the proposed project would not require major road closures or otherwise impact the functionality of Azusa Canyon Road or Los Angeles Street as public safety access routes. Some minor improvements would be required within the Azusa Canyon Road and Los Angeles Street rights-of-way that could require temporary closure of a small portion of the easternmost and northernmost lanes, respectively. For example, some construction would occur within the public right-of-way of Azusa Canyon Road to make the necessary potable water and wastewater infrastructure connections and to accommodate the new access driveway. Any minor road closure would be temporary and would only be necessary during the construction activities associated with these improvements. All proposed road closures would also be subject to review and approval by the City. Upon completion of the improvements in the Azusa Canyon Road and Los Angeles Street rights-of-way, all road conditions would be restored to normal.

Based on the preceding factors, a less than significant impact to emergency access would occur.

3.18 TRIBAL CULTURAL RESOURCES

- a) **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:**
 - i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

No Impact. As shown in Figure 3, *Aerial Photograph*, the site is presently developed with the Pepsi Bottling Group building, a large metal shed north of the building, and a loading dock and large truck yard on the eastern portion of the site. The project site appears to have been used as an orchard from at least 1928 until around 1952 when the site was vacant. The current main building was constructed in 1956.

The project site is not identified on any state or local historic registers or sources, including the National Register of Historic Places, the California Register of Historic Resources, the California Built Environment

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Resources Directory, the California Historical Landmarks, and the California Points of Historical Interest. As a part of the cultural resources assessment for the project site, Cogstone conducted an archaeological and historic records search of the California Historic Resources Inventory System on April 9, 2021 (Appendix C). The search was conducted for the project site and a one-half-mile radius from the site. The search indicated that five previous studies were completed within one-half mile of the proposed project area, but none within the project site. Also, no previously recorded historic resources have been recorded for the project site.

Therefore, no impact to historical resources would occur.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant Impact with Mitigation Incorporated. Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (in this case, the City of Irwindale) during the project planning process to identify and protect tribal cultural resources.

The provisions of CEQA, PRC Sections 21080.3.1 et seq. (or AB 52), require meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (OPR 2017b).

As part of the AB 52 process, Native American tribes must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

Cogstone requested an SLF search from the NAHC on April 13, 2021. On April 27, 2021, the NAHC responded that the project area was negative for any known sacred sites or resources. The NAHC

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provided a list of seven tribes affiliated with the project site and recommended that they be consulted for information on sacred sites in the vicinity of the project area.

In accordance with the provisions of AB 52, the City sent formal notification letters on May 10, 2021, to the following tribes: Gabrieleno Band of Mission Indians–Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrieleno Tongva Indians of California Tribal Council, Gabrieleno/Tongva Nation, Gabrieleno-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseno Indians. The 30-day noticing requirement under AB 52 was completed on June 9, 2021, 30 days from the date the City sent the notification letter.

The City received three responses. On June 17, 2021, the Gabrieleno Tongva Indians of California Tribal Council requested that the tribe be notified if prehistoric materials are found and would like to be notified if burial remains are found even if the tribe is not designated as the most likely descendant. If burial remains are found, the tribe wants to engage in formal consultation. The tribe's request is included here as mitigation measure TCR-1 to ensure notification and consultation take place as requested. Additionally, on June 10, 2021, the Santa Rosa Band of Cahuilla Indians indicated that the tribe did not have any comments.

On August 20, 2021, the Gabrieleno Band of Mission Indians–Kizh Nation provided documents from historic books and screenshots of historic maps to identify the high cultural sensitivity of the project location and to explain their concerns with specific subsurface ground disturbance activities that have impacted tribal cultural resources in the past. The tribe also explained the cultural significance of the area and the high amount of pre-historic human activity that occurred there and submitted mitigation measures included below as Mitigation Measures MM TCR 1 through TCR 4. Therefore, the City has complied with its obligation under AB 52, and the consultation process is deemed complete.

Additionally, as discussed in Section 3.5, *Cultural Resources*, deep ground excavations or disturbances would not be required to implement the proposed project. Furthermore, it is anticipated that up to 14,933 cubic yards of soil would be imported during the grading phase to balance the site; no soil export would occur. The project site is heavily developed and therefore has already been subject to similar construction and ground-disturbing activities that would occur under the proposed project. However, since the site is of high cultural importance to the Gabrieleno Band of Mission Indians–Kizh Nation, implementation of Mitigation Measures TRC-2 through TRC-4 area required. Mitigation Measure TRC-1 is also included to comply with the request of the Gabrieleno Tongva Indians of California Tribal Council through the AB 52 consultation process. With the implementation of these mitigation measures, impacts to tribal cultural resources would be less than significant.

