DRAFT ENVIRONMENTAL IMPACT REPORT

SOUTH EL MONTE ATHELTIC FIELDS AND BUISNESS PARK PROJECT

(SCH No. 2024070062)

Lead Agency	City of South El Monte 1415 Santa Anita Avenue South El Monte, California 91733
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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The environmental impact report (EIR) process, as defined by the California Environmental Quality Act (CEQA) (*California Public Resources Code* [PRC] §§21000 et seq.), requires the preparation of an objective, full-disclosure document in order to (1) inform agency decision-makers and the general public of the potential direct and indirect significant environmental effects of a proposed action; (2) identify feasible mitigation measures to reduce or eliminate potentially significant adverse impacts; and (3) identify and evaluate reasonable alternatives to a project. In accordance with State CEQA Guidelines Section 15161 (Title 14 of the California Code of Regulations [CCR]), this is a Project EIR that addresses the potential environmental impacts associated with the proposed Project, known as the "South El Monte Athletic Fields and Business Park Project."

1.2 PROJECT OVERVIEW

The approximately 21.17-acre (rounded to 21 acres) project site is located at 825 Lexington-Gallatin Road (Assessor Parcel Number [APN] 8119-005-032), just within the southwestern boundary of the City of South El Monte in Los Angeles County, California. The site is generally bordered by Santa Anita Avenue to the north and west, Lexington-Gallatin Road to the south/southeast, and vacant land to the east. Surrounding land uses and infrastructure include State Route (SR) 60 and vacant property to the north; Whittier Narrows Recreation Area to the southeast and west; and limited office uses to the south at the intersection of Santa Anita Avenue and Lexington-Gallatin Road; and residential uses to the northeast.

The approximately 21-acre project site is a previously disturbed and primarily vacant property containing non-native grasses with sparse patches of ornamental vegetation and exposed soil. Remains of previous uses of the site include building foundations, remnants of a dilapidated shack, and radio tower footings. The topography of the site generally slopes downward from the east to the west at a gradient of less than one percent with elevations ranging from 219 to 226 above mean sea level (msl)

The Project includes the development of an approximately 221,815-square-foot (sf) one-story warehouse building on approximately 10.5 acres of the eastern portion of the project site. The remaining approximately 10.7 acres in the northwestern portion of the project site would be dedicated to the City pursuant to either a long-term ground lease or property donation agreement for future development of a public City park.

The project site is located within the U.S. Army Corps of Engineers (USACE) reservoir flowage easement area associated with the spillway activation elevation of the Whittier Narrows Dam. The project site is located approximately two miles northeast of the Whittier Narrows Dam. The Project includes the construction of storage and drainage improvements for the required volume of potential flood waters from the Whittier Flood Control Basin (referred herein as the Storage Basin Improvements). The Storage Basin Improvements include but are not limited to the (i) installation of a new storage basin approximately three to ten feet below the existing grade of Santa Anita Avenue and (ii) installation of a new gravity storm drain connection for the new storage basin, which would connect to an existing Los Angeles County Flood Control District (LACFCD) pipeline along the northern property line. The warehouse and future City park components of the Project would be designed to accommodate the Storage Basin Improvements. The USACE has an easement across the entire project site to "overflow, flood and submerge" all or a portion of the project site in connection with the Whittier Flood Control Basin project (USACE Easement) pursuant to the covenants and conditions provided in an order and judgement entered on September 8, 1955, in

an action by the United States of America in Case No. 9103, recorded October 9, 1958, in Book M131, Page 58, Official Records (Order). The Order requires written consent from the USACE for "the type and location of any structure and/or appurtenance thereto" in the USACE Easement.

Approval of the Project by the USACE is required pursuant to the USACE Section 408 Program (Section 408 Program), which is codified at United States Code Title 33 Section 40. The purpose of the Section 408 Program is to verify that changes to an authorized USACE Civil Works project will not be injurious to the public interest and will not impair the usefulness of the applicable USACE project. The proposed Project is not allowed to and would not reduce the Whittier Narrows reservoir's storage space. Therefore, to avoid an adverse effect to flood storage capacity of the reservoir, the Project would balance the cut and fill up to the spillway activation elevation of the Whittier Narrows Dam. To maintain the reservoir capacity, the Project proposes to excavate within the City park portion of the project site and to raise the finished grade of the warehouse portion above the spillway activation elevation using the excavated material. The proposed 6- to-12-foot-high retention basin would be surrounded by 2.5h:1v (horizontal to vertical) to 3h:1v earthen slopes. The warehouse finished floor elevation would be approximately 229 feet and retention basin elevation within the future City park area would have a minimum elevation of approximately 213 feet.

The approximately 221,815-sf warehouse building would include approximately 10,000 sf of ancillary office space on the first floor and approximately 10,000 sf of ancillary office in the mezzanine with 27 trailer truck dock doors. The proposed structure would be a concrete tilt up warehouse building and would have a roof line of approximately 45 feet in height. Vehicular access to the warehouse component of the proposed Project would be from two new driveways on Lexington-Gallatin Road. Both driveways would provide truck and passenger vehicle ingress/egress to the site. The warehouse would include a total of 277 standard vehicle parking spaces, 92 of which would be located within the secured lot on the southern side of the building. The secured lot would also be utilized as a truck maneuvering area with access to the proposed dock doors.

The Project Applicant would conduct limited site preparation for the future public City park prior to development of the public park improvements by the City. Those exact future improvements are unknown at this time. Therefore, it has been assumed for purposes of this EIR that the future public City park would include multiple improvements including two athletic fields with stadium lighting, open lawn areas, restroom facilities, and public surface parking. Access to the future City park would be provided from one new driveway with a double swing entry gate off Santa Anita Avenue. Vehicular circulation between the two Project components is not proposed.

The Project Applicant also proposes one freeway adjacent digital billboard sign up to 70 feet in height on the northern portion of the project site within the future City park area.

The Project would require a General Plan Amendment to change the existing General Plan land use designation from Commercial (C) to Commercial-Manufacturing (CM) and a zone change from Commercial (C) to Manufacturing (M). Warehousing and recreational facilities, including but not limited to athletic fields, are principally permitted uses in the M zone.

1.3 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines (14 CCR) requires "A statement of objectives sought by the proposed Project. A clearly written statement of objectives would help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and would aid the decision-makers in preparing

findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project". The following objectives have been identified for the Project.

Objective 1: Provide public benefits to the City by increasing employment opportunities during construction of the Project and occupancy of the warehouse building and increasing property sales and tax revenues that the City will receive as part of the warehouse building improvements.

Objective 2: Provide additional public benefits to the City under the Development Agreement for the Project by creating opportunities for City development of a public park to meet the recreational needs of the City and providing digital billboard advertising revenue sharing.

Objective 3: Develop the warehouse component of the Project consistent with the guidelines and policies of the City of South El Monte General Plan land use designation (Commercial-Manufacturing (CM)) and Zoning designation (Manufacturing (M)) proposed as part of the Project and applicable Municipal Code provisions.

Objective 4: Develop a single pad Class A[1] warehouse of sufficient size and with sufficient trailer truck doors and parking to be competitive within the industrial warehouse marketplace in the vicinity.

Objective 5: Develop a warehouse use proximate to the State Route 60 transportation corridor.

Objective 6: Improve the Property's flood storage capacity via Storage Basin Improvements in the USACE Easement area.

1.4 ALTERNATIVES ANALYZED

State CEQA Guidelines Section 15126.6(a) (14 CCR 15126.6[a]) requires an EIR to "describe the range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but will avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

Alternatives that would avoid or substantially lessen any significant effects of the Project and would feasibly attain most or all of the Project objectives are summarized below. A detailed alternatives analysis is provided in **Section 6.0: Alternatives to the Proposed Project.**

Alternative A: No Project/No Development

Alternative A is the "No Project" alternative required by the State CEQA Guidelines Section 15126.6(e), which allows the decision-makers to compare the potential impacts of the proposed Project with the potential impacts of not approving the proposed Project. CEQA Guidelines Section 15126.6(e)(3)(B) states "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved…"

[1] "Class A buildings command the market's highest rents and attract credit-worthy tenants" and consist of "[i]nvestment-grade buildings that offer an excellent location and first-rate design, building systems, amenities, and management." *See* Richard B. Peiser with Anne B. Frej, *Professional Real Estate Development: The ULI Guide of the Business* (Second Edition).

The No Project/No Development Alternative would retain the project site in its current primarily vacant condition. None of the proposed Project improvements would be implemented. Further, the Project's requested entitlements (i.e., General Plan Amendment, Zone Change, Site Permit approval) would not be granted. Importantly a portion of the project site would not be dedicated to the City for future development of a public City park because there would not be private development of the warehouse facility and no additional public benefits.

Alternative B: Existing Land Use and Zoning Designations – Commercial Development

Consistent with State CEQA Guidelines Section 15126.6, the Existing Land Use Designation Alternative assumes development of the project site pursuant to existing General Plan and zoning designations. The project site has an existing General Plan land use designation of Commercial (C) and Commercial (C) zoning district. The existing Commercial (C) General Plan and zoning designations for the site permit a broad range of retail, professional office, and service-oriented business activities.

Instead of a warehouse, Alternative B assumes development of a 228,690-sf retail shopping center, based on the allowable General Plan maximum floor-area-ratio (FAR) of 0.5 over 10.5 acres with 763 passenger vehicle parking stalls, based on 1 space for every 300 sf of retail gross floor area. Under Alternative B, the remaining 10.7 acres of the project site would be graded and left primarily vacant as private property instead of being dedicated to the City for development of a future City park. A freeway adjacent digital billboard is not assumed under Alternative B.

The project site is located within USACE reservoir flowage easement lands associated with the Whittier Narrows Dam. Per USACE requirements, projects on the site would be required to include Storage Basin Improvements. Therefore, like the proposed Project, Alternative B assumes the development on approximately 10.5 acres of the eastern portion of the site and the remaining approximately 10.7 acres on the northwestern portion of the site would be excavated by approximately 10 feet to accommodate the Storage Basin Improvements.

Alternative C: Reduced Warehouse

The proposed Project would result in significant unavoidable GHG emissions. To reduce GHG impacts to a less than significant level, the size of the proposed warehouse would need to be substantially reduced by approximately 63 percent, which is equivalent to an 82,072-sf warehouse with a commensurate reduction in dock doors and with 100 passenger vehicle parking spaces. Like the proposed Project, Alternative C would require a General Plan Amendment, Zone Change, and Site Permit approval. Under this development scenario, approximately 10.7 acres in the northwestern portion of the project site would be graded and left primarily vacant as private property instead of being dedicated to the City for development of a future City park. A freeway adjacent digital billboard is not assumed under Alternative C.

The project site is located within USACE reservoir flowage easement lands associated with the Whittier Narrows Dam. Per USACE requirements, projects on the site would be required to include Storage Basin Improvements. Like the proposed Project, Alternative C assumes that approximately 10.7 acres on the northwestern portion of the site would be excavated by approximately 10 feet to accommodate the Storage Basin Improvements.

1.5 SUMMARY OF EFFECTS WITH NO IMPACT

State CEQA Guidelines Appendix G was used to determine the impact categories that would require evaluation to determine the potentially significant environmental effects of the proposed Project. The

following includes a discussion of the impact categories where the Project would have "no impact" and a summary discussion of why this determination was reached. There is no further evaluation of these environmental questions in the EIR.

Aesthetics

The State CEQA Guidelines ask for an evaluation of the following:

- "Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?"

The City of South El Monte General Plan (General Plan) Resource Element notes "none of the existing highways, streets, or roads in the City meet requirements for designation as a scenic highway". Interstate 210 (I-210) is the nearest eligible State highway, which is approximately 10 miles northwest of the project site[2]. The project site is not visible from I-210. The project site does not contain any scenic rock outcroppings, historic buildings, or heritage trees. Therefore, the proposed Project would not affect scenic resources along an officially designed or an eligible scenic highway. No impact would occur and this threshold question is not further addressed in the EIR.

Agriculture and Forestry Resources

The State CEQA Guidelines ask for an evaluation of the following:

- "Would the project 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?"
- "Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?"
- "Would the project 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))?"
- "Would the project result in the loss of forest land or conversion of forest land to non-forest use?"
- "Would the project 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?"

The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The nearest designated area of Prime Farmland is located approximately 1.3 miles southwest of the project site[3]. No portion of the project site is covered by a Williamson Act Contract[4]. Additionally, the area does not include forest resources, including timberlands, and is not zoned for agriculture. Therefore, the Project would not result in an impact concerning mapped farmlands, Williamson Act

[2] California Department of Transportation. *List of eligible and officially designated State Scenic Highways*. Retrieved from https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed Oct 20, 2024.

[3] State of California Department of Conservation. *California Important Farmland Finder*. Retrieved from https://maps.conservation.ca.gov/dlrp/ciff/. Accessed October 20, 2024.

[4] State of California Department of Conservation. 2023. *California Williamson Act Enrollment 2023*. Retrieved from https://gis.conservation.ca.gov/portal/home/item.html?id=c608c0e32810424f8f4f9d39570cc45b. Accessed October 20, 2024.

Contracts, agricultural, forest, or timberland zoning, or the conversion or loss of Farmland, forest land, or timberland. No impact would occur and this topic is not further addressed in the EIR.

Biological Resources

The State CEQA Guidelines ask for an evaluation of the following:

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

The project site is not located with an active Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) area (**Appendix D**). No impact would occur and therefore this threshold question is not further addressed in the EIR.

Geology and Soils

The State CEQA Guidelines ask for an evaluation of the following:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the 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 or strong seismic ground shaking.
- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.
- Would the project 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?

There are no known active or potentially active faults at the project site, and the site is not within an Alquist-Priolo Earthquake Fault Zone as designated by the California Department of Conservation (CGS).[5] The nearest Alquist-Priolo Earthquake Fault Zone is located approximately three miles northwest of the project site. Therefore, the Project would not directly, or indirectly, cause potential substantial adverse effects involving rupture of a known earthquake fault and no impact would occur. For this reason, this topic is not further addressed in the EIR.

The project site is located on relatively flat ground and is not adjacent to any areas with steep slopes. Additionally, the site is not located within a Zone of Required Investigation for earthquake-induced landslides. The General Plan states that there is no history of landslides in South El Monte.[6] Further, no areas in the City have been determined to be at high risk of landslides due to South El Monte's relatively flat topography. Therefore, no impacts related to landslides would occur. For this reason, this topic is not further addressed in the EIR.

The Project does not propose the use of septic tanks. There is an existing 8-inch local sanitary sewer mainline located approximately 400 feet north of the site in Lexington Gallatin Road at the intersection with Andrews Street. Project implementation would extend the existing local sewer main line south

[5] State of California Department of Conservation. *Earthquake Zones of Required Investigation*. Retrieved from: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed May 22, 2025.

[6] City of South El Monte. 2021. *City of South EL Monte General Plan, Public Health, Safety, and Environmental Justice Element*. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 4, 2024.

toward the project site on Lexington-Gallatin Road for connection via a 6-inch sewer lateral to serve the proposed warehouse. Wastewater collection for the future City park component of the Project would be provided by running a domestic sewer line through the warehouse component of the Project pursuant to a public easement on private property. The Project does not require septic tanks or assume alternative wastewater disposal systems. Therefore, no impact would occur and for this reason, this topic is not further addressed in the EIR.

Hazards and Hazardous Materials

The State CEQA Guidelines ask for an evaluation of the following:

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

The project site is not located within two miles of a public airport or public use airport; the nearest airport is San Gabriel Valley Airport (also known as the El Monte Airport), which is located approximately three miles north of the project site. Further, the project site is not located within Airport's influence area or noise contours.[7] Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working at the project site.

According to CAL FIRE, there are no wildfire Fire Hazard Severity Zones (FHSZ) in the City. The project site is within a Local Responsibility Area (LRA).[8] LRAs are incorporated cities, urban regions, agriculture lands, and portions of the desert where the local government is responsible for wildfire protection. The nearest Very High FHSZ is in a LRA approximately 1.1 miles southwest of the project site. The Whittier Narrows Recreation Area is a large open space to the south and west of the project site that could pose a fire risk, however, existing roadways and parking lots create a natural fire break preventing wildfire spread. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and these topics are not further addressed in the EIR.

Land Use and Planning

The State CEQA Guidelines ask for an evaluation of the following:

- "Would the project physically divide an established community?"

Examples of projects that could physically divide an established community include a new freeway or highway that traverses an established neighborhood. The project site is within an urbanized and established area of the City of South El Monte. The project site is generally bordered by Lexington-Gallatin Road and Santa Anita Avenue and is separated from SR-60 by a vacant parcel. There is an existing residential neighborhood northeast of the project site adjacent to SR-60 that is accessed from Lexington-Gallatin Road. The Project does not propose any new streets or other physical barriers that could

[7] County of Los Angeles Department of Regional Planning. *El Monte Airport Master Plan Report*. June 1995. Retrieved from: https://dpw.lacounty.gov/avi/airports/documents/SGV_MP.pdf. Accessed May 2025.

[8] CAL FIRE, *Fire Hazard Severity Zone Viewer.* Retrieved from: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0. Accessed May 2025.

physically divide an established community. Therefore, no impact would occur and this topic is not further addressed in the EIR.

Mineral Resources

The State CEQA Guidelines ask for an evaluation of the following:

- "Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?"
- "Would the project result in the loss of availability of a locally-important mineral resources recovery site delineated on a local general plan, specific plan, or other land use plan?"

The project site is not located in a Mineral Resource Zone (MRZ) per the Mineral Resource Zones in Los Angeles County as mapped by the State of California Department of Conservation[9]. None of the prior uses on the site included those that focus on mineral refinement or mining. There are no known mineral resources or recovery sites located on or immediately adjacent to the project site. Therefore, no impact to mineral resources would occur, and this topic is not further addressed in the EIR.

Noise

The State CEQA Guidelines ask for an evaluation of the following:

- "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?"

The project site is located approximately three miles south of the San Gabriel Valley Airport and is not located within the airport's influence area or noise contours. The project site is not located within an existing or projected noise contour associated with any private or public airport. Therefore, the Project would not expose people residing or working in the project area to excessive airport or airstrip-related noise levels and this topic is not further addressed in the EIR.

Public Services

The State CEQA Guidelines ask for an evaluation of the following:

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

The project site is located within the Valle Lindo School District and the El Monte Union High School District. The Project proposes the construction of a warehouse building and future development of a public City park by the City. No residential development is proposed. Project employees, including construction workers, are expected to predominately come from the existing workforce in the City and would therefore not contribute to a significant population increase and associated student population influx to the school districts, see **Section 4.12: Population and Housing** for additional analysis. For this reason, no impact would occur and this topic is not further addressed in the EIR.

[9] Los Angeles County Department of Regional Planning, *GIS-NET Public -Mineral Resource Zones*, Retrieved from: https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, Accessed October 30, 2024.

Other public facilities generally refers to libraries and government buildings that serve the population within the jurisdiction. The South El Monte Library is located at 1430 North Central Avenue, approximately one mile north of the project site. Construction and operation of the Project would not result in a substantial permanent population growth that would result in increased use of public services, like libraries, such that a significant deterioration of the facility would occur, or such that new facilities would be required. Therefore, the Project would not result in a substantial adverse physical impact associated with the construction of a new or physically altered school or other public facilities, like libraries. For this reason, no impact would occur and this topic is not further addressed in the EIR.

Wildfire

The State CEQA Guidelines ask for an evaluation of the following:

- "If located in or near SRA or lands classified as Very High FHSZ, would the project:
  - a) Substantially impair an adopted emergency response plan or emergency evacuation plan.
  - b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
  - 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.
  - d) Expose people or structures, either directly or indirectly, to significant loss, injury or death involving wildfires, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes."

Fire Hazard Severity Zones (FHSZs) are mapped by the California Department of Forestry and Fire Protection (CAL FIRE) as set forth in PRC 4201-4204 and Government Code 51175-89. FHSZs are categorized fire protection within a Federal Responsibility Area under the jurisdiction of a federal agency, a State Responsibility Area (SRA) under the jurisdiction of CAL FIRE, or within a Local Responsibility Area (LRA) under the jurisdiction of a local agency. CAL FIRE is responsible for fire protection within SRAs. CAL FIRE defines a SRA as land that is not federally owned, not incorporated, does not exceed a housing density of three units per acre, contains wildland vegetation as opposed to agriculture or ornamentals, and has watershed value and/or has range/forage value (this effectively eliminates most desert lands). Where local fire protection agencies are responsible for wildfire protection, the land is classified as a LRA. The CAL FIRE mapping states " The geographic center of this parcel is located in an area that the State Fire Marshal has identified as having no Fire Hazard Severity Zone in Local Responsibility Area, per Government Code section 51178**."** The project site is identified as within a LRA, with the nearest Very High FHSZ approximately 0.7 mile southeast of the project site (the 2025 maps show portions of Durfee Avenue and Rosemead Boulevard as Very High FHSZs but not the property adjacent to the roadways. Land east and west of San Gabriel Boulevard, approximately 1.2 miles to the west is designated Very High FHSZ).[10] Fire protection services in the City are provided by the Los Angeles County Fire Department, with local reliance on the LA County Fire Station 90 located at 10115 Rush Street, 0.9 mile north of the project site. The Project would tie into existing infrastructure and would not require the installation or maintenance

[10] CAL FIRE, *Fire Hazard Severity Zone Viewer*, Retrieved from: Compare old and new LRA FHSZ | Fire Hazard Severity Zone and Local PIO Viewer App. Accessed May 22, 2025.

of associated infrastructure such as roads, fuel breaks, emergency water sources, or power lines that could exacerbate fire risk in the area. Therefore, no impact would occur and this topic is not addressed further in the EIR.

1.6 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 1-1: Summary of Impacts and Mitigation Program provides a summary of the potential environmental effects of the proposed Project, the Mitigation Program recommended to ensure that Project impacts are mitigated to the extent feasible, and the expected status of effects following the implementation of the Mitigation Program. The Mitigation Program is comprised of Standard Conditions and Requirements (SCs) and Mitigation Measures (MMs). The Mitigation Program will serve to prevent, reduce, or fully mitigate potential environmental impacts. The more detailed evaluation of these issues, as well as the full text of the Mitigation Program, is presented in EIR Sections 4.1 through 4.17. Where a measure applies to more than one topic, it is presented in the primary section to which it applies and is then cross-referenced.

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Section 4.1: Aesthetics			
Impact 4.1-1: Would the project have a substantial adverse effect on a scenic vista?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.1-2: In non-urbanized areas, would the project 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	None required.	Less than Significant Impact
Impact 4.1-3: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact	**MM AES-1.** Stadium lights at the future City park athletic fields shall comply with the following requirements: Orientation; Full Cutoff Fixtures; Shielding; Lighting Intensity; Dimming Capabilities; Scheduling Controls; Maintenance and Adjustments (refer to **Section 4.1** for the full text of the mitigation measure). **MM AES-2.** Digital Billboard. The billboard shall comply with requirements associated with Lighting Intensity; Design and Control; Messaging Timing and Content (refer to **Section 4.1** for the full text of the mitigation measure).	Less than Significant Impact
Section 4.2: Air Quality			
Impact 4.2-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.2-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable state or federal ambient air quality standard?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.2-3: Would the project expose sensitive receptors to substantial pollutant concentrations?	Less than Significant Impact	None required.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Impact 4.2-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.3: Biological Resources			
Impact 4.3-1: Would the project 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 CDFW or USFWS?	Potentially Significant Impact	**MM BIO-1.** Regardless of the results of focused burrowing owl surveys, a qualified biologist shall conduct a take avoidance preconstruction survey no less than 14 days prior to the onset of construction activities within the construction limits of the project site and a 500-foot buffer. A second survey shall be conducted within 24 hours prior to the onset of construction activities. Surveys will be conducted at least seven days apart. The surveys shall assess the presence of burrowing owls and occupied nest burrows and be conducted in accordance with the most current California Department of Fish and Wildlife (CDFW) survey methods. If burrowing owls are not observed during the preconstruction survey, no additional conditions may be required to avoid impacts to burrowing owl. A preconstruction survey shall be repeated if Project activities are suspended or delayed more than 14 days from the second survey. If burrowing owl is documented on site, occupied burrowing owl burrows shall not be disturbed without CDFW authorization. Disturbance avoidance buffers shall be determined and set up by a qualified biologist in accordance with the recommendations included in the BUOW Guidelines (CDFW 2012). A biologist shall be contracted to perform monitoring during all construction activities approximately every other day. The definitive frequency and duration of monitoring shall be dependent on whether it is the breeding versus non-breeding season and the efficacy of the exclusion buffers, as determined by a qualified biologist and in coordination with CDFW. The Project Applicant shall submit at least one burrowing owl preconstruction survey report to the satisfaction of the City of South El Monte and CDFW to document compliance with this avoidance and minimization measure. For the purposes of this avoidance and minimization measure, “qualified biologist” is a biologist who meets the requirements set forth in the BUOW Guidelines (CDFW 2012).	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		MM BIO-2. If take avoidance pre-construction burrowing owl surveys are positive and avoidance is not possible, either directly or indirectly, the California Department of Fish and Wildlife (CDFW) shall be consulted and, if necessary, a California Endangered Species Act Incidental Take Permit (CESA ITP) shall be obtained authorizing take of burrowing owl incidental to approved project activities. All Conditions of Approval outlined in the CESA ITP shall be fully implemented and strictly followed. Conditions of Approval may include, but are not limited to, worker education program, construction/compliance monitoring, best management practices, CDFW notifications, compliance reporting, final mitigation reporting, take minimization measures, burrowing owl mortality reduction plan, burrow replacement plan, pre-construction surveys, burrow avoidance measures, burrow blockage requirements, burrow excavation requirements, operations and maintenance take avoidance measures, habitat management land acquisition, and endowment fund. If the burrowing owl is no longer a candidate or listed species under CESA at the time of Project construction, an ITP would not be required. **MM BIO-3.** To avoid impacts to special-status resources and inadvertent disturbance to areas outside the limits of the Project activities, the following monitoring requirements and Best Management Practices (BMPs) shall be implemented (refer to **Section 4.3** for the full text of the mitigation measure). **MM BIO-4.** Project impacts on non-native grassland (21.6 acres) shall be mitigated at a 0.5:1 ratio through the purchase of 10.8 acre of grassland habitat at an approved mitigation bank, such as the Petersen Ranch Mitigation Bank. Confirmation of the purchase of grassland habitat at an approved mitigation bank shall be provided to the City of South El Monte Community Development Department prior to the issuance of the first action or permit for site disturbance. **MM BIO-5.** To ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3513 and to avoid potential impacts to nesting birds, vegetation clearing, and ground-disturbing activities shall be conducted outside of the bird nesting season (generally January 15 - August 31 for raptors and February 15 - August 31 for other bird species). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within seven days prior to	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading. If the qualified biologist determines that no active bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements. If active nests of any species protected by the MBTA or CFGC are identified, the biologist shall establish suitable disturbance limit buffers around the nests marked using flagging or staking. The disturbance limit buffer size shall depend on the site conditions, level of activity within the buffer, and species observed. The disturbance limit buffer zones shall be avoided until the nests are no longer occupied. Any active nests shall be monitored by a qualified biologist during active construction, at a frequency determined using their best professional judgment, but not less than twice per week. If potential effects to nesting birds are observed, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds. Once a nest is no longer occupied and the juvenile birds can survive independently from the nest, the project can proceed without further regard to the nest site. **MM BIO-6.** To avoid impacts on the pallid bat, any on-site abandoned structures and all trees with suitable roosting cavities shall be surveyed by a qualified biologist prior to demolition or removal. Pre-construction surveys shall take place no more than 14 days prior to the start of demolition activities. If active roosts are identified, a biological monitor shall be employed to direct avoidance measures. If bats are detected during pre-construction surveys, biological monitoring shall be conducted by a qualified biologist to ensure that project activities do not result in direct take. The biologist shall be present for all demolition or tree removal activities in areas known or suspected to support roosting bats as determined by the qualified biologist. The biological monitor shall perform clearance surveys at the start of each workday in areas scheduled for immediate demolition. The monitor shall direct project activities away from special-status bat species, should they be found on site, to ensure that impacts on these species are avoided to the fullest extent possible. If present, bats are expected to flush from the project site at the onset of demolition activities. However, if they persist	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		on site through demolition of non-roost site areas, consultation with the CDFW may be required.	
Impact 4.3-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?	Potentially Significant Impact	MM BIO-3 is applicable.	Less than Significant Impact
Impact 4.3-3: Would the project have a substantial adverse effect on State or federal protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Impact 4.3-4: Would the project 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?	Potentially Significant Impact	MM BIO-6 is applicable.	Less than Significant Impact
Impact 4.3-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No mitigation is required.	No Impact
Section 4.4: Cultural Resources			
Impact 4.4-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Potentially Significant Impact	**MM CUL-1.** In the event that cultural resources (archaeological or historical) are inadvertently unearthed or encountered during excavation and grading activities, all work within 60 feet of the find shall cease and an archaeologist, the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes, shall be contacted. The archaeologist shall meet the Secretary of Interior's professional qualifications in archaeology and will record and evaluate the resource for potential significance. The City of South El Monte, as the lead agency shall consult with the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		California, and any other consulting tribes regarding the significance of the resource and its potential as a Tribal Cultural Resource (TCR) under CEQA. In the event of the discovery of a TCR, refer to Mitigation Measure (MM) TCR-2. The archaeologist shall determine if the resource meets the CEQA definition of historical (State CEQA Guidelines §15064.5(a)) and/or unique archaeological resources (Public Resources Code [PRC] §21083.2(g)). Should the archaeologist have concerns that the find is potentially significant, the archaeologist shall prepare a mitigation plan for review and approval by the City. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to State CEQA Guidelines Section 15064.5 shall be followed.	
Impact 4.4-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact	MM CUL-1 is applicable.	Less than Significant Impact
Impact 4.4-3: Would the project disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant Impact	No mitigation is required. **SC CUL-1.** If human remains are encountered during the undertaking, California State Health and Safety Code Section 7050.5 states that excavation shall stop and no further disturbance shall occur within 100 feet of the discovery until the County Coroner has made a determination of origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery within 48 hours of notification. If the NAHC is unable to identify an MLD, the MLD fails to make a recommendation, or the landowner or his/her authorized representative rejects the recommendation, the human remains and associated items will be interred on the property with appropriate dignity in a location that will not be subject to future disturbance.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Section 4.5: Energy			
Impact 4.5-1: Would the project 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	None required.	Less than Significant Impact
I**mpact 4.5-2:** Would the project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.6: Geology and Soils			
Impact 4.6-1: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?	Potentially Significant Impact	**SC GEO-1.** The Applicant shall submit to the City of South El Monte Building and Safety Department for review and approval, a site-specific design-level geotechnical investigation prepared for the project site by a registered geotechnical engineer. The investigation shall comply with all applicable State and local code requirements and: a) Include an analysis of the expected ground motions at the site from known active faults using accepted methodologies; b) Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults; and c) Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements. Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigation in the site-specific investigations. The structural engineer shall review the site-specific investigations, provide any additional necessary measures to meet Building Code requirements, and incorporate all applicable recommendations from the investigation in the structural design plans and shall ensure that all structural plans for the Project meet current Building Code requirements.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		The City's registered geotechnical engineer or third-party registered engineer retained to review the geotechnical reports shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical requirements contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and all other relevant construction permits. The City shall review all Project plans for grading, foundations, structural, infrastructure and all other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements. **MM GEO-1.** Prior to the issuance of the first grading permit for ground disturbing activities, the City of South El Monte Building and Safety Department shall review all Project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits to ensure compliance with the applicable recommendations from the Geotechnical Investigation. This shall include recommendations related to the discovery of groundwater, wet soils, or unstable soils during grading, stabilization, dewatering, fill materials, and foundations.	
Impact 4.6-2: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking including liquefaction?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.6-3: Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact	MM GEO-1 is applicable.	Less than Significant Impact
Impact 4.6-4: Would the project 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	No mitigation is required.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Impact 4.6-5: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.6-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	**MM GEO-2.** Prior to the issuance of the first grading permit for ground-disturbing activities, the Applicant shall provide evidence to the City of South El Monte Building and Safety Department that a qualified paleontologist has been retained. The selection of the qualified paleontologist shall be subject to the acceptance of the City. If paleontological resources are encountered, the contractor shall immediately cease all earth-moving activities within a 100-foot radius of the area of discovery. The qualified paleontologist shall be contacted to evaluate the significance of the finding and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements under State CEQA Guidelines Section 15064.5 shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.	Less than Significant Impact
Section 4.7: Greenhouse Gas Emissions			
Laws, Ordinances, and Regulations (LORs) are existing requirements that are based on local, State, or federal regulations or laws that are frequently required independently of CEQA review.		**LOR GHG-1.** Require diesel powered construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449. **LOR GHG-2.** Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485. **LOR GHG-3.** In accordance with California Title 24 Standards, buildings will be designed to have 15 percent of the roof area "solar ready" that will structurally accommodate later installation of rooftop solar panels. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy. **LOR GHG-4.** Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		LOR GHG-5. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11. **LOR GHG-6.** Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410 of the California Green Building Standards Code Part 11. **LOR GHG-7**. To facilitate future installation of electric vehicle supply equipment (EVSE), construction shall comply with Section 5.106.5.3 (nonresidential electric vehicle charging) of the California Green Building Standards Code Part 11. **LOR GHG-8.** Tenants of the warehouse shall comply with the South Coast Air Quality Management District (SCAQMD) Warehouse Indirect Source Rule (Rule 2305). This rule is expected to reduce NO_X and PM_{10} emissions during operations. Compliance with Rule 2305 is enforced by the SCAQMD through their reporting process and is required for all warehouse projects greater than 100,000 square feet.	
Impact 4.7-1: Would the project generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment?	Potentially Significant Impact	**MM GHG-1. Electric Landscape Equipment.** Prior to the issuance of a tenant occupancy permit for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division shall confirm that tenant lease agreements include contractual language that all handheld landscaping equipment used on site shall be 100 percent electrically powered. The warehouse building, as well as the parking lots for the future City park and warehouse components shall be equipped with exterior electrical outlets to accommodate this requirement. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable. Therefore, this mitigation measure is applicable to the warehouse and City park. **MM GHG-2. On-Site Renewable Electricity Generation.** The Project shall install solar photovoltaic (PV) panels or other source of renewable energy generation on the site, or otherwise acquire energy from the local utility that has been generated by renewable sources, that would provide 100 percent of the expected building load. (i.e., the Title 24 electricity demand and the plug-load,	Significant and Unavoidable Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		anticipated to be approximately 5.75 kilowatt hours per year [kWh/year] per square foot). This mitigation measure is only applicable to the warehouse. **MM GHG-3. CALGreen Tier 2.** Prior to the issuance of a building permit, the Project Applicant or successor in interest, and the City (as applicable) shall provide documentation to the City of South El Monte Community Development Department, Building and Safety Division demonstrating the following: ▪ The warehouse shall be designed to achieve Leadership in Energy and Environmental Design (LEED) certification to meet or exceed CALGreen Tier 2 standards in effect at the time of building permit application. ▪ The Project (warehouse and City park) shall provide facilities to support electric charging stations per the Tier 2 standards in Section A5.106.5.3 (Nonresidential Voluntary Measures) of the 2022 CALGreen Code. **MM GHG-4. On-site Electricity Efficiency.** Prior to the issuance of tenant occupancy permits for the warehouse, the Planning Division shall confirm that tenant lease agreements include contractual language that appliances used on site shall be ENERGY-STAR Certified. This mitigation measure is only applicable to the warehouse. **MM GHG-5. Require All-Electric Development.** Prior to the issuance of building permits for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division confirm that building plans require the Project to use all-electric appliances and end uses instead of natural gas. The Project shall not include natural gas utility lines or connections. Therefore, this mitigation measure is only applicable to the warehouse. **MM GHG-6. Solid Waste Diversion.** The warehouse shall divert a minimum of 75 percent of landfill waste. Prior to issuance of a tenant occupancy permit for the warehouse by the City of South El Monte Community Development Department, Planning Division, a recyclables collection and load area shall be constructed in compliance with City standards for recyclable collection and loading areas. This mitigation measure applies only to tenant permits for the warehouse and not the warehouse building shell approvals. The diversion plan shall also comply with the established solid waste and recycling laws including AB 939 and AB 341.	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		The City park shall divert a minimum of 50 percent of land fill waste in compliance with AB 75 and AB 939. In addition, a recyclables collection and load area shall be constructed in compliance with City standards for recyclable collection and loading areas. **MM GHG-7.** Prior to issuance of tenant occupancy permits for the warehouse, the tenant/facility operator shall prepare and submit a Transportation Demand Management (TDM) program detailing strategies that would reduce the use of single occupant vehicles by employees by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. The TDM shall include, but is not limited to the following: ▪ Provide a transportation information center and on-site TDM coordinator to educate residents, employers, employees, and visitors of surrounding transportation options. ▪ Promote bicycling and walking through design features such as showers for employees, self-service bicycle repair area, etc. around the Project site. ▪ Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support, such as ride-matching service. ▪ Incorporate incentives for using alternative travel modes, such as preferential load/unload areas or convenient designated parking spaces for carpool/vanpool users. This mitigation measure applies only to tenant occupancy and not the building shell approvals. Therefore, this mitigation measure is only applicable to the warehouse. **MM GHG-8. Non-Diesel Off-road And Emergency Equipment.** Prior to the issuance of a tenant occupancy permit for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division shall confirm that the Project plans and specifications show the following: ▪ All outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, and forklifts) are zero emission/powered by electricity. The building shall include the necessary charging stations for cargo handling equipment. Note that SCAQMD Rule 2305 (Warehouse Indirect Source Rule) Warehouse Actions and Investments to Reduce Emissions	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		(WAIRE) points may be earned for electric/zero emission yard truck/hostler usage. This mitigation measure applies only to tenant improvements and not the building shell approvals. ▪ Any and all standard emergency generators shall meet California Air Resources Board Tier 4 Final emissions standards. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification) and CARB or SCAQMD operating permit (if applicable) shall be provided to the City. This mitigation measure is only applicable to the warehouse. **MM-GHG-9. Water Use Efficiency and Conservation Plan.** The Project Applicant or designee shall implement a Water Use Efficiency and Conservation Plan that includes the following minimum requirements: Please refer to **Section 4.7: Greenhouse Gas Emissions** for the complete measure: ▪ Indoor Conservation Features and Operations ▪ Outdoor Conservation Features and Operations This mitigation measure is applicable to the warehouse and City park (i.e., restroom facilities and landscaped areas).	
Impact 4.7-2: Would the project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions?	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Section 4.8: Hazards and Hazardous Materials			
Impact 4.8-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	Potentially Significant Impact	No mitigation is required.	Less than Significant Impact
Impact 4.8-2: Would the project 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?	Potentially Significant Impact	MM GEO-1 and MM HYD-1 are applicable.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Impact 4.8-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact	MM GEO-1 and MM HYD-1 are applicable.	Less than Significant Impact
Impact 4.8-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Potentially Significant Impact	MM GEO-1 and MM HYD-1 are applicable.	Less than Significant Impact
Impact 4.8-5: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.9: Hydrology and Water Quality			
Impact 4.9-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Potentially Significant Impact	**SC HYD-1.** The Applicant or his/her designees shall obtain a General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit). The Applicant or his/her designees shall provide a copy of this permit to the City Public Works Department prior to the issuance of the first grading permit. **SC HYD-2.** Prior to issuance of the first grading permit, the Applicant shall submit to the City Engineer for approval, a Storm Water Quality Management Plan (SWQMP) specifically identifying Best Management Practices (BMPs) that will be incorporated into the Project to control storm water and non-storm water pollutants during and after construction. To ensure compliance, a legal and fiduciary enforcement mechanism in the form of a Storm Water Quality Management Plan Agreement shall be executed with the City of Rialto. This agreement shall additionally be recorded in the office of the County Recorder for the County of San Bernardino. The SWQMP shall specify best management practices specific to the project site, which shall be integrated into the storm	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		water conveyance plan. The plan shall identify specific strategies, including the following. ▪ Site design features, including maximizing open space, preservation of natural drainages, and minimization of impervious surfaces. ▪ Source control features, including leveraging public outreach and education, use of appropriate landscaping, and covering trash storage areas. ▪ Treatment controls, including the use of underground chambers. **SC HYD-3.** An Erosion Control Plan shall be prepared, and included with the Project's grading plan, and implemented for the Project that identifies specific measures to control on-site and off-site erosion from the time ground disturbing activities are initiated through completion of grading. The Erosion Control Plan shall include the following measures at a minimum: ▪ Specify the timing of grading and construction to minimize soil exposure to rainy periods experienced in Southern California; and ▪ An inspection and maintenance program shall be included to ensure that any erosion which does occur either on-site or off-site as a result of this Project will be corrected through a remediation or restoration program within a specified time frame. **MM HYD-1.** Groundwater Dewatering Permits. Prior to initiation of excavation activities, the Project Applicant shall obtain coverage under the Los Angeles Regional Water Resource Control Board (RWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles And Ventura Counties (Order No. R4-2023-0429, NPDES No. CAG994004), or any other subsequent permit for dewatering activities, and provide evidence of coverage to the City of South El Monte Building and Safety Department. This shall include submission of a Notice of Intent (NOI) for coverage under the permit to the Los Angeles RWQCB at least 45 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and	

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Los Angeles RWQCB.	
Impact 4.9-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Potentially Significant Impact	MM HYD-1 is applicable.	Less than Significant Impact
Impact 4.9-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in substantial erosion or siltation on- or off-site?	Less than Significant Impact	SC HYD-1 through SC HYD-3 are applicable. No mitigation is required.	Less than Significant Impact
Impact 4.9-3: Would the project 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: ii) increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? iv) impede or redirect flood flows?	Potentially Significant Impact	MM HYD-1, SC HYD-1, and SC HYD-2 are applicable.	Less than Significant Impact
Impact 4.9-4: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant Impact	None required.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Impact 4.9-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Potentially Significant Impact	MM HYD-1, SC HYD-1, and SC HYD-2 are applicable.	Less than Significant Impact
Section 4.10: Land Use and Planning			
Impact 4.10-1: Would the project cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.11: Noise			
Impact 4.11-1: Would the project generate 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?	Potentially Significant Impact	**SC NOI-1:** Prior to issuance of a building permit, the applicant shall demonstrate, to the satisfaction of the City of South El Monte Building Official or Chief Engineer, that the construction contracts include the following: ▪ Noise Shielding and Muffling ▪ Enclosure of Outdoor Mechanical Equipment ▪ Location of Construction Staging Areas **MM NOI-1:** Prior to issuance of a building permit, the applicant shall demonstrate, to the satisfaction of the City of South El Monte Building Official or Chief Engineer, that the construction contracts include the installation of a 10-foot-high temporary construction noise barrier along the portion of the southwest project site boundary line that is within approximately 20 feet of the office/commercial uses within Whittier Narrows Recreation area as depicted in Figure 4.11-2. The temporary construction noise barrier shall have a sound transmission class (STC) of 25 or greater in accordance with the American Society for Testing and Materials (ASTM) Test Method E90, or a density of at least two pounds per sf to ensure adequate transmission loss characteristics. To achieve this, the barrier may consist of steel tubular framing, welded joints, a layer of 18-ounce tarp, a two-inch thick fiberglass blanket, a half-inch thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding. An alternate design may be proposed by the applicant provided that the noise attenuation requirements above are met. The temporary construction noise barrier must be free of	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		degrading holes or gaps and shall be designed to prevent structural failure due to factors such as wind, shear, shallow soil failure, earthquakes, and erosion.	
Impact 4.11-2: Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.12: Population and Housing			
Impact 4.12-1: Would the project 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?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.13: Public Services			
Impact 4.13-1: 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 fire protection?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.13-2: 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 police protection?	Less than Significant Impact	No mitigation is required. **SC PS-1.** Prior to issuance of building permits, the Los Angeles County Sheriff's Department (LASD) shall review development plans for the incorporation of defensible space concepts to reduce demands on police services. Public safety planning recommendations shall be incorporated into the Project plans. The Applicant shall prepare a list of project features and design components that demonstrate responsiveness to defensible space design concepts. The LASD shall review and approve all defensible space design features incorporated into the Project prior to initiating the building plan check process.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		SC PS-2. Prior to the issuance of the first grading permit and/or action that would permit site disturbance, the Applicant shall provide evidence to the Los Angeles County Sheriff's Department (LASD) that a construction security service or equivalent service shall be established at the construction site along with other measures, as identified by the LASD, to be instituted during the grading and construction phase of the Project.	
Section 4.14: Recreation			
Impact 4.14-1: Would the Project increase the use of existing neighborhood, community and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? and **Impact 4.14-2:** 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?	Less than Significant Impact	None required.	Less than Significant Impact
Section 4.15: Transportation			
Impact 4.15-1: Would the project, conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.15-2: Would the proposed project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.15-3: Would the proposed project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? **Impact 4.15-4:** Would the proposed project result in inadequate emergency access?	Less than Significant Impact	None required.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
Section 4.16: Tribal Cultural Resources			
Impact 4.16-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC §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 CRHR, or in a local register of historical resources as defined in PRC §5020.1(k) or: 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 PRC §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Potentially Significant Impact	MM CUL-1 is applicable. **MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The Project Applicant/City of South El Monte shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the Project inclusive of the warehouse and public park at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement shall be submitted to the City of South El Monte (lead agency) prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The 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 TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes from a designated point of contact for the Project Applicant/City of South El Monte	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
		that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the consulting tribes to the Project Applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs. **MM TCR-2: Discovery of TCRs**. Upon discovery of any tribal cultural resources (TCRs), all construction activities in the immediate vicinity (i.e., not less than the surrounding 50 feet) of the discovery shall cease. The Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes shall be immediately informed of the discovery, and the Native American Monitor shall promptly evaluate the TCR. The City shall consult with the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes to determine the appropriate treatment and/or final disposition for the TCR, which may include one of the following options: preservation in place/avoidance, on-site reburial/relocation, data recovery/excavation, curation, or transfer to the consulting tribes. No project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until its assessment/evaluation/recovery has been completed.	
Section 4.17: Utilities			
Impact 4.17-1: Require or result in the relocation or construction of new or expanded water, facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant Impact	None required. No additional impacts beyond that assumed in Section 4.1 through Section 4.17 of the EIR.	Less than Significant Impact
Impact 4.17-2: 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	None required.	Less than Significant Impact
Impact 4.17-3: Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation	Less than Significant Impact	None required. No additional impacts beyond that assumed in Section 4.1 through Section 4.17 of the EIR.	Less than Significant Impact

Table 1-1: Summary of Impacts and Mitigation Program

Thresholds	Level of Significance Before Mitigation	Standard Conditions; Mitigation Measures; Laws, Ordinances and Regulations	Level of Significance After Mitigation
of which could cause significant environmental effects?			
Impact 4.17-4: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant Impact	None required.	Less than Significant Impact
Impact 4.17-5: Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?	Less than Significant Impact	No mitigation is required. No additional impacts beyond that assumed in Section 4.1 through Section 4.17 of the EIR.	Less than Significant Impact
Impact 4.17-6: 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. **Impact 4.17-7:** Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than Significant Impact	None required.	Less than Significant Impact

2.0 INTRODUCTION

2.1 PURPOSE OF THIS ENVIRONMENTAL IMPACT

This Environmental Impact Report (EIR; State Clearinghouse [SCH] No. 2024070062) has been prepared to evaluate the potential environmental impacts associated with the construction and operation of the proposed South El Monte Athletic Fields and Business Park Project (Project or proposed Project). The EIR has been prepared in conformance with the California Environmental Quality Act (CEQA) (California *Public Resources Code* [PRC] §§21000 et seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations* [CCR] Chapter 3, §§15000 et seq.).

The City of South El Monte (City) is the "public agency which has the principal responsibility for carrying out or approving the project" and, as such, is the "Lead Agency" for this Project under CEQA (14 CCR §15367). CEQA requires the Lead Agency to consider the information contained in an EIR prior to taking any discretionary action. This EIR is intended to provide information to the Lead Agency and other public agencies, the general public, and decision-makers regarding the potential environmental impacts from the construction and operation of the proposed Project. As the Lead Agency, the City will review and consider this EIR in its decision to approve, condition approval of, or deny the proposed Project.

Pursuant to CEQA, "[t]he purpose of the environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the proposed project, and to indicate the manner in which significant environmental effects can be mitigated or avoided" (PRC §21002.1[a]). An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines, and provides the information needed to assess the environmental consequences of a project to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a project that may have the potential to result in significant adverse environmental impacts.

2.1.1 Type of Environmental Impact Report

The City has determined that a Project EIR is the appropriate CEQA document for the proposed Project. In accordance with State CEQA Guidelines Section 15161, a Project EIR "examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation." This EIR evaluates the potentially significant, adverse impacts on the environment resulting from implementation of the proposed Project. This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the current proposed actions, as required by State CEQA Guidelines Section 15146. The EIR analysis considers the activities associated with the Project, to determine the short-term and long-term effects associated with their implementation. This EIR discusses both direct and indirect impacts of the Project, as well as cumulative impacts. **Section 3.0: Project Description** provides a detailed description of the construction and operational components of the proposed Project. **Section 4.0: Environmental Impact Analysis** discusses the regulatory environment, existing conditions, environmental impacts, and mitigation program for the Project.

2.1.2 Standards of Adequacy Under CEQA

While Sections 15120 through 15132 of the State CEQA Guidelines generally describe the content of an EIR, neither CEQA nor the CEQA Guidelines contain specific, detailed, quantified standards for the content of environmental documents. State CEQA Guidelines Section 15151 states:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have not looked for perfection but for adequacy, and a good faith effort at full disclosure.*

2.1.3 Compliance with CEQA

The City of South El Monte, which has the principal responsibility for processing and approving the Project, along with other public agencies with direct interest in the Project (e.g., responsible, trustee, and federal agencies), may use this EIR in their decision-making or permitting processes and will consider the information in this EIR in combination with other information that may be presented during the CEQA process. The Lead Agency can approve subsequent actions without additional environmental documentation unless otherwise required by Section 21166 of the CEQA Statutes and Section 15162 of the State CEQA Guidelines. In addition, this EIR provides the analysis in support of the Mitigation Program that will, if the Project is approved, be made conditions of approval for the Project and implemented through the CEQA-mandated Mitigation Monitoring and Reporting Program.

In accordance with CEQA, public agencies are required to make appropriate findings for each potentially significant environmental impact identified in the EIR if it decides to approve a project. If the EIR identifies significant environmental impacts that cannot be mitigated to a less than significant level through the adoption of mitigation measures or project alternatives, the Lead Agency (and responsible agencies using this CEQA document for their respective permits or approvals) must decide whether the benefits of the project outweigh any identified significant environmental effects that cannot be mitigated to below a threshold of significance. If the agency decides that the overriding considerations, including project benefits, outweigh the unavoidable impacts, then the agency (Lead Agency or responsible agency) is required to adopt a Statement of Overriding Considerations, which states the reasons that support its actions.

The Lead Agency's actions involved in the implementation of the Project are described in **Section 3.0: Project Description**. Other agencies that may have discretionary approval over the Project, or components thereof, are also identified in the Project Description.

2.2 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This EIR provides a comprehensive evaluation of the reasonably anticipated scope of the proposed Project. It is intended to serve as an informational document for public agency decision-makers and the general public regarding (1) the objectives and components of the Project; (2) any potentially significant environmental impacts (individual and cumulative) that may be associated with the planning,

construction, and operation of the Project; (3) an appropriate and feasible Mitigation Program; (4) feasible alternatives that may be adopted to reduce or avoid significant impacts.

In compliance with the State CEQA Guidelines, the City has taken steps to maximize opportunities for the public and other public agencies to participate in the environmental review process. The scope of this EIR includes issues identified in consultation with the City during the Notice of Preparation (NOP) comment period, during the public Scoping Meeting, and environmental issues raised by agencies and the general public in response to the scoping process.

2.2.1 Notice of Preparation (NOP)

State CEQA Guidelines Section 15063 provides that if a lead agency determines that an EIR will clearly be required for a project, an Initial Study is not required. Pursuant to CEQA Guidelines Section 15082, the City of South El Monte prepared and circulated a Notice of Preparation (NOP) to affected agencies and interested parties for a public review period beginning on July 2, 2024. The deadline to submit comments on the NOP was August 1, 2024. **Table 2-1: Summary of Written Comments on Notice of Preparation** summarizes the comments received from agencies/persons during the NOP process and provides a reference, as applicable, to the section(s) of this EIR where the issues are addressed. The NOP and comment letters are provided in **Appendix A** of this EIR. This table identifies areas of controversy/ unresolved issues and issues to be addressed in the EIR.

2.2.2 Scoping Meeting

Pursuant to Section 21083.9 of the CEQA Statute, the Lead Agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance. A scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, and environmental effects to be analyzed. The City held a Scoping Meeting on July 22, 2024, at 6:30 p.m. at the City of South El Monte in the City Hall Council Chambers, located at 1415 Santa Anita Avenue in the City of South El Monte. Four members of the public were present. Members of the public voiced concerns related to traffic on Lexington-Gallatin Road because it is the only access road in/out of the nearby residential neighborhood adjacent to SR-60. Members of the public also noted that there are additional vehicles on Lexington-Gallatin Road because students attending South El Monte High School are dropped off and picked up in the residential neighborhood; South El Monte High School backs up to the residences.

Table 2-1: Summary of Written Comments on Notice of Preparation

Commenter Name	Summary of Comment and Where Addressed
Regional and Local Agencies	
South Coast Air Quality Management District, letter dated July 19, 2024	Recommendations and Comments: ▪ Use the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook and website as guidance when preparing the air quality and greenhouse gas (GHG) analyses ▪ Use CalEEMod land use emissions software to estimate pollutant emissions ▪ Quantify criteria pollutant emissions and compare the emissions to SCAQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds (LSTs) to determine Project air quality impacts. ▪ Identify potential adverse air quality impacts from all phases of the Project and all air pollutant sources related to the Project. Calculate air quality impacts from both construction (including demolition, if any) and operations ▪ Evaluate air quality impacts from indirect sources ▪ Emissions from the overlapping construction and operational activities should be combined and compared to SCAQMD's regional air quality CEQA operational thresholds to determine the level of significance ▪ If the Project generates diesel emissions from long-term construction or diesel-fueled vehicular trips, it is recommended that a mobile source health risk assessment be prepared. Residents in the area may have a greater exposure to air pollution and bear a disproportionate burden of increasing health risks ▪ Mitigation considerations: install solar energy arrays, use light colored paving and roofing materials, use Energy Star heating, cooling, lighting devices, and appliances, use low-VOC or water-based cleaning products ▪ Design considerations: mark truck routes with trailblazer signs, truck entrance/exits face away from sensitive receptors, traffic inside site oriented away from sensitive receptors, restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the project site ▪ Review SCAQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation can be identified and implemented that may help future warehouse operators meet compliance obligations See **Section 4.2: Air Quality** and **Section 4.7: Greenhouse Gas Emissions**.
Department of Transportation (Caltrans), letter dated August 1, 2024	Comments: ▪ Encourages the lead agency to improve pedestrian and bicyclist amenities in community destinations, specifically along Santa Anita Ave. and Durfee Ave, connecting Whittier Narrows Park and South El Monte High School ▪ Requests that future Project documents confirm that there is a minimum of 20 feet of horizontal clearance from the edge of the traveled way to the face of the billboard foundation for a clear recovery zone ▪ Any work performed within the State right-of-way will require a new Outdoor Advertising Display (ODA) Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications Recommendations: ▪ Construct physically separated facilities such as ADA compliance, Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing

Table 2-1: Summary of Written Comments on Notice of Preparation	
Commenter Name	**Summary of Comment and Where Addressed**
	▪ Implement visual indicators such as pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes ▪ Implement bike amenities for public use on the project site. The NOP states that "Short-term and long-term bike racks would also be provided for warehouse employees," which may prevent accessibility for the athletic field users ▪ Parking reduction whenever possible ▪ If the Project has new sidewalks and intersection improvements, reconstruct the sidewalk along property frontage per the latest State standards, and construct ADA curb ramps to meet the current Caltrans Standard Plans ▪ Caltrans will require an Encroachment Permit for work performed within the State right-of-way. Recommends that large-size truck travel and construction traffic be limited to off-peak commute hours ▪ Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. See **Section 3.0: Project Description** and **Section 4.15: Transportation**.
Los Angeles County Sanitation Districts (Districts), letter dated July 19, 2024	Comments: ▪ Wastewater from the Project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall H Unit 5D Trunk Sewer ▪ Wastewater will be treated at the Whittier Narrows Water Reclamation Plant (WRP) ▪ The Districts changes a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. ▪ The available capacity of the Districts' treatment facilities will be limited to levels associated with the approved growth identified by SCAG. See **Section 4.17: Utilities and Service Systems**.
Individuals	
Jesus Samuel Flores	Comments: ▪ Increased levels of noise pollution and congestion will create a safety hazard for local youth who use surrounding parks and public schools ▪ Surrounding residents will experience increased levels of stress and anxiety from increased exposure to exhaust/toxic fumes as a result of the Project ▪ Noise pollution associated with the project will create a negative living experience for nearby residents ▪ Requests increased community engagement opportunities See **Section 4.2: Air Quality**, **Section 4.11: Noise**, **Section 4.15: Transportation**
Sal Ramirez	▪ Requests more insight and transparency about the Project and the intended use of the property See **Section 3.0: Project Description**
Jose Flores	▪ Recommends updating the zoning; instead change from Commercial to Manufacturing to Commercial-Residential to limit traffic surrounding South El Monte High School **See Section 6.0: Alternatives to the Proposed Project**

2.3 EIR SCOPE AND CONTENT

This EIR addresses the potential environmental effects of the proposed Project and was prepared following input for the public and the responsible and affected agencies, through the EIR scoping process. The City, as the lead agency, made the determination the EIR was required to address potentially significant environmental effects on the following resources:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Services Systems

The City has determined that the EIR for the proposed Project would not require the assessment of Agriculture and Forestry Resources, Mineral Resources, Public Services: Schools and Libraries, and Wildfire. Substantiation is provided in **Section 1.0: Executive Summary**.

2.4 DOCUMENTS INCORPORATED BY REFERENCE

Pertinent documents relating to this EIR have been cited in accordance with CEQA Guidelines Section 15148 or have been incorporated by reference in accordance with CEQA Guidelines Section 15150, which encourages incorporation by reference as means of reducing redundancy and the length of environmental reports. The following documents are hereby incorporated by reference into this EIR and are available for review at the City of South El Monte. Information contained within these documents has been used for various sections in the EIR.

South El Monte General Plan 2020. The City's General Plan, as amended, presents a comprehensive plan to accommodate the City's vision for the physical development of the City. The General Plan sets forth goals and policies addressing economic development, land use, circulation, housing, and related issues that affect the quality of life in South El Monte. The General Plan includes the 2021-2029 6th Cycle Housing Element and the Public Health, Safety, and Environmental Justice Element; both elements were adopted on October 12, 2021. Goals and policies related to Noise have been incorporated from the General Plan 2020 Public Safety Element. This document is available for viewing on the City's website at:

- General Plan | https://www.cityofsouthelmonte.org/186/General-Plan

City of South El Monte Municipal Code. The South El Monte Municipal Code (Municipal Code) regulates land use and activities within the City's jurisdiction including through the Zoning Code (codified in Title 17, as amended April 23, 2024). The Zoning Code is the primary tool for implementing the City's General Plan policies. The Municipal Code is referenced in this EIR to establish the baseline requirements according to the City's Municipal Code regulations. The Municipal Code can be accessed online at:

- Municipal Code | https://ecode360.com/SO5015

2.5 LEAD AGENCY AND CONTACT PERSONS

The City of South El Monte is the Lead Agency for the preparation of the EIR. Inquiries regarding the EIR should be directed to the City.

Lead Agency: City of South El Monte
Community Development Department
1415 Santa Anita Avenue
South El Monte, CA 91733
Contact: Gerardo Marquez, Interim Director
(626) 579 6540
Email: gmarquez@soelmonte.org

2.6 ENVIRONMENTAL REVIEW PROCESS

Notice of the availability of the Draft EIR has been provided to agencies, organizations, and interested groups and persons for comment during a 45-day review period in accordance with State CEQA Guidelines Section 15087. The Notice of Completion for the Draft EIR has also been distributed as required by CEQA. This Draft EIR, including all studies, is available for review during normal business hours at the City of South El Monte Planning Division. Additionally, copies of the Draft EIR and technical appendices are also available at the reference desk of the following library and on the City's website.

- **City of South El Monte**, Planning Division 1415 Santa Anita Avenue, South El Monte, California 91733
- **City website**: https://www.cityofsouthelmonte.org/606/Current-Projects
- **South El Monte Library**, 1430 North Central Avenue, South El Monte, California 91733

The City will subsequently respond to environmental comments on the Draft Program EIR received in writing during the public review period through the preparation of a Responses to Comments document for the Final EIR. All persons who commented on the Draft Program EIR will be notified of the availability of the Final EIR and the dates of public hearings before the Planning Commission and City Council.

2.7 LIST OF ACRONYMS USED IN THE EIR

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADT	Average Daily Traffic
APN	Assessor Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BACT	Best Available Control Technology
BMP	Best Management Practice
BTU	British Thermal Unit
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards

CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBEES	California's Building Energy Efficiency Standards
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Conditional Development Permit
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (Superfund)
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFCs	chlorofluorocarbons
CFR	Code of Federal Regulations
CGS	California Geologic Survey
CH_4	methane
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
COG	Council of Governments
CPP	Clean Power Plan
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency (hazardous materials)
cy	cubic yards
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel scale
DEH	Department of Environmental Health, San Bernardino County
DIF	Development Impact Fee
DOF	Department of Finance
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control, State of California
EIR	Environmental Impact Report
EO	Executive Order

EMMA	Emergency Mutual Aid Agreements
ESA	Endangered Species Act
FCCA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FR	Federal Register
FHWA	Federal Highway Administration
GHG	greenhouse gas
GHGRP	GHG Reduction Plan
gpm	gallons per minute
GWh	gigawatt-hours
HCM	Highway Capacity Manual
HFCs	hydrofluorocarbons
Hz	hertz
ITE	Institute of Transportation Engineers
kWh	kilowatt-hour
LCFS	Low Carbon Fuel Standard
Ldn	Day-Night average noise level
Leq	Equivalent noise levels
LID	Low Impact Development
Lmax	Maximum sound level
Lmin	Minimum sound level
LOS	Level of Service
LST	Localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MCE	Maximum Credible Earthquake
MLD	most likely descendants
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mph	miles per hour
mpg	miles per gallon
MPO	Metropolitan Planning Organization
msl	mean sea level
MWh	megawatt-hour
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission

NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO_2	Nitrogen dioxide
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
NO_x	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRHP	National Register of Historic Places
NSR	New Source Review Program (air pollution health effects)
O_3	Ozone
OES	Office of Emergency Services, State of California
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCE	Passenger Car Equivalent
PFCs	perfluorocarbons
$PM_{2.5}$	Fine particulate matter (2.5 microns or less)
PM_{10}	Fine particulate matter (10 microns or less)
PPD	Precise Plan of Design
ppv	peak particle velocity
ppm	Parts per million
PRC	Public Resources Code
PUC	Public Utilities Commission
UST	underground storage tank
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gases
RTIP	Regional Transportation Improvement Program
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy (SCAG)
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCOG	San Bernardino Council of Governments
SC	Standard Condition
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments

SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
sf	square feet
SIP	State Implementation Plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SRA	Source Receptor Area
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TDM	Transportation Demand Management
TMDL	total maximum daily load
TPM	Tentative Parcel Map
USACE	United States Army Corps of Engineers
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VOC	Volatile organic compound
Wh	watt-hours
WQMP	Water Quality Management Plan

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

The purpose of the Project Description is to describe the South El Monte Athletic Fields and Business Park Project (Project or proposed Project) to allow for meaningful review by reviewing agencies, decision-makers, and interested parties. Section 15124 of the CEQA Guidelines (14 CCR §15124) requires that a project description for an EIR contain (1) the precise location and boundaries of a project site; (2) a statement of objectives sought by a project including the underlying purpose of the project; (3) a general description of a project's characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of the permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, State, or local laws, regulations, or policies. An adequate Project Description need not be exhaustive, but should supply the detail necessary for project evaluation.

3.2 PROJECT LOCATION AND SETTING

The approximately 21.17-acre (rounded to 21 acres) project site is located at 825 Lexington-Gallatin Road (Assessor Parcel Number [APN] 8119-005-032), just within the southwestern boundary of the City of South El Monte (City) in Los Angeles County, California. The Whittier Narrows Recreation Area is located west/southwest of the project in unincorporated Los Angeles County. A vacant property and State Route 60 (SR-60) are located north/northeast of the project site, specifically at the Santa Anita Avenue freeway interchange. The project site is located approximately two miles northeast of the Whittier Narrows Dam and is within U.S. Army Corps of Engineers (USACE) reservoir flowage easement area. **Figure 3-1: Regional Map** and **Figure 3-2: Vicinity Map** depict the project site in a regional and local context, respectively.

The site was primarily used for agricultural uses from 1928 to 1938. Around 1948, the project site was developed as a transmitter site for KRLA radio station with two buildings and six radio towers on the southern portion of the site. The KRLA station became obsolete and was abandoned in 1987, the radio towers were removed in the late 1980s to early 1990s, and the site has remained vacant with the exception of the structural foundations of the buildings and radio towers footings.

The project site is previously disturbed and generally vacant land containing non-native grasses with sparse patches of ornamental vegetation and exposed soil. The site is relatively flat with an elevation of approximately 219 feet above mean sea level (msl) in the western corner and 226 msl in the eastern corner. The existing topography slopes generally from the southeast to northwest at a gradient of less than one percent.

As noted above, the project site is located within USACE reservoir flowage easement area associated with the spillway activation elevation of the Whittier Narrows Dam. Flowage easement land is non-federal land on which the United States government has acquired certain perpetual rights, including the right to overflow, flood, and submerge the land; the right to prohibit structures for human habitation; and the right to approve all other structures proposed for construction within the flowage easement.

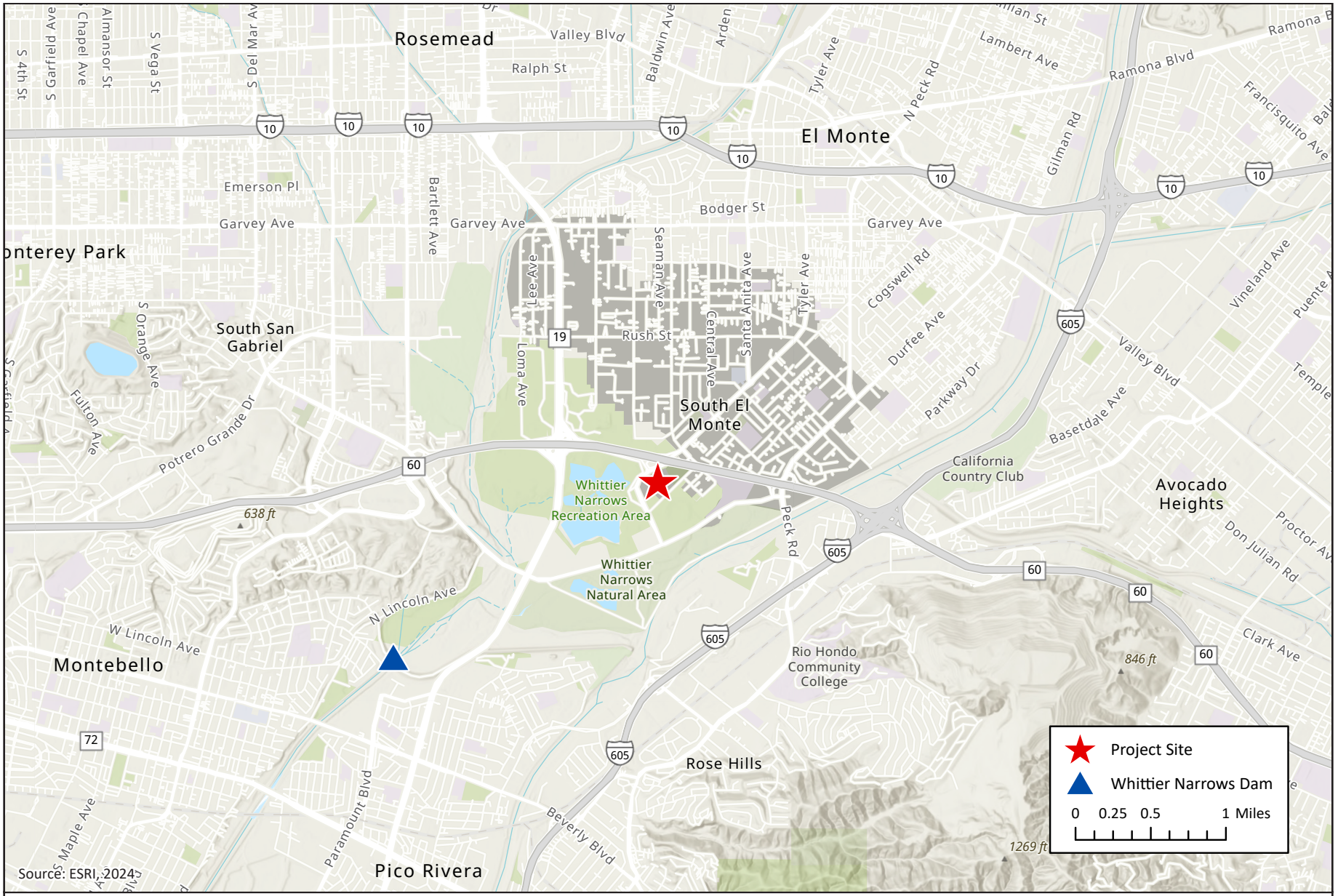


Figure 3-1: Regional Map

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

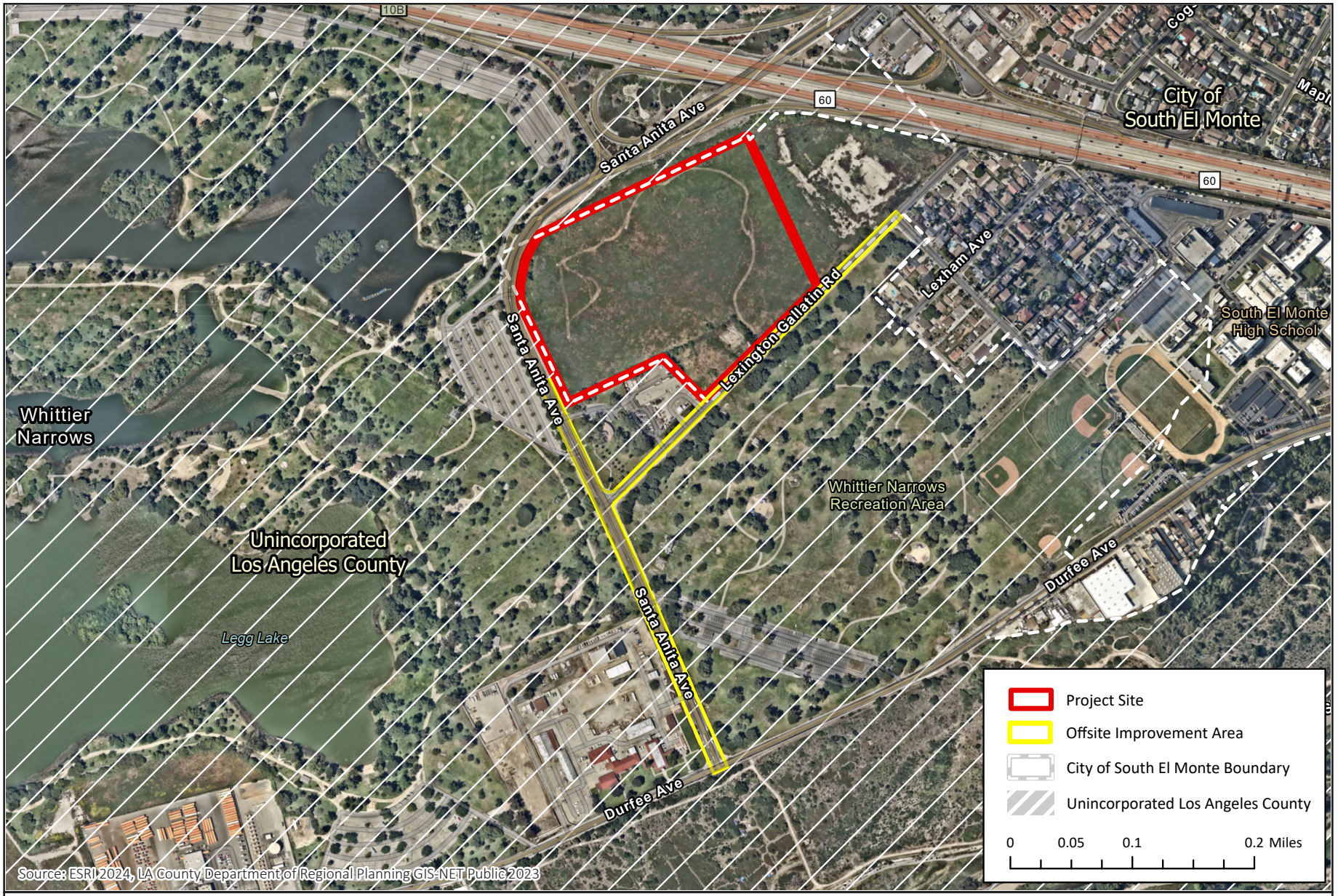


Figure 3-2: Vicinity Map

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Existing pedestrian facilities within the project area include continuous sidewalks along the south side of Lexington-Gallatin Road between Santa Anita Road and Andrews Street, continuous sidewalks along the west side of Santa Anita Avenue between Durfee Avenue and the eastbound SR-60 ramps, and discontinuous sidewalks along the east side of Santa Anita Avenue between Durfee Avenue and Merced Avenue. These sidewalks provide access to nearby transit stops and residential and non-residential uses. There are currently no sidewalks along the project site frontage on the north side of Lexington-Gallatin Road. There are also gaps in the pedestrian facility along the east side of Santa Anita Road that boarder the vacant undeveloped parcels adjacent to the project site. There are no crosswalks at the intersections of Santa Anita Avenue at Lexington-Gallatin Road or at the north and south Whittier Narrows parking lot. There are currently no existing on-street or off-street bicycle facilities adjacent to the project site. Foothill Transit provides fixed-route bus public transit service to the San Gabriel Valley in the greater Los Angeles area. The nearest bus stop is at the intersection of Lexington-Gallatin Road at Santa Anita Avenue, which is located approximately 600 feet to the southwest of the project site.

3.2.1 Surrounding Land Uses

The project site is bordered to the northeast by a construction yard, which abuts SR-60. The east side of the site is bordered by Lexington-Gallatin Road with the Whittier Narrows picnic area and single-family residences on the southern side of the roadway; there are residences northeast of the project site and adjacent to SR-60. To the south, the site is bordered by the Los Angeles County Parks and Recreation facilities located along Lexington-Gallatin Road. The site is bordered to the southwest by Santa Anita Avenue with Whittier Narrows Recreation Area west of Santa Anita Avenue. To the northwest, the site is bordered by Santa Anita Avenue with Whittier Narrows Recreation Area parking lot and SR-60 north of Santa Anita Avenue.