Mitigation Measure

TCR-1 The City of Irwindale shall notify the Gabrieleno Tongva Indians of California Tribal Council if prehistoric materials, including Native American burial remains, are found. Any notification by the City of Irwindale to the Tribe of the discovery of burial remains shall be separate from the Native American Heritage Commission (NAHC) process and shall occur regardless of whether the NAHC designates the Tribe as Most Likely Descendant. If Native American

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burial remains are found, the Tribe shall engage the City of Irwindale in formal Native American consultation.

TCR-2 A Native American monitor from the Gabrieleño Band of Mission Indians – Kizh Nation shall be retained prior to commencement of ground-disturbing activities:

- The project applicant shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation the direct lineal descendants of the project location. The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project, at all project locations (i.e., both on-site and any off-site locations that are included in the project description and/or required in connection with the project, such as public improvement work). Ground-disturbing activity includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be provided to the City of Irwindale prior to the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity.
- The project applicant shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project.
- The project applicant shall hold at least one pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where a senior member of the Gabrieleño Band of Mission Indians – Kizh Nation shall inform and educate the project's construction and managerial crew and staff members (including any project subcontractors and consultants) about the tribal cultural resources mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential tribal cultural resources, and other informational and operational guidance to aid in the project's compliance with the mitigation measures.
- The Native American monitor shall complete daily monitoring logs that shall provide descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant and/or lead agency upon written request.
- Native American monitoring for the project shall conclude upon the latter of the following: (1) written confirmation from a designated project point of contact to the Tribe

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that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact tribal cultural resources.

TCR-3 Discovery of tribal cultural resources, human remains, and or grave goods:

- Upon the discovery of a tribal cultural resources, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Gabrieleño Band of Mission Indians – Kizh Nation shall be immediately informed of the discovery, and the Kizh monitor shall promptly report to the location of the discovery to evaluate the tribal cultural resource and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 50 feet of the discovered tribal cultural resource unless and until the Tribe has completed its assessment, evaluation, and recovery of the discovered tribal cultural resource and surveyed the surrounding area.
- The Tribe shall recover and retain all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate in its sole discretion, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes.
- If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities shall immediately cease. Native American human remains are defined to include an inhumation or cremation, and in any state of decomposition or skeletal completeness (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as associated grave goods, shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).)
- Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
- Thereafter, construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if the Tribe determines in its sole discretion that resuming construction activities at that distance

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is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Tribal monitor and/or archaeologist deems necessary). (14 Cal. Code Regs. § 15064.5(f).) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.

- Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.
- Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance.

TCR-4

Procedures for burials, funerary remains, and grave goods:

- As the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented for all discovered Native American human remains and/or grave goods. Tribal traditions include, but are not limited to, the preparation of the soil for burial, the burial of funerary objects and/or the deceased, and the ceremonial burning of human remains.
- If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated grave goods are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later, as well as other items made exclusively for burial purposes or to contain human remains. Cremations shall either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials.
- In the case where discovered human remains cannot be fully recovered (and documented) on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe shall make every effort to divert the project while keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials shall be removed.
- In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or

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ceremonial objects. The site of reburial/repatriation shall be agreed upon by the Tribe and the landowner and shall be protected in perpetuity.

- Each occurrence of human remains and associated grave goods shall be stored using opaque cloth bags. All human remains, grave goods, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site if possible. These items shall be retained and shall be reburied within six months of recovery.
- The Tribe shall work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

3.19 UTILITIES AND SERVICE SYSTEMS

The analysis in this section is based partly on the service provider questionnaire responses, which are included as Appendix H to this Initial Study.

Would the project:

- 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?**

Less Than Significant Impact. Following is a discussion of the proposed project's potential impacts on water, wastewater treatment, stormwater drainage, electric power, natural gas facilities, and telecommunications facilities.