3.3 LAND USE DESIGNATIONS

3.3.1 General Plan Designation

The City of South El Monte General Plan (2000, as amended) is the comprehensive planning document governing development in the City, and contains goals, policies, and actions describing the community's vision for economic viability, livable neighborhoods, and environmental protection. The General Plan establishes land use designations for land in the City and policies for the orderly growth and development of South El Monte. Among other purposes, the General Plan identifies policies necessary to protect and enhance those features and services which contribute to the quality of life of the community in which it serves. **Section 4.10: Land Use and Planning**, of this EIR includes a discussion of the General Plan goals and policies relevant to the proposed Project. As depicted in **Figure 3-3: Existing Land Use Designation**, the project site is designated Commercial (C) in the City's General Plan Land Use Element. The Commercial (C) category includes a broad range of retail, professional office, and service-oriented business activities designed to serve both the local residential and business communities, as well as to meet regional shopping and service needs. The maximum permitted Floor Area Ratio (FAR) under the Commercial (C) land use designation is 0.50. The Project would require a General Plan Amendment from the existing Commercial (C) designation to Commercial-Manufacturing (C-M), the latter of which allows general commercial and limited manufacturing uses to co-locate; see **Figure 3-4: Proposed Land Use Designation**. Permitted uses include all uses allowed under the Commercial designation as well as uses including but not limited to warehousing and distribution uses. The proposed future City park would also be an allowed use under the C-M land use designation. The maximum permitted FAR under the C-M land use designation is 0.75. Overall, the Project would be an allowed use under the C-M General Plan land use designation.

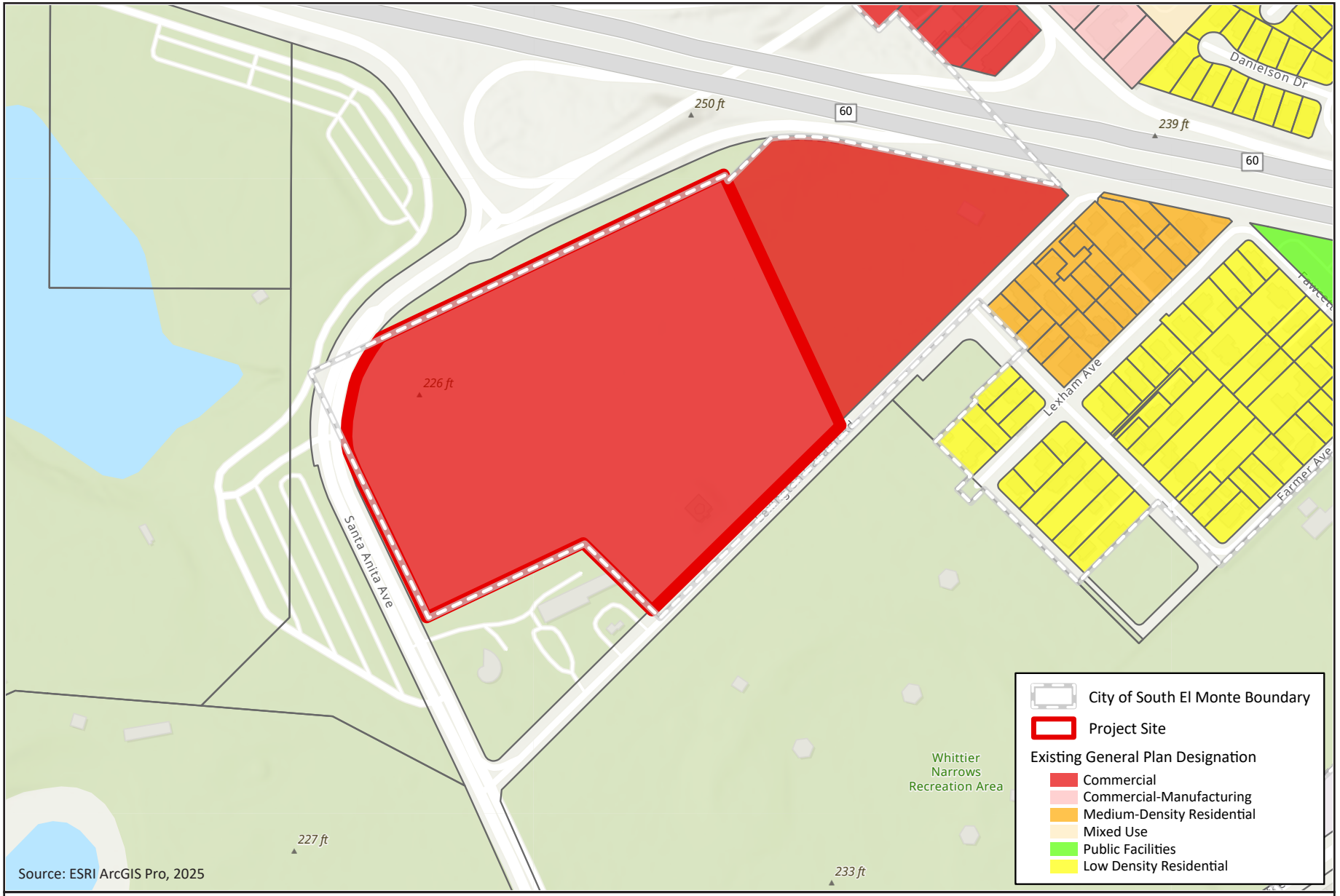


Figure 3-3: Existing Land Use Designation

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

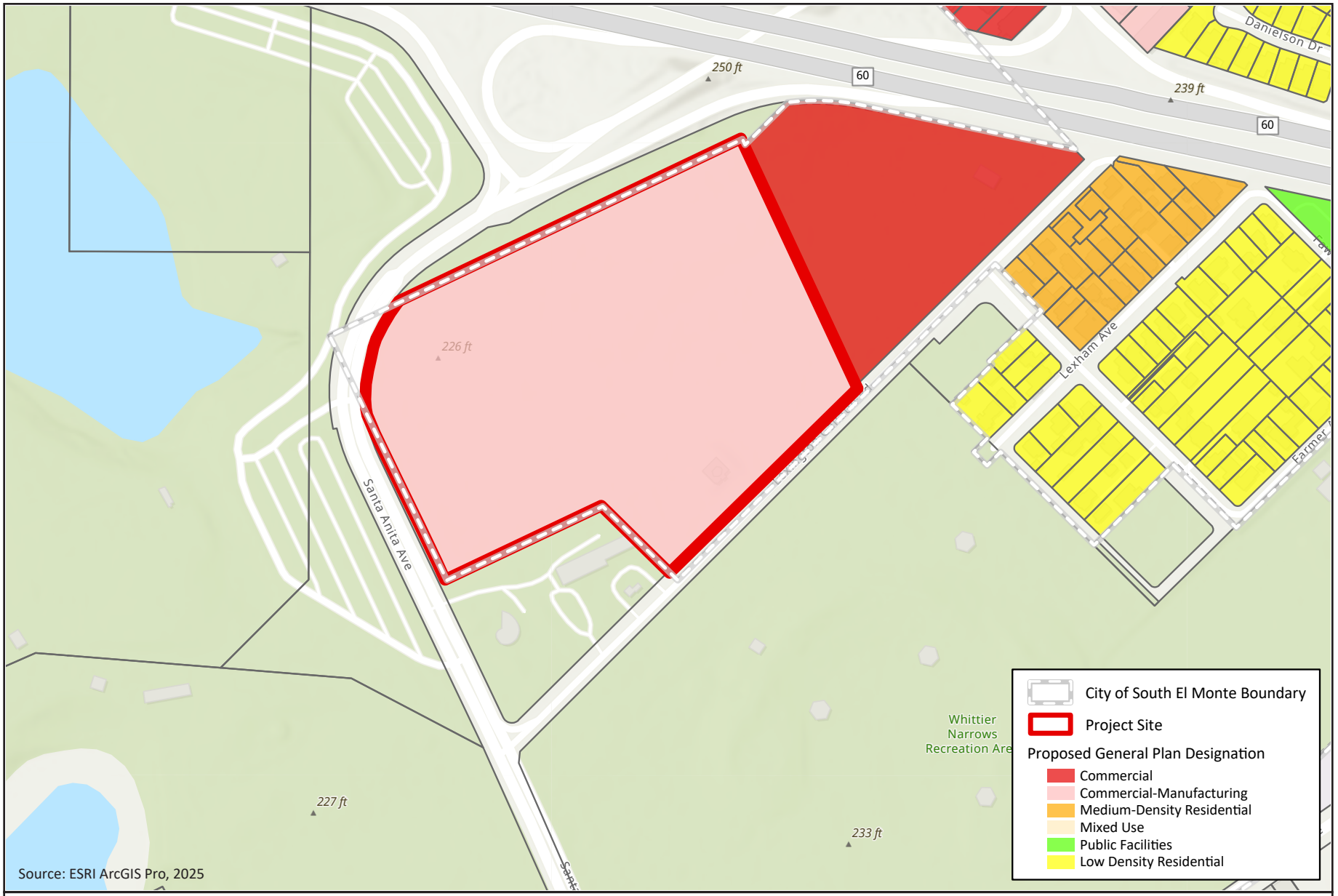


Figure 3-4: Proposed Land Use Designation

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

3.3.2 Zoning

The overall purpose of the City of South El Monte Municipal Code (Municipal Code) – Title 17 (Zoning Ordinance) is "to serve the public health, safety and general welfare by establishing zone districts designed to obtain the social, health, and economic advantages resulting from the planned use of land, and by establishing those regulations of the use of land and improvements within the various districts which are deemed necessary to ensure that the growth and development of the city shall be orderly and proper for the maximum benefit of its citizens."

As depicted in **Figure 3-5: Existing Zoning District**, the project site is located within the Commercial (C) zone which is intended to provide areas throughout the City in which commercial facilities designed to serve a broad area with a wide range of commercial services may be located. Municipal Code Section 17.06.020 outlines the permitted uses under the C zone; warehouses are not a permitted use in the C zone.

The Project would require a zone change to the Manufacturing (M) zone; see **Figure 3-6: Proposed Zoning District**. The M Zone is intended to provide for and encourage the development of industrial uses in suitable areas throughout the City. As outlined in Municipal Code Section 17.09.020, warehousing and recreational facilities, including but not limited to athletic fields, are principally permitted uses in the M zone.

Pursuant to Municipal Code Table 17.15.070-A, freestanding exterior lighted signs are permitted in the Commercial and Manufacturing zoning districts. The proposed Development Agreement for the Project would address the fact that the digital billboard would be located on what is currently entirely private property and therefore, Municipal Code Section 17.15.090 (regulations of off-site signs) does not apply. A freeway adjacent billboard would also require approval from Caltrans.

3.4 PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines (14 CCR) requires "A statement of objectives sought by the proposed Project. A clearly written statement of objectives would help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and would aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project". The following objectives have been identified for the Project.

Objective 1: Provide public benefits to the City by increasing employment opportunities during construction of the Project and occupancy of the warehouse building and increasing property sales and tax revenues that the City will receive as part of the warehouse building improvements.

Objective 2: Provide additional public benefits to the City under the Development Agreement for the Project by creating opportunities for City development of a public park to meet the recreational needs of the City and providing digital billboard advertising revenue sharing.

Objective 3: Develop the warehouse component of the Project consistent with the guidelines and policies of the City of South El Monte General Plan land use designation (Commercial-Manufacturing (CM)) and Zoning designation (Manufacturing (M)) proposed as part of the Project and applicable Municipal Code provisions.

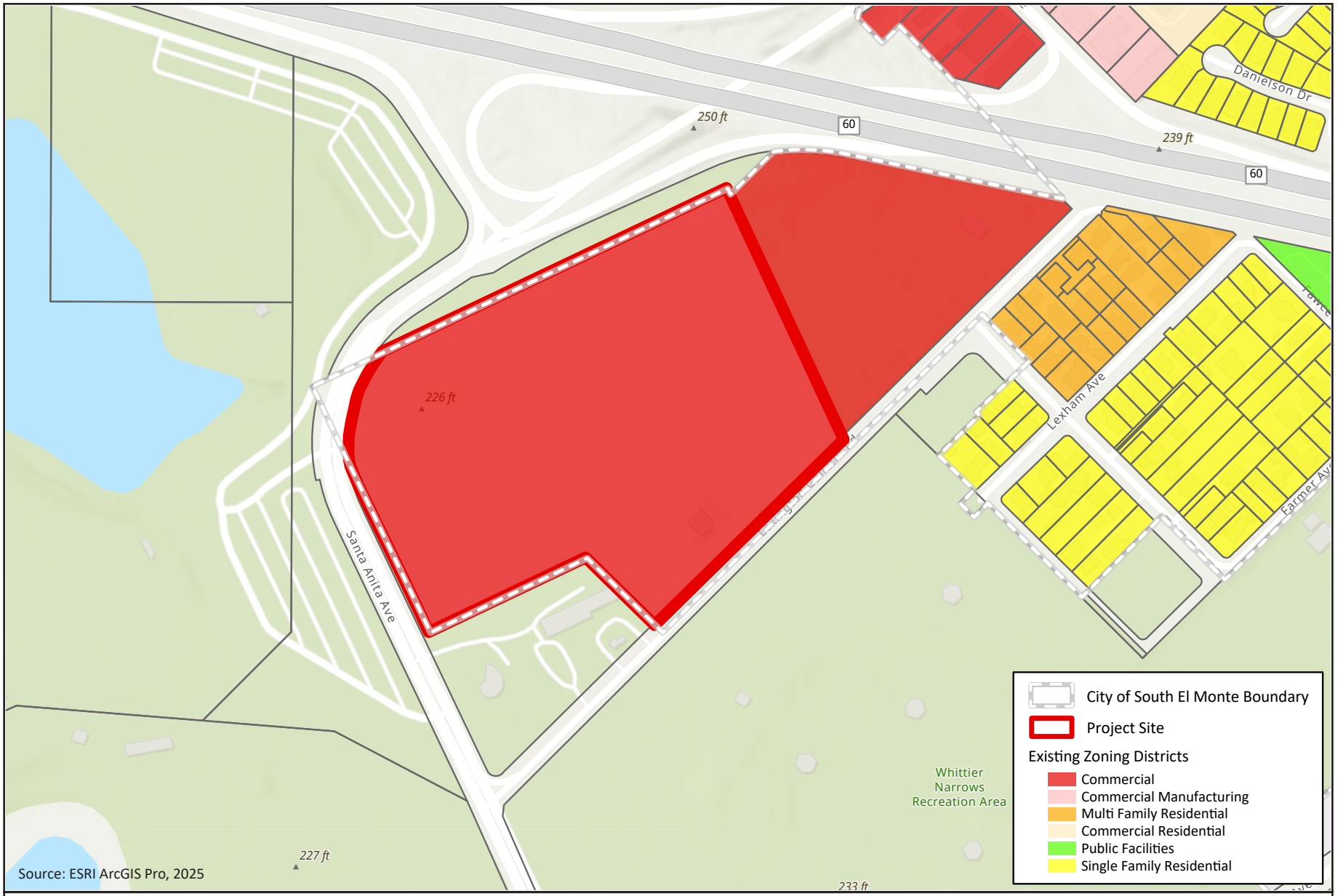


Figure 3-5: Existing Zoning District

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

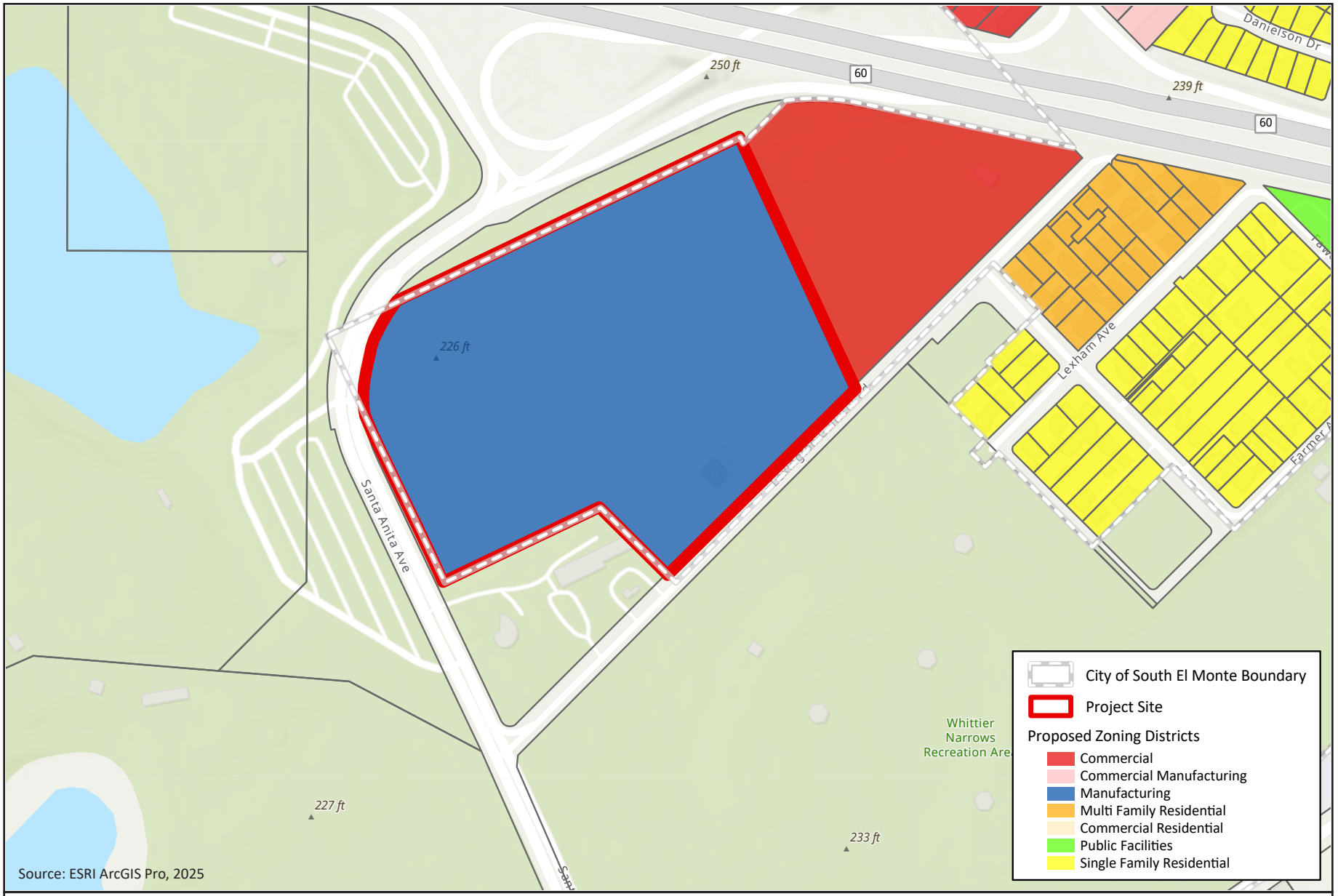


Figure 3-6: Proposed Zoning District

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Objective 4: Develop a single pad Class A[1] warehouse of sufficient size and with sufficient trailer truck doors and parking to be competitive within the industrial warehouse marketplace in the vicinity.

Objective 5: Develop a warehouse use proximate to the State Route 60 transportation corridor.

Objective 6: Improve the Property's flood storage capacity via Storage Basin Improvements in the USACE Easement area.

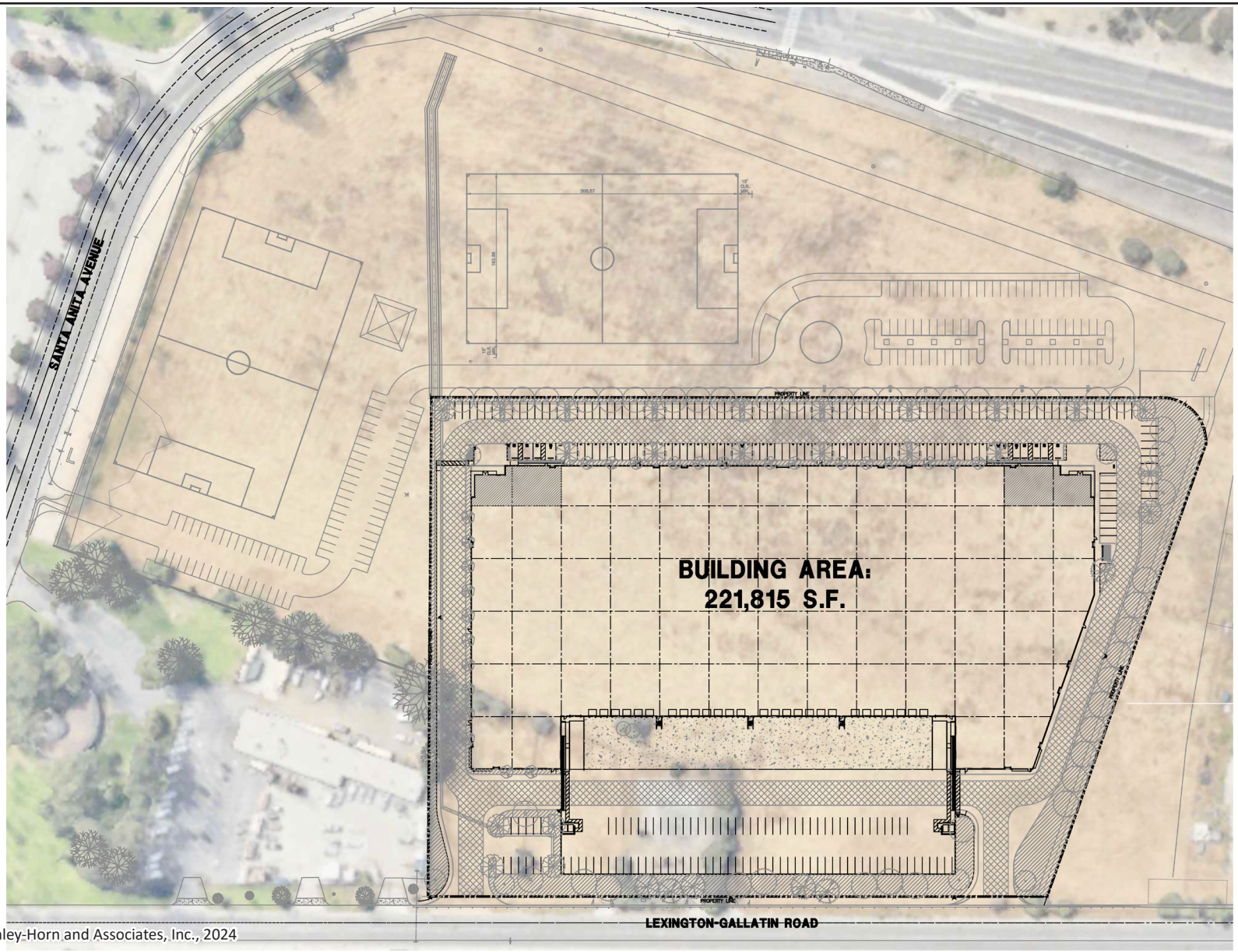
3.5 PROJECT CHARACTERISTICS

Magellan Value Partners (MVP) (Project Applicant) is proposing to develop the Project on one 21-acre parcel, as depicted on **Figure 3-7: Project Site Configuration**. The Project would include the development of a warehouse use on approximately 10.5 acres of the eastern portion of the site and the remaining approximately 10.7 acres on the northwestern portion of the site would be dedicated to the City pursuant to either a long-term ground lease or property donation agreement (referred herein as a dedication) for future development of a City park and a digital billboard. The single parcel would be subdivided into two parcels to allow for the development of the warehouse on one parcel and the public City park on the other parcel. The components of the Project are described below and are collectively referred to in this EIR as the Project or proposed Project unless otherwise noted.

Storage Basin Improvements

As previously addressed, the entire project site is located within USACE reservoir flowage easement area associated with the spillway activation elevation of the Whittier Narrows Dam. Flowage easement land is non-federal land on which the United States government has acquired certain perpetual rights, including the right to overflow, flood, and submerge the land; the right to prohibit structures for human habitation; and the right to approve all other structures proposed for construction within the flowage easement. Because of the rights of the USACE over the project site, any alteration is subject to the USACE Section 408 Program because the existing storage volumes on the site cannot be compromised. The USACE has an easement across the entire project site to "overflow, flood and submerge" all or a portion of the project site in connection with the Whittier Flood Control Basin project (USACE Easement) pursuant to the covenants and conditions provided in an order and judgement entered on September 8, 1955 in an action by the United States of America in Case No. 9103, recorded October 9, 1958 in Book M131, Page 58, Official Records (Order). The Order requires written consent from the USACE for "the type and location of any structure and/or appurtenance thereto" in the USACE Easement.

[1] "Class A buildings command the market's highest rents and attract credit-worthy tenants" and consist of "[i]nvestment-grade buildings that offer an excellent location and first-rate design, building systems, amenities, and management." *See* Richard B. Peiser with Anne B. Frej, *Professional Real Estate Development: The ULI Guide of the Business* (Second Edition).



Source: Kimley-Horn and Associates, Inc., 2024

Figure 3-7: Project Site Configuration

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

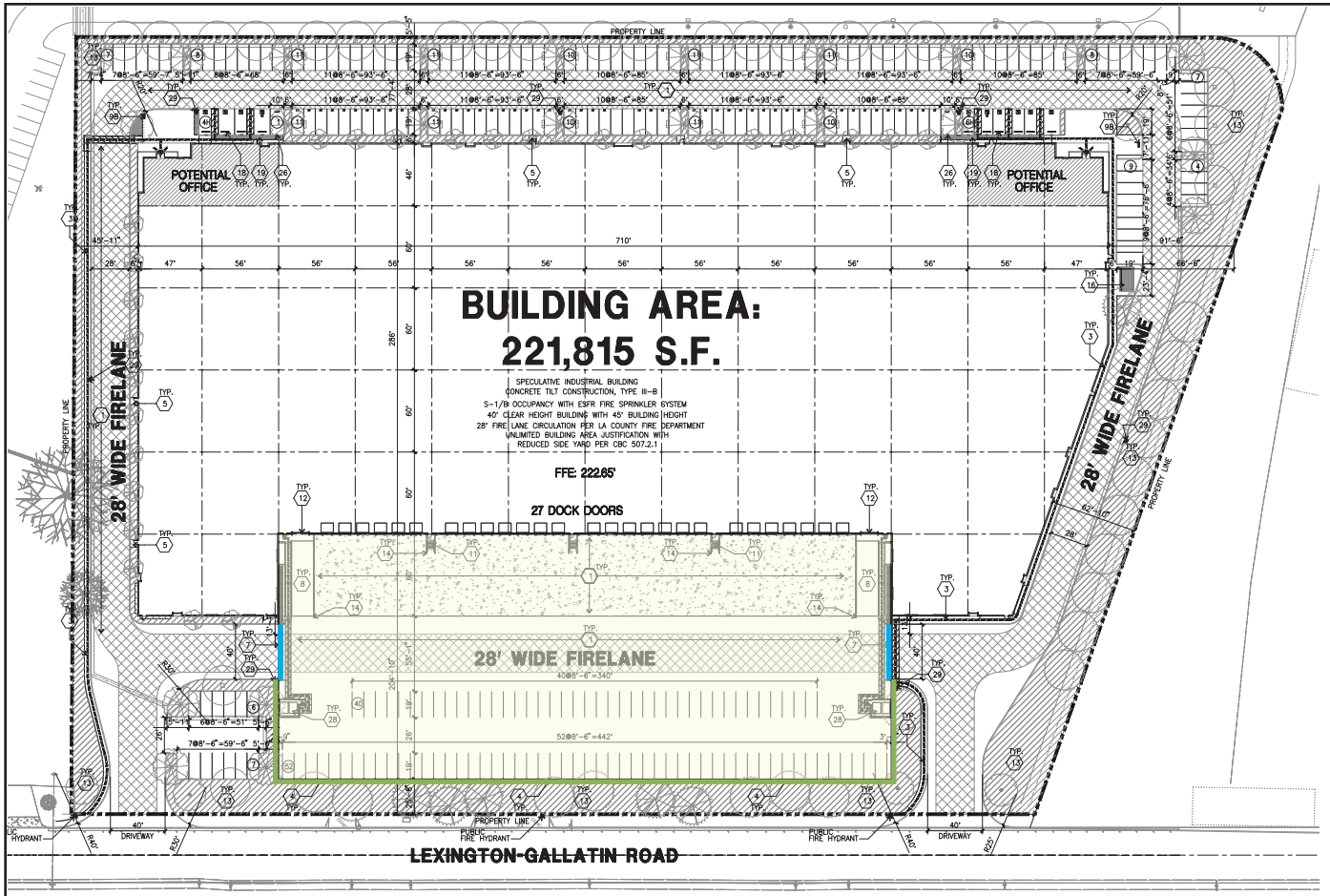
The Project includes the construction of storage and drainage improvements for the required volume of potential flood waters from the Whittier Flood Control Basin by balancing the cut and fill up to the spillway activation elevation of the Whittier Narrows Dam. The total existing volume is 247,100 cubic feet and the proposed volume at the 229 finished floor elevation would be 248,500 cubic feet. The Storage Basin Improvements include but are not limited to the (i) installation of a new storage basin and (ii) installation of a new gravity storm drain connection for the new storage basin. With respect to the storage basin, the future City park portion of the project site would be excavated by approximately three to ten feet below the existing grade of Santa Anita Avenue and the finished grade of the warehouse portion of the site would be raised to approximately 229 feet, above the spillway activation elevation using the excavated material. The proposed 6- to-12-foot-high retention basin would be surrounded by 2.5h:1v (horizontal to vertical) to 3h:1v earthen slopes. The warehouse finished floor elevation would be approximately 229 feet and retention basin elevation within the future City park area would have a minimum elevation of approximately 213 feet. Therefore, the Project would be designed such that finished grade elevations of the future City park area would have the same or higher water storage capacity as compared to the existing conditions. The excavated area would serve as a storage basin for flood waters associated with the Whittier Narrows Dam.

The new gravity storm drain connection for the new storage basin would connect to an existing Los Angeles County Flood Control District (LACFCD) pipeline along the northern property line. Similar to existing conditions, stormwater would flow in a westerly direction to an outlet headwall that would connect to an existing 90-inch reinforced concrete pipe (RCP) LACFCD storm drain line in Santa Anita Avenue near the northwestern property line. A flap gate may be required to prevent backwater from the 90-inch pipe entering the future City park. Stormwater would then travel from the public system and discharge into the nearby Legg Lakes within the Whittier Narrows Recreation Area.

Approval of the Project by USACE is required pursuant to the USACE Section 408 Program (Section 408 Program), which is codified at United States Code Title 33 Section 40. The purpose of the Section 408 Program is to verify that changes to an authorized USACE Civil Works project will not be injurious to the public interest and will not impair the usefulness of the applicable USACE project. The proposed Project is not allowed to and would not reduce the Whittier Narrows reservoir's storage space.

Warehouse Component

The proposed warehouse component and the future City park component would be designed to accommodate the Storage Basin Improvements. **Figure 3-8: Conceptual Warehouse Site Plan** depicts the warehouse plan. The warehouse component of the Project would include the construction of an approximately 221,815-square-foot (sf) single-story industrial warehouse building with approximately 201,815 sf of warehouse space, approximately 10,000 sf of ancillary office space on the ground level, and approximately 10,000 sf of ancillary office space on a mezzanine level. The proposed structure would be a concrete tilt up warehouse building and would have a roof line of approximately 45 feet in height with an internal clear height of 40 feet. Additional site components would include bike racks to be located near the ancillary offices in the warehouse building and an outdoor employee break area near the northeast corner of the warehouse site.



Secured Lot/Truck Loading Area
14' Concrete Screen Wall
8' Metal Gate with Knox-Box



PROJECT DATA

SITE AREA	
In s.f.	454,765 s.f.
In acres	10.44 ac
BUILDING AREA	
Office - 1st Floor	10,000 s.f.
Warehouse	201,815 s.f.
Total Building Footprint	211,815 s.f.
Office - 2nd Floor	10,000 s.f.
TOTAL BUILDING AREA	221,815 s.f.
COVERAGE	46.6%
AUTO PARKING REQUIRED	
Office: 1/300 s.f.	67 stalls
Whse: 1/1,000 s.f.	202 stalls
TOTAL	268 stalls
EV AUTO REQUIRED	
EV Capable with EVSE (8'-6" x 18')	14 stalls
EV Capable w/o EVSE (8'-6" x 18')	37 stalls
ADA EV Van Parking (12' x 18')	1 stalls
ADA EV Std. Parking (9' x 18')	2 stalls
Ambulatory Parking (10' x 18')	2 stalls
Total Required	56 stalls
ADA REQUIRED	
ADA Van Parking (12' x 18')	2 stalls
ADA Std. Parking (9' x 18')	5 stalls
Total Required	7 stalls
AUTO PARKING PROVIDED	
Standard (8'-6" x 18')	122 stalls
ADA Van (12' x 18')	2 stalls
ADA Std (9' x 18')	5 stalls
EV Capable with EVSE (8'-6" x 18')	14 stalls
EV Capable w/o EVSE (8'-6" x 18')	37 stalls
ADA EV Van Parking (12' x 18')	1 stalls
ADA EV Std. Parking (9' x 18')	2 stalls
Ambulatory Parking (10' x 18')	2 stalls
TOTAL	185 stalls
Additional Parking Plan:	
Standard (8'-6" x 18')	92 stalls
TOTAL	277 stalls
ZONING ORDINANCE FOR CITY	
Proposed Zoning Designation - Commerical - Manufacturing	
MAXIMUM BUILDING HEIGHT ALLOWED	
None	
MINIMUM LANDSCAPE REQ.	
5%	22,738 s.f.
LANDSCAPE PROVIDED	
12.4%	56,470 s.f.
MAXIMUM FLOOR AREA RATIO	
FAR - to be verified	
SETBACKS	
Front - 5'	
Interior/Side/Rear - none	

Source: Kimley-Horn and Associates, Inc., 2024

Figure 3-8: Conceptual Warehouse Site Plan

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Vehicular access to the warehouse would be from two 40-foot-wide driveways on Lexington-Gallatin Road. Both driveways would provide truck and passenger vehicle ingress/ egress to the site. Standard vehicle parking would be provided on the northern side of the warehouse and within the secured lot on the southern side of the building. The secured lot would also be used as a truck maneuvering area with access to the 27 dock doors and would be shielded by a 14-foot-high concrete screen wall. **Table 3-1: Warehouse On-Site Parking Summary** summarizes the automobile parking stalls required by the City and proposed for the warehouse. The warehouse would include a total of 277 standard parking stalls, with 92 stalls located within the secured lot on the south side of the warehouse building.

Table 3-1: Warehouse On-Site Parking Summary

Land Use	Parking Requirement[1]	Units (sf)	Parking Spaces Required	Parking Spaces Provided
Warehouse	1 space/1,000 sf	201,815	202 spaces	277 spaces (56 EV, 7 ADA, 214 Standard)
Office	1 space/300 sf	20,000	67 spaces	
Total			**269 spaces**	**277 spaces**

sf = square feet; EV = electric vehicle; ADA = Americans with Disabilities Act
1. City of South El Monte Municipal Code Section 17.16.020

The future tenants of the warehouse building are not currently known. Without knowing who the future tenants will be, an exact number of future employees or hours of operation cannot be determined. Therefore, this EIR and associated technical reports use approximate potential on-site employees, hours of operation, and vehicular traffic generation based on the proposed Project's warehouse characteristics (square footage). Consistent with the assumptions used in **Section 4.12: Population and Housing**, based on an employment generation factor of one employee per 749 sf of warehouse use, the warehouse component of the Project could employ approximately 297 employees.[2] Additional employees would be associated with construction activities. The EIR analysis assumes that the warehouse could operate 24 hours per day, 7 days per week. This EIR and the associated technical reports recognize that the conservatively assumed uses and intensities that may be greater than what might actually occurs at buildout and operation.

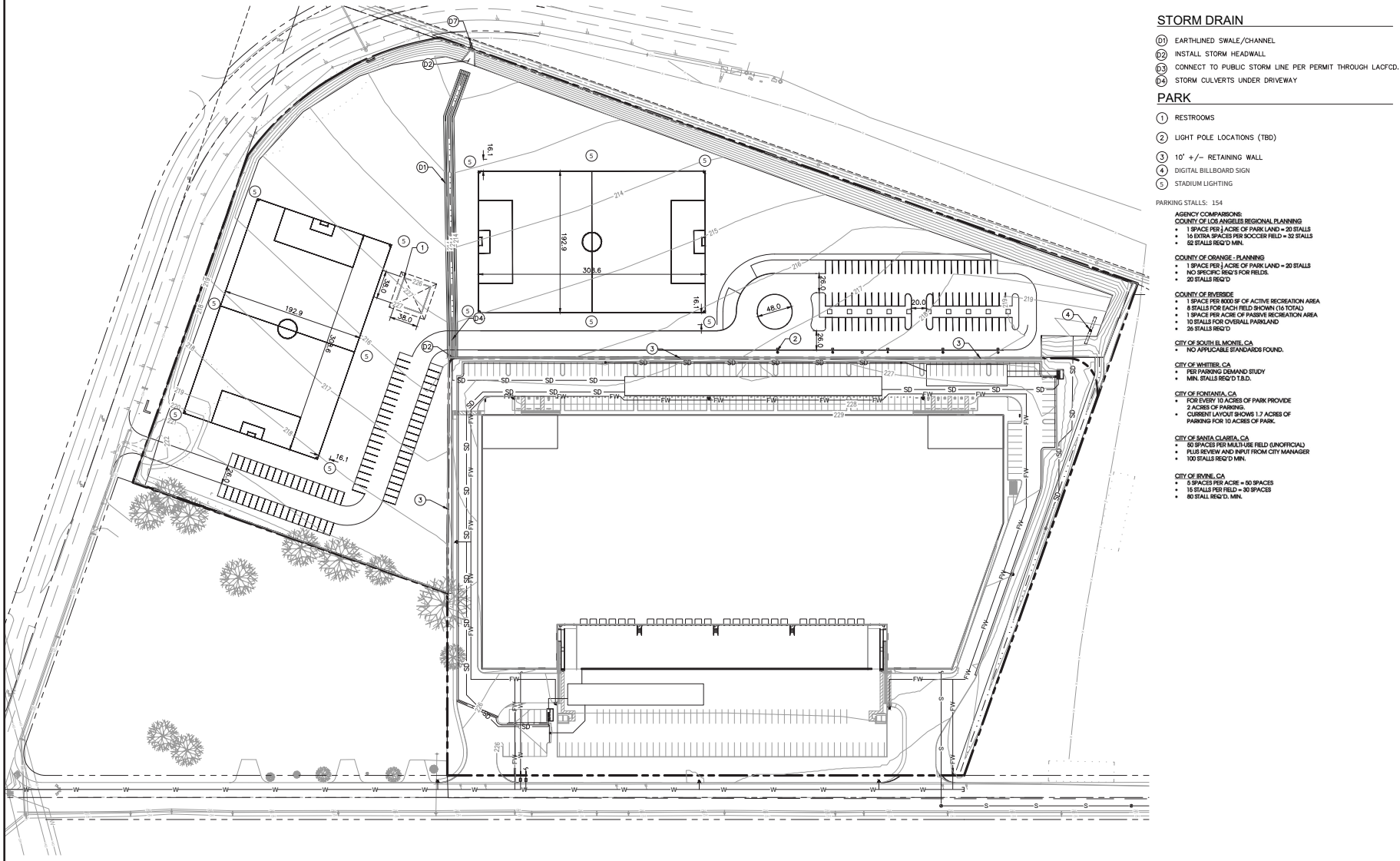
Future City Park Component

The remaining approximately 10.7 acres in the northwest portion of the project site would be dedicated to the City for future development of a public City park. The Project Applicant does not propose the construction or operation of the City park; therefore, specific information regarding final design and construction is not known at this time because that will later be determined by the City.