Water Supply and Distribution Facilities

The project site is over the Main San Gabriel Groundwater Basin. The VCWD would provide potable water to the project site. The VCWD's water service area encompasses approximately 9.4 square miles and incorporates portions of Baldwin Park, Irwindale, West Covina, and Azusa. VCWD has the legal right to pump groundwater from the Main San Gabriel Groundwater Basin. In addition, VCWD may receive water from CIC and the MWD to serve its customers. Groundwater has historically accounted for approximately 93 percent of the VCWD's overall water supplies. Imported water from MWD has historically accounted for approximately 5 percent of overall water supplies, and CIC has accounted for 2 percent (VCWD 2017). However, in the past five years groundwater has supplied 100 percent of the VCWD's supply (Mortenson 2021)

VCWD has a pumping right of about 5,960 afy and a pumper's share of approximately 3 percent of the Operating Safe Yield as of fiscal year 2014-15. Although there is no limit to the quantity of water that may be

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extracted by parties to the Main Basin Adjudication, groundwater production—more than a party’s water right or its proportional share (pumper’s share) of the Operating Safe Yield—requires purchase of replenishment water to recharge the basin. VCWD’s four active wells include Maine West, Maine East, Nixon West, and Nixon East. These wells have a combined capacity of about 7,700 gallons per minute (VCWD 2017). VCWD has averaged 6,796 afy (4,213 gallons per minute) of groundwater production in the last five years (Mortenson 2021).

VCWD is a shareholder of CIC and has purchased treated water from CIC. The flow capacity from the CIC connection is about 3.3 cubic feet per second (cfs). Furthermore, VCWD can receive direct deliveries of treated imported water through its MWD connection, USG-9, which has a capacity of 29 cfs (about 21,000 afy if used continuously). VCWD typically does not use service connection USG-9 because the collective groundwater supplies along with water purchased from CIC are sufficient to meet water demands. VCWD historically purchased treated imported water from MWD when the wells were impacted by contaminants and treatment facilities were being constructed. VCWD may use the MWD-treated imported water as an emergency water supply source (VCWD 2017).

Projected water demand for the proposed project is estimated based on a water consumption rate of 0.27 afy per acre used by VCWD to project water demands for land zoned industrial (Song 2021). The lot size for the proposed project site is 5.89 acres, therefore the projected water demand is approximately 1.59 afy (1,419 gallons per day [gpd]). The approximate water demand for the Pepsi Bottling plant was 1 afy (893 gpd) (Song 2021). Therefore, the proposed project would result in an increase in water demand of 0.59 afy.

VCWD estimates that it will have sufficient water supplies to meet proposed growth for normal, single-dry, and multiple-dry years. VCWD also confirmed that the water consumption for the proposed project does not exceed overall water supplies, and the system is adequate to serve the proposed project (Song 2021). Therefore, project development would not require the construction of new or expanded water treatment facilities. Impacts would be less than significant.

Wastewater Treatment Facilities

Wastewater generated by the land uses in the City is treated by the Sanitation Districts of Los Angeles County (LACSD). Wastewater is collected in the City’s local sewer collection system, which tie into one of LACSD’s regional trunk sewers. Wastewater from the project site would be treated at the San Jose Creek Water Reclamation Plant (WRP). The San Jose Creek WRP currently provides primary, secondary, and tertiary treatment for a design capacity of 100 million gallons of wastewater per day (mgd). The San Jose WRP currently processes an average flow of 66.9 mgd (Irwindale 2020; Ng 2021).

Wastewater generation due to the development of the proposed project is conservatively assumed to be 90 percent of the indoor water use. The proposed project would comply with the requirements of the 2019 CALGreen (Title 24, California Code of Regulations, Part 11), which establishes mandatory nonresidential measures for water efficiency and conservation under Sections 5.3. The provisions establish the means of conserving water used indoors and include standards for water-conserving plumbing fixtures and fittings. With the implementation of these requirements, as shown in Table 26, the proposed project would have an indoor water demand that is less than the existing bottling plant and a subsequent net decrease of 17 gpd in wastewater

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generation. Therefore, project development would not require the construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Table 26 Proposed and Former Wastewater Generation

Landscape Square Footage	Outdoor Water Use (gpd)	Total Water Demand (gpd)	Indoor Water Demand (gpd)	Wastewater Generation (gpd) ³
Former Land Use				
1,000 ¹	20 ²	893	873	786
Proposed Land Use				
23,271 ⁴	565	1,419	854	769
Net Increase	545	526	(19)	(17)

Source: DWR 2017, 2021; Scott Peterson Landscape Architect 2021.

Notes: gpd = gallons per day

¹ The existing site includes several mature ornamental trees at the entrance to the northern parking lot along with a few shrubs. The square footage of this area was estimated using Google maps.