The EIR and technical studies prepared as a part of the EIR evaluates the conceptual plan of the future City park that includes two athletic fields, open lawn areas, public surface parking, restroom facilities, and site access via one driveway off Santa Anita Avenue as depicted in **Figure 3-9: Conceptual Future City Park Plan**. The EIR assumes 12 stadium lights (6 lights per athletic field) of approximately 60 to 80 feet in height. Based on an employment generation factor of 5.71 employees per acre of local parks/recreational areas, the City park component of the Project could employ 61 employees as well as construction employees.[3].

[2] Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Table 4B.*

[3] Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Appendix B: Employment Densities By Anderson Code, using code 1820 for Local Parks and Recreation in the County of Los Angeles.*



Source: Kimley-Horn and Associated, Inc., 2024

Figure 3-9: Conceptual Future City Park Plan

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Digital Billboard

The Project Applicant also proposes one freeway adjacent digital billboard sign up to 70 feet in height on the northern portion of the project site within the future City park area (**Figure 3-9**). The digital billboard would be required to comply with requirements set forth in this EIR; see **Section 4.1: Aesthetics**. In addition, the billboard would be required to comply with all applicable federal, State, and local laws and regulations including, but not limited to, the Highway Beautification Act of 1965 (23 U.S.C. 131), the California Outdoor Advertising Act, and the California Vehicle Code.

3.5.1 Site Access, Circulation, and Parking

There is currently no vehicular access to the project site. Project implementation would include one new driveway for the future City park component and two new driveways for the warehouse component. Vehicle access is not proposed between the future City park and warehouse.

Warehouse Component

Access to the warehouse component would be provided via two 40-foot-wide driveways on Lexington-Gallatin Road which would allow for truck and passenger vehicle ingress/egress to the site and allow for truck turning movements. Both driveways would provide access to a secured lot/truck loading area along the south side of the building and drive aisles leading to additional standard vehicle parking along the northern elevation of the building. All drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers for emergency vehicles and fire services.

Access to the secured lot/truck loading area would be restricted by 40-foot-wide and 8-foot-high metal gates, and views from Lexington-Gallatin Road would be blocked by a 14-foot-tall concrete tilt-up decorative screen wall on the east, south, and west sides of the truck loading area and dock doors. The secured lot would be used as a truck maneuvering area with access to the proposed 27 truck dock doors and 92 standard vehicle parking stalls.

The proposed 20,000 sf of office space would require 67 parking spaces and the proposed 211,815 sf of warehouse space would require 202 parking spaces (**Table 3-1**). The Project proposes 277 stalls, of which 92 would be provided within the secured lot/truck loading area. Therefore, the warehouse would meet the City's parking requirements.

Future City Park Component

As conceptually proposed, access to the future City park would be provided via one new driveway with a double swing entry gate from Santa Anita Avenue located in the southern corner of the future City park area. The driveway would lead along the eastern City park area boundary providing access to two conceptually proposed parking lot areas and culminating in a turn-around feature. The City does not currently have any applicable requirements for the number of parking stalls for recreational areas. This EIR assumes that the future City park component would provide 154 standard parking stalls. All drive aisles would accommodate standard fire lane turning radiuses for emergency vehicles and fire services.

3.5.2 Building Design, Landscaping, and Lighting

Warehouse

The conceptual architectural design for the warehouse includes concrete tilt-up panels with architectural treatments, such as panel reveals to provide visual relief of the building facades. The exterior elevations would include multiple colors, including white and grey with red accents, Arizona tile, and blue window

glazing, as shown in **Figure 3-10: Conceptual Warehouse Elevations**. Rooftop mechanical equipment would be screened. To screen the truck loading and unloading activities and the proposed dock doors from Lexington-Gallatin Road, a 14-foot-tall decorative concrete screen wall is proposed surrounding the secured lot/truck loading area along the southern project site boundary and Lexington-Gallatin Road, see **Figure 3-11a: Conceptual Rendering** and **Figure 3-11b: Conceptual Rendering**. Additionally, an 8-foot-tall wrought iron fence would surround the perimeter of the warehouse site.

As shown on **Figure 3-12: Conceptual Landscape Plans**, landscaping would be provided along Lexington-Gallatin Road in front of the proposed 14-foot-tall screen wall, along the west elevation of the building, along the northeast and northwest property lines, and internal to the site. The City's landscaping guidelines outlined in Section 17.09.070 of the Municipal Code require 5 percent site coverage; the Project proposes approximately 56,470 sf or approximately 12.7 percent site coverage. Landscaping would be focused near parking lot areas, driveway entries, and along the warehouse site perimeter to provide visual screening. A mix of accent trees including Chitalpa, Afghan Pine, Chilean Mesquite, African Sumac, and Brisbane box would be planted along Lexington-Gallatin Road and the northwestern warehouse site boundary. The northeastern perimeter would include Afghan Pines and the southwestern boundary along the building would include Brisbane box trees. Smaller understory landscaping including shrubs and groundcover would be layered beneath the trees and provided throughout the site.

Site lighting would be used to provide adequate lighting for circulation, safety, and security; night lighting would be provided seven days per week. Outdoor lighting for the parking areas would be provided, consistent with the requirements set forth in Municipal Code Section 17.09.100. All exterior lighting would be shielded to direct the source of light downward and would be oriented to not create interference with highways and neighboring properties, consistent with Municipal Code requirements for exterior lighting.

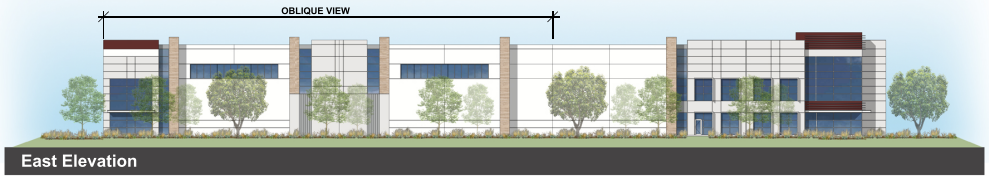
Future City Park

Landscaping for the future City park area could include a mix of trees, shrubs, and groundcover and is expected to be focused along the perimeters of the City park site and parking lots and islands. Lighting for the future City park area would include safety and security lighting for the parking lots; parking lot lighting would include 25-feet light poles. The EIR assumes 12 stadium lights (6 lights per athletic field) of approximately 60 to 80 feet in height. Field (stadium) lighting would be used during scheduled games and would be turned off by 10:00 PM. Lighting would be shielded to direct the source of light downward and be oriented to not create interference with highways and neighboring properties, as is consistent with Section 17.09.100 of the City of South El Monte's Municipal Code for exterior lighting.









Source: HPA, Inc., 2023

Figure 3-10: Conceptual Warehouse Elevations

South El Monte Athletic Fields and Business Park Project

Not to scale



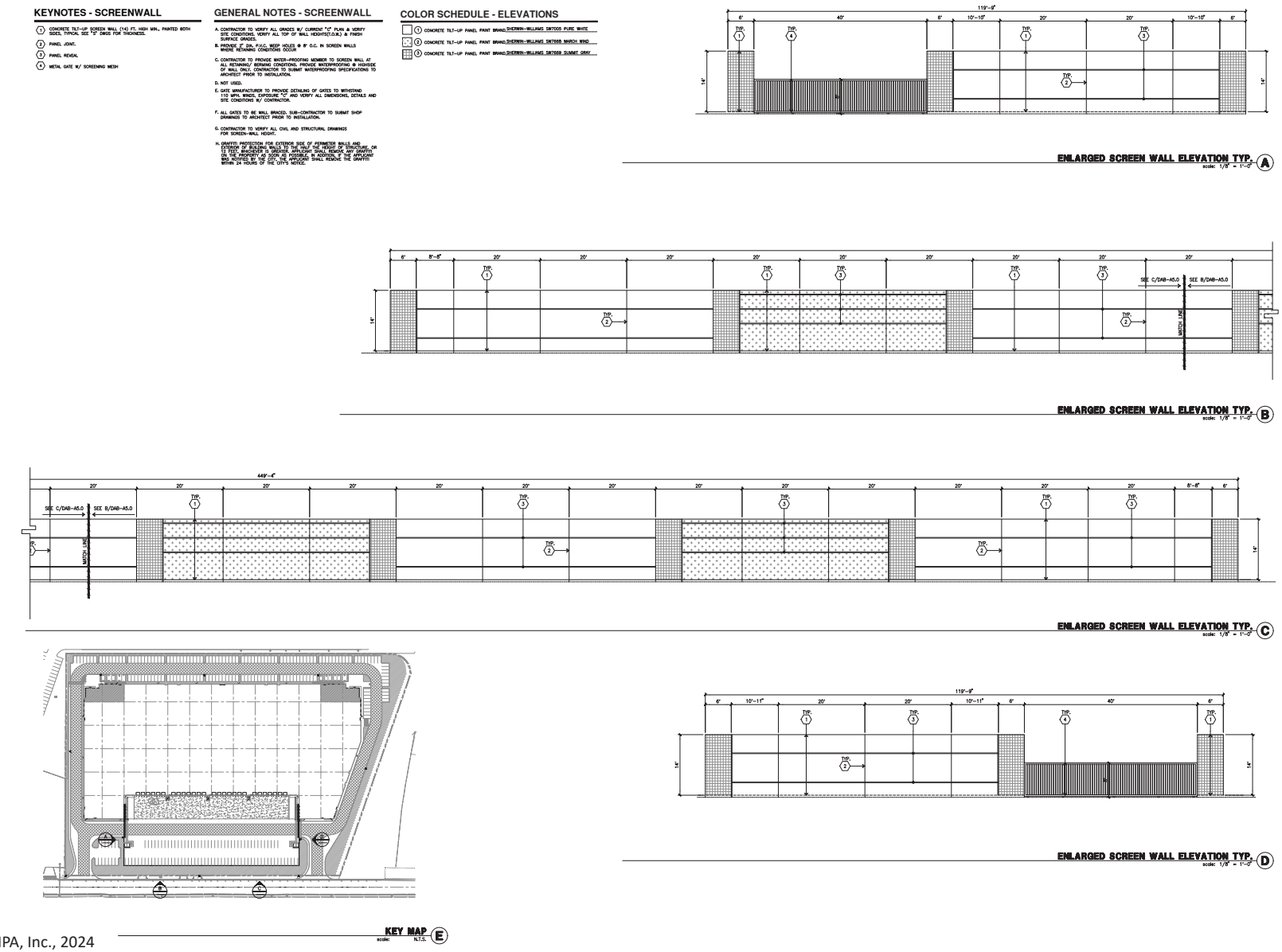
Source: HPA, Inc., 2024

Figure 3-11a: Conceptual Rendering

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn



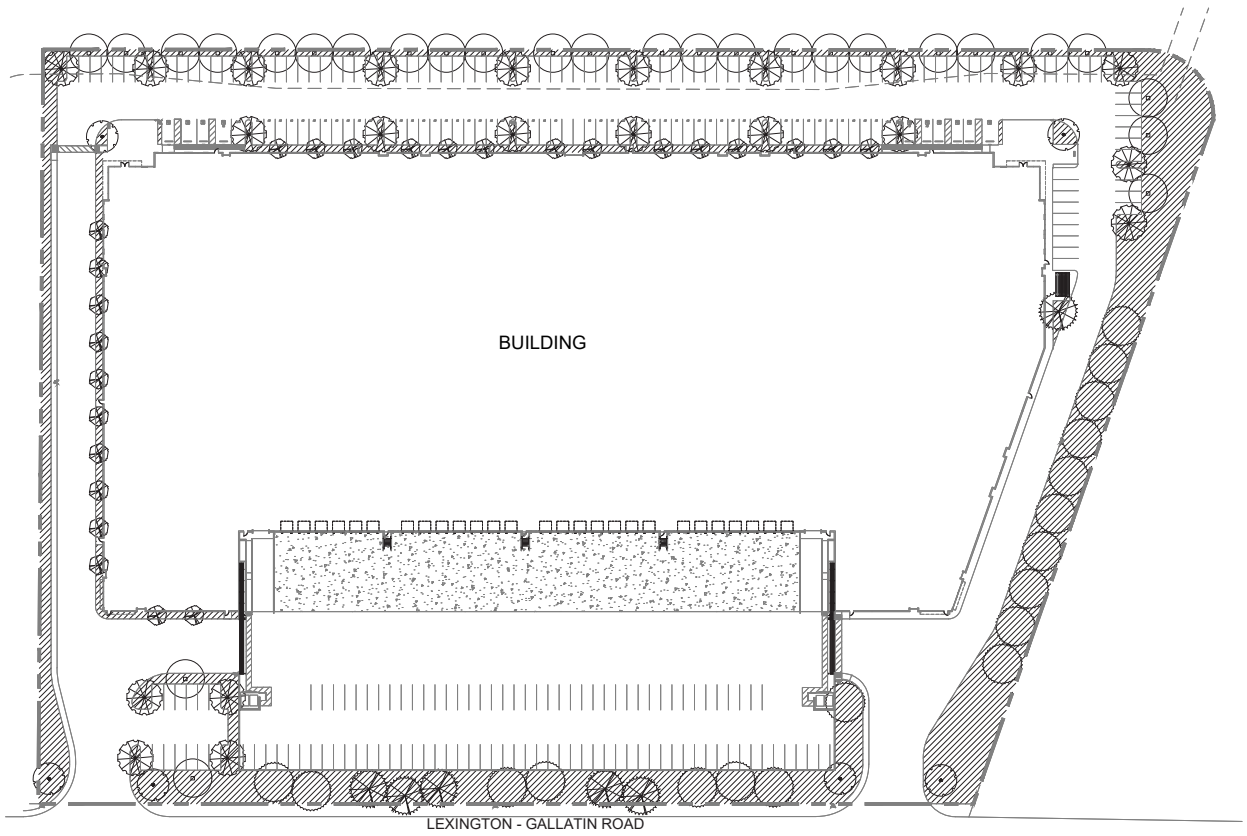
Source: HPA, Inc., 2024

Figure 3-11b: Conceptual Rendering

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Chitalpa tashkentensis Chitalpa	24" Box	22	L	Standard
	Olea europaea Olive	36" Box	6	L	Multi
	Pinus eldarica Afghan Pine	24" Box	18	L	Standard
	Prosopis chilensis Chilean Mesquite	24" Box	6	L	Multi
	Rhus lancea African Sumac	24" Box	27	L	Standard
	Tristania conferta Brisbane Box	15 Gal	26	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	SPACING
	Agave americana Century Plant	5 Gal	15	L	
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	143	M	3' OC 2' from hardscape
	Carissa m. 'Green Carpet' Prostrate Natal Plum	5 Gal	77	M	
	Cassia phyllodenia Silverleaf Cassia	5 Gal	103	L	4' OC 2.5' from hardscape
	Dietes bicolor Fortnight Lily	5 Gal	235	M	3' OC 2' from hardscape
	Lantana 'Gold Mound' Yellow Lantana	5 Gal	41	L	
	Ligustrum j. Texanum Texas Privet	5 Gal	410	M	3' OC 2' from hardscape
	Westringia fruticosa Coast Rosemary	5 Gal	127	L	5' OC 3' from hardscape

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Bougainvillea 'La Jolla' Bougainvillea	1 Gal	6' O.C.	L	
	Carissa m. 'Green Carpet' Prostrate Natal Plum	1 Gal	36" O.C.	M	
	Myoporum parvifolium Myoporum	1 Gal	36" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	
	Trachelopspermum jasminiodes Star Jasmine	1 Gal	24" O.C.	M	

Source: Hunter Landscape, 2024

Figure 3-12: Conceptual Landscape Plans

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

3.5.1 Infrastructure and Off-Site Improvements

Water Service

Figure 3-13: Preliminary Utility Plan depicts proposed utility connections for water and sewer. The San Gabriel Valley Water Company (SGVWC) would provide water service to the project site. There is an existing water main in Durfee Avenue, approximately 0.3 mile south of the project site. Project implementation would require an approximately 2,600-linear-foot 16-inch water main line extension in Santa Anita Avenue from Durfee Avenue to the project site in Lexington-Gallatin Road to provide potable water service and fire flow water to the warehouse portion of the project site. The Project would connect to the proposed water main extension in Lexington-Gallatin Road via one approximately 2-inch pipe for potable water supply, two approximately 8 to 12-inch pipes for fire flow water to the warehouse, and one approximately 1 to 2-inch pipe for irrigation. No construction or upsizing of the existing water main in Durfee Avenue would be required. Off-site improvements associated with the connection and extension of the existing main line would occur within the public right-of-way of Santa Anita Avenue and Lexington-Gallatin Road. The proposed water system improvements would be designed and constructed in accordance with City and SGVWC requirements and require City and SGVWC approval.

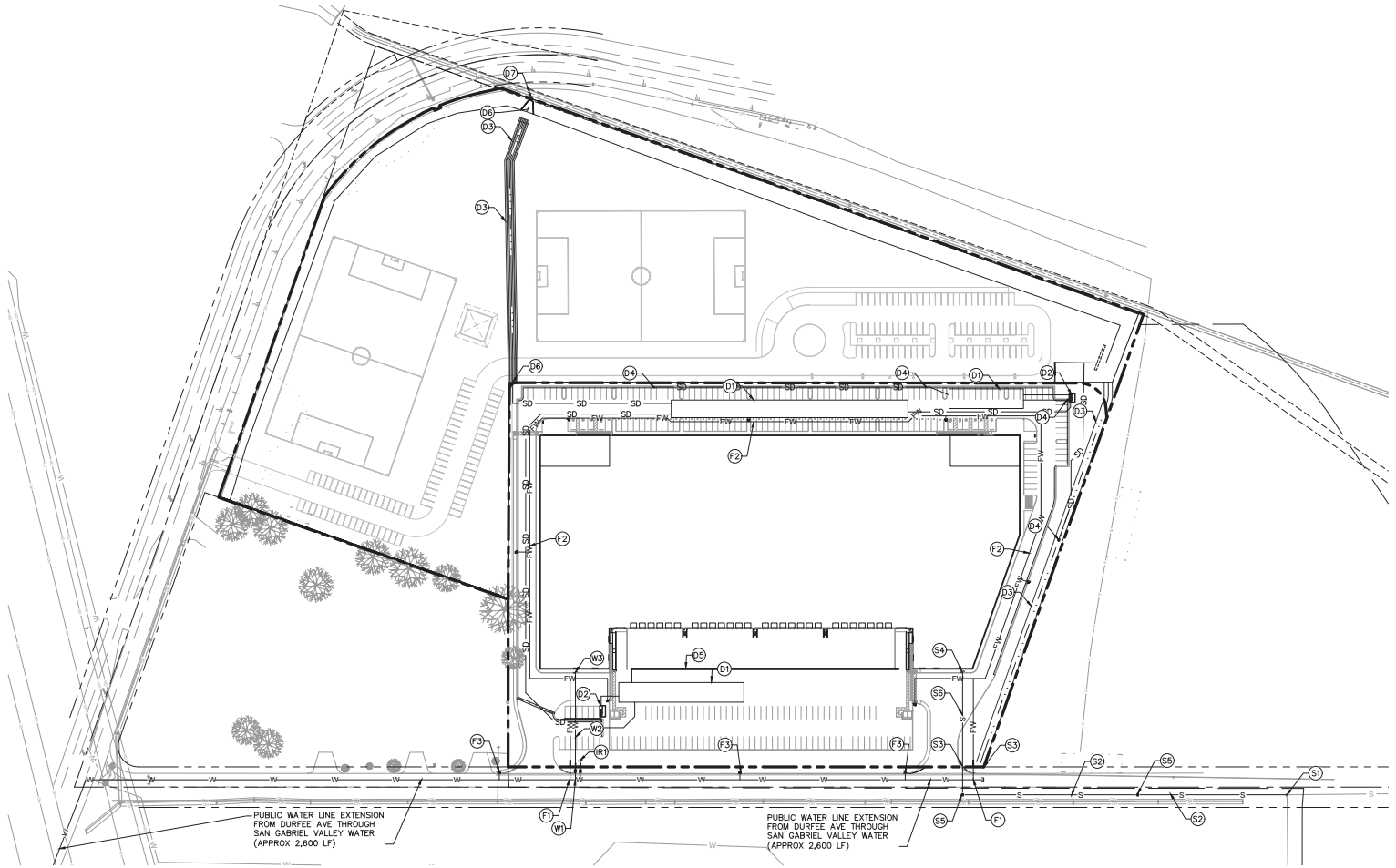
Water service to the future City park component of the Project would be provided via either connecting to an approximately 550-foot main line extension in Santa Anita Avenue north of the intersection with Lexington-Gallatin Road or running an approximately 2-inch domestic water line through the warehouse component of the Project through a private easement.

Drainage and Water Quality Treatment

The City owns and maintains a limited number of catch basins and storm drains while the LACFCD, a part of the Los Angeles County Public Works Division, owns and maintains a larger network of catch basins, storm drains and channels throughout the City. There is an existing 90-inch RCP public storm drain line managed by LACFCD located in Santa Anita Avenue near the northwestern property line. The Project Applicant or its successor would be responsible for drainage and water quality treatment before discharging into the LACFCD's existing storm drainage infrastructure.

Stormwater from the warehouse component of the Project would initially enter the drainage system through an inlet/catch basin and would then be conveyed to the treatment system via private storm drain lines. The treatment system would capture and treat stormwater volumes up to the 85th percentile storm event before continuing to a 5-foot-high by 400-linear-foot detention tank located along the northwest boundary of the warehouse area. From the detention tank, water would be released to flow through a dedicated earthen channel (4 feet wide at the bottom with 3-foot to 1-foot side slopes) that is isolated from the future City park area. The earthen channel would guide stormwater from the warehouse site to the existing 90-inch RCP LACFCD storm drain line located in Santa Anita Avenue on the western boundary of the future City park area. Stormwater would then travel from the public system and discharge into the nearby Legg Lakes within the Whittier Narrows Recreation Area.

The future City park area would remain primarily pervious and self-treating. Flows on the future City park area would be directed to the existing 90-inch RCP LACFCD storm drain line as well. As both Project components would discharge into this existing storm drain line, the drainage system on the site would be designed to detain and mitigate the peak flow rate during storm events to not exceed allowable discharge per LACFCD requirements.



LEGEND

- CENTER LINE
- PROPERTY LINE
- EASEMENT LINE
- W — PROPOSED DOMESTIC WATER LINE
- SS — PROPOSED SANITARY SEWER LINE
- FW — PROPOSED FIRE WATER LINE
- SD — PROPOSED STORM DRAIN LINE
- FLOW LINE

SEWER

- (S1) CONNECTION TO EXISTING LACSD SEWER MAIN
- (S2) PUBLIC SEWER MAIN LINE EXTENSION ALONG LEXINGTON–GALLATIN PER CITY OF SOUTH EL MONTE STANDARDS (APPROX. 480 LF)
- (S3) INSTALL SEWER CLEANOUT.
- (S4) BUILDING POINT OF CONNECTION (5–FT FROM BUILDING FACE). REFER TO PLUMBING PLANS FOR CONTINUATION.
- (S5) INSTALL PUBLIC SEWER MANHOLE.
- (S6) INSTALL PRIVATE SEWER LATERAL.

DOMESTIC WATER

- (W1) CONNECTION TO PROPOSED SGV WATER MAIN.
- (W2) DOMESTIC WATER LINE.
- (W3) BUILDING POINT OF CONNECTION (5–FT FROM BUILDING FACE). REFER TO PLUMBING PLANS FOR CONTINUATION.

FIRE WATER

- (F1) CONNECTION TO PROPOSED SCV WATER MAIN.
- (F2) INSTALL PVC C–900, CLASS 200.
- (F3) INSTALL PUBLIC HYDRANT PER LACFD REQUIREMENTS.

STORM DRAIN

- (D1) INSTALL DETENTION TANK.
- (D2) INSTALL WETLAND MOD BMP FOR WATER QUALITY PURPOSES
- (D3) EARTHLY SWALE/CHANNEL
- (D4) INSTALL CATCH BASIN
- (D5) INSTALL TRENCH DRAIN
- (D6) INSTALL STORM HEADWALL
- (D7) CONNECT TO PUBLIC STORM LINE PER PERMIT THROUGH LACFCD.

Source: Kimley-Horn and Associated, Inc., 2024

Figure 3-13: Preliminary Utility Plan

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Wastewater Collection and Disposal

The Los Angeles County Public Works Consolidated Sewer Maintenance District provides operation and maintenance services for the City's sewer facilities. There is an existing 8-inch local sanitary sewer mainline located approximately 400 feet north of the site in Lexington Gallatin Road at the intersection with Andrews Street. The line is not maintained by the County of Los Angeles Sanitation Districts. The City maintains the existing sewer mainline. Project implementation would extend the existing local sewer main line south toward the project site on Lexington-Gallatin Road. A new 6-inch sewer lateral would connect to the extension in the road and continue west for conveyance to the Sanitation District's 33-inch Join Outfall H Unit 5D Trunk Sewer, which is located in Fawcett Avenue at Santa Anita Avenue. The off-site construction/improvements would be limited to what is typical for connection to an existing sewer main and extension which would occur within public rights-of-way. The proposed wastewater system improvements would be designed and constructed in accordance with City and Los Angeles County Public Works requirements.

Wastewater collection for the future City park component of the Project would be provided by running a domestic sewer line through the warehouse component of the Project pursuant to a public easement on private property.

Dry Utilities and Services

Dry utilities would be extended to the project site from existing facilities along Lexington-Gallatin Road. Southern California Edison Company (SCE) is the primary distribution provider for electricity in the City. There are existing overhead SCE electrical power lines along Lexington-Gallatin Road that the Project would connect to. The SoCalGas Company provides gas services to most of Southern California, there are existing natural gas lines in Lexington-Gallatin Road. Existing telecommunication lines are also located along Lexington-Gallatin Road, which the Project would tie into.

3.5.2 Project Construction

For the purpose of this EIR analysis, construction of the Storage Basin Improvements and warehouse component of the Project assumes a construction duration of approximately 12 months and would be completed in one phase following a conventional construction sequence of demolition, site preparation, grading/earthwork, paving, building construction, and architectural coating. The EIR assumes that construction would be completed in 2026. The proposed Project would use the excavated fill within the future City park portion of the project site to raise the finished grade of the warehouse portion above the spillway activation elevation. The future public City park component of the Project would be constructed by the City of South El Monte at a future date.

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating applications. Such activities would require dozers, excavators, and concrete saws during demolition; dozers and tractors during site preparation; graders, excavators, tractors, dozers, and scrapers during grading; forklifts, cranes, generators, tractors, and welders during building construction; pavers, rollers, and paving equipment during paving; and air compressors during architectural coating applications.

3.6 INTENDED USE OF THE EIR

Pursuant to Section 15121 of the State CEQA Guidelines, an EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant

environmental effects of a project. Prior to consideration of Project approval, the City must consider the information in this EIR and certify the Final EIR. As previously addressed, the Project activities are inclusive of the Storage Basin Improvements, Warehouse Component, City Park Component, and Digital Billboard.

The City of South El Monte, as Lead Agency for the Project, has discretionary authority over the primary approvals. The Project Applicant has requested the consideration of the following discretionary actions.

3.6.1 City of South El Monte

- **Certification of the South El Monte Athletic Fields and Business Park Project Final Environmental Impact Report** (**Environmental Assessment Review No. 25-01)**: The Project requires CEQA compliance through the certification of a Final Environmental Impact Report (EIR) prior to approval of the Project. The Final EIR is intended to serve as the primary environmental document for all actions associated with the approval of the Project.
- **General Plan Amendment (GPA 23-03):** The Project requires a General Plan Amendment to change the designation from Commercial (C) to Commercial-Manufacturing (CM).
- **Zone Change (ZC 23-01):** The Project requires a Zone Change from Commercial (C) to Manufacturing (M).
- **Site Permit Approval.**
- **Parcel Map Subdivision.**
- **Conditional Use Permit.**
- **Development Agreement.** A Development Agreement is proposed by and between the City and the Project Applicant for the Project.
- **City Park Donation Agreement**. The City park component will be dedicated to the City pursuant to either a long-term ground lease or property donation agreement pursuant to the Development Agreement for the Project.

In addition to the approvals identified above, the Project would be subject to other discretionary and ministerial actions by the City as part of Project implementation. Additional City approvals include, but are not limited to, site development permits, grading permits, use permits, sign permits, and building permits.

3.6.2 Responsible State and Federal Agencies

- **United States Army Corps of Engineers (USACE)**: Section 408 Permission pursuant to Section 14 of the Rivers and Harbors Act of 1899, 33 USC 408. This includes approval of a National Environmental Policy Act (NEPA) Environmental Assessment leading to a Finding of No Significant Impact (FONSI).
- **Los Angeles Regional Water Quality Control Board (RWQCB):** Issuance of a National Pollution Discharge Elimination System (NPDES) Permit and Construction General Permit.
- **California Department of Transportation (Caltrans):** Issuance of a permit for outdoor advertising under the Outdoor Advertising Act (Business and Professions Code, §§5200 et. seq.), inclusive of State highways.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.1 INTRODUCTION

Sections 4.1 through 4.17 of this EIR provide an impact analysis for those environmental impact categories where it was determined that the proposed Project could result in "potentially significant impacts". Each topical EIR section includes the following information: summary of applicable federal, State, and local regulations; description of the existing environmental setting; identification of thresholds of significance; analysis of potential Project effects; identification of a Mitigation Program to reduce the identified significant impacts; and identification of the level of significance of impacts after mitigation, including any unavoidable significant adverse impacts. The impact analysis is formatted to analyze the potential impacts of the Project related to each identified threshold of significance set forth in Sections 4.1 through 4.17.

4.2 SECTION CONTENT AND DEFINITION OF TERMS

The environmental setting, potential environmental impacts, and mitigation measures related to each environmental resource area are described in the following sections:

- Section 4.1: Aesthetics
- Section 4.2: Air Quality
- Section 4.3: Biological Resources
- Section 4.4: Cultural Resources
- Section 4.5: Energy
- Section 4.6: Geology and Soils
- Section 4.7: Greenhouse Gas Emissions
- Section 4.8: Hazards and Hazardous Materials
- Section 4.9: Hydrology and Water Quality
- Section 4.10: Land Use and Planning
- Section 4.11: Noise
- Section 4.12: Population and Housing
- Section 4.13: Public Services
- Section 4.14: Recreation
- Section 4.15: Transportation
- Section 4.16: Tribal Cultural Resources
- Section 4.17: Utilities and Service Systems

Pursuant to State CEQA Guidelines Section 15128, "An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." The City determined that the proposed Project would have no impact on the following CEQA environmental topic: Agriculture and Forestry Resources, Mineral Resources, Wildfire. Therefore, as addressed in Section 1.5 of this EIR, these topics require no further evaluation.

Organization

Sections 4.1 through 4.17 of the EIR are organized as follows:

- **Regulatory Setting** identifies the plans, policies, laws, and regulations that are relevant to each resource area and describes permits and other approvals that may be necessary to implement the Project. Applicable federal, State, regional and local plans, policies, and regulations are identified. This subsection summarizes or lists the potentially relevant policies and regulations, such as from the City of South El Monte General Plan, City of South El Monte Municipal Code, and regional plans applicable to the environmental issue area. Compliance with these applicable laws and regulations is mandatory unless otherwise noted. Therefore, as it relates to the impact analysis, compliance is assumed because the laws in effect require it, and mitigation would generally not

be required when compliance with an existing law or regulation would either avoid or reduce a significant impact to a level below significance.

- **Environmental Setting** provides an overview of the existing physical environmental conditions in the study area that could be affected by implementation of the Project (i.e., the "affected environment"). In accordance with State CEQA Guidelines Section 15125, each environmental resource section will include a description of the existing physical environmental conditions at the project site to provide the "baseline condition" against which project-related impacts are compared. Typically, the baseline condition is the physical condition that exists when the Notice of Preparation (NOP) is published; however, a different baseline may be used in specific cases where it is deemed appropriate. Unless otherwise noted in a specific EIR section, the environmental setting is based on data and known conditions at the date of the NOP was published on July 2, 2024.
- **Thresholds of Significance** provides the thresholds criteria used in this EIR to define the level at which an impact would be considered significant in accordance with CEQA based on the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment. Significance criteria are based on factual or scientific information and data and regulatory standards of federal, State, and local agencies. For some resource areas, the thresholds are quantitative (e.g., transportation), while for other resource areas, the thresholds are qualitative (e.g., aesthetics). The thresholds of significance are intended to assist the reader in understanding how an impact is determined to be significant or less than significant.
- **Project Impacts and Mitigation.** State CEQA Guidelines Section 15126.2(a) states that direct, indirect, short-term, long-term, on-site, and/or off-site impacts must be addressed, as appropriate, for the environmental issue being analyzed. This EIR uses the following terms to describe the level of significance of impacts identified by the environmental analysis:
    - **No Impact.** This term is used when the Project would have no adverse effect on an environmental resource.
    - **Less than Significant Impact**. An impact that is adverse but that does not exceed the defined thresholds of significance. Although an impact may occur, it will not be at a significant level based on applicable standards and thresholds. Less than significant impacts do not require mitigation.
    - **Significant Impact**. An impact that exceeds the defined thresholds of significance and would or could cause a substantial adverse change in the environment. For impacts that exceed a threshold of significance, measures are identified to prevent the impact, eliminate the impact, or reduce it to a level that is considered less than significant.
    - **Significant Unavoidable Impact.** An impact that exceeds the defined thresholds of significance and cannot be eliminated or reduced to a less than significant level through the implementation of mitigation.
- **Cumulative Impacts** identifies potential environmental impacts of past, present and reasonably foreseeable future projects, in combination with implementation of the Project;
- **Level of Significance After Mitigation** identifies the findings of the environmental analysis after the application of mitigation. To approve a project with unavoidable significant impacts, the lead

agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether to approve the project. If a project's benefits are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable" (State CEQA Guidelines §15093(a)).

- **References** are the primary public information and/or technical studies that were used to prepare the impact analysis for each environmental resource.

Terminology

To assist reviewers in understanding CEQA, the following terms are defined.

Project means the whole of an action that has the potential for resulting in a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

Environment means the physical conditions that exist in the area and which would be affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved is where significant direct or indirect impacts would occur as a result of the project. The environment includes both natural and man-made (artificial) conditions.

Impacts analyzed under CEQA must be related to a physical change. Impacts are:

- Direct or primary impacts that would be caused by a proposed project and would occur at the same time and place; or
- Indirect or secondary impacts that would be caused by a proposed project and would be later in time or farther removed in distance but would still be reasonably foreseeable. Indirect or secondary impacts may include growth-inducing impacts and other effects related to induced changes in the pattern of land use; population density or growth rate; and related effects on air and water and other natural systems.

Significant impact on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions in the area affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. An economic or social change by itself is not considered a significant impact on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant. Impacts may also be beneficial.

Mitigation measures "describe feasible measures which could minimize significant adverse impacts" as required by State CEQA Guidelines Section 15126.4. The State CEQA Guidelines define feasibility as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations."

Cumulative impacts are two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts.

4.3 BASIS FOR CUMULATIVE ANALYSIS

Under the State CEQA Guidelines, "a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts" (14 CCR §15130(a)(1)). Therefore, an EIR must discuss cumulative impacts if the incremental

effect of a project, combined with the effects of other projects is "cumulatively considerable" (14 CCR §15130(a)). Such incremental effects are to be "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (14 CCR §15064(h)(1)). Together, these projects compose the cumulative scenario which forms the basis of the cumulative impact analysis.

Pursuant to Section 15130(b) of the CEQA Guidelines:

> *The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.*

A project's cumulative impact is "an impact to which that project contributes and to which other projects contribute as well. The project must make some contribution to the impact; otherwise, it cannot be characterized as a cumulative impact of that project."[1] The cumulative analysis must be in sufficient detail to be useful in deciding whether, or how, to alter the project to lessen cumulative impacts.

There are two commonly used approaches for establishing the cumulative impact setting or scenario. One approach is to use a "list of past, present, and probable future projects producing related or cumulative impacts" (14 CCR §15130(b)(1)(A)). The other is to use a "summary of projections contained in an adopted local, regional, or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect" (14 CCR §15130(b)(1)(B)).

As discussed in Sections 4.1 through 4.17, the geographic areas considered for the cumulative analyses vary according to environmental issue area and were determined based upon the Project's scope and anticipated area in which the Project could contribute to an incremental increase in cumulatively considerable impacts. Certain issues areas are most appropriately addressed at the local level, while other issue areas necessitate the consideration of regional, State, and/or national-scale implications. For example, in assessing air quality impacts, all development within the South Coast Air Quality Management District contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, only development within the localized area of change would contribute to a cumulative visual effect since the area of change is only visible within the vicinity of that area. For this reason, the geographic scope for the analysis of cumulative impacts is identified for each resource area in the respective environmental topical sections of this EIR.

[1] *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 700.

4.1 AESTHETICS

4.1.1 Introduction

This section of the EIR identifies and analyzes the scenic vistas, visual resources, and aesthetic qualities present on and near the project site while assessing the potential impact the proposed Project could have on those resources. The pre-development conditions of the project site and surrounding area were used as the baseline to compare potential impacts associated with the Project. Applicable regulations provide further context regarding the area's visual character.

4.1.2 Visual Resource Terminology and Concepts

When viewing the same landscape, people may have different responses to that landscape and any proposed visual changes, based upon their values, familiarity, concern, or expectations for that landscape and its scenic quality. Because each person's attachment to and value for a landscape is unique, visual changes to that landscape inherently affect viewers differently. However, generalizations can be made about viewer sensitivity to scenic quality and visual changes. Recreational users (e.g., hikers, equestrians, tourists, and people driving for pleasure) are expected to have high concern for scenery and landscape character. People commuting daily through the same landscape generally have a moderate concern for scenery, while people working at industrial sites generally have a lower concern for scenic quality or changes to existing landscape character. The visual sensitivity of a landscape is also affected by the travel speed at which a person is viewing the landscape (high speeds on a highway, low speeds on a hiking trail, or stationary at a residence). The visual sensitivity of a landscape is affected by the viewing distances at which it is seen.

The same project feature can be perceived differently by people depending on the distance between the observer and the viewed object. When a viewer is closer to a viewed object in the landscape, greater detail is visible, and there is greater potential influence of the object on visual quality because of its form or scale (the object's relative size in relation to the viewer). When the same object is viewed at background distances, details may be imperceptible but overall forms of terrain and vegetation are evident, and the horizon and skyline are dominant. In the middle ground, some detail is evident (e.g., the foreground), and landscape elements are seen in context with landforms and vegetation patterns (e.g., the background).

The following terms and concepts are used in the discussion below to describe and assess the aesthetic setting and Project impacts.

Scenic Vista. An area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. A scenic vista is a view of natural environmental, historic, and/or architectural features possessing visual and aesthetic qualities of value to the community. The term "vista" generally implies an expansive view, usually from an elevated point or open area. This includes any such areas designated by a federal, State, or local agency.

Scenic Resources. Typical examples of natural scenic resources include rock outcroppings, trees, and prominent ridgelines, but scenic resources can occur naturally or be man-made, such as historic or architecturally distinctive buildings.

Scenic Highway. Refers to any highway designated as a scenic highway by an agency of the city, county, or State.

Sensitive Receptors. Viewer responses to visual settings are inferred from a variety of factors, including distance and viewing angle, types of viewers, number of viewers, duration of view, and viewer activities. The viewer type and associated viewer sensitivity are distinguished among project viewers in recreational, residential, commercial, military, and industrial areas. Viewer activities can range from a circumstance that encourages a viewer to observe the surroundings more closely (such as recreational activities) to one that discourages close observation (such as commuting in heavy traffic). Viewers in recreational areas are considered to have high sensitivity to visual resources. Residential viewers generally have moderate sensitivity but extended viewing periods. Viewers in commercial, military, and industrial areas are considered to have low sensitivity.

Viewshed. A project's viewshed is the surrounding geographic area from which the project is likely to be seen, based on topography, atmospheric conditions, land use patterns, and roadway orientations. "Project viewshed" is used to describe the area surrounding a project site where a person standing on the ground or driving a vehicle can view a project site.

Visual character. Visual character typically consists of landforms, vegetation, water features, and cultural modifications that impart an overall visual impression of an area's landscape. Scenic areas typically include open space, landscaped corridors, and viewsheds. Visual character is influenced by many different landscape attributes including color contrasts, landform prominence, repetition of geometric forms, and uniqueness of textures among other characteristics.

4.1.3 Regulatory Setting

State Regulations

California Scenic Highway Program

The California Scenic Highway Program created in 1963 is managed by the California Department of Transportation (Caltrans) for the purpose of protecting the aesthetic significance of the State's scenic highways. The California Scenic Highways Program was created through the adoption of the Streets and Highways Code (§§2260 through 2263). A highway may be designated as scenic based on certain criteria, including how much of the natural landscape can be seen by travelers, the landscape's scenic quality, and the extent to which development intrudes on the traveler's enjoyment of the view. The California Scenic Highway Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such. Official designation requires a local jurisdiction to enact a scenic corridor protection program that protects and enhances scenic resources. According to Caltrans' California State Scenic Highway System Map,[1] the City does not have any roads or highways that are designated within the California Scenic Highway Program.

California Building Standards Code

The 2022 California Building Code (CBC), Title 24 of the California Code of Regulations (CCR), is administered by the California Building Standards Commission. The CBC, as amended and adopted by each local jurisdiction, regulates the design of all new buildings within the State of California. Part 6 of Title 24 contains standards for outdoor lighting that are intended to improve energy efficiency and reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. The 2022 CBC went into effect on January 1, 2023.

[1] California Department of Transportation. 2018. *California State Scenic Highway System Map*. Retrieved from: California State Scenic Highway System Map (arcgis.com). Accessed May 23, 2025.

Regional and Local Regulations

City of South El Monte General Plan

The *City of South El Monte General Plan* (General Plan) contains the following elements: Land Use; Economic Development; Circulation; 2021-2029 6th Cycle Housing; Public Health, Safety, and Environmental Justice; and Resources. The Land Use Element of the General Plan identify policies related to improving City identity through effective landscaping techniques, improving aesthetics through decorative walls and landscaping, and strengthening park maintenance to support community beautification and recreation.

The following list includes General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect related to aesthetics and are applicable to the proposed Project.

Land Use Element

Goal 3.0	**Accommodate new development that is compatible with and complements existing land uses.**
Policy 3.3	Require that industrial development provide adequate buffers (such as decorative walls and landscaped setbacks) at the designated boundaries with adjacent residential and commercial uses to prevent impacts on residences and commercial businesses due to noise, traffic, parking, light and glare, and differences in scale; to ensure privacy; and to provide visual compatibility.
Policy 3.4	Require that the external lighting of commercial and industrial properties be confined to the site to avoid adverse impacts on adjacent land uses due to light spillover or glare.
Goal 4.0	**Work toward the gradual elimination of residential land uses within areas designated and zoned for industrial use and development.**
Policy 4.3	Require that industrial development provide adequate buffers (such as decorative walls or setbacks) at the designated boundaries with adjacent existing residential uses so as to prevent impacts on residences due to noise, traffic, parking, light and glare, and differences in scale.
Goal 5.0	**Create a sense of identity and place for South El Monte within the San Gabriel Valley.**
Policy 5.2	Provide for the consistent use of street trees along all sidewalks and property frontages.
Policy 5.6	Upgrade the visual quality of edge conditions between industrial and residential uses through street tree planting and on-site landscaping.

City of South El Monte Municipal Code

Title 17, Chapter 17.09: Industrial Zones—Standards and Uses.[2] The South El Monte Municipal Code aims to ensure that the aesthetic integrity of the City is maintained in Industrial zones through development standards. This is done through standards that target the following:

- 17.09.050: Property development standards
- 17.09.070: Landscaping
- 17.09.080: Outdoor storage and operations
- 17.09.100: Exterior lighting facilities

4.1.4 Existing Conditions

The City of South El Monte is in eastern Los Angeles County. The City is within the San Gabriel Valley, approximately 23 miles east of the Pacific Ocean and 9 miles south of the San Gabriel Mountain Range. Located within an urban setting, the approximately 21-acre site is within the southern portion of the City and is generally bordered by vacant property and State Route 60 (SR-60) to the north; Lexington-Gallatin Road and single-family residences to the east; and the Whittier Narrows Recreation Area to the south and west.

The site is relatively flat and gently slopes north from an elevation of approximately 219 feet above mean sea level (msl) in the western corner and 226 msl in the eastern corner of the site. Apart from the scattered remains of previous uses, including a pad foundation to the south and scattered radio tower footings/pile caps, the site is undeveloped. The project site is primarily populated by non-native grasses with sparse patches of ornamental vegetation.

Scenic Vistas

While the General Plan does not identify any scenic vistas within the City, the San Gabriel Mountain Range is a prominent vista within the San Gabriel Valley. Distant views of the San Gabriel Mountain Range are visible from the project site. Although not designated as a scenic vista, Whittier Narrows Recreation Area and Whittier Narrows Nature Center are major recreational areas to the west and south of the project site and provide open space views within those areas. The Whittier Narrows Recreation Area is located within unincorporated Los Angeles County and managed by Los Angeles County Parks and Recreation department.

Scenic Corridors

The project site is not located along a State Scenic Highway. The nearest eligible State Scenic Highway is Interstate 210 (I-210), which is approximately 10 miles northwest of the project site. Given the distance between the nearest eligible State Scenic Highway segment and the site, it is not visible from the project site, and the project site is not visible from the designated eligible State Scenic Highway segment.

Light and Glare

Sources of light and glare in the area are typical of that found in urban environments. Stationary source lighting in the area is generated from building interiors and exterior sources (e.g., building illumination, security lighting, parking lot lighting, landscape lighting) associated with the Whittier Narrows Recreation

[2] City of South El Monte. 2024. *City of South El Monte Code of Ordinances – Chapter 17.09 Industrial Zones—Standards and Uses.* Retrieved from: https://ecode360.com/45041846?highlight=lighting&searchId=1982302228684333#45041803. Accessed July 2024.

Area, the residential properties, and street lighting along Lexington-Gallatin Road. The area is also influenced by light and glare from passing traffic on SR-60, Santa Anita Avenue, and Lexington-Gallatin Road. The project site is currently vacant and undeveloped and does not contain any lighting or sources of potential glare.

4.1.5 Methodology

The analysis of visual quality of the proposed Project is based on the conceptual site plan and conceptual landscape plan, as described in **Section 3.0: Project Description**. The assessment of aesthetic/visual changes is based on field reconnaissance; the evaluation of the General Plan, and other regulatory requirements; and the evaluation of the proposed site development in comparison to existing conditions. Aesthetics may be defined as visual qualities within a given field of view and may include such considerations as size, shape, color, contextual and general composition, and the relationships between these elements; the potential aesthetic impacts of a project can be evaluated by considering such factors as scale and mass, landscaping, and setbacks.

The Project is evaluated against the State CEQA Guidelines significance criteria/thresholds below, as the basis for determining the impact's level of significance concerning aesthetics. In addition to the design characteristics of the Project, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce potentially significant environmental impacts. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the Project's potentially significant environmental impacts.

This analysis of impacts on aesthetic resources examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects-based significance criteria/threshold's application. For each criterion, the analyses address both temporary (construction) and operational impacts, as applicable. Each criterion is discussed in the context of Project components that share similar characteristics/geography. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

4.1.6 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G, which* states that a project could potentially have a significant impact if it would:

- Have a substantial adverse effect on a scenic vista.
- If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

As addressed in **Section 1.5: Summary of Effects with No Impact**, the City has determined that the proposed Project would not have a significant impact on the following threshold for the reasons stated below, and that no further analysis was required:

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

The General Plan Resource Element notes "none of the existing highways, streets, or roads in the City meet requirements for designation as a scenic highway." I-210 is the nearest eligible state highway, which is approximately 10 miles northwest of the project site; the project site is not visible from I-210.[3] The project site does not contain any scenic rock outcroppings, historic buildings, or heritage trees. Therefore, the proposed Project would not affect scenic resources along an officially designed or an eligible scenic highway.

4.1.7 Project Impacts and Mitigation

Threshold 4.1-1:	**Would the Project have a substantial effect on a scenic vista?**
	Level of Significance: Less than Significant Impact

Scenic vistas can be defined as views or vistas generally panoramic in nature and identified as viewpoints or vistas (e.g., formal turnouts along roadways) or as identified in planning documents. A substantial adverse effect on a scenic vista or view would occur where the majority of an existing public view would be blocked or substantially interrupted. The General Plan Resource Element does not identify any scenic vistas in the City. However, the San Gabriel Mountain Range, a part of the Angeles National Forest, is a prominent vista within the San Gabriel Valley and is assumed to be a scenic vista for purposes of this EIR analysis. For example, the Mount Wilson Observatory, in the San Gabriel Mountains, is approximately 13 miles due north of the project site. Background views of the San Gabriel Mountains are visible from the project site; however, the publicly accessible views (i.e., from Lexington-Gallatin Road and Santa Anita Avenue) are already limited and interrupted by existing urban development and existing tree lines.

The Project would include a General Plan Amendment from Commercial (C) to Commercial-Manufacturing (C-M) and a zone change from Commercial (C) to Manufacturing (M). In compliance with Municipal Code Chapter 17.09 for the M zone,[4] the Project's proposed one-story warehouse would have a roof line of approximately 45 feet in height, a front yard setback of approximately 145 feet from Lexington-Gallatin Road, an approximately 40-foot setback from the southwestern property line, and an approximately 51-foot setback from the northeastern property line. The height of the proposed development would not be so tall as to substantially obstruct publicly accessible views, as the San Gabriel Mountains are far enough away such that existing views are background and limited due to the distance, existing tree linings, and urban development. Further, the proposed setbacks would ensure the limited background views of the scenic vista would not be blocked from those travelling along Lexington-Gallatin Road and Santa Anita Avenue. Therefore, compared to existing conditions and due to compliance with the City's Municipal Code requirements for maximum building height and setbacks, the Project would not have a substantial adverse effect on a scenic vista.

Construction activities would result in temporary changes to the existing partially obstructed background views of the San Gabriel Mountains, as viewed from the surrounding uses. Construction activities would be visible to residents and passersby along Lexington-Gallatin Road and Santa Anita Avenue. The construction of the warehouse component of the Project and excavation and grading of the future City park component of the Project is anticipated to be completed in one phase and construction activities are anticipated to last approximately 12 months. As the background views of the San Gabriel Mountains are

[3] California Department of Transportation. 2018. *California State Scenic Highway System Map*. Retrieved from: California State Scenic Highway System Map (arcgis.com). Accessed July 2024; May 23, 2025.

[4] City of South El Monte. *South El Monte Code of Ordinances – Title 17 Zoning.* Retrieved from: https://ecode360.com/44545380#44545380. Accessed August 28, 2024.

already partially obstructed, the temporary construction activities would not result in a substantial effect on the scenic vista. Impacts would be less than significant and no mitigation is required.

Threshold 4.1-2:	**In an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?**
	Level of Significance: Less than Significant Impact

The Project would be constructed in a predominately urban area of the City; therefore, this discussion evaluates whether the Project would conflict with applicable zoning and other regulations governing scenic quality. As noted above, the Project would be subject to the requirements of Municipal Code Chapter 17.09, which address permitted and prohibited development intended to provide for areas within the City in which industrial uses can be collocated. The Project would comply with Municipal Code Section 17.09.050,[5] which includes property development standards that apply to all uses within the M zone. The development standards are imposed to ensure the building design does not negatively impact the area in which the use is located. Compliance with the M zoning district development standards would be ensured through the City's review during the application process, project approval process, and future review of building permits.

The Project proposes the development of an approximately 201,815 sf warehouse building in the eastern portion of the project site. The warehouse component of the Project proposes approximately 12.7 percent of landscape coverage, which exceeds Municipal Code Section 17.09.070 requirements, and would be designed and configured to provide landscape (buffer) areas along all frontages. Consistent with General Plan Policy 3-3, the Project would include landscape buffers to separate vehicle and truck parking areas from the sidewalks and streets and screen views of the warehouse from the future City park component of the Project. Moreover, the Project would provide a series of trees and 14-foot-high decorative concrete tilt-up screen wall along Lexington-Gallatin Road and along the east and west sides of the secured truck parking lot to visually screen the Project, specifically the truck loading area, from public view. The City's design standards have been incorporated in the Project to ensure full compliance with the City's Municipal Code development standards and avoid impacts to visual character or scenic quality. In addition, the proposed digital billboard would be required to comply with all applicable federal, State, and local laws and regulations including, but not limited to, the Highway Beautification Act of 1965 (23 U.S.C. 131), the California Outdoor Advertising Act, and the California Vehicle Code. Compliance with such measures would ensure avoidance of adverse impacts to scenic quality associated with the Project. Additional information regarding site design, necessary permits, and land use regulations are provided in **Section 3.0: Project Description** and **Section 4.10: Land Use and Planning**, of this EIR.

Project design would be reviewed during the City's development review process and would only be approved after finding the proposed development is consistent with the City's General Plan and Municipal Code guidelines concerning visual character and quality. Therefore, following compliance with the established regulatory framework, Project implementation would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant and no mitigation would be required.

[5] City of South El Monte. *South El Monte Code of Ordinances – Section 17.09.050.* Retrieved from: https://ecode360.com/45041799#45041811. Accessed August 29, 2024.

Threshold 4.1-3	**Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?** ***Level of Significance:*** Less than Significant Impact with incorporation of MM AES-1 and MM AES-2.

Light pollution, also known as "sky glow," is an adverse effect of man-made light. It is often used to denote urban sky glow (brightening of the night sky due to man-made lighting) but also includes glare (intense and blinding light) and light trespass (light falling where it is not wanted or needed; spill light). In many cases, sky glow is visible from great distances, particularly in evenings when there is moisture in the air. Minute water droplets in the evening air reflect and scatter light into the atmosphere.

Glare is created by the reflection of sunlight and electric lights from windows and building surfaces. Daytime glare is generally caused by the reflection of sunlight from highly reflective surfaces at or above eye level. Reflective surfaces are typically associated with buildings constructed with broad expanses of highly polished surfaces or broad, light-colored areas of paving. Daytime glare is usually present during early morning and late afternoon hours when the sun is at a low angle and the potential exists for intense reflected light to interfere with vision and driving conditions. Daytime glare may also hinder outdoor activities performed within surrounding land uses. Nighttime glare includes direct, intense, focused light, along with reflected light. Glare generated by direct light typically comes from mobile sources (e.g., automobiles). Glare is also less frequently caused by intense stationary sources, such as floodlights or cargo crane lights. As with daytime sun glare, intense nighttime light may cause undesirable interference with driving or other activities.

The City is primarily built out, and a significant amount of ambient light from urban uses already exists. Existing lighting sources include streetlights, outdoor safety and security lighting from adjacent recreational commercial buildings to the south, residential properties to the east, and from vehicle headlights traveling at night on adjacent roadways.

With respect to light and glare, the Project would introduce additional sources of lighting to illuminate the outside of the warehouse building, building entrance areas, signage, internal pedestrian paths, parking areas, as well as stadium lighting in the City park, and a freeway adjacent digital billboard on the northern portion of the project site within the future City park area.

For the evaluation set forth in this EIR, within the future City park area of the project site, it has been conservatively assumed in this EIR that stadium lighting could be provided for the athletic fields. The EIR assumes 12 stadium lights (6 lights per athletic field) of approximately 60 to 80 feet in height. In compliance with Municipal Code Section 17.09.100, any stadium lighting would be directed and shielded down to avoid light pollution and to ensure it would not create a hazardous interference with the highways and neighboring properties. The stadium lighting would only be used for activities associated with the athletic fields and in compliance with Municipal Code Section 12.12.404, would conclude by 10:00 PM therefore, not substantially affecting nighttime views. Additionally, the stadium lighting would be required to comply with best practices outlined in MM AES-1, which include orientation, full cutoff fixtures, shielding, light intensity, dimming, etc. Compliance with such measures would help to avoid light pollution and ensure the Project would not result in an adverse light or glare impact. As identified in the Lighting Study prepared for the Project, and included as **Appendix B: Lighting Analysis** to this EIR, the proposed stadium lighting for the future City park area would not result in light spill at the property line

greater than 0.3 footcandles (fc). Therefore, implementation would not result in a new substantial source of light or glare which would adversely affect day or nighttime views in the area.

The freeway adjacent digital billboard sign would be up to 70 feet in height on the northern portion of the project site within the future City park area, see **Figure 3-6: Project Site Configuration**. With respect to freeway adjacent digital billboard, the primary concern is potential distraction of drivers traveling along SR-60 and potential adverse impacts from nighttime light or glare. The proposed billboard would be required to comply with requirements set forth in MM AES-2 to avoid potential significant light and glare impacts. MM AES-2 outlines requirements for display brightness, light levels, display control system, and image appearance and motion. In addition, the billboard would be required to comply with all applicable federal, State, and local laws and regulations including, but not limited to, Caltrans requirements under the Highway Beautification Act of 1965 (23 U.S.C. 131), the California Outdoor Advertising Act, and the California Vehicle Code. The Lighting Study prepared for the Project demonstrates the proposed digital billboard for informational purposes. The proposed billboard is located in an urban environment adjacent to SR-60 which is characterized by existing sources of light and glare, including streetlights, vehicles, and illuminated signage resulting in ambient nighttime lighting. Therefore, consistent with the area's existing visual conditions, the billboard would not result in a new substantial source of light or glare. Overall, compliance with MM AES-2, the established regulatory framework, and the Development Agreement with the City would ensure the Project would not result in an adverse light or glare impact such that day or nighttime views would be significantly affected.

Project lighting would be designed in accordance with Municipal Code Section 17.09.100[6], which requires all exterior lighting to be arranged in a manner that will not provide a direct glare or create hazardous interference with highways and neighboring properties. Warehouse buildings are typically constructed as concrete tilt-up structures with minimal glazing (see **Figure 3-6** and **Figure 3-7** in **Section 3.0: Project Description**). Further, the Project would be required to comply with CCR Title 24 standards which would require all glass used in the building design to have minimal reflectivity to reduce glare to surrounding neighbors. Buildings with large facades constructed of reflective surfaces (e.g., brightly colored building facades, metal surfaces, and reflective glass) could increase existing levels of daytime glare. The Project's proposed design does not include such surfaces or components. Compliance with the above regulations would ensure that the introduction of the new sources of light or glare associated with the Project would not adversely impact day or nighttime views. Impacts would be less than significant.

As discussed above, the Project area includes existing nighttime lighting from security, parking lot, and wayfinding lights associated the adjacent office buildings, vehicle headlights, and streetlights. The Project would introduce additional nighttime lighting on the site; however, this would be generally consistent with the existing sources of nighttime lighting in the area. Additionally, potential impacts would be avoided with MM AES-1, MM AES-2, and compliance with the City's established regulatory framework (i.e., the City's Municipal Code and CCR Title 24), which would be verified through the City's plan review process. These measures would ensure the Project does not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Impacts would be less than significant with mitigation.

Construction activities associated with the pouring of concrete for the structure foundations may occur during early nighttime hours, up to 10:00 PM, necessitating safety and security lighting. This would include

[6] City of South El Monte. South El Monte Code of Ordinances – *Section 17.06.110 Exterior Lighting Facilities*. Retrieved from: https://ecode360.com/45041706?highlight=lighting&searchId=5601001849185034#45041693. Accessed August 28, 2024.

the use of lighting fixtures typical of construction sites such as light towers, night lights, and balloon lights. In general, lighting exposure from construction activities would be associated with the use of artificial light during the evening hours from construction equipment, lighting fixtures, and security lighting, as well as car/truck headlights. Although the use of lighting for construction activities would create new sources of nighttime lighting, the duration would be expected to occur over a limited number of days, likely five days or less. Due to the short duration of construction activities requiring the use of additional lighting and because there are no immediately adjacent land uses, impacts are considered less than significant.

4.1.8 Cumulative Impacts

When evaluating cumulative aesthetic impacts, a number of factors must be considered. The cumulative study area for aesthetic impacts is the viewshed that includes the project site and surrounding areas. The contrast a project has with its surrounding environment may actually be reduced by the presence of other cumulative projects. For example, if most of an area becomes urbanized, the contrast of a project with the natural surroundings may be less since it would not stand out in contrast as much. In order for a cumulative aesthetic impact to occur, the aesthetic impacts from cumulative projects would need to occur within the same geographic area to substantially alter the existing viewshed or existing scenic character of an area. The cumulative projects would need to be visible together or near each other so a viewer could perceive them in the same view.

As identified above, the Project would be designed and constructed in compliance with the City's General Plan and Municipal Code, as would future projects in the cumulative study area, as it relates to visual character or scenic quality. Project compliance would be ensured through the City's review during the application process and future review of building permits. The Project would not result in a significant impact to a scenic vista or scenic quality and therefore would not result in a cumulatively considerable impact.

With respect to nighttime illumination, nighttime lighting effects may be considered in a regional context because of the potential for night glow that can extend beyond the boundaries of a site. Therefore, with respect to night lighting, the proposed Project is considered in context to the forecasted growth for the area and with cumulative projects in the area that may contribute to the increased nighttime lighting. Therefore, with respect to night lighting, the Project is considered in context to the forecasted growth for the area and with cumulative projects in the area that may contribute to the increased nighttime lighting. Since the Project would be required to comply with lighting requirements, including mitigation, to preclude glare and light spillage, the Project's contribution to nighttime lighting would not be cumulatively considerable. Therefore, the Project's incremental effects involving scenic vistas, consistency with zoning/other regulations governing scenic quality, and light and glare are not cumulatively considerable.

4.1.9 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

MM AES-1: Stadium lights at the future City park athletic fields shall comply with the following requirements:

a. **Orientation.** Fixtures shall be oriented in such a way that they direct light downward and toward the field, ensuring that no direct light is emitted towards adjacent lands.

b. **Full Cutoff Fixtures.** Fixtures shall be "full cutoff" type to direct light exclusively onto the playing surface and avoid light spill and glare beyond the field boundaries.

c. **Shielding.** Shielding or deflectors shall be installed to reduce light spill.

d. **Lighting Intensity.** The lighting intensity shall not exceed necessary levels for safety and visibility.

e. **Dimming Capabilities.** Lights shall be dimmable to adjust levels based on the activity or time of day.

f. **Scheduling Controls.** The lighting system shall have an automatic timer to turn off all lights promptly after events and practices, and to limit unnecessary lighting during non-use periods (e.g., after 10:00 PM).

g. **Maintenance and Adjustments.** The lighting system shall be subject to annual inspection and adjustments to ensure ongoing compliance with the requirements outlined above. In the event that the above requirements are no longer being met, corrective measures, including re-aiming lights, upgrading fixtures, or adjusting light levels, shall be implemented immediately.

MM AES-2 **Digital Billboard**. The billboard shall comply with the following requirements:

- The display brightness shall be controlled by a photocell or light sensor that adjusts the brightness to the required level based on ambient light conditions without the need for human input. Use of other brightness adjustment methods, such as timer- or calendar-based systems, shall only be used as a backup system.
- The billboard shall comply with outdoor advertising requirements under the Caltrans Federal Highway Beautification Act and the California Outdoor Advertising Act.
- The display shall be factory-certified as capable of complying with the City's illumination requirements.
- The sign shall be equipped with a control system that, in the event of a display or control malfunction, "freezes" the display on either a single, unchanging message, or a blank screen.
- Any sign area not comprising the digital display panel is prohibited. This area includes, but is not limited to, static sign area, appendages, cutout letters, and figures.
- Where screen transitions are used, the transitions shall not give the appearance of moving text or images. The sign copy shall not use flashing, intermittent, or moving lights or produce the optical illusion of movement.
- Each sign copy shall be displayed for a minimum of four seconds. The still images shall not move or present the appearance of motion and shall not use flashing, scintillating, blinking, or traveling lights or any other means not providing constant illumination. Transition or blank screen time between one still image and the next shall not exceed one second.
- The digital billboard shall comply with all applicable laws and regulations concerning brightness, including, without limitation, California Vehicle Code Section 21466.5, as amended.

4.1.10 Level of Significance After Mitigation

Impacts would be mitigated to a less than significant level.

4.1.11 References

California Department of Transportation. 2018. *California State Scenic Highway System Map*. Retrieved from: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed October 2024.

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4.2 AIR QUALITY

4.2.1 Introduction

This section of the EIR identifies potential air quality impacts associated with development and implementation of the Project. The current conditions were observed as the baseline for the analysis and were compared to the potential effects anticipated for the Project. The ambient air quality of the local and regional area is described, along with relevant federal, State, regional, and local air pollutant regulations. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). Criteria air pollutant emissions modeling for the proposed Project is included in **Appendix C: Air Quality Assessment** of this EIR. The Health Risk Assessment (HRA) for the proposed Project is included in **Appendix D: Health Risk Assessment**.

4.2.2 Regulatory Setting

The federal and State governments have been empowered by the Federal Clean Air Act (FCAA) and the California Clean Air Act (CCAA), respectively, to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The U.S. Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the State equivalent. Local control in air quality management is provided by CARB through county-level or regional (multi-county) air pollution control districts. CARB establishes air quality standards and is responsible for control of mobile emission sources, while the local air pollution control districts are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide.

Federal Regulations

Federal Clean Air Act

Air quality is federally protected by the Federal Clean Air Act (FCAA; 42 U.S.C. §§7401 et seq.) and its amendments. Under the FCAA, the United States Environmental Protection Agency (U.S. EPA) developed the primary and secondary National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants including O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead. Proposed projects in or near nonattainment areas could be subject to more stringent air-permitting requirements. The FCAA requires each state to prepare a State Implementation Plan to demonstrate how it will attain the NAAQS within the federally imposed deadlines.

The U.S. EPA can withhold certain transportation funds from states that fail to comply with the planning requirements of the FCAA. If a state fails to correct these planning deficiencies within two years of Federal notification, the U.S. EPA is required to develop a Federal implementation plan for the identified nonattainment area or areas. The provisions of 40 Code of Federal Regulations Parts 51 and 93 apply in all nonattainment and maintenance areas for transportation-related criteria pollutants for which the area is designated nonattainment or has a maintenance plan. The U.S. EPA has designated enforcement of air pollution control regulations to the individual states. Applicable federal standards are summarized in **Table 4.2-1: State and Federal Ambient Air Quality Standards.**

Table 4.2-1: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	State Standards[1,2]	Federal Standards[3,4,5]
Ozone (O_3)[6]	1 Hour	0.09 ppm (180 µg/m^3)	NA
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Respirable Particulate Matter (PM_{10})[7]	24-Hour	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	NA
Fine Particulate Matter ($PM_{2.5}$)[7]	24-Hour	NA	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	9.0 µg/m^3
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
	8 Hour	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)
Nitrogen Dioxide (NO_2)[8]	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)
Sulfur Dioxide (SO_2)[9]	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	Annual Arithmetic Mean	NA	0.03 ppm (80 µg/m^3)
Lead (Pb)[10,11]	30-Day Average	1.5 µg/m^3	NA
	Calendar Quarter	NA	1.5 µg/m^3
	Rolling 3-Month Average	NA	0.15 µg/m^3
Visibility Reducing Particles[12]	8 hours	See Note 11	NA
Sulfates (SO_4^{-2})	24 Hour	25 µg/m^3	NA
Hydrogen Sulfide (H_2S)	1 Hour	0.03 ppm (42 µg/m^3)	NA
Vinyl Chloride (C_2H_3Cl)[10]	24 Hour	0.01 ppm (26 µg/m^3)	NA

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; NA = no information available.

1. California standards for O_3, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, suspended particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
3. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
4. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
5. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
6. On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12.0 µg/m^3 to 9.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15.0 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
7. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
8. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in

Table 4.2-1: State and Federal Ambient Air Quality Standards

effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

9. The ARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
10. The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
11. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: South Coast Air Quality Management District, Table of *Air Quality Standards.* Retrieved from: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf. Accessed February 2025.

Federal Emissions Standards for On-Road Trucks

To reduce emissions from on-road, heavy-duty diesel trucks, the U.S. EPA established a series of increasingly strict emission standards for new engines, starting in 1988. The U.S. EPA promulgated the final and cleanest standards with the 2007 Heavy-Duty Highway Rule. The PM emission standard of 0.01 gram per horsepower-hour (g/hp-hr) is required for new vehicles beginning with model year 2007. Also, the NO_X and nonmethane hydrocarbon (NMHC) standards of 0.20 g/hp-hr and 0.14 g/hp-hr, respectively, were phased in together between 2007 and 2010 on a percent of sales basis: 50 percent from 2007 to 2009 and 100 percent in 2010.

Emission Standards for Off-Road Diesel Engines

To reduce emissions from off-road diesel equipment, the U.S. EPA established a series of cleaner emission standards for new off-road diesel engines. Tier 1 standards were phased in from 1996 to 2000 (year of manufacture), depending on the engine horsepower category. Tier 2 standards were phased in from 2001 to 2006. Tier 3 standards were phased in from 2006 to 2008. Tier 4 standards, which generally require add-on emission control equipment to attain them, were phased in from 2008 to 2015.

State Regulations

California Air Resources Board

The California Air Resources Board (CARB) administers the air quality policy in California. The California Ambient Air Quality Standards (CAAQS) were established in 1969 pursuant to the Mulford-Carrell Act. **Table 4.2-1** identifies the CCAQS and NAAQS standards. The State standards are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates.

The California Clean Air Act (CCAA), which was approved in 1988, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. These AQMPs also serve as the basis for the preparation of the State Implementation Plan for meeting the federal clean air standards for the State of California. Like the U.S. EPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events such as

wildfires, volcanoes, etc. are not considered violations of a State standard, and are not used as a basis for designating areas as nonattainment.

Diesel Risk Reduction Plan

The identification of diesel particulate matter (DPM) as a toxic air contaminant (TAC) in 1998 led CARB to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (DRRP) in October 2000. The DRRP's goals include an 85 percent reduction in DPM by 2020 from the 2000 baseline. CARB estimates that emissions of DPM in 2035 will be less than half those in 2010, further reducing statewide cancer risk and non-cancer health effects. The DRRP includes regulations to establish cleaner new diesel engines, cleaner in-use diesel engines (retrofits), and cleaner diesel fuel.

Truck and Bus Regulation Reducing Emissions from Existing Diesel Vehicles

On December 12, 2008, CARB approved the Truck and Bus Regulation to significantly reduce particulate matter (PM) and oxides of nitrogen (NO_X) emissions from existing diesel vehicles operating in California. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavier trucks must be retrofitted with PM filters beginning January 1, 2012, and older trucks must be replaced starting January 1, 2015. Beginning January 1, 2023, nearly all trucks and buses are required to have 2010 model year engines or equivalent.

The regulation applies to most privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. Small fleets with three or fewer diesel trucks can delay compliance for heavier trucks and there are several extensions for low-mileage construction trucks, early PM filter retrofits, adding cleaner vehicles, and other situations. Privately and publicly owned school buses have different requirements.

Heavy-Duty Vehicle Idling Emission Reduction Program

The purpose of the CARB Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling is to reduce public exposure to diesel particulate matter and criteria pollutants by limiting the idling of diesel-fueled commercial vehicles. The driver of any vehicle subject to this Airborne Toxic Control Measure is prohibited from idling the vehicle's primary diesel engine for more than five minutes at any location and is prohibited from idling a diesel-fueled auxiliary power system for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if it has a sleeper berth and the truck is located within 100 feet of a restricted area (homes and schools).

CARB's Final Regulation Order, Requirements to Reduce Idling Emissions from New and In-Use Trucks, beginning in 2008, requires that new 2008 and subsequent model-year heavy-duty diesel engines be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged.

Section 2485 and Section 2449 of Title 13 of the California Code of Regulations limits diesel-fueled motor vehicle idling to no more than five minutes. Section 2485 limits idling for diesel-fueled commercial motor vehicles with gross vehicle weight ratings of greater than 10,000 pounds that are or must be licensed to operate on publicly maintained highways and streets within California. Section 2449 limits idling for off-road diesel-fueled fleets.

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales**: Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting**: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

On January 13, 2025, CARB withdrew its requests for CAA waivers from the U.S. EPA needed to support four adopted vehicle emissions regulations: (1) the Advanced Clean Fleets Regulations; 2) the In-Use Locomotive Regulations; 3) part of the Commercial Harbor Craft and Ocean-Going Vessels At-Berth Regulations; and 4) part of the Transport Refrigeration Unit Engine Standards Regulations. Implementation of these regulations is currently unknown.

CARB Advanced Clean Fleets Regulation

CARB approved Advanced Clean Fleets Regulation (ACF) on April 28, 2023, which includes requirements for drayage trucks transporting cargo to and from California's intermodal seaports and railyards. Drayage trucks will be required to start transitioning to zero-emission technology beginning in 2024, with full implementation by 2035. As noted above, on January 13, 2025, CARB withdrew its requests for CAA waivers from the U.S. EPA needed to support four adopted vehicle emissions regulations including the Advanced Clean Fleets Regulations. Implementation of these regulations is currently unknown.

Executive Order N-79-20

Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new zero emission vehicles (ZEVs) "towards the target of 100 percent." The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production facilities with a goal

toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

CARB 2017 Technical Advisory (Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways)

CARB published a Technical Advisory in 2017 to provide planners and other stakeholders involved in land use planning and decision-making with information on scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways. Near-roadway development is a result of a variety of factors, including economic growth, demand for built environment uses, and the scarcity of developable land in some areas. The Technical Advisory notes that research has demonstrated the public health, climate, financial, and other benefits of compact, infill development along transportation corridors, and demonstrates that planners, developers, and local governments can pursue infill development while simultaneously reducing exposure to traffic-related pollution. On-site strategies to remove air pollution identified in the Technical Advisory include the use of particle filtration systems (i.e., high-efficiency filtration in mechanical ventilation systems), solid barriers, and vegetation.