² Outdoor water use is based on the California Department of Water Resources' Water Budget Workbook for New and Rehabilitated Non-residential Landscapes. Precipitation for the City of Monrovia was used.

³ Calculated as 90 percent of indoor water demand.

⁴ While the total landscaped area is 27,979 square feet, only 23,271 square feet is irrigated.

Stormwater Drainage Facilities

See response to Section 3.10.c.iii. As discussed in that section, the proposed project would not require or result in the relocation or construction of new or expanded storm water drainage, and impacts are less than significant.

Electricity and Natural Gas Facilities

Electricity to the project site would be provided by SCE via existing infrastructure in the immediate area. SCE obtains electricity from conventional and renewable sources. The proposed project would result in a net increase in electricity demand of 310,585 kWh per year (see Table 10, *Electricity Consumption*).

Total electricity consumption in SCE's service area is forecasted to increase by approximately 18,000 GWh between 2016 and 2030 (CEC 2018). SCE forecasts that it will have sufficient electricity supplies to meet demands in its service area; and the electricity demand due to the project is within the forecast increase in SCE's electricity demands. Project development would not require SCE to obtain new or expanded electricity supplies.

Additionally, natural gas needs to the project site would be provided by the Southern California Gas Company (SoCalGas) via existing infrastructure in the immediate area of the project site. The proposed project would result in a net increase in gas demand of 337,131 kBTU per year (see Table 11, *Natural Gas Consumption*).

The total gas consumption in the SoCalGas service area was approximately 7,700 million therms in 2016, with little to no growth projected up to the 2030 (CEC 2018). The natural gas consumption rate for the proposed project is typical for projects of this size and is a modest increase in gas use in the context of SoCalGas' service territory.

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In addition, the proposed project would be required to comply with energy efficiency standards by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The proposed project would also comply with CALGreen requirements related to energy and water conservation. These measures will decrease electricity and gas consumption. Therefore, the proposed project would not result in a substantial increase in natural gas and electrical service demands. SCE and SoCalGas would not need to expand their supply and transmission facilities to handle the demand generated by the proposed project, and the impact would be less than significant.

Telecommunication Facilities

The proposed project would include on-site connections to telecommunication services. The construction-related impacts associated with these improvements are analyzed throughout this Initial Study as part of project development. Impacts would be less than significant.

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

Less Than Significant Impact. VCWD has adequate water supplies to meet project water demands, as substantiated in Section 3.19.a.

The proposed project's landscaping would be required to be installed and maintained in compliance with Chapter 15.30, Water Efficient Landscape Standards and Guidelines, of the Irwindale Municipal Code, which sets landscape design standards for water conservation.

Development of the proposed project would also be required to comply with the provisions of CALGreen, which has requirements for indoor water use reduction and site irrigation conservation. Specifically, project development would be required to adhere to the mandatory nonresidential measures in CALGreen Division 5.3, Water Efficiency and Conservation, including Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use.

Based on the preceding, there are adequate water supplies to meet the water demands of the proposed project, and project development would not require VCWD to obtain new or expanded water supplies. Therefore, impacts on water supplies due to project development would be less than significant.

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

Less Than Significant Impact. As substantiated in Section 3.19.a, there is existing wastewater treatment capacity in the region for estimated project wastewater generation. Project development would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Athens Services waste haulers provide services in the City of Irwindale. In 2019, approximately 82 percent of the municipal solid waste landfilled from the City was disposed of at the Mid-Valley Sanitary Landfill, San Timoteo Sanitary Landfill, Azusa Land Reclamation Landfill, Simi Valley Landfill, and El Sobrante Landfill (CalRecycle 2019a). Waste Management Inc. (WM) owns and operates the Azusa Land Reclamation Landfill and the Simi Valley Landfill. WM stated that the Azusa Land Reclamation Landfill does not accept municipal solid waste but can handle solid waste generated from the construction phase of the proposed project. Operational solid waste can be accepted at the Simi Valley Landfill (BoI 2021). WM also confirmed that the El Sobrante Landfill would be able to adequately serve the expected construction waste. The El Sobrante Landfill would also accept operational solid waste from the proposed project (Dowaliby 2021). The County of San Bernardino owns and operates the Mid-Valley Sanitary Landfill and the San Timoteo Sanitary Landfill. The County said that solid waste from the proposed project would need to be conveyed to landfills in Los Angeles County (Meeka 2021).