California Energy Commission - Title 24 Building Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in California Code of Regulations (CCR) Title 24 Part 6, were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Energy Standards include requirements for mandatory mechanical ventilation intended to improve indoor air quality in homes and requirements for Minimum Efficiency Reporting Value (MERV) 13 air filtration on space conditioning systems, and ventilation systems that provide outside air to a dwelling's occupiable space. The Residential Compliance Manual for the 2022 Building Energy Efficiency Standards notes that air filter efficiencies of at least MERV 13 protect occupants from exposure to the smaller airborne particles (i.e., $PM_{2.5}$) that are known to adversely affect respiratory health. CCR Title 24 Part 6 requires a particle size efficiency rating equal to or greater than 85 percent in the 1.0 to 0.3 micrometer (µm) range.

CalEnviroScreen

The Office of Environmental Health Hazard Assessment (OEHHA) has developed CalEnviroScreen 4.0, which is a mapping tool that helps identify California communities that are most affected by various pollution sources, and where people are often especially vulnerable to pollution's effects. CalEnviroScreen uses environmental, health, and socioeconomic information to produce scores for every census tract in the State. The scores are mapped so that different communities can be compared. An area with a high score experiences a much higher pollution burden than areas with low scores.

According to CalEnviroScreen, the project site and the nearest sensitive receptors (i.e., park receptors located approximately 40 feet to the southeast and the single-family residences located approximately 230 feet to the east) are within Census Tract 6037433802, which is within the 92nd percentile. It is noted that the CalEnviroScreen scores are relative to other census tracts and are not an expression of health risk, and do not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment.

Senate Bill 535

Senate Bill (SB) 535 directs 25 percent of the proceeds from the Greenhouse Gas Reduction Fund (i.e., funds from the AB 32 cap-and-trade program) to go to projects that provide a benefit to disadvantaged communities (DACs) (as identified by the OEHHA mapping). These funds must be used for programs that further reduce greenhouse gas emissions. Funding programs that reduce greenhouse gas emissions would also potentially reduce exposure to other emissions including TACs. Based on OEHHA mapping, the project site is within an SB 535 designated disadvantaged community (Census Tract 6037433802). SB 535 does not include project-specific requirements or prohibit developments in proximity to the designated communities.

Regional and Local Regulations

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial counties, and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. With respect to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide for the region, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the 2022 South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan. SCAG is responsible under the CCAA for determining transportation conformity of projects, plans, and programs with the SCAQMD.

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that State and federal ambient air quality standards are attained and maintained in the South Coast Air Basin (SCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The SCAQMD is also the lead agency in charge of developing each AQMP, with input from the Southern California Association of Governments (SCAG) and CARB. The AQMP is a comprehensive plan that includes control strategies to reduce emissions from stationary and area sources, as well as for on-road and off-road mobile sources. SCAG has the primary responsibility for providing future growth projections and the development and implementation of transportation control measures. CARB, in coordination with federal agencies, has jurisdiction over mobile sources.

The 2016 AQMP was adopted by the SCAQMD Governing Board on March 3, 2017. The purpose of the 2016 AQMP is to set forth a comprehensive and integrated program that would lead the SCAB into compliance with those NAAQS for which the basin is in nonattainment (i.e., the federal 24-hour $PM_{2.5}$ air quality standard), and to provide an update to the SCAQMD's commitments towards meeting the federal 8-hour O_3 standards. The 2016 AQMP incorporated the latest scientific and technological information and planning assumptions, including the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) and updated emission inventory methodologies for various source categories.

On October 1, 2015, the U.S. EPA strengthened the NAAQS for ground-level O_3. The 2022 AQMP, adopted by the SCAQMD Governing Board on December 2, 2022, was developed to address the strengthened requirements for meeting the 2015 ground-level 8-hour O_3 standard. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures to achieve the 2015 8-hour ozone standard. Like earlier AQMPs, the 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including the *2020-2045* RTP/SCS and updated emission inventory methodologies for various source categories.

The SCAQMD has published the CEQA Air Quality Handbook (approved by the SCAQMD Governing Board in 1993 and augmented with guidance for Local Significance Thresholds [LST] in 2008). The SCAQMD guidance helps local government agencies and consultants to develop environmental documents required by CEQA and suggests thresholds of significance for criteria pollutants for both construction and operation (see discussion of thresholds below). With the help of SCAQMD's CEQA Air Quality Handbook and associated guidance, local land use planners and consultants are able to analyze and document how proposed and existing projects affect air quality in order to meet the requirements of the CEQA review process. The SCAQMD periodically provides supplemental guidance and updates to the handbook on their website.

The State and federal attainment status designations for the SCAB are summarized in **Table 4.2-2: South Coast Air Basin Attainment Status.** The SCAB is currently designated as a nonattainment area with respect to the State O_3, PM_{10}, and $PM_{2.5}$ standards, as well as the national 8-hour O_3 and $PM_{2.5}$ standards. The SCAB is designated as attainment or unclassified for the remaining State and federal standards.

The Project must comply with the following SCAQMD rules:

- **Rule 401 (Visible Emissions)** – A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.
- **Rule 402 (Nuisance)** – This rule prohibits the 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. This rule does not apply to odors emanating from agricultural operations necessary for the growing or crops or the raising of fowl or animals.

Table 4.2-2: South Coast Air Basin Attainment Status

Pollutant	State	Federal
Ozone (O_3) (1 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Ozone (O_3) (8 Hour Standard)	Non-Attainment	Non-Attainment (Extreme)
Particulate Matter ($PM_{2.5}$) (24 Hour Standard)	–	Non-Attainment (Serious)
Particulate Matter ($PM_{2.5}$) (Annual Standard)	Non-Attainment	Non-Attainment (Moderate)
Particulate Matter (PM_{10}) (24 Hour Standard)	Non-Attainment	Attainment (Maintenance)
Particulate Matter (PM_{10}) (Annual Standard)	Non-Attainment	–
Carbon Monoxide (CO) (1 Hour Standard)	Attainment	Attainment (Maintenance)
Carbon Monoxide (CO) (8 Hour Standard)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO_2) (1 Hour Standard)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	Attainment	–
Lead (Pb) (30 Day Standard)	–	Unclassifiable/Attainment
Lead (Pb) (3 Month Standard)	Attainment	Nonattainment (Partial)[1]
Sulfates (SO_{4-2}) (24 Hour Standard)	Attainment	–
Hydrogen Sulfide (H_2S) (1 Hour Standard)	Unclassified	–

Source: South Coast Air Quality Management District, *Air Quality Management Plan.* 2022. U.S. Environmental Protection Agency, *Nonattainment Areas for Criteria Pollutants (Green Book)*, 2024.

Rule 403 (Fugitive Dust) - This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

b) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.

c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the work day to remove soil from pavement.

Rule 431.2 (Sulfur Content of Liquid Fuels) - This rule limits the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines.

Rule 1113 (Architectural Coatings) – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) – This rule would minimize emissions associated with stationary engines over 50 horsepower by establishing operating requirements and emission standards, enforcing the Airborne Toxics Control Measure, and requiring owners and operators to submit a Compliance Status Report and a Compliance Plan to the SCAQMD.

Rule 2202 (On-Road Motor Vehicle Mitigation Options) – This rule requires employers with 250 or more employees to implement an approved mobile source emission reduction measure, in compliance with FCAA and CCAA requirements, Health and Safety Code Section 40458, and Section 182(d)(1)(B) of the FCAA.

Rule 2305 (Warehouse Indirect Source Rule) - Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021, to reduce NOX and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. This rule applies to existing and proposed warehouses over 100,000 sf located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses WAIRE (Warehouse Actions and Investments to Reduce Emissions) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install onsite energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

South El Monte General Plan

The City of South El Monte's General Plan outlines the concerns of the community and the means of addressing those concerns. The Resources Element and the Public Health, Safety, and Environmental Justice Element of the General Plan identifies goals and policies that protect City residents from air pollution. General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project are as follows:

Resources Element

Goal 5.0	**Improve air quality for future generations of South El Monte residents.**
Policy 5.1	Continue to improve traffic flow through within the City.
Policy 5.2	Review the zoning regulations annually to identify whether revisions are required to accommodate and encourage the use of alternative-fuel vehicles (e.g., electric cars).

Public Health, Safety, and Environmental Justice Element

Goal 2	**Promote a community safe from human-caused hazards.**
Policy 2.1	Reduce localized air pollution exposure near major roads.
Action 2.1b	Designate truck routes away from residential neighborhoods and other sensitive uses.
Action 2.1c	Use landscaping and other buffers to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources.
Policy 2.4	Support Remediation and Pollution Prevent Efforts that Arise from Industrial, Roadway, and Household Sources.
Action 2.4c	Limit diesel truck idling, including construction and transit vehicles, within 100 feet of schools, parks, and residences.
Action 2.4d	Require air pollution point sources to be located at safe distances from sensitive sites such as homes and schools.

4.2.3 Existing Conditions

Climate and Meteorology

The CARB divides the State into 15 air basins that share similar meteorological and topographical features. The project site is located within the SCAB, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, as well as all of Orange County. The SCAB is on a coastal plain with connecting broad valleys and low hills, bordered by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The SCAB is part of a semi-permanent high-pressure zone in the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. This usually mild weather pattern is occasionally interrupted by periods of extreme heat, winter storms, and Santa Ana winds. The annual average temperature throughout the 6,645-square-mile SCAB ranges from low 60 to high 80 degrees Fahrenheit with little variance. With more oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. Contrasting the steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rainfall occurs between the months of November and April. Summer rainfall is reduced to widely scattered thundershowers near the coast, with slightly heavier activity in the east and over the mountains.

Although the SCAB has a semiarid climate, the air closer to the Earth's surface is typically moist because of the presence of a shallow marine layer. Except for occasional periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog are

frequent and low clouds known as high fog are characteristic climatic features, especially along the coast. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

Wind patterns across the SCAB are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is typically higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, result in very strong, downslope Santa Ana winds. These winds normally continue for a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

In addition to the characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which air pollutants are mixed. These inversions are the marine inversion and the radiation inversion. The height of the base of the inversion at any given time is called the "mixing height." The combination of winds and inversions is a critical determinant leading to highly degraded air quality for the SCAB in the summer and generally good air quality in the winter.

Air Pollutants of Concern

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by State and federal laws. These regulated air pollutants are known as "criteria air pollutants" and are categorized into primary and secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead are primary air pollutants; CO, NO_X, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. For example, the criteria pollutant ozone (O_3) is formed by a chemical reaction between ROG and NO_X in the presence of sunlight. O_3 and nitrogen dioxide (NO_2) are the principal secondary pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 4.2-3: Air Contaminants and Associated Public Health Concerns**.

Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that can cause short-term (acute) or long-term (i.e., chronic, carcinogenic or cancer-causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

Table 4.2-3: Air Contaminants and Associated Public Health Concerns

Pollutant	Major Man-Made Sources	Human Health Effects
Particulate Matter (PM_{10} and $PM_{2.5}$)	Power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases/volatile organic compounds (ROG or VOC)[1] and nitrogen oxides (NO_X) in the presence of sunlight. Motor vehicle exhaust industrial emissions, gasoline storage and transport, solvents, paints and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to O_3. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Due to the phase out of leaded gasoline, metals processing is the major source of lead emissions to the air today. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers.	Exposure to lead occurs mainly through inhalation of air and ingestion of lead in food, water, soil, or dust. It accumulates in the blood, bones, and soft tissues and can adversely affect the kidneys, liver, nervous system, and other organs. Excessive exposure to lead may cause neurological impairments such as seizures, mental retardation, and behavioral disorders. Even at low doses, lead exposure is associated with damage to the nervous systems of fetuses and young children, resulting in learning deficits and lowered IQ.

1. Volatile Organic Compounds (VOCs or Reactive Organic Gases [ROG]) are hydrocarbons/organic gases that are formed solely of hydrogen and carbon. There are several subsets of organic gases including ROGs and VOCs. Both ROGs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation).

Sources: U.S. Environmental Protection Agency, *Criteria Air Pollutants*, https://www.epa.gov/criteria-air-pollutants. Accessed July 2024.

CARB has identified diesel particulate matter (DPM) as a toxic air contaminant. DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles (such as DPM) and gases produced when an engine burns diesel fuel. DPM includes the particle-phase constituents in diesel exhaust. DPM is a concern because it causes

lung cancer; many compounds found in diesel exhaust are carcinogenic. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Ambient Air Quality

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the Project are documented by measurements made by the SCAQMD, the air pollution regulatory agency in the SCAB that maintains air quality monitoring stations which process ambient air quality measurements.

The closest air monitoring station to the project site that monitors ambient concentrations of O_3, CO, NO_2, and $PM_{2.5}$ is Pico Rivera (located approximately 2 miles to the south of the site) and PM_{10} is Los Angeles-North Main Street (located approximately 10 miles west of the site). Local air quality data from 2021 to 2023 (the latest currently available) are provided in **Table 4.2-4: Ambient Air Quality Data,** which lists the monitored maximum concentrations and number of exceedances of State or federal air quality standards for each year.

Table 4.2-4: Ambient Air Quality Data

Criteria Pollutant	2021	2022	2023
Ozone (O_3)			
1-hour Maximum Concentration (ppm)	0.104	0.123	0.120
8-hour Maximum Concentration (ppm)	0.074	0.091	0.090
Number of Days Standard Exceeded			
CAAQS 1-hour (>0.09 ppm)	2	3	7
NAAQS 8-hour (>0.070 ppm)	3	2	7
Carbon Monoxide (CO)			
1-hour Maximum Concentration (ppm)	1.786	1.564	1.524
Number of Days Standard Exceeded			
NAAQS 1-hour (>35 ppm)	0	0	0
CAAQS 1-hour (>20 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
1-hour Maximum Concentration (ppm)	0.072	0.065	0.058
Number of Days Standard Exceeded			
NAAQS 1-hour (>100 ppm)	0	0	0
CAAQS 1-hour (>0.18 ppm)	0	0	0
Particulate Matter Less Than 10 Microns (PM_{10})			
National 24-hour Maximum Concentration	64.0	61.0	58.0

Table 4.2-4: Ambient Air Quality Data			
Criteria Pollutant	2021	2022	2023
State 24-hour Maximum Concentration	138.5	43.7	51.6
State Annual Average Concentration (CAAQS=20 µg/m^3)	30.9	24.1	21.8
Number of Days Standard Exceeded			
NAAQS 24-hour (>150 µg/m^3)	0	0	0
CAAQS 24-hour (>50 µg/m^3)	17.2	0	6.1
Particulate Matter Less Than 2.5 Microns ($PM_{2.5}$)			
National 24-hour Maximum Concentration	66.0	53.8	60.7
State 24-hour Maximum Concentration	66.1	53.8	60.7
Number of Days Standard Exceeded			
NAAQS 24-hour (>35 µg/m^3)	8.9	3.1	3.1
NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; µg/m^3 = micrograms per cubic meter; – = not measured Measurements for O_3, CO, NO_2, and $PM_{2.5}$ taken at the Pico Rivera Monitoring Station at 4144 San Gabriel River Parkway, Pico Rivera, California 90660 (CARB #70185) and for PM_{10} at the Los Angeles- North Main Street Monitoring Station at 1630 North Main Street, Los Angeles, CA 90012 (CARB #70087)			
Source: All pollutant measurements are from the CARB Aerometric Data Analysis and Management system database (https://www.arb.ca.gov/adam) except for CO, which were retrieved from the CARB Air Quality and Meteorological Information System (https://www.arb.ca.gov/aqmis2/aqdselect.php). Accessed November 2024.			

Sensitive Receptors

Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are in proximity to localized sources of toxics are of particular concern. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Sensitive land uses nearest to the Project are listed in **Table 4.2-5: Sensitive Receptors**.

Table 4.2-5: Sensitive Receptors	
Receptor Description	**Distance[2] and Direction from the Project Site**
Whittier Narrows Recreation Area	40 feet to the southeast
Future City Park[1]	40 feet to the west (of the warehouse)
Single-family Residences	230 feet to the east
Single-family Residences	1,040 feet to the north
South El Monte High School	1,250 feet to the southeast
Shiveley Park	1,750 feet to the north
South El Monte Library	2,600 feet to the north
New Temple Park	2,600 feet to the northeast
New Temple Elementary School	2,700 feet to the northeast
1. The proposed Project would include the future development of a recreational public park by the City that would be exposed to emissions associated with the operation of the proposed warehouse component. Therefore, this analysis considers the future recreational use as a sensitive receptor. 2. Distance measured from the property line of the project site to the nearest receptor property line (all numbers are approximate).	
Source: Google Earth, 2024.	

4.2.4 Methodology

This analysis considers construction and operational impacts associated with the Project. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod) version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Air quality impacts were assessed according to methodologies recommended by CARB and the SCAQMD.

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate emissions of criteria air pollutants and precursors. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod. Project construction is anticipated to occur over approximately 12 months.[1] Although components of the Project would be constructed in separate phases, the EIR analysis conservatively assumes that the proposed warehouse building, off-site improvements, digital billboard, and future City park improvements would be constructed concurrently.

Project operations (i.e., warehouse and future City park) would result in emissions of area sources (consumer products such as solvents used in non-industrial applications), energy sources (natural gas usage), and mobile sources (motor vehicles from Project generated vehicle trips). It should be noted that digital billboard emissions would be generated by electricity usage and were calculated in the Project's Greenhouse Gas Emissions Assessment.[2] Project-generated increases in operational emissions would be predominantly associated with motor vehicle use. The operational emissions sources are described below.

- **Area Source Emissions**. Area source emissions would be generated due to consumer products, on-site equipment, architectural coating, and products used to treat on-site landscaping that were previously not present on the site. Consumer products are various solvents used in non-industrial applications, which emit VOCs during product use. These typically include cleaning supplies, kitchen aerosols, cosmetics, and toiletries.

  The warehouse would include office space and may have small kitchen areas and bathrooms that would use cleaning products, however the majority of the square footage for the Project would be used for warehousing/distribution. Negligible quantities of personal care products, home, lawn, and garden products, disinfectants, sanitizers, polishes, cosmetics, and floor finishes would be used. As the default CalEEMod area source rates are based on a statewide average, ROG emissions are therefore likely overestimated for the proposed warehouse component of the Project and therefore conservative assumption for purposes of this EIR.

- **Energy Source Emissions**. Energy source emissions would be generated due to electricity and natural gas usage associated with the Project. Primary energy uses include space heating and

[1] Emissions in future years (i.e., due to a later construction start date or operational opening year) would be lower due to phased-in emissions standards, inspection and maintenance requirements, and fleet turnover. Specifically, project construction was modeled to start in the third quarter of 2025 but may commence at a later date. As such, construction impacts would be less than those analyzed due to the use of more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, Project-related construction air quality impacts would be lower than the impacts disclosed herein. For emissions modeling purposes, conservatively analyzing the emissions using an earlier construction start date (i.e., third quarter of 2025), provides for a worst-case analysis and full disclosure of potential air quality impacts, as required by CEQA.

[2] Kimley-Horn and Associates, Inc., *South El Monte Athletic Fields and Business Park Project Greenhouse Gas Emissions Assessment*, 2025.

cooling, water heating, ventilation, lighting, appliances, and electronics. Energy source emissions were calculated in CalEEMod.

- **Mobile Source Emissions.** Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source. Project-generated vehicle emissions are based on the trip generation estimates and have been incorporated into CalEEMod, as recommended by the SCAQMD. According to the *Transportation Study - South El Monte Athletic Fields and Business Park Project*, prepared by Kimley-Horn and Associates, Inc. (2025), the Project would generate approximately 1,997 total daily vehicles, of which the City park component would generate approximately 810 passenger vehicles and the warehouse component of the Project would generate approximately 1,187 passenger vehicles and 320 truck vehicles.

  Adjustments were made in CalEEMod to reflect the warehouse truck trip lengths and fleet mix characteristics. The warehouse truck trip lengths were adjusted to 33.2 miles, based on the distance to the Ports of Los Angeles and Long Beach, as well as CARB estimates for drayage trucks. Trucks are classified by type (or axle configuration) into light heavy-duty trucks (LHDT), medium heavy-duty trucks (MHDT), and heavy heavy-duty trucks (HHDT), reflecting a mix of large trucks with 2, 3, and 4 or more axles. To better represent warehouse-specific operations, the warehouse fleet mix was adjusted to represent 17 percent LHDT, 23 percent MHDT, and 60 percent HHDT. In total, the warehouse component of the Project would generate 320 truck trips.

- **Emergency Backup Generator.** For the purposes of this EIR analysis, it is conservatively assumed that the warehouse component of the Project would include an emergency backup generator. A backup generator would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with this type of equipment were included to be conservative. Emissions from an emergency backup generator for the proposed warehouse building was calculated separately from CalEEMod using default emission rates; refer to **Appendix C**. If a backup generator is ultimately proposed, the end user (the future operator of the warehouse building) would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions if and when a backup generator is in use. It should be noted that the Project may include an electric fire pump to provide additional water pressure for an early-suppression fast-response (EFSR) fire sprinkler system. In the event that the building loses electricity, power for the electric fire pump would be provided by the emergency backup generator.

- **Off-Road Equipment.** Operational off-road emissions would be generated by off-road cargo handling equipment used during operational warehouse activities. For the Project, it was conservatively assumed that the warehouse would include approximately one diesel yard truck and five diesel forklifts for loading and unloading goods per the SCAQMD High Cube Warehouse Truck Trip Study White Paper. It should be noted that the Project does not include cold storage.

Therefore, this analysis models the proposed warehouse building as unrefrigerated, and the Project would not include emissions from transport refrigeration units.

The SCAQMD provides significance thresholds for emissions associated with project construction and operations. The proposed Project's construction and operational emissions are compared to the daily criteria pollutant emissions significance thresholds in order to determine the significance of a Project's impact on regional air quality.

The localized construction and operational effects from Project on-site emissions were evaluated in accordance with the SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes area sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). However, the CalEEMod model outputs do not separate on-site and off-site emissions for mobile sources. On-site mobile emissions equate to approximately six percent of the project-related new mobile sources. The on-site one-way truck trip length is conservatively anticipated to be approximately 0.15-mile, which is approximately 0.5 percent of the 33.2-mile truck trip length modeled in CalEEMod. The on-site one-way trip length for passenger vehicles is conservatively anticipated to be approximately 0.33-mile, which is approximately 5 percent of the 6.13-mile passenger car trip length modeled in CalEEMod.

Health Risk Assessment

The Health Risk Assessment (HRA) conducted for this Project evaluated potential health risks associated with the emission of DPM resulting from Project implementation. Construction equipment and associated heavy-duty truck traffic generate diesel exhaust, which is a known TAC. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors. Operational activities would also include the use of heavy-duty diesel trucks.

Construction Sources

Construction would generate DPM emissions from the use of off-road diesel equipment required for demolition (remains of previous uses of the site include building foundations, remnants of a dilapidated shack, and radio tower footings), grading and excavation, paving, and other construction activities. For construction activity, DPM is the primary TAC of concern because it is the most potent TAC emitted from construction and includes hundreds of chemicals. Although DPM is a subset of PM_{10} exhaust, the analysis conservatively assumes all PM_{10} exhaust emissions are DPM. On-road diesel-powered haul trucks traveling to and from the construction site to deliver materials and equipment were conservatively included in the analysis, although they are typically less of a concern because they would not stay on the site for long durations.

Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer. The use of diesel-powered construction equipment would be episodic and would occur throughout the project site. In compliance with State law (Section 2485 and Section 2449 of Title 13 of the California Code of Regulations), during construction activities, the

construction contractor would be required to limit diesel construction truck/equipment idling to no more than five minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Furthermore, even during the most intense period of construction, DPM emissions would be generated from different locations on the project site rather than in a single location because different types of construction activities (e.g., site preparation and building construction) would not occur at the same place at the same time. Construction emission rates for PM_{10} (DPM) were calculated using the California Emissions Estimator Model (CalEEMod); refer to **Appendix D.** For the purpose of the EIR analysis, Project construction is proposed to commence in 2025 over approximately 12 months; refer to **Appendix C** for the construction phasing and schedule.

Operational Sources

- **Mobile Sources.** Due to the increased truck traffic from the warehouse component of the Project, the resulting emissions could result in pollutant concentrations at existing sensitive receptors near the project site. Average daily trips from truck traffic to the project site were obtained from the *Transportation Study - South El Monte Athletic Fields and Business Park Project*, prepared by Kimley-Horn and Associates, Inc. (2024). An emission rate for PM_{10} (DPM) was calculated using trip data and a CARB 2021 EMission FACtors model (EMFAC) model run for Los Angeles County; refer to **Appendix C**. EMFAC generates emission factors in terms of grams of pollutant emitted per vehicle activity and calculates a matrix of emission factors at specific values of vehicle speed and type. The model was run for heavy-duty diesel vehicles traveling along off-site roads, circulating the project site, and idling at proposed loading docks.
- **Off-Road Equipment.** This analysis assumes the warehouse component of the Project would include five forklifts and one yard truck for loading and unloading goods per the SCAQMD High Cube Warehouse Truck Trip Study White Paper. This analysis conservatively assumes the Project would use diesel off-road cargo handling equipment. Off-road equipment emissions were calculated based on CARB's Carl Moyer Program Guidelines.
- **Emergency Backup Generator**. Again, it is unknown whether an emergency backup generator would be used by the future operator of the warehouse building. The backup generator would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with a backup generator for the proposed warehouse building was included to be conservative. If a backup generator is required, the end user would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions if and when the backup generator is in use.

4.2.5 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G Environmental Checklist Form.* Impacts concerning air quality would be significant if a project would:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment under an applicable State or federal ambient air quality standard.

- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

SCAQMD Thresholds

Mass Emissions Thresholds. According to the *CEQA Guidelines Appendix G*, an air quality impact is considered significant if a project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for criteria pollutant and precursor emissions during construction and operational activities of land use development projects, as shown in **Table 4.2-6: South Coast Air Quality Management District Emissions Thresholds**.

Table 4.2-6: South Coast Air Quality Management District Emissions Thresholds

Criteria Air Pollutants and Precursors	Daily Emissions (pounds/day)	
	Construction-Related	Operational-Related
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55

Source: South Coast Air Quality Management District, *CEQA Air Quality Significance Thresholds,* March 2023.

Localized Significance Criteria. In addition to the following CO hotspot analysis, the SCAQMD developed LSTs for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without being expected to cause or substantially contribute to an exceedance of the most stringent State or federal ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. LST analysis for construction is required for all projects that disturb five acres or less on a single day. The project site is located within SCAQMD SRA 11 (South San Gabriel Valley). The nearest existing sensitive receptors are the recreational uses (Whitter Narrows Recreation area), the nearest portion of which is located approximately 40 feet (12 meters) to the southeast of the project site. The nearest portion of the future City park would be located approximately 40 feet (12 meters) to the west of the proposed warehouse building. LSTs associated with the 25-meter threshold for 1-acre, 2-acre, and 5-acre projects in SRA 11 are provided in **Table 4.2-7: Local Significance Thresholds for Construction and Operations**.

LSTs associated with all acreage categories are provided in the table for informational purposes, which shows that the LSTs increase as acreages increase. It should be noted that LSTs are screening thresholds and are therefore conservative. The construction LST acreage is determined based on daily acreage disturbed. The operational LST acreage is based on the total area of the project site. As acreage increases, pollutants have a greater area to disperse and concentrations would be lower. As such, LSTs increase as acreage increases and the 5-acre operational LSTs are conservatively used to evaluate the approximately 21-acre project site.

Table 4.2-7: Local Significance Thresholds for Construction and Operations

Project Size	Maximum Pounds Per Day (Construction/Operation)[1]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
1 Acre	83/83	673/673	5/1	4/1
2 Acres	121/121	1,031/1,031	7/2	5/2
5 Acres	183/183	1,841/1,814	14/4	9/2

NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

Source: South Coast Air Quality Management District, *Localized Significance Threshold Methodology,* July 2008.

Localized Carbon Monoxide. In addition to the daily thresholds listed above, operations associated with the Project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts (known as CO "hot spots"). The significance of localized CO impacts depends on whether changes in ambient CO levels attributed to the traffic generated by Project operations would exceed the State and federal CO standards (the more stringent California standards are 20 ppm for 1-hour and 9 ppm for 8-hour) near the project site. The SCAB has been designated as in attainment under the 1-hour and 8-hour standards.

Health Risk Analysis Thresholds

Project health risks are determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the Lead Agency's purview pursuant to the State CEQA Guidelines, the SCAQMD recommends that lead agencies use the following air pollution thresholds in determining whether a project's impacts are significant. If the lead agency finds that the project has the potential to exceed the following air pollution thresholds, a project's impacts should be considered significant. The TAC emissions thresholds are as follows:

- **Cancer Risk (Individual):** Emit contaminants that result in a maximum individual incremental cancer risk equal to or greater than 10 in one million.
- **Non-Cancer Risk:** Emit contaminants that result in a chronic hazard index equal to or greater than 1.0 (project increment).

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to TAC exposure. This threshold is an upper-bound incremental probability to determine whether or not a given project has a potentially significant development-specific and cumulative impact and to ensure an individual new source does not contribute a cumulatively significant impact. The 10 in one million standard is a health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons, out of one million equally exposed persons, would contract cancer if exposed continuously (24 hours per day) to the TAC levels over a specified duration of time. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these TACs.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). A REL is a concentration at or below which health effects are not likely to occur. A hazard index of less than 1.0 means that adverse health

effects are not expected. Therefore, non-carcinogenic exposures of less than 1.0 are considered less than significant.[3]

4.2.6 Project Impacts and Mitigation

Threshold 4.2-1	**Would the Project conflict with or obstruct implementation of the applicable air quality plan?** ***Level of Significance:*** Less than Significant Impact

As previously discussed, the project site is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP established a program of rules and regulations directed at reducing air pollutant emissions and achieving State (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs. The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone NAAQS. Air quality management planning is a regional and multi-agency effort including the SCAQMD, the CARB, SCAG, and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's 2016 and 2022 AQMPs.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

Consistency Criterion No. 1 refers to exceedances of the CAAQS or NAAQS. As discussed in Threshold 5.2 (cumulative net increase in air emissions), the Project would not exceed the construction or operational standards. Therefore, the Project would not exceed the CAAQS or NAAQS, would not contribute to an existing air quality violation, and is consistent with the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts (SCAG's 2020-2045 RTP/SCS). SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. SCAGs forecast 2045 population is based on the project site's existing General Plan land use designation (Commercial). To implement the development, the Project proposes a General Plan Amendment to change the site's land

[3] It is noted that there is no acute REL for DPM and acute health risk cannot be calculated.

use designation from Commercial to Commercial-Manufacturing. Although the Project requires a General Plan Amendment, the proposed Commercial-Manufacturing land use would generate less employees than the existing Commercial land use; refer to **Section 4.12: Population and Housing**. Therefore, the Project would not cause the City's General Plan buildout population forecast to be exceeded. The growth forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. Additionally, as the SCAQMD has incorporated these same projections into the AQMPs, it can be concluded that the proposed Project would be consistent with the projections. Thus, no impact would occur, as the Project is also consistent with the second criterion.

Air pollutant emissions resulting from Project implementation would not exceed the SCAQMD localized significance thresholds. Localized significance thresholds were developed to ensure no exceedances of the California or federal ambient air quality standards would occur if project emissions were below thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project would not cause the City's General Plan buildout population forecast to be exceeded, the Project would be consistent with the emissions forecasts in the AQMPs and AQMP control measures. Based on the foregoing, the Project would not conflict with or obstruct the implementation of the AQMPs or any applicable air quality plan. Impacts would be less than significant and no mitigation is required.

Threshold 4.2-2	**Would the Project 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?**
	Level of Significance: Less than Significant Impact

The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions could contribute to existing cumulatively significant adverse air quality impacts. Appendix D of the *SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are considered to result in a less than significant impact on a cumulative basis. Therefore, a project with projected emissions that would exceed SCAQMD thresholds would also make a cumulatively considerable contribution to a significant cumulative impact and, conversely, a project with projected emissions that would be below SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern in the SCAB include ozone-precursor pollutants (i.e., ROG and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions of these criteria pollutants would be short-term and of temporary duration, lasting only as long as construction activities occur but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Project construction would result in the temporary generation of criteria pollutant emissions from all phases of construction, including demolition, site grading, building construction, and architectural coating, as well as from motor vehicle exhaust associated with construction equipment, materials deliveries and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water to avoid fugitive dust exposure.

Project construction is anticipated to occur over approximately 12 months beginning in the third quarter of 2025 and ending in the third quarter of 2026. Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), version 2022.1, which is designed to model emissions for land use development projects based on typical construction requirements. It was assumed that all construction equipment operated during each individual phase would be operated simultaneously, to provide a conservative analysis; see **Appendix C** for more information regarding the construction assumptions used in this analysis. This analysis is also conservative because it assumes that both the proposed warehouse building and the improvements for the future City park would be constructed concurrently and be operational in the third quarter of 2026. It is noted that due to technology improvements for construction equipment, emissions from Project construction activities would likely be lower than those shown in the following table if construction were to occur in later years.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 4.2-8: Project Construction Criteria Pollutant Emissions**. As noted in **Table 4.2-8**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures. The results summarized in the table show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds, even with the conservative assumptions made above. Project construction would also comply with SCAQMD Rules 402 (Nuisance) and 1113 (Architectural Coatings) and CARB's anti-idling regulations, which prohibit idling for more than five minutes; however, compliance with these rules was not assumed when estimating the Project's construction emissions identified in the table for purposes of a conservative EIR analysis. Therefore, the Project's maximum-day construction emissions of criteria pollutants would be even lower than reported in **Table 4.2-8** when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are considered.

The Project's estimated criteria pollutant emissions during construction would be below their respective thresholds. Impacts would be less than significant and no mitigation is required.

Table 4.2-8: Project Construction Criteria Pollutant Emissions

Construction Year	Maximum Pounds Per Day					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Unmitigated Emissions[1,2]						
Year 1 (2025)	5.86	54.88	52.35	0.09	8.55	4.97
Year 2 (2026)	49.51	23.35	36.71	0.05	2.74	1.25
Maximum Emissions	49.51	54.88	52.35	0.09	8.55	4.97
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. Worst-case seasonal maximum emissions are reported.
2. SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.

Source: CalEEMod version 2022.1. Refer to **Appendix C** for model outputs.

Operational Emissions

The Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.), energy sources, and mobile sources (i.e., motor vehicle use). Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in **Table 4.2-9: Operational Criteria Pollutant Emissions**.

Table 4.2-9: Operational Criteria Pollutant Emissions

Source	Maximum Pounds Per Day					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Unmitigated Emissions[1]						
Area	6.92	0.08	9.65	0.00	0.02	0.01
Energy	0.06	1.15	0.96	0.01	0.09	0.09
Mobile – Trucks	0.71	31.87	12.79	0.28	9.89	2.94
Mobile – Passenger Cars	5.48	4.55	59.99	0.15	14.62	3.77
Emergency Generator	0.50	1.39	1.27	<0.01	0.07	0.07
Off-Road Yard Trucks[2]	0.06	0.33	3.31	0.01	0.01	0.01
Off-Road Forklifts[2]	0.04	0.19	2.68	<0.01	0.01	0.01
Total Emissions	*13.78*	*39.56*	*90.65*	*0.44*	*24.71*	*6.90*
SCAQMD Thresholds	***55***	***55***	***550***	***150***	***150***	***55***
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Total values are from CalEEMod and may not add up 100% due to rounding.
ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. Worst-case seasonal maximum emissions are reported.
2. Emissions were calculated with CARB OFFROAD 1.0.5.

Source: CalEEMod version 2022.1. Refer to **Appendix C** for model outputs.

As summarized in **Table 4.2-9**, operational (i.e., area, energy, mobile vehicle, emergency generator, and off-road equipment) emissions would not exceed SCAQMD thresholds for any criteria pollutant.

Therefore, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and no mitigation is required.

Threshold 4.2-3:	**Would the Project expose sensitive receptors to substantial pollutant concentrations?** ***Level of Significance:*** Less than Significant Impact

Localized Construction Significance Analysis

To assess the potential for Project construction to create impacts to sensitive receptors (see **Table 4.2-5**), the SCAQMD recommends utilizing its Localized Significance Thresholds (LSTs) for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the State or federal ambient air quality standard (the more stringent of the two). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters.

The nearest existing sensitive receptors to the project site are recreational uses (Whittier Narrows Recreation area), the nearest portion of which is located 40 feet (12 meters) to the southeast of the project site. The nearest portion of the future City park would be located approximately 40 feet (12 meters) to the west of the proposed warehouse building. LSTs were determined based on the closest distance of 25 meters, which is consistent with the SCAQMD LST methodology. Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 4.2-10: Equipment-Specific Grading Rates** was used to determine the maximum daily disturbed acreage for the LST analysis. For this Project, the appropriate source receptor area (SRA) for the LSTs is the South San Gabriel Valley (SRA 11) area, since this SRA includes the project site. LSTs take into consideration emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Based on the daily construction equipment assumed for the Project and modeled in CalEEMod, Project construction is anticipated to disturb a maximum of 3 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for a 3-acre threshold were interpolated and used for this analysis.

Table 4.2-10: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Site Preparation	Dozers	3	0.5	8	1.5
				Total Acres Graded per Day	*1.5*
Grading	Tractor/Backhoe	2	0.5	8	1
	Graders	1	0.5	8	0.5
	Dozers	1	0.5	8	0.5
	Scrapers	2	1	8	2
				Total Acres Graded per Day	*3*
				Maximum Acres Graded per Day	**3**

Source: CalEEMod version 2022.1. Refer to **Appendix C** for model outputs.

The SCAQMD's methodology states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As previously noted, the nearest existing sensitive receptor is located approximately 40 feet (12 meters) to the southeast of the project site and the nearest portion of the future City park would be located approximately 40 feet (12 meters) to the west of the proposed warehouse building. LSTs were determined based on the total acres graded per day (3 acres; see above) at the closest distance of 25 meters, which is consistent with the SCAQMD LST methodology. **Table 4.2-11: Localized Significance of Construction Emissions** presents the unmitigated localized emissions during each individual and overlapping construction phase. As stated above, for purposes of a conservative EIR analysis, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for **Table 4.2-11**. Therefore, the Project's maximum-day localized construction emissions would be even lower than reported in the table. The emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not create substantial concentrations of pollutants at the sensitive receptors closest to the project site or cause or contribute to an exceedance of federal or State ambient air quality standards. Impacts would be less than significant and no mitigation is required.

Table 4.2-11: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1,2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Individual Construction Phases				
Demolition (2025)	22.20	19.92	1.45	0.93
Site Preparation (2025)	31.64	30.18	6.48	3.88
Grading (2025)	29.68	28.31	3.63	2.09
Infrastructure Improvements (2025)	4.78	6.71	0.20	0.18
Infrastructure Improvements (2026)	4.56	6.67	0.17	0.16
Building Construction (2025)	10.44	13.04	0.43	0.40
Building Construction (2026)	9.85	12.97	0.38	0.35
Paving (2026)	7.12	9.94	0.32	0.29
Architectural Coating (2026)	0.86	1.13	0.02	0.02
Overlapping Construction Phases				
Demolition/Site Preparation (2025)	53.84	50.10	7.93	4.81
Infrastructure Improvements/Building Construction/Paving (2026)	21.53	29.58	0.87	0.80
Maximum Daily Emissions	53.84	50.10	7.93	4.81
SCAQMD LST (for 3 acres at 25 meters)	142	1,292	9	6
Maximum Daily Emissions Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. Worst-case seasonal maximum daily emissions are reported.
2. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment.

Source: CalEEMod version 2022.1. Refer to **Appendix C** for model outputs.

Localized Operational Significance Analysis

According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project only if it includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project includes a warehouse, the operational phase LST protocol is conservatively applied to both the area source and a portion of the mobile source emissions. The nearest sensitive receptors are the existing (Whittier Narrows Recreation Area) and proposed recreational uses (the future City Park component) located approximately 40 feet (12 meters) to the southeast and west, respectively. It should be noted that the future City Park component is within the project site boundaries, located approximately 40 feet from the proposed warehouse building. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, the LST thresholds for SRA 11 at 25 meters were used in this analysis.

Pursuant to SCAQMD LST methodology, the LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate mobile emissions generated on-site (i.e., within the Project boundaries) and off-site (i.e., along roadways). For a worst-case scenario assessment, the emissions shown in **Table 4.2-12: Localized Significance of Operational Emissions**, conservatively include all on-site project-related stationary sources, on-site off-road equipment (forklifts, yard trucks, and generators), and

on-site mobile sources, since a portion of mobile sources could include vehicles idling on the site. **Table 4.2-12** shows that the maximum unmitigated daily emissions of these pollutants generated during Project operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Impacts would be less than significant and no mitigation is required.

Table 4.2-12: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1,2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions (Area, Energy, Mobile Sources,[3] and Off-Road Equipment Sources)	3.53	21.16	1.03	0.41
SCAQMD Localized Screening Threshold (for 5.0 acres at 25 meters)	*183*	*1,814*	*4*	*2*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

NO_X = Nitrogen Oxides; CO = Carbon Monoxide; PM_{10} = Particulate Matter 10 microns in diameter or less; $PM_{2.5}$ = Particulate Matter 2.5 microns in diameter or less

1. As recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. On-site emissions consist of area, energy, mobile, and off-road equipment sources.
3. The on-site one-way trip length is anticipated to be 0.15-mile for trucks and 0.33-mile for passenger vehicles, which is approximately 0.5 percent of the 33.2-mile truck trip length and 5 percent of the 6.13-mile passenger car trip length modeled in CalEEMod. Specifically, mobile on-site emissions were calculated using the following:
   mobile on-site emissions = (vehicle on-site trip distance/vehicle total trip distance) * mobile emissions

Source: CalEEMod version 2022.1. Refer **to Appendix C** for model assumptions and outputs.

Criteria Pollutant Health Impacts

On December 24, 2018, the California Supreme Court issued an opinion identifying the need to provide sufficient information connecting a project's significant air emissions to health impacts or explain why such information could not be ascertained (*Sierra Club v. County of Fresno* [Friant Ranch, L.P.] [2018] Cal.5th, Case No. S219783).

The SCAQMD has set its CEQA significance thresholds based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the SCAB) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect the public health. Therefore, Projects that do not exceed the SCAQMD's LSTs and mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts would occur.

As previously discussed, localized effects of on-site Project emissions on nearby sensitive receptors were found to be less than significant (refer to **Table 4.2-11** and **Table 4.2-12**). The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable State or federal ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each SRA and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air pollutant emissions necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Information on health impacts related to exposure to ozone and particulate matter

emissions published by the U.S. EPA and CARB have been summarized above and discussed in the Regulatory Setting section. Project-related emissions would not exceed the regional thresholds or the LSTs, and therefore would not exceed the ambient air quality standards or cause an increase in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards. Impacts would be less than significant and no mitigation is required.

Localized Carbon Monoxide Analysis

Projects that would not produce traffic volumes resulting in more than 100,000 daily vehicles along project area roadway segments are not required to prepare a detailed CO hot spot analysis. The proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. Durfee Ave between Rosemead Boulevard and Santa Anita Avenue has an existing vehicle count of 18,745; Durfee Avenue between Santa Anita Avenue and Peck Road has an existing vehicle count of 16,587; Santa Anita Avenue between State Route 60 and Lexington-Gallatin Road has an existing vehicle count of 10,823; Santa Anita Avenue between Lexington-Gallatin Road and Durfee Avenue has an existing vehicle count of 8,852; and Lexington-Gallatin Road east of Santa Anita Avenue has an existing vehicle count of 1,079. Because the Project's 1,997 daily vehicle trips in combination with existing vehicle volumes would not come close to 100,000 daily vehicles, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the project site. Therefore, the Project would not result in any significant effects relating to CO concentrations because sensitive receptors would not be exposed to any CO hotspots as a result of the Project. Impacts would be less than significant and no mitigation is required.

Health Risk Assessment

CARB identified DPM as a TAC in 1998. Mobile sources (including trucks, buses, automobiles, trains, ships, and farm equipment) are by far the largest diesel emissions source. Diesel exhaust is emitted from a broad range of on- and off-road diesel engines. As previously addressed (see **Table 4.2-5**), because the project site is near existing and future sensitive receptors, an analysis of DPM was performed using the U.S. EPA-approved AERMOD model.

Carcinogenic Risk

Table 4.2-13: Carcinogenic Risk Assessment shows the unmitigated health risk for Project construction and operations. Based on the OEHHA Risk Assessment Guidelines, the exposure duration for a resident is 30 years, beginning with the third trimester, and the worker and student/recreational exposure duration is 25 years and 9 years, respectively. For the purpose of this EIR analysis, it is reasonably assumed that operations would commence following construction and construction would not overlap with operations. The analysis calculates risk based on exposure to construction concentrations during the initial 12 months of the exposure duration and operational concentrations for the remainder of the exposure duration. As identified in **Table 4.2-13**, the Project (construction and operations combined scenario) would result in a maximum cancer risk of 1.90 at the nearest residential receptors, 0.19 in one million at the nearest student receptors, 1.27 in one million at the nearest recreational receptors, and 0.49 in one million at the nearest worker receptors. Therefore, the SCAQMD threshold of 10 in one million would not be exceeded at the nearest sensitive receptors. Impacts would be less than significant and no mitigation is required.

Table 4.2-13: Carcinogenic Risk Assessment

Exposure Scenario[1]	Cancer Risk (per Million)[2,3]	Significance Threshold (per Million)	Risk Exceeds Threshold?
Construction			
Future Recreational Receptor (on site)[4] located at 402770.3, 3766685.72	0.00	10	No
Residential Receptor (off site): Single-Family Residential Use located at 403117.78, 3766876.16	0.38	10	No
Student Receptor (off site): South El Monte High School located at 403215.26, 3766564.09	0.01	10	No
Recreational receptors (off site): Whittier Narrows Park located at 402978.58, 3766731.8	0.15	10	No
Worker receptor (off site): Southern California Municipal Athletic Federation located at 402811.25, 3766632.49	0.03	10	No
Operations			
Future Recreational Receptor (on site) located at 402770.3, 3766685.72	1.04	10	No
Residential Receptor (off site): Single-Family Residential Use located at 403117.78, 3766876.16	1.67	10	No
Student Receptor (off site): South El Monte High School located at 403215.26, 3766564.09	0.21	10	No
Recreational Receptors (off site): Whittier Narrows Park located at 402978.58, 3766731.8	1.26	10	No
Worker Receptor (off site): Southern California Municipal Athletic Federation located at 402811.25, 3766632.49	0.48	10	No
Construction and Operations Combined			
Future Recreational Receptor (on site) located at 402770.3, 3766685.72	1.04	10	No
Residential Receptor (off site): Single-Family Residential Use located at 403117.78, 3766876.16	1.90	10	No
Student Receptor (Off site): South El Monte High School located at 403215.26, 3766564.09	0.19	10	No
Recreational Receptors (off site): Whittier Narrows Park located at 402978.58, 3766731.8	1.27	10	No
Worker Receptor (off site): Southern California Municipal Athletic Federation located at 402811.25, 3766632.49	0.49	10	No

NA = Not Applicable
1. The receptor locations are presented as Units Transverse Mercator coordinates.
2. The reported annual pollutant concentration is at the closest maximally exposed individual resident (MEIR) to the project site.
3. The cancer risk conservatively assumes that cargo handling equipment (i.e., yard trucks and forklifts) would be diesel powered.
4. Future park receptors would not be present at the time of construction of the warehouse component of the Project as the Project proposes construction of the future park and warehouse component concurrently.

Source: Refer to **Appendix D** for model outputs.

Non-Carcinogenic Risk

The SCAQMD also requires an evaluation of non-cancer risk from TAC exposure stated in terms of a hazard index. As discussed above, construction-related and operational-related activities would result in Project-

generated DPM emissions, which is the primary TAC of concern. **Table 4.2-14: Chronic Hazard Assessment** shows the chronic non-cancer risk hazard index from Project construction and operational emissions. A chronic non-cancer risk hazard index of 1.0 or greater is considered individually significant. The highest maximum chronic hazard index associated with DPM emissions from Project construction would be 0.000000139 at the nearest residential receptors, 0.000103 at the nearest student receptors, 0.00206 at the nearest recreational receptors, and 0.00240 at the nearest worker receptors. Additionally, the highest maximum chronic hazard index associated with DPM emissions from Project operations would be 0.000439 at the nearest residential receptors, 0.000320 at the nearest student receptors, 0.00188 at the nearest recreational receptors, and 0.00155 at the nearest worker receptors. Therefore, based on the foregoing and the information provided in **Table 4.2-14**, non-carcinogenic hazards would be within acceptable limits. Impacts would be less than significant and no mitigation is required.

Table 4.2-14: Chronic Hazard Assessment

Emissions Sources[1]	Concentration (µg/m^3) [2]	Chronic Hazard[3]
Construction		
Future Recreational Receptor (on site)[4] located at 402770.3, 3766685.72	0.00	0.00
Residential Receptor (off site): Single-Family Residential Use located at 403117.78, 3766876.16	6.93E-07	1.39E-07
Student Receptor (off site): South El Monte High School located at 403215.26, 3766564.09	5.17E-04	1.03E-04
Recreational Receptors (off site): Whittier Narrows Park located at 402978.58, 3766731.8 (Future City Park)	1.03E-02	2.06E-03
Worker Receptor (off site): Southern California Municipal Athletic Federation located at 402811.25, 3766632.49	1.20E-02	2.40E-03
Operations		
Future Recreational Receptor (on site) located at 402770.3, 3766685.72	7.74E-03	1.55E-03
Residential Receptor (off site): Single-Family Residential Use located at 403117.78, 3766876.16	2.20E-03	4.39E-04
Student Receptor (off site): South El Monte High School located at 403215.26, 3766564.09	1.60E-03	3.20E-04
Recreational Receptors (off site): Whittier Narrows Park located at 402978.58, 3766731.8 (Future City Park)	9.41E-03	1.88E-03
Worker Receptor (off site): Southern California Municipal Athletic Federation located at 402811.25, 3766632.49	7.77E-03	1.55E-03
SCAQMD Threshold	N/A	1.0
Threshold Exceeded?	**N/A**	**No**

1. The receptor locations are presented as Units Transverse Mercator coordinates.
2. The reported pollutant concentration (annual period) is at the closest receptor (maximally exposed individual receptor).
3. Future recreational receptors would not be present at the time of construction of the warehouse component as the Project proposes construction of the future recreational use and warehouse component concurrently.
4. It is noted that there is no acute REL for DPM and acute health risk cannot be calculated.

Source: Refer to **Appendix D** for modeling outputs.

As concluded above, the Project's cancer and non-cancer risks from construction emissions would be less than significant, as both would be below the SCAQMD's thresholds of significance. It is noted that this

analysis assesses the Project's incremental contribution to health risk impacts, consistent with the SCAQMD guidance and methodology. The SCAQMD has not established separate cumulative thresholds and does not require combining impacts from cumulative projects. The SCAQMD considers projects that do not exceed the project-specific individual incremental thresholds to not be cumulatively significant. Therefore, because the Project's health risks (i.e., cancer and non-cancer) would not exceed the Project-specific incremental thresholds, the Project would not result in a cumulatively significant impact and the Project's contribution would be less than cumulatively considerable. Impacts would be less than significant and no mitigation is required.

Threshold 4.2-4	**Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**
	Level of Significance: Less than Significant Impact

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

Odors may be generated during Project construction associated with equipment diesel exhaust, architectural coatings, volatile organic compounds, and paving activities. However, these standard construction-related odors would be temporary, are not expected to affect a considerable number of people, and would disperse rapidly. Therefore, the Project would comply with SCAQMD Rule 402. Further, standard construction requirements and compliance with established regulations (Code of Federal Regulations [CFR], Part 1926 – *Safety and Health Regulations for Construction,* Subpart H – *Materials Handling, Storage Use and Disposal, et al*.) addressing construction materials storage, use, and disposal would minimize odor impacts from construction activity. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Impacts would be less than significant and no mitigation is required.

Operations

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as potentially significant sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project proposes the construction of a warehouse, which would not involve the types of uses that would emit objectionable odors affecting considerable numbers of people. The Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources. Therefore, the Project would comply with SCAQMD Rule 402. Impacts would be less than significant and no mitigation is required.

4.2.7 Cumulative Impacts

Cumulative Construction Impacts

The proposed Project and cumulative projects are located within the SCAB. The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ under the State standards and nonattainment for O_3 and $PM_{2.5}$ under the federal standards. As discussed above, the Project's construction-related emissions, by themselves, would not exceed the SCAQMD significance thresholds for criteria pollutants. As discussed above, if a project is estimated to result in emissions that do not exceed SCAQMD thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. Project construction-related emissions would not exceed the SCAQMD significance thresholds for any of the criteria pollutants (see **Table 4.2-8**). Therefore, the Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions as outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be used during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB. As concluded above, the Project's construction-related impacts would be less than significant, and its compliance with SCAQMD rules and regulations would further minimize the proposed Project's construction-related emissions. Therefore, project-related construction emissions, in combination with those from other cumulative projects in the area, would not substantially deteriorate the local air quality. The Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Impacts would be less than significant and no mitigation is required.

Cumulative Operational Impacts

As previously addressed, projects that would result in operational emissions that do not individually exceed SCAQMD regional thresholds of significance are not considered to make a cumulatively considerable contribution to a significant cumulative impact on air quality in the SCAB. The Project's operational emissions would not exceed the SCAQMD thresholds (see **Table 4.2-9**). Operational emissions associated with the Project would not make a cumulatively considerable contribution to significant cumulative air quality impacts. Impacts would be less than significant and no mitigation is required.

4.2.8 Mitigation Program

Standard Conditions

No standard conditions are applicable.

Mitigation Measures

No mitigation measures are required.

4.2.9 Level of Significance After Mitigation

No significant air quality impacts have been identified.

4.2.10 References

Kimley-Horn and Associates, Inc. 2025. *Air Quality Assessment*. Included as **Appendix C** to this EIR.

Kimley-Horn and Associates, Inc. 2025. *Health Risk Assessment*. Included as **Appendix D** to this EIR.

South El Monte, City of. 2021. City of South El Monte General Plan Public Health, Safety, and Environmental Justice Element and Resources Element. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 2024.

4.3 BIOLOGICAL RESOURCES

4.3.1 Introduction

This section of the EIR describes biological resources with the potential to be located within or in the vicinity of the project site, potential impacts to any present resources associated with construction and operation of the proposed Project, and mitigation measures that would reduce these impacts, if applicable. The analysis in this section is based on the *Biological Technical Report* prepared by Rocks Biological Consulting in 2024 and updated in 2025 for the proposed Project (**Appendix E**), as well as publicly available resources provided by entities such as the California Department of Fish and Wildlife (CDFW).

4.3.2 Regulatory Setting

Several federal, State, and local regulations govern biological resources. The following is a summary of the regulatory framework that provides the context for the protection of biological resources.

Federal Regulations

Federal Endangered Species Act (16 United States Code [USC] 153 et seq.)

The U.S. Fish and Wildlife Service (USFWS) administers the Federal Endangered Species Act (FESA) of 1973, as amended (16 United States Code [USC] 1531 et seq.). The FESA provides a process for listing species as either threatened or endangered and the designation of critical habitat for listed animal species, as well as methods of protecting listed species. The FESA defines as "endangered" any plant or animal species that is in danger of extinction throughout all or a significant portion of its known geographic range. A "threatened" species is a species that is likely to become endangered. A "proposed" species is one that has been officially proposed by the USFWS for addition to the federal threatened and endangered species list.

FESA regulates the "taking" of any endangered fish or wildlife species, per Section 9 of the FESA. Per FESA Section 9, "take" of threatened or endangered species is prohibited. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in such conduct (codified at 16 U.S. Code §1532(19). "Take" can include disturbance to habitats used by a threatened or endangered species during any portion of its life history. The presence of any federally threatened or endangered species in a project area generally imposes severe constraints on development, particularly if development would result in "take" of the species or its habitat. Under the regulations of the FESA, the USFWS may authorize a "take" when it is incidental to, but not the purpose of, an otherwise lawful act.

As development is proposed, the responsible agency or individual landowner is required to consult with the USFWS to assess potential impacts on listed species (including plants) or the critical habitat of a listed species, pursuant to FESA Sections 7 and 10. The USFWS is required to determine the extent a project would impact a particular listed species in the form of a Biological Opinion. If the USFWS determines that a project is likely to potentially impact a listed species, measures to avoid or reduce such impacts must be identified.

Following consultation and the issuance of a Biological Opinion, the USFWS may issue an incidental take statement that allows for the take of a species if it is incidental to another authorized activity and will not adversely affect the existence of the species. FESA Section 10 allows issuance of incidental take permits to non-federal parties in conjunction with the development of a habitat conservation plan (HCP). FESA

Section 7 allows permitting of projects where interagency cooperation is necessary to ensure that a federal action/decision does not jeopardize the existence of a listed species. The FESA also requires consultation when a federal permit, such as a Clean Water Act Section 404 permit, is required.

Sections 404 and 401 of the Clean Water Act

The Clean Water Act (CWA) is the primary federal statute regulating the protection of the nation's water. The CWA aims to prevent, reduce, and eliminate pollution in the nation's water in order to "restore and maintain the chemical, physical, and biological integrity of the nation's waters", as described in CWA Section 101(a). A stated CWA goal is to eliminate discharge of pollutants into navigable waters, as defined in CWA Section 502(7) and corresponding case law.

Pursuant to CWA Section 404, the U.S. Army Corps of Engineers (USACE) is authorized to regulate any activity that would result in the discharge of dredged or fill material into "waters of the U.S." (including wetlands), which includes those waters listed in Code of Federal Regulations (CFR) Title 33 Section 328.3, as amended. The USACE, with oversight from the U.S. Environmental Protection Agency (U.S. EPA), has the principal authority to issue CWA Section 404 permits. The USACE would require a Standard Individual Permit for more than minimal impacts to "waters of the U.S." as determined by the USACE. Projects with minimal individual and cumulative adverse effects on the environment may meet the conditions of an existing approved Nationwide Permit.

Under CWA Section 401, an activity requiring an USACE Section 404 permit must obtain a State Water Quality Certification (or waiver thereof) to ensure that the activity will not violate established State water quality standards. The State Water Resources Control Board (SWRCB), in conjunction with the nine California Regional Water Quality Control Boards (RWQCBs), is responsible for administering the CWA Section 401 Water Quality Certification Program. The RWQCB is required to provide "certification that there is reasonable assurance that an activity that may result in the discharge to 'waters of the U.S.' will not violate water quality standards." Water Quality Certification must be based on the finding that a proposed discharge will comply with applicable water quality standards.

Under CWA Section 401, an activity involving discharge into a water body must obtain a federal permit and a State Water Quality Certification to ensure the activity will not violate established water quality standards. The U.S. EPA is the federal regulatory agency responsible for implementing the CWA Section 401 program. However, pursuant to the CWA, the SWRCB, in conjunction with the nine RWQCBs, has been delegated the responsibility to administer the CWA Section 401 Water Quality Certification Program.

The National Pollutant Discharge Elimination System (NPDES) is the permitting program for discharge of pollutants into surface "waters of the U.S." under CWA Section 402.

Federal Migratory Bird Treaty Act (16 USC 703–711)

The Migratory Bird Treaty Act (MBTA) prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to do so (16 U.S Code §703 et seq.). The number of bird species covered by the MBTA is extensive and listed in CFR 10.13 Title 50. Additionally, Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds," directs federal agencies that take actions that either directly or indirectly effect on migratory birds to develop a Memorandum of Understanding (MOU), and to work with the USFWS and other federal agencies to promote the conservation of migratory bird populations.

State Regulations

California Endangered Species Act (California Fish and Game Code §§2050 et seq.)

The California Endangered Species Act (CESA), in combination with the California Native Plant Protection Act of 1977 (CNPPA; California Fish and Game Code §1900 et seq.), regulates the listing and take of plant and animal species designated as endangered, threatened, or rare within the State. California also lists Species of Special Concern based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. CESA defines an endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." CESA defines a threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985, is a threatened species." Candidate species are defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the California Fish and Wildlife Commission. Unlike the FESA, the CESA does not list invertebrate species.

CESA Sections 2080 through 2085 address the take of threatened, endangered, or candidate species by stating "no person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided." Under CESA, "take" is defined as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the State to allow "take" require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes and for take incidental to otherwise lawful activities. CFGC Section 1901 and Section 1913 provide that notification is required prior to disturbance. The California Department of Fish and Wildlife (CDFW) is responsible for assessing development projects for their potential to impact listed species and their habitats. State-listed special-status species are addressed through the issuance of a 2081 permit (Memorandum of Understanding).

California Desert Native Plants Act (California Food and Agriculture Code §§80001–80201)

The California Desert Native Plants Act prohibits the removal of certain species of California desert native plants on public and privately owned lands without a valid permit from the sheriff or commissioner of the county where collecting would occur. This Act applies within the boundaries of Los Angeles, Imperial, Inyo, Kern, Mono, Riverside, San Bernardino, and San Diego counties.

Nesting Bird Protection (California Fish and Game Code §§3503, 3503.5, and 3513)

Birds of prey are protected under CFGC Section 3503, which states "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation adopted pursuant thereto." CFGC Section 3503.5 states "It is unlawful to take, possess, or

destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto". Construction-related disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by the CDFW.

California Environmental Quality Act—Treatment of Listed Plant and Animal Species

CEQA was established in 1970 as California's counterpart to the National Environmental Policy Act (NEPA; 42 USC §4321 et seq.). This statute requires State and local agencies to identify significant environmental impacts related to their actions and to avoid or mitigate those impacts, where feasible. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity that must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency that may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

The FESA and CESA protect only those species formally listed as threatened or endangered (or rare in the case of the State list). However, State CEQA Guidelines Section 15380(b) independently defines "endangered" species of plants or animals as those whose survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; and "rare" species as those in such small numbers throughout all or a significant portion of its range such that they could become endangered if their environment worsens. The "rare" species is likely to become endangered within the foreseeable future throughout all or a significant portion of A species of animal or plant shall be presumed to be endangered, rare or threatened, as it is listed in: Section 670.2 or Section 670.5, Title 14, of the CCR; or Title 50, CFR Section 17.11 or 17.12 pursuant to the FESA as rare, threatened, or endangered. A species not included in these noted CCR or CFR can be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in CEQA Guidelines Section 15380(b).

California Fish and Game Code (§§1600-1602)

Pursuant to Division 2, Chapter 6, Section 1602 of the CFGC, the CDFW regulates activities that would divert or obstruct the natural flow of or substantially change the bed, channel or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses and wetland habitats supported by a river, lake, or stream. Jurisdictional waters are delineated by the outer edge of riparian vegetation (i.e., drip line) or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not extend to tidal areas or isolated resources. A Notification of Lake or Streambed Alteration must be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions and, if necessary, submits (to the applicant) a proposal that includes measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

California Fish and Game Code Sections 3503, 3511, 3513, 3801, 4700, 5050, and 5515

CDFW protects and manages fish, wildlife, and native plant resources within California. The California Fish and Game Commission and/or CDFW are responsible for issuing permits for the take or possession of protected species. The following sections of the CFGC address protected species: Section 3511 (birds),

Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish). In addition, the protection of birds of prey is provided for in Sections 3503, 3513, and 3800 of the CFGC.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) (California Water Code §13000 et seq.) provides for statewide coordination of water quality regulations. The SWRCB was established as the statewide authority and the nine separate RWQCBs were developed to oversee water quality on a day-to-day basis. The SWRCB is the primary agency responsible for protecting water quality in California. The RWQCBs regulate discharges to surface waters under the CWA. In addition, the RWQCBs are responsible for administering the Porter-Cologne Act. Pursuant to the Porter-Cologne Act, California is given authority to regulate "waters of the state," which include wetlands, rivers, lakes, and the ocean, also defined as any surface water or groundwater, including saline waters within the boundaries of the State. As such, any person proposing to discharge waste, which includes discharges of dredged or fill material, into "waters of the state" that could affect its water quality must first file a Report of Waste Discharge per the 2019 State Policy for Water Quality Control if a Section 404 permit is not required for the activity. The 2019 State Policy also includes Procedures for Discharges to Waters of the State and wetland delineation methods.

Local Regulations

South El Monte General Plan

The South El Monte General Plan Resources Element provides measures to protect and enhance open space, natural habitat, and biological and cultural resources. The General Plan notes that "no rare or endangered species of plants, fish, or wildlife have been found in the City." Therefore, no policies or goals from the General Plan are relevant to the proposed Project as it relates to biological resources.

4.3.3 Existing Conditions

The project site is generally located northeast of Whittier Narrows Recreation Area and south of State Route 60 (SR-60) in southwest South El Monte in Los Angeles County, California. The site is located approximately 200 linear feet southeast of the Whittier Narrows Reservoir, southwest of SR-60, east of Santa Anita Avenue, and north of the Puente Hills Significant Ecological Area (SEA).[1] The project site is previously disturbed and generally vacant land containing non-native grasses with sparse patches of ornamental vegetation. The remains of previous uses of the site include building foundations and radio tower footings.

The Project also includes off-site improvements to accommodate utility connections, these improvements would be located within Santa Anita Avenue public right of way extending from Durfee Avenue to the project site in Lexington-Gallatin Road, and approximately 550 feet north of the intersection with Lexington-Gallatin Road to the future City park. Additionally, improvements would occur within Lexington-Gallatin Road public right-of-way extending approximately 400 feet north of the project site to the intersection with Andrews Street.

[1] Significant Ecological Areas (SEA) are areas within Los Angeles County that are designated by the County of Los Angeles as "Land that is identified to hold important biological resources representing the wide-ranging biodiversity of the County, based on the criteria for SEA designation established by the General Plan and as mapped in the adopted SEA Policy Map." Source: County of Los Angeles Municipal Code 22.14.190. Accessed on May 15, 2025.

Topography and Soils

The project site is relatively flat with no areas of topographic relief, at an approximate elevation of 219 to 226 feet above mean sea level. The existing topography slopes downward to the west at a gradient of less than one percent. Based on the Natural Resources Conservation Service, U.S. Department of Agriculture Web Soil Survey, the project site is underlain by Urban land-Biscailuz-Pico complex 0 to 2 percent slopes and Urban land-Pico-Metz complex 0 to 2 percent slopes, neither soil type is hydric (**Appendix E**). On-site soils have been mechanically disturbed from prior land uses and weed abatement.

Vegetation and Land Cover

The project site supports little diversity in vegetation communities and other land covers. **Table 4.3-1: Vegetation and Land Cover Type Summary** below provides a summary of land cover types with the project site and for the off-site improvements within the survey buffer. The land cover types are depicted on **Figure 4.3-1: Biological Survey Results**, which depicts the off-site improvement areas and study area buffer. Natural communities with ranks of S1 through S3 are considered sensitive natural communities by CDFW to be addressed in the environmental review processes of CEQA. Project associated improvements would not occur on habitat that is considered a sensitive vegetation community by CDFW because no such habitat is located on the project site or the area where off-site improvements are proposed (**Appendix E**).

Table 4.3-1: Vegetation and Land Cover Type Summary

Vegetation (Holland)[1]	Vegetation[2]	Global/State Rank	Survey Area: Project Site + 100 Foot Buffer (acres)	Project Site + Off-Site Improvement Areas (acres)
Developed	Developed/Disturbed	No Rank	23.8	4.9
Disturbed	Developed/Disturbed	No Rank	0.9	0.01
Southern North Slope Chaparral	Holly Leaf Cherry, Toyon, Greenbark Ceanothus Chaparral	G5/S4	0.5	0
Non-native Grassland	Wild Oats and Annual Brome Grasslands	No Rank	23.3	21.6
Ornamental	Developed/Disturbed	No Rank	1.0	0.9
		Total[3]	**49.4**	**27.4**

1. Vegetation communities recognized by Holland (1986)
2. Vegetation communities from Holland (1986) cross referenced to the Manual of California Vegetation, Online Edition
3. Total acreage includes off-site improvement areas within the survey buffer. Acreages summed using raw numbers provided during GIS analysis and thus the sum of the total rounded numbers may not directly add up in this table.

Source: Rocks Biological Consulting, 2025 (**Appendix E**).

Developed. Developed land is typically classified as lands regularly used by humans that are devoid of natural habitat. Developed land within the survey area consists primarily of roads, recreational facilities, and government agency buildings. Developed land on the project site (4.9 acres) is primarily comprised of asphalt roads and areas that were previously occupied by structures. Ornamental landscaping, including species such as sycamores (*Platanus occidentalis*) and pine trees (*Pinus* sp.), is present within the developed land on the project site. Developed habitat is not recognized by CDFW; therefore, it is not considered a sensitive natural community under CEQA.



Source: Rocks Biological Consulting, 2025

Figure 4.3-1: Biological Survey Results

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Disturbed. Disturbed land is typically classified as land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and project site conditions are not characteristic of the disturbed phase of a plant association (e.g., disturbed Riversidean sage scrub). Disturbances observed are those typically associated with vacant lots, roadsides, construction staging areas, and abandoned fields. Disturbed land is typically dominated by non-native annual species and perennial broadleaf species. Disturbed land occurs within the central and northeast regions of project site (0.01 acre). Disturbances observed are those typically associated with vacant lots, including soil compaction and non-native vegetation colonization. It is primarily vegetated by non-native species such as common barley (*Hordeum vulgare*), cheeseweed mallow (*Malva parviflora*) and milk thistle (*Silybum marianum*). Disturbed land is not recognized by CDFW; therefore, it is not considered a sensitive natural community under CEQA.

Southern North Slope Chaparral (Holly Leaf Cherry, Toyon, Greenbark Ceanothus Chaparral). Southern north slope chaparral includes greenbark ceanothus (*Ceanothus spinosus*), toyon (*Heteromeles arbutifolia*), and/or holly leaf cherry (*Prunus ilicifolia*) as dominant or codominant shrub species with varied canopy and herb densities. Southern north slope chaparral was not observed on the project site but occurs within the off-site survey buffer. The habitat within the survey buffer is primarily composed of holly leaf cherry but also includes coast live oak (*Quercus agrifolia*), toyon, poison hemlock (*Conium maculatum*), and white horehound (*Marrubium vulgare*). Southern north slope chaparral is ranked as G5/S4, meaning it is not considered a sensitive natural community under CEQA.

Non-Native Grassland (Wild Oats and Annual Brome Grasslands). Non-native grassland (wild oats and annual brome grasslands) is typified by dense to sparse cover of annual, non-native grasses. Non-native grassland within the project site (21.6 acres) is dominated by ripgut grass (*Bromus diandrus*), common barley, and slender wild oat (*Avena barbata*). Non-native grassland comprises nearly the entire northern half of the project site. Non-native grassland is not recognized by CDFW; therefore, it is not considered a sensitive natural community under CEQA.

Ornamental. Ornamental vegetation is typically classified as an area containing landscaped, aesthetically appealing plant species. Ornamental vegetation within the project site (0.9 acre) is present in patches bordering the non-native grassland. Ornamental habitat on the project site is primarily comprised of blue elderberry and pine species. Ornamental vegetation is also found throughout the survey area in association with development. Ornamental habitat is not recognized by CDFW; therefore, it is not considered a sensitive natural community under CEQA.

Special-Status Biological Resources

A literature review and records search was conducted for special-status biological resources potentially occurring on or proximate to the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a review of pertinent literature and databases, including but not limited to the following (**Appendix E**).

- CDFW California Natural Diversity Database (CNDDB)
- California Native Plant Society (CNPS) Electronic Inventory
- USFWS Special-Status Species Database
- USFWS Information for Planning and Consulting (IPaC) Database
- USFWS National Wetlands Inventory (NWI) Database

- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) Database
- Natural Resources Conservation Service (NRCS) Soils Survey Database
- iNaturalist
- eBird: An Online Database of Bird Distribution and Abundance
- The Calflora Database (Calflora) and Consortium of California Herbaria
- Bumble Bee Watch (The Xerces Society et al.)
- San Gabriel Watershed and Mountains Special Resource Study (National Park Service)
- Los Angeles County Drainage Area Whittier Narrows Dam Flood Control Project Dam Safety Modification Study Final Environmental Impact Statement (USACE)

Special-status wildlife and plant species and their potential to occur on the project site is presented in **Table 4.3-2: Special-Status Species Potential to Occur within the Project Site**. The table includes federally and state-listed species, candidate species, and other state-designated special-status species that have been reported within three miles of the project site (CNDDB and USFWS Special-Status Species Database) and determined to be potentially present in the IPaC Database, as well as California Rare Plant Rank (CRPR) 1 and 2 species that occur within the 'Nine Quads' search within an elevational range of 220 to 230 feet above mean sea level (**Appendix E**). The potential for special-status species to occur at the project site or the area for off-site improvements was refined by considering the habitat affinities of each species, field habitat assessments, vegetation mapping, and knowledge of local biological resources. Most species listed with no or very low potential are not included in the table; see **Appendix E** for the full list of species. Additionally, please note the special-status species with low potential to occur or that are not expected to occur are not addressed further in this EIR as no impacts are anticipated to these species.

Special-Status Plant Species

As identified in **Table 4.3-2**, no special status plant species have a moderate or high potential to occur within the project site or the area for off-site improvements based on the highly disturbed nature of the site and lack of suitable habitat. No special-status plants were observed on the project site or the area for off-site improvements during the field investigation conducted as part of the general biological survey or focused rare plant survey. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined the project site and the area for off-site improvements has a low potential to provide suitable habitat for Intermediate mariposa lily (*Calochortus weedii var. intermedius*). One CRPR 1B.1 list plant, southern tarplant, was initially determined to have moderate potential to occur on site based on the existence of nearby populations subject to similar habitat conditions (i.e., disturbed land and non-native grasslands that periodically retain water). However, Southern tarplant was not detected on the project site or the area for off-site improvements during general biological or focused rare plant survey and therefore is identified as absent from the site. All other special-status plant species are presumed absent from the project site and the area for off-site improvements due to the lack of native habitats and routine on-site disturbances and were not observed in either area during the general biological survey or focused rare plant survey.