Capacity and disposal data for the El Sobrante Landfill and Simi Valley Landfill are shown in Table 27. As shown in the table, the landfills have a combined residual capacity of approximately 10,598 tons per day.

Table 27 Landfill Capacity

Landfill	Current Remaining Capacity (tons) ¹	Maximum Daily Disposal Capacity (tons)	Average Daily Disposal, 2019 (tons) ²	Residual Daily Disposal Capacity (tons)	Estimated Close Date
Simi Valley Landfill	82,954,873	10,791	4,850	5,941	2063
El Sobrante Landfill	143,977,170	16,054	11,398	4,656	2051
Total	226,932,043	26,845	16,248	10,597	NA

Sources: CalRecycle 2019b, 2019c, 2019d.

¹ A volume-to-weight conversion rate of 2,000 lbs/cubic yard (1 ton/cubic yard) for "Compacted - MSW Large Landfill with Best Management Practices" is used according to CalRecycle's 2016 Volume-to-Weight Conversion Factors, https://www.epa.gov/sites/production/files/201604/documents/volume_to_weight_conversion_factors_memoirandum_04192016_508fnl.pdf.

² Average daily disposal is calculated based on 300 operating days per year.

As shown in Table 28, the proposed project is estimated to generate a net increase of approximately 8,778 pounds (or 0.44 ton) of solid waste per day.

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Table 28 Former and Proposed Solid Waste Generation

Land Use	Square Feet	Generation Rate (lbs/square foot/day)	Total (ppd)
Former Land use			
Bottling Plant	62,713	0.0142	(891)
Proposed Land use			
Warehouse	103,670	0.0142	1,472
Manufacturing	17,000	0.0142	241
Office Use	9,160	0.006	55
Net Increase			877
Source: CalRecycle 2019e. Notes: ppd = pounds per day			

As demonstrated in Tables 27 and 28, the total amount of solid waste expected to be generated by the proposed project would be minimal compared to the residual daily disposal capacity of the two landfills that could serve the proposed project.

Enclosures with a roof and double swing gates would accommodate trash bins for solid waste and recyclable materials. The trash enclosure would be in the southwest corner of the truck court area. The provision of recycling bins would help reduce the amount of solid waste that would need to be transported to landfills.

Substantial reductions in solid waste from construction materials can be achieved through recycling, reuse, and diversion programs. Chapter 8.20, Solid Waste Collection and Salvage of Recyclable Materials, of the Irwindale Municipal Code outlines the requirements for diverting construction waste from landfills. As currently codified, the regulations require diversion of 65 percent of nonhazardous construction and demolition waste through recycling, reuse, and diversion programs. Applicants are required to submit a waste diversion plan (WDP) to the City as part of the building or demolition permit process. The preliminary WDP submitted before starting the project must estimate the weight or volume of project construction and demolition debris by material type; the maximum weight or volume of such materials that can feasibly be diverted via reuse, recycling or salvage; and the estimated weight or volume of construction and demolition debris that will be sent to a landfill. The purpose of the WDP is to ensure that development projects meet the 65 percent requirement. Upon completion of the construction phase and prior to obtaining occupancy permits, the applicant would submit documentation to the City that proves compliance with diversion requirements. The documentation shall consist of a final completed WDP showing the actual waste tonnage data, supported by original or certified photocopies of receipts and weight tickets or other records of measurement from recycling companies, deconstruction contractors, and/or landfill and disposal companies. Preparation of the final WDP would be imposed by the City as a condition of project approval, and compliance would be ensured through the City's building plan check and development review process.

Finally, development of the proposed project would be required to comply with the provisions of the 2019 CALGreen, which outlines requirements for construction waste reduction, material selection, and natural resource conservation.

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Based on the preceding, impacts on landfill capacity would be less than significant.

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

Less than Significant Impact. See response to section 3.19.d.

The following federal, state, and local laws and regulations govern solid waste disposal:

- The EPA administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- AB 341 (Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multifamily residential land uses.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) required every California city and county to divert 50 percent of its waste from landfills by the year 2000 by means such as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. Therefore, no impact would occur.

3.20 WILDIFRE

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?

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project area and surrounding properties during and after construction. Vehicular access for the project site would be provided via three driveways—one off Azusa Canyon Road and two off Los Angeles Street. The proposed project would not result in inadequate emergency access and impacts to adopted emergency response and evacuation plans are less than significant.

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

Less Than Significant Impact. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is flat and in an urbanized environment. The proposed project would not impact weather or topography. According to CAL FIRE’s Fire and Resource Assessment Program, the project area is not in a High or Very High Fire Hazard Safety Zone (FHSZ) (CAL FIRE 2021). Therefore, impacts of exposing project occupants to pollutant concentrations from or exacerbating a wildfire would be less than significant.

- 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?**

Less Than Significant Impact. The proposed project would require utility connections and new infrastructure for electricity, natural gas, telecommunications, and cable service. The project site is not in a High or Very High FHSZ but in a highly urbanized part of the City. The proposed project would not add infrastructure such as roads or overhead power lines in areas with wildland vegetation. Therefore, impacts of exacerbating fire risks on the environment would be less than significant.

- 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?**

Less Than Significant Impact. The project site is generally flat. It is not in a designated area with potential for landslides or in a 100-year flood hazard zone (FEMA 2008). Therefore, it is unlikely that the site would be susceptible to downslope or downstream flooding or landslides as a result of postfire slope instability. The project site is also not in a Very High FHSZ. Impacts would be less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact With Mitigation Incorporated. As shown in Figure 3, *Aerial Photograph*, the site is currently occupied by the Pepsi Bottling Group building. The project site and surrounding area are highly urbanized and primarily dominated by commercial and industrial uses, with some residential uses to the northeast, southeast, south, and southwest.

As substantiated in Section 3.4, *Biological Resources*, implementation of the proposed project would not result in the reduction of the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-

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sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. There would be a less than significant impact to nesting habitat for migratory birds.

As substantiated in Section 3.5, *Cultural Resources*, the project was assessed to have low sensitivity for prehistoric resources and a low-to-moderate sensitivity for buried historic archaeological resources. Mitigation measure CUL-1 was included to reduce impacts to a less than significant level.

In Section 3.7, *Geology and Soils*, impacts to paleontological resources were deemed less than significant with mitigation incorporated, and in Section 3.18, *Tribal Cultural Resources*, impacts to tribal cultural resources were deemed to be less than significant with mitigation incorporated.

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

Less Than Significant Impact.

Regarding cumulative effects on agricultural, biological, and mineral resources, the project site is in a developed area and other developments occurring in the vicinity of the proposed project would largely occur on disturbed land. Thus, no cumulative impacts to these resources would occur. Impacts related to archaeological resources, paleontological resources, and hazards and hazardous materials are generally confined to a specific site and do not affect off-site areas. As such, impacts would also be less than significant.

Furthermore, the evaluation of air quality and greenhouse gas impacts considered the proposed project’s cumulative contribution to federal or State nonattainment pollutants within the SoCAB and the evaluation of traffic impacts considered the cumulative effect of other proposed projects in the immediate vicinity. Through the analyses, no significant cumulative impacts were identified for the proposed project. Additionally, the project site is in a highly urbanized area of the city where supporting utility infrastructure (e.g., water, wastewater, and drainage) and services (e.g., solid waste collection) currently exist. Implementation of the proposed project would not require the construction of new or expansion of existing utility infrastructure and services. The proposed project would also have no impacts on recreation and housing.

In consideration of the preceding factors, the proposed project’s contribution to cumulative impacts would be rendered less than significant; therefore, project impacts would not be cumulatively considerable.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in the respective topical sections of this Initial Study, implementation of the proposed project would not result in significant impacts or substantial adverse effects on human beings in the areas of geology and soils, GHG, hydrology and water quality, noise, or wildfire. Therefore, impacts related to these environmental effects are less than significant. As demonstrated in Section 3.3, *Air Quality*, project-related nuisance odors would be reduced to a level of less than

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significant with implementation of Mitigation Measure AQ-1. Also, compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of potentially contaminated soils and implementation of Mitigation Measure HAZ-1 would ensure that impacts to human beings would be less than significant.

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5. List of Preparers

LEAD AGENCY

Brandi Jones, Senior Planner

Lisa Chou, Associate Planner

Daniel Co, Assistant City Engineer

Jamie Traxler, Assistant City Attorney

PLACEWORKS

JoAnn Hadfield, Principal

Dina El Chammas Gass, Senior Engineer

Josh Carman, Senior Associate, Noise and Vibration

John Vang, Senior Associate, Air Quality and GHG

Steve Bush, Senior Engineer, Health Risk Assessment

Izzy Garcia, Associate, Noise and Vibration

Jasmine Osman, Project Planner

Cary Nakama, Graphic Artist

5. List of Preparers

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