Table 4.3-2: Special-Status Species Potential to Occur within the Project Site

Species	Status	Habitat Description	Potential to Occur
Invertebrates			
Crotch bumblebee (*Bombus crotchii*)	SC; SSC	Found in open grasslands and scrublands from coastal California east toward the Sierra-Cascade Crest. Less common in western Nevada (Williams et al. 2014). Current populations of Crotch bumble bee are primarily found in Los Angeles, Orange, Riverside, and San Bernardino Counties. Occurs near food plants including *Acmispon, Asclepias, Antirrhinum, Chaenactis, Lupinus, Medicago, Saliva, Phacelia, Clarkia, Dendromecon, Eschscholzia,* and *Eriogonum.*	**Very low.** No suitable habitat occurs on site. No preferred Crotch's bumble bee nectar sources are present on site as none were observed during rare plant surveys or other biological surveys. The nearest observation of this species is approximately five miles northeast of the site (CDFW 2025b). All nearby observations have occurred in association with preferred nectar sources (The Xerces Society 2025).
Monarch butterfly, California overwintering population (*Danaus plexippus plexippus pop. 1*)	FPT	Found in a variety of habitats across the United States and Mexico (e.g., grasslands, urban land, mountains, and coastal habitats). Exclusively oviposit on milkweed. Nectivorous adults require flowering plants. Roost in eucalyptus, Monterey pines, and Monterey cypresses in California.	**Presumed absent**. Three monarch butterfly individuals were observed during rare plant focused survey on July 27, 2023. However, due to the time of year, this observation does not indicate overwintering. No milkweed habitat for the Monarch butterfly observed; the site does not have potential to support reproduction. A eucalyptus tree exists in survey area near the on-site development but is unlikely to provide the necessary conditions for a suitable overwintering site, which require protection from high wind and storms, absence of freezing temperatures, varying levels of sunlight, high humidity, and the presence of water.
Birds			
American Peregrine falcon (*Falco peregrinus anatum*)[1]	FP	Found within a variety of habitats, though perennially dependent on wetlands and riparian habitats. Breeds near a water source and nests on natural or anthropogenic ledges (less frequently in trees). Winters in the Central Valley and Channel Islands.	**Moderate**. Suitable nesting habitat is not present on site but tall pine and sycamore trees in the Whittier Narrows Recreational Area serve as potential nesting sites. Suitable hunting habitat present on site and adjacent to the site in the Whittier Narrows Recreational Area.
Bald eagle (*Haliaeetus leucocephalus*)[3]	SE	Nests at the tallest branch crux of large-canopied trees, often near a body of water. Breeds in forested habitats. Requires water source with abundant fish for hunting.	**Low**. Whittier Narrows Reservoir borders the site to the northwest and supports suitable habitat. The project site does not support suitable nesting or hunting habitat for this species. Species may fly over the site.

Table 4.3-2: Special-Status Species Potential to Occur within the Project Site

Species	Status	Habitat Description	Potential to Occur
Bank swallow (*Riparia riparia*)	ST	Predominantly forages over open riparian areas but also over brushland, grassland, wetlands, water, and cropland. Seeks refuge in holes in riverbanks or cliffs, telephone wires, logs, and shoreline vegetation.	**Low**. Suitable foraging habitat may occur on site. Suitable nesting habitat is not present on site but may occur near Whittier Narrows Reservoir northwest of the project site. Species may fly over the site.
Burrowing owl (*Athene cunicularia*)[2]	SE (candidate) SSC	Found in grasslands and open scrub from the coast to foothills. Strongly associated with California ground squirrel (*Otospermophilus beecheyi*) and other fossorial mammal burrows. Occurs in open to sparsely vegetated habitats or in regions of low vegetative height.	**Moderate**. Symbiont (California ground squirrel) was observed on site, suitable burrows present. Tall grasses likely would preclude year-round inhabitance of the project site; however, periodic weed management increases site suitability for nesting and foraging.
California horned lark (*Eremophila alpestris actia*)	WL	Found from coastal deserts and grasslands to alpine dwarf-shrub habitat above tree line. Also seen in coniferous or chaparral habitats.	**Low**. On-site non-native grassland height and density preclude nesting and foraging. Species may fly over the site.
Cooper's hawk (*Accipiter cooperii*)[1]	WL	Usually found in oak woodlands but occasionally in willow or eucalyptus woodlands. Hunts on habitat edges often near riparian areas. Occasionally observed in urban areas.	**Moderate**. Suitable hunting habitat and fossorial prey occur on site. The project site is surrounded by potential perches (e.g., ornamental trees and light posts).
Ferruginous hawk (*Buteo regalis*)[4]	WL	Found in grassland, desert, and scrubland habitats and at the edges of low/moderate elevation forests.	**Moderate**. Suitable foraging habitat present on site. Species does not nest in Southern California.
Lawrence's goldfinch (*Spinus lawrencei*)[1]	BCC	Found in dry, open oak woodlands, coastal scrub, pinyon pine-juniper woodlands and streamside habitats.	**Present**. Observed on site in ornamental vegetation, namely blue elderberry (*Sambucus mexicana*), during the general biological survey on April 21, 2023. Suitable habitat is present on site and this species is known to occur in the project vicinity.
Loggerhead shrike (*Lanius ludovicianus*)[1]	SSC	Found within grassland, chaparral, desert, and desert edge scrub, particularly near dense vegetation used for nesting.	**Present.** Observed during follow up biological survey on November 15, 2024. Suitable foraging habitat occurs on site. Dense ornamental vegetation suitable for nesting.
Merlin (*Falco columbarius*)[4]	WL	Found in a wide variety of open and semi-open habitats. Primarily found in grasslands when wintering in Southern California but will inhabit any habitat except dense woodland.	**Moderate**. Suitable foraging habitat present on site. Species does not nest in Southern California.
Northern harrier (*Circus hudsonius*)[1]	SSC	Found in wetlands (e.g., sloughs and marshes), meadows, open fields, agriculture, and shrublands. Nests on the ground, often near an aquatic resource or within the	**Moderate**. Suitable foraging habitat and fossorial prey present on site. On-site non-native grassland may

Table 4.3-2: Special-Status Species Potential to Occur within the Project Site

Species	Status	Habitat Description	Potential to Occur
		waterbody itself using sticks or sedge tussocks as a foundation.	provide suitable nesting habitat considering proximity to Whittier Narrows Reservoir.
Sharp-shinned hawk (*Accipiter striatus*)[1]	WL	Roost in mid- to high-canopy forests, nest in single layered forest canopy, prefer conifers, and hunt migratory birds and small animals (e.g., reptiles and insects) at the edge of woodlands, brushy pastures, and shorelines.	**Low**. The project site lacks conifers and forest canopy; however, it supports reptile and insect prey items and is near the shoreline of Whittier Narrows Reservoir. Species may fly over the site.
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)	WL	Found in mostly in sage scrub and chaparral, but also grassland habitats with scattered scrubs. Prefers open habitat with rocky slopes.	**Low**. Although grasslands are present on site, scrub habitat and rocky slopes are not present. Species may fly over the site.
Southwestern willow flycatcher (*Empidonax traillii extimus*)[1]	FE; SE	Breeds in dense riparian forests and woodlands with structural diversity, often with open water. Restricted to a few colonies throughout southern California.	**Very low.** No suitable habitat occurs on site. Species may fly over the site.
Swainson's hawk (*Buteo swainsoni*)[1]	ST	Found in open habitats for foraging including grasslands, prairies, and sometimes pastures. Nest in solitary trees or sometimes very small groves near water.	**Low.** Suitable breeding habitat is not present. Preferred foraging habitat is not present on site and species has not been documented in the vicinity since 1880. Species may fly over the site.
Tricolored blackbird (*Agelaius tricolor*)	SSC	Nests in cattail (Typha spp.) in freshwater marshes or in willow canopies in riparian habitat. Open water, nest protection (e.g., flooded or thorny vegetation), and access to insect prey are required for nesting.	**Low**. Suitable wetland habitat not present. Grasslands present with low suitability to support a nesting colony. Species may fly over the site.
Vermilion flycatcher (*Pyrocephalus rubinus*)[1]	SSC	Found in deserts, scrub, grasslands, agricultural fields, parks, golf courses, and riparian woodlands, often near a water source.	**Moderate**. Site is primarily composed of non-native grassland, is surrounded by sycamore trees, and lies adjacent to Whittier Narrows Reservoir and park. On-site suitable nesting habitat in the form of non-native grassland and ornamental shrubs.
White-tailed kite (*Elanus leucurus*)	FP	Found in coastal and valley lowlands across a wide variety of habitats during herbaceous stage. Hunts in open grasslands, meadows, farmlands, and emergent wetlands that have not experienced disturbance.	**Low**. Disturbed foraging habitat occurs on site; higher quality hunting grounds occur in the adjacent Whittier Narrows Reservoir and park. Majority of project site is herbaceous (i.e., grasses). Species may fly over the site.

Table 4.3-2: Special-Status Species Potential to Occur within the Project Site

Species	Status	Habitat Description	Potential to Occur
Yellow breasted chat (*Icteria virens*)[1]	SSC	Nests in early stage riparian habitats with adequate shrub cover and an open canopy where dense thickets and tall perching trees are present.	**Low to moderate**. On-site ornamental shrubs may provide nesting habitat for this species.
Yellow warbler (*Dendroica petechia brewsteri*)[1]	SSC	Found in riparian habitats along aquatic resources containing willows and cottonwoods or in wet meadows. Riparian species generalist depending on geographic location. Occasionally found in disturbed or semiurban areas.	**Moderate**. Site is adjacent to Whittier Narrows Reservoir. On-site non-native grassland and surrounding ornamentals provide suitable habitat for this species.
Mammals			
Pallid bat (*Antrozous pallidus*)	SSC	Found in a variety of habitats including grasslands, shrublands, woodlands, and forests. Especially common in open, arid habitats with rock outcrops for roosting. Roosts in caves, crevices, mines, hollow trees, and buildings.	**Moderate**. Suitable foraging habitat is present on site. Abandoned sheds may provide shelter for roosting and thermoregulation.
Plant Species			
Intermediate mariposa-lily (*Calochortus weedii var. intermedius*)	CRPR 1B.2	Perennial bulbiferous herb. Blooms May-July. Chaparral, coastal scrub, and valley and foothill grasslands. Elevation 345-2805 feet.	**Low**. Not observed on site during general biological survey. Species is found in rocky sediment, which is not on site. Site is primarily composed of competitive non-natives.
Southern tarplant (*Centromadia parryi ssp. australis*)	CRPR 1B.1	Annual herb. Blooms May-November. Marshes and swamps (margins), valley and foothill grassland (vernally mesic), vernal pools. and some disturbed habitats. Elevation 0-1575 feet.	**Absent**. Not observed during the focused rare plant survey targeting this species.

BCC: USFWS Bird of Conservation Concern
FC: Federal Candidate Species for listing under the Endangered Species Act
FE: Federally Endangered
FP: California Department of Fish and Wildlife (CDFW) Fully Protected
FT: Federally Threatened
FPT: Federally Proposed Threatened under Endangered Species Act
SC: State Candidate for listing under the California Endangered Species Act
SE: State Endangered
ST: State Threatened
SSC: CDFW Species of Special Concern
WL: CDFW Watch List Species
CRPR: California Rare Plant Rank
1 CNDDB, administered by CDFW, only tracks documented nest sites and behavior indicating reproduction for this species
2 CNDDB, administered by CDFW, tracks detections of burrow sites and some wintering sites for this species
3 CNDDB, administered by CDFW, tracks detections of nest sites, behavior indicating reproduction, and wintering locations for this species
4 CNDDB, administered by CDFW, only tracks detections of wintering locations for this species

Source: Rocks Biological Consulting, 2025.

Special Status Wildlife Species

Of the potential special-status wildlife species evaluated, nine special-status wildlife species have a moderate potential to occur, one has a low-to-moderate potential to occur on the site, and three were observed on the site (**Table 4.3-2**). Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the project site has a low-to-moderate potential to support Yellow breasted chat *(Icteria virens)* and a moderate potential to support American Peregrine falcon (*Falco peregrinus anatum),* western Burrowing owl *(Athene cunicularia hypugaea),* Cooper's hawk *(Accipiter cooperii),* Ferruginous hawk *(Buteo regalis),* Merlin *(Falco columbarius),* Northern harrier *(Circus hudsonius),* Vermilion flycatcher *(Pyrocephalus rubinus),* Yellow warbler *(Dendroica petechia brewsteri),* and Pallid bat *(Antrozous pallidus).*

Lawrence's goldfinch (*Spinus lawrencei*), Loggerhead shrike (*Lanius ludovicianus*), and Monarch butterfly (*Danaus Plexippus plexippus pop. 1*), were observed on the project site. One Lawrence's goldfinch was observed in ornamental vegetation on the project site – foraging in a blue elderberry shrub – during the general biological survey on April 21, 2023. One adult Loggerhead shrike was observed perched on a tree in the south-central project site during the follow-up biological survey on November 15, 2024. Suitable habitat is present on-site for both Lawrence's goldfinch and Loggerhead shrike, therefore they have the potential to occur on-site.

Monarch butterfly, California overwintering population. As of December 10, 2024, the monarch butterfly is a candidate for potential listing under FESA when overwintering in California. Protections under FESA would only apply if and when the monarch butterfly is formally listed as threatened under the FESA, and would apply to the California overwintering population only. The USFWS is currently undertaking a 12 month species status process review as to whether and to what extent the species should be formally listed, and at the earliest, that determination will be made in March 2026.

The California overwintering monarch butterfly population range extends from northern Baja California, Mexico, to Mendocino County, California. Overwintering sites require specific conditions including protection from high wind and storms, absence of freezing temperatures, varying levels of sunlight, high humidity, and the presence of water. Most of the California overwintering population cluster on non-native blue gum trees (*Eucalyptus globulus*), but they may also utilize native trees. Asserted threats to this population include loss of suitable overwintering habitat from development, tree trimming, fire and fire management, tree disease, herbicide and pesticide use, and climate change.

Only three monarch butterflies were observed flying through the project site during the singular focused rare plant survey conducted on July 27, 2023. No host plants – milkweed – were observed and no colonial roosting monarchs were observed. The lemon-scented gum tree (*Corymbia citriodora*) present in the ornamental vegetation near the southeastern border of the project site is highly unlikely to provide the necessary conditions for a suitable overwintering site. Additionally, the project site is not mapped as a Monarch Overwintering Area within the Areas of Conservation Emphasis (ACE) dataset and this species has never been known to overwinter within proximity to the project site. The nearest known occurrence of the California overwintering population of monarch butterfly is approximately 24 miles west of the project site (**Appendix E**). Therefore, based on Project site conditions (no suitable host plants present) and known overwintering occurrences elsewhere (where suitable host plants are present), the California overwintering population of monarch butterfly is presumed absent.

All other special-status wildlife species are presumed absent from the project site due to the lack of native habitats and routine on-site disturbances.

Critical Habitat

The FESA defines critical habitat as a specific geographic area, or areas, that contains features essential for the survival and recovery of federally endangered and/or threatened species. The USFWS designates critical habitat for endangered and threatened species and may include sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Critical habitat may also include areas that are not currently occupied by the species, but that will be needed for its recovery.

No USFWS designated critical habitat occurs on or immediately adjacent to the project site. The nearest critical habitat is for the coastal California gnatcatcher, located approximately one mile south of the project site (see **Appendix E**, Figure 4b). Additionally, it should be noted that Least Bell's vireo occurs along the San Gabriel River, but no critical habitat per USFWS is present on the project site or in the off-site improvement area.

Wildlife Corridors

A wildlife corridor is a physical feature that connects wildlife habitats, typically consisting of native vegetation, and links two or more larger areas of similar habitat. Corridors enable migration, colonization, and genetic diversity through interbreeding and are therefore critical for the movement of animals and the continuation of viable populations. Corridors can consist of large, linear stretches of connected habitat (such as riparian vegetation) or as a sequence of stepping-stones across the landscape (discontinuous areas of habitat such as wetlands and ornamental vegetation), or corridors can be larger habitat areas with known or likely importance to local fauna.

Regional corridors are defined as those linking two or more large patches of habitat, and local corridors are defined as those allowing resident animals to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development. A viable wildlife migration corridor consists of more than an unobstructed path between habitat areas. Appropriate vegetation communities must be present to provide food and cover for both transient species and resident populations of less mobile animals. There must also be a sufficient lack of stressors and threats within and adjacent to the corridor for species to use it successfully.

The project site does not function as part of a wildlife corridor. Based on a review of the CDFW Biogeographic Information and Observation System (BIOS) data, no large scale habitat connectivity corridors are mapped across the project site (**Appendix E**). The project site and area around the project site are designated as Rank 1, "Limited Connectivity Opportunity," which is the lowest rank within the Terrestrial Connectivity, Areas of Conservation Emphasis (ACE) dataset (**Appendix E**). The project site is vacant highly disturbed land, that is generally bordered to the north and east by development. No large areas of native vegetation are contiguous with the disturbed land on the site. The Puente Hills SEA is directly south of the Project's off-site improvement area on the south side of Durfee Avenue. It is in association with the San Gabriel River and floodplain. A BIOS 'missing California linkage' follows the San Gabriel River alignment. The Puente Hills SEA is likely used as a wildlife corridor because of its size and ecological value (i.e., native riparian vegetation and the San Gabriel River). Impacts to the Puente Hills SEA would not occur with Project implementation due to fencing on the northern border of the Puente Hills SEA impedes terrestrial locomotion to existing development to the north and east of the project site.

A very small portion of the northwest corner of the project site is within the California Essential Habitat Connectivity Natural Small Areas category. The site likely provides some movement opportunities for common wildlife species locally; however, the Project would not result in fragmentation, as those

opportunities are afforded by adjacent lands to the south, east, and west as well. These lands are protected open spaces or fall within other sensitive land designations, such as County SEAs and federally designated critical habitat, making development or creation of movement barriers on these surrounding lands unlikely. The existing roadways, urbanization, and SR-60 already impede movement onto the site from the north. Therefore, the project site is highly unlikely to be used by wildlife species as refuge between larger areas of naturally occurring habitat.

Jurisdictional Resources

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The U.S. Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the CWA and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the RWQCB regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

National Hydrography Dataset (NHD) records show one underground pipeline for stormwater conveyance occurring just north of the project site boundaries. The inlet to the NHD-mapped underground pipeline is off site at the Whittier Narrows Reservoir. No additional aquatic resources were identified on the project site and 50-foot buffer during desktop review of the NWI and NHD databases. During the constraints-level aquatic resources assessment, no aquatic resources potentially jurisdictional by the United States or State (U.S./State) or indicators thereof were observed on site. Vernal pools and/or seasonal wetlands are presumed absent from the site, as depressions with indicators of hydrology (i.e., soil cracking, algal mats) were not observed. Additionally, much of the site is characterized by well drained soils.

During the constraints-level aquatic resource assessment, a culvert was recorded approximately fifteen feet north of the project site that runs beneath SR-60 and directs water flow to the south. Based on the lack of hydric soils and wetland hydrology indicators observed within this area, the feature would not qualify as a wetland water of the U.S./State per the USACE and the SWRCB/RWQCB or associated wetland potentially jurisdictional by the CDFW. The feature would also not qualify as a non-wetland water of the U.S./State, as it did not display an observable Ordinary High Water Mark (OHWM) or defined bed and bank.

4.3.4 Methodology

This analysis considers the *State CEQA Guidelines, Appendix G* thresholds in determining whether Project implementation would result in a substantial impact to biological resources (i.e., environmental study areas, protected wetlands, marine resources). The evaluation was based on a review of regulations and determining their applicability to the Project. The determination that the Project would or would not result in "substantial" temporary or permanent impact to biological resources considers the relevant policies and regulations established by local and regional agencies and the Project's compliance with these policies.

Rocks Biological Consulting (RBC) biologists conducted vegetation mapping, habitat assessments for special-status species, and a general biological survey on April 21, 2023. Additionally, the biologists performed a general reconnaissance survey for potentially jurisdictional aquatic resources; however, a formal aquatic resources delineation was not conducted.

The general biological survey, vegetation mapping, and habitat assessments were conducted at the project site and included a 100-foot buffer (survey area), which includes the area for off-site improvements; see **Figure 4.3-1**. The constraints-level aquatic resources assessment was conducted at the project site plus a surrounding 50-foot buffer (review area). Note that where applicable, buffer areas are included to assess the potential for special-status species or resources in areas immediately adjacent to the project site that could be impacted by the Project.

Following the general biological survey, biologists conducted a focused rare plant survey for southern tarplant (*Centromadia parryi ssp. australis*) on July 27, 2023; one reconnaissance non-breeding season western burrowing owl survey on November 15, 2024; and a follow up general biological survey also on November 15, 2024. Four focused breeding season burrowing owl surveys were conducted from March 24 to June 25, 2025.

4.3.5 Thresholds of Significance

The City uses the thresholds of significance specified in *State CEQA Guidelines, Appendix G*. Impacts related to biological resources would be significant if the Project would:

- 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 CDFW or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.
- 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.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

As addressed in **Section 1.5, Summary of Effects with No Impact**, the City has determined that the Project would not have a significant impact on the following threshold for the reasons stated below and that no further analysis was required:

- Conflict with the provisions of an adopted Habitat Conservation Plan, NCCP, or other approved local, regional, or state habitat conservation plan.

The project site is not located with an active Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) area. Therefore, Project implementation would have no impact with respect to this threshold.

4.3.6 Project Impacts and Mitigation

Threshold 4.3-1:	**Would the Project 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?** ***Level of Significance*:** Less than Significant with the incorporation of MMs BIO-1 through BIO-6 and MM AES-1.

The proposed Project involves ground disturbance (e.g., grubbing, clearing, and grading) and construction of a warehouse, City public park, access roadways, and other needed infrastructure and improvements that could result in impacts to special status plant and wildlife species during construction. Impacts to special-status species could also occur during Project construction and operations. Impacts may be direct (e.g., destruction of potential habitat, disturbance of species located on the site) or indirect (e.g., disturbance of habitat or species as a result of increased noise, vibration, dust, nighttime lighting, and human activity in the area). Specific potential impacts are discussed below.

Special-Status Plant Species

As identified in **Table 4.3-2**, southern tarplant (*Centromadia parryi ssp. Australis*) was the only special-status plant species originally identified as having moderate potential to occur on the project site based on the existence of nearby populations subject to similar habitat conditions (i.e., disturbed land and non-native grasslands that periodically retain water). Southern tarplant is an annual herb in the sunflower family (*Asteraceae*) with hairy or puberulent yellow flowers that bloom from May to November. Southern tarplant is native to California and Baja, Mexico; it occurs in the U.S. from San Diego County to Santa Barbara County at elevations less than 1,575 feet above mean sea level. Southern tarplant is a CRPR rank 1B.1 species, meaning it is rare, threatened, or endangered in California and elsewhere

Despite the moderate suitability of the project site to support southern tarplant, it was not detected during the general biological survey or the focused rare plant survey (**Appendix E**). Southern tarplant would not be impacted with Project implementation, as it is absent from the project site and offsite improvement areas. The proposed Project would not impact federally and/or state listed or other special-status plants as none are present and no additional species have a moderate to high potential to occur within the project site or the area for off-site improvements due to lack of suitable habitat and the overall disturbed nature of the site. Therefore, the Project's impact to special-status plant species would be less than significant.

Special-Status Wildlife Species

As identified in **Table 4.3-2**, the project site has a moderate or low to moderate potential to support American Peregrine falcon (*Falco peregrinus anatum),* western burrowing owl *(Athene cunicularia),* Cooper's hawk *(Accipiter cooperii),* Ferruginous hawk *(Buteo regalis),* Merlin *(Falco columbarius),* Northern harrier *(Circus hudsonius),* Vermilion flycatcher *(Pyrocephalus rubinus),* Yellow warbler *(Dendroica petechia brewsteri),* Pallid bat *(Antrozous pallidus)*, and Yellow breasted chat (*Icteria virens*). Lawrence's goldfinch (*Spinus lawrencei*), and Loggerhead shrike (*Lanius ludovicianus*) were observed on the project site during specific surveys and have the potential to occur on-site. The Project's potential to

impact species or indirectly impact foraging and movement behavior of species is discussed in greater detail below.

Threatened and Endangered Wildlife Species

Burrowing Owl. On October 10, 2024, the California Fish and Game Commission ("Commission") unanimously approved the western burrowing owl as a candidate species for potential listing under CESA. The CDFW is currently undertaking a 12 month species status review process to inform its recommendation to the Commission as to whether and to what extent the species should be formally listed, and at the earliest, a recommendation would be provided in October 2025. As a candidate for potential listing under CESA, the species is temporarily afforded the same protections as a state-listed endangered or threatened species (California Fish and Game Commission, 2024).

No burrowing owls or signs of burrowing owls were documented during the general biological survey, rare plant survey, or the reconnaissance non-breeding season survey of the project site and the off-site improvement area. Burrowing owls have been documented less than three miles south of the project site. Additionally, the fossorial symbiont – California ground squirrel – and prey species (*Eleodes* sp.) occur on site. Vacated burrows created by the California ground squirrel are also present on site, which burrowing owls may use for shelter, roosting, or nesting. Therefore, the general biological survey on April 21, 2023, and the single reconnaissance non-breeding season survey on November 15, 2024, determined that even though no burrowing owls were present, the project site supports suitable habitat for burrowing owl, dependent in part on weed management. For example, if weed abatement is performed periodically, the on-site suitability for burrowing owl nesting and foraging within the non-native grassland would increase. Considering the proximity of documented off-site burrowing owl observations, the presence of symbiotic California ground squirrel and associated squirrel burrows, and the variability of vegetation height and density on the project site, the overall potential for burrowing owl to occur on the site is moderate. Therefore, absent mitigation, potentially significant impacts to burrowing owl could occur.

Four focused breeding season surveys for western burrowing owls were conducted within accessible suitable habitat between March 24 and June 25, 2025, in accordance with the Burrowing Owl (BUOW) Guidelines and within the species' breeding season (CDFW 2012). Presence/absence of burrowing owls within the survey area was assessed by analyzing the presence of suitable burrows and searching for live burrowing owls and recent burrowing owl sign. No burrowing owls were identified.

Based on the general biological survey on April 21, 2023, the rare plant survey on July 27, 2023, the reconnaissance non-breeding season burrowing owl survey on November 15, 2024, and four focused breeding season surveys in 2025, the project site seasonally supports suitable habitat for burrowing owl, however suitability can vary dependent on weed management. Considering site suitability and the presence of the symbiotic California ground squirrel and burrows, the project site has a moderate potential to support burrowing owl.

With Project implementation, direct impacts on burrowing owl could occur in the form of death, injury, or harassment of nesting birds, their eggs, and their young, if owls are present. Such impacts, if they were to occur, would be potentially significant due to the direct reduction in local populations and loss of genetic diversity. Injury or mortality occurs most frequently during the vegetation clearing stage of construction and affects eggs, nestlings, and recently fledged young that cannot safely avoid equipment. As set forth in MM BIO-1, pre-construction burrowing owl clearance surveys would be conducted no less than 14 days prior to ground disturbance activities, and a second survey would be conducted within 24 hours prior the onset of construction activities. Thus, ensuring no occupied burrowing owl burrows are

present within or adjacent to construction areas during ground disturbance. As outlined in MM BIO-1, if detected on site or within the buffer area during pre-construction surveys, CDFW would be contacted within 48 hours and disturbance avoidance buffers would be installed, and no work would occur within avoidance buffers until consultation with CDFW. Additionally, in accordance with MM BIO-2, if pre-construction burrowing owl surveys are positive and avoidance is not possible, either directly or indirectly, CDFW would be consulted. If necessary, a CESA ITP would be obtained and all Conditions of Approval outlined in the CESA ITP would be implemented.

Burrowing owls, if present during active construction activities, would be particularly susceptible to vehicle strikes because they use roadways and adjacent areas for hunting. In addition, burrowing owls are known to use man-made materials, such as pipes and culverts, for shelter and nesting. As set forth in MM BIO-3, the Project would implement construction best management practices (BMPs), which include construction vehicles not exceeding 15 miles per hour, and all construction pipe, culverts, or similar structures screened, covered, or elevated overnight reducing the potential impact to burrowing owl.

A potentially significant impact could also occur to burrowing owls, if present, in suitable habitat west of the project site, due to elevated noise, vibration, and dust levels generated by construction equipment. However, these disturbances are temporary and relatively short in duration, and thus unlikely to affect burrowing owl behavior. Further, as outlined in MM BIO-3, construction activities would occur during day within the City's allowed construction hours, up to 10 PM. Therefore, due to the temporary nature and limited construction hours, impacts to burrowing owl would be less than significant in this regard.

Operational impacts on burrowing owl could potentially occur if burrowing owls are present within nearby habitat and light from the future City park stadium lighting for the athletic fields is directed into or near their habitat. Such impacts would be potentially significant because lights could reduce burrowing owls' hunting success and make burrowing owls easier targets for predators. MM AES-1 requires best practices to be implemented to ensure that direct light or glare is not emitted towards adjacent open space/ potential suitable burrowing owl habitat and that lighting use is restricted to specific times.

With implementation of MM BIO-1 through MM BIO-3 and MM AES-1, the Project would have a less than significant impact on burrowing owls.

The proposed Project would not significantly impact any additional federally and/or state-listed wildlife species, as no additional listed species were observed during general biological surveys and none have moderate to high potential to occur on site based on lack of suitable habitat.

Special-Status Bird Species

Two non-listed special-status wildlife species – Lawrence's goldfinch (BCC) and loggerhead shrike (SSC) – were observed on site. Additionally, the following bird species were found to have a moderate or low to moderate potential to occur on the project site: Cooper's hawk (*Accipiter cooperii*), Ferruginous hawk (*Buteo regalis*), Merlin (*Falco columbarius*), Northern harrier (*Circus hudsonius*), American Peregrine falcon (*Falco peregrinus anatum*), Vermilion flycatcher (*Pyrocephalus rubinus*), yellow breasted chat (*Icteria virens*), and yellow warbler (*Dendroica petechia brewsteri*). The above listed special-status bird species were found to have a moderate or low to moderate potential to occur on the project site due to their ability to inhabit urban areas and the presence of ornamental trees and non-native grasslands on the site for nesting and foraging. Project implementation would include the removal of the suitable nesting and foraging habitat on the site, therefore resulting in a potential impact to those special-status bird species.

Potential impacts to special-status bird species from Project implementation would be mitigated through implementation of MM BIO-3, MM BIO-4, and MM BIO-5. MM BIO-3 would reduce potential impacts to special status bird species through implementation of construction BMPs and monitoring requirements. MM BIO-4 would ensure impacts from habitat removal would be mitigated to less than significant through purchase of 10.8 acres of grassland habitat at an approved mitigation bank. MM BIO-5 would ensure potential impacts to nesting birds would be less than significant through compliance with CFGC Sections 3503, 3503.5, and 3513, by avoiding construction activities during nesting bird season or requiring a nesting bird survey prior to site disturbance if construction occurs during nesting bird season. If active nests are identified, a qualified biologist would determine a suitable buffer and potential avoidance or minimization measures. Therefore, with implementation of MM BIO-3, MM BIO-4, and MM BIO-5, potential impacts to special-status bird species would be mitigated to a less than significant level.

Special-Status Mammal Species

The pallid bat is a CDFW Species of Special Concern (SSC), and inhabits open, dry habitats such as grasslands, shrublands, woodlands, and forests. It is a nocturnal species that day roosts in caves, rock crevices, mines, and occasionally hollow trees and buildings. It forages in open areas about 1.6 to 8 feet above ground level and mainly captures prey on the ground. The existing ornamental trees on the project site may be suitable for pallid bat roosting and thermoregulation. Additionally, suitable foraging habitat exists on site in the non-native grassland vegetation community. Although the pallid bat was not documented during the general biological survey of the project site, it has a moderate potential to occur due to the suitable nesting and foraging habitat. Therefore, impacts to pallid bat could occur with Project implementation due the removal of suitable habitat, and absent mitigation, potentially death, injury, or harassment of bats or their young if present during demolition or tree removal. Potential impacts would be mitigated with implementation of MM BIO-3, MM BIO-4, and MM BIO-6. As noted above, MM BIO-3 would reduce potential impacts to special status wildlife species, including the pallid bat, through the implementation of construction BMPs and monitoring requirements. MM BIO-4 requires the purchase of grassland habitat at a mitigation bank. MM BIO-6 would require pre-construction surveys for pallid bat, and, if identified, a qualified biologist would implement avoidance measures. Therefore, with implementation of MM BIO-3, MM BIO-4, and MM BIO-6, potential impacts to pallid bat would be mitigated to a less than significant level.

Threshold 4.3-2:	**Would the Project 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 Service or U.S. Fish and Wildlife Service?** ***Level of Significance*:** Less than Significant with the incorporation of MM BIO-3.

Riparian areas are ecosystems bordering a river or stream, where soil moisture is permanently available. Riparian areas are highly productive transitional areas between streams and terrestrial uplands and support a diverse community of plants and animals. The project site is currently vacant undeveloped land and does not support any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils (**Appendix E**). Further, the constraints-level aquatic resources assessment and NWI and NHD database research did not reveal any jurisdictional drainage and/or wetland features, blueline streams, or riparian habitat. Therefore, Project implementation would not adversely affect any riparian habitat.

Table 4.3-1 distinguishes the land cover types impacted by Project implementation. The four land cover types/vegetation communities identified are non-native grassland, developed, disturbed, and ornamental land covers. Developed, disturbed, and ornamental land covers are not considered sensitive vegetation communities; as such, no significant impacts would occur with Project implementation. Southern north slope chaparral, which is a native vegetation community but is not considered sensitive under CEQA, occurs to the south of the site. This vegetation community does not occur on the project site and would not be directly impacted by Project construction or operation. There would be no direct impacts anticipated from the proposed water main line extension in Santa Anita Avenue as the improvements would occur within the roadway and County right-of-way, therefore avoiding the southern north slope chaparral native vegetation community. Potential indirect impacts would be mitigated through compliance with MM BIO-3, which would require implementation of construction BMPs and monitoring requirements, including the demarcation of construction limits. Therefore, the Project would not have a substantially adverse impact to southern north slope chaparral. Project implementation would result in a less than significant impact to sensitive natural communities with mitigation incorporated.

Threshold 4.3-3:	**Would the Project 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?** ***Level of Significance*:** Less than Significant Impact

Wetlands are areas that are periodically or permanently inundated or saturated with water and support a prevalence of vegetation typically adapted for life in saturated soils. As discussed above, the project site does not contain any potentially jurisdictional wetlands, marshes or vernal pools, or other protected waterways, as defined by Section 404 of the Clean Water Act. The Biological Technical Report found the site was absent of State or federally protected wetlands though review of the NWI and NHD databases and during the constraints-level aquatic resources assessment (**Appendix E**). Accordingly, implementation of the proposed Project would not 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.

It should be noted that the project site is located within the USACE reservoir flowage easement lands associated with the spillway activation elevation of the Whittier Narrows Dam. Potential impacts from Project implementation associated with the flowage easement lands are addressed in **Section 4.9: Hydrology and Water Quality**, of this EIR. Impacts would be less than significant and no mitigation is required associated with this threshold.

Threshold 4.3-4:	**Would the Project 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?** ***Level of Significance*:** Less than Significant with Incorporation of MM BIO-5.

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow

animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. As previously discussed, the project site does not function as part of a wildlife corridor. The Puente Hills SEA is located south of the project site and is likely used as a wildlife corridor because of its size and ecological value. However, impacts to the Puente Hills SEA are not anticipated to occur with Project implementation due to fencing on the northern border of the Puente Hills SEA that impedes terrestrial locomotion to existing development to the north and east of the project site. The project site does not serve as part of a regional wildlife corridor. The primary impact of the Project would be to non-native annual grassland for temporary movement/foraging of more common wildlife species. The Project would not create a dispersal or movement barrier.

The Project has the potential to impact nesting migratory birds which have acclimated to urban life and nest and forage in the local trees and shrubs. Disturbed, developed, nonnative grassland, and ornamental land covers at the project site have the potential to support avian nests. The proposed Project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season. The project site contains vegetation with potential to support nesting birds, migratory birds, and foraging raptors. The direct injury or death of a migratory bird due to construction or other disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered a significant impact. Impacts on nesting birds are prohibited by the MBTA and/or CFGC Section 3503. The Project would implement MM BIO-5 which would require compliance with CFGC Sections 3503, 3503.5, and 3513, avoidance of nesting season, nesting bird surveys, and active nest buffers, if applicable. Following compliance with the established regulatory framework and implementation of MM BIO-5, development impacts concerning interference 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 would be less than significant.

Threshold 4.3-5:	**Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**
	***Level of Significance*:** Less than Significant Impact

The General Plan does not include goals or policies associated with biological resources. Project would not conflict with any local policies or ordinances protecting biological resources. The City of South El Monte Tree Policy only applies to the planting and removal of street trees, park trees, and trees impacted by capital improvements projects[2]. The Tree Policy also includes an Approved Tree List that outlines approved Street Trees and Parks and Open Space Trees. The Project does not include the removal or planting of any trees within public rights-of-way or designated street trees. Project implementation would include the removal of one ornamental tree (not a special-status species) on the site and planting of six different tree species within the warehouse component of the Project. Tree planting within the future City park component for the Project would be subject to the Approved Tree List and compliance with the City's Tree Policy. As such, Project implementation would not conflict with any local policies or ordinances protecting biological resources. No impact would occur and no mitigation is required.

[2] City of South El Monte, March 22, 2011, *Council Report, Tree Policy.*

4.3.7 Cumulative Impacts

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of related projects in the area, would be considered potentially significant. Related projects refers to past, present and reasonably foreseeable future projects in the area. Such projects would also be required to implement measures, as set forth in their respective CEQA documents, consistent with federal, State, and local regulations to avoid adverse effects to existing biological resources or to mitigate for significant impacts to these resources. The types of measures required for projects impacting protected habitat, species, and regulated resources can include avoidance, project design features, regulatory approvals, best management practices, and mitigation measures.

The project site is degraded and does not support sensitive native vegetation communities, nor does it provide essential habitat for any special-status species. The site is bordered by existing development and the Whittier Narrows Recreation Area and the nature area. Whittier Narrows, located to the west, is maintained as public open space and a wildlife preserve by the County of Los Angeles and therefore this area would not be subject to development. The Puente Hills SEA and federally designated critical habitat to the south is subject to County and USFWS, respectively, review and mitigation process for any development-related impacts and therefore is unlikely to be converted to an urbanized or developed condition. Adjacent developments and infrastructure including SR-60 to the northeast were developed prior to 1985 (based on the oldest Google Earth imagery available). As such, related projects, which would produce similar impacts (e.g., the conversion of non-native grassland to developed land), are not anticipated to occur in the vicinity of the project site. Focusing development on parcels with lower biological constraints such as the project site is of cumulative benefit to locally sensitive resources as higher quality habitats in the vicinity are avoided and, in this case, preserved as open space or designated as SEAs and/or critical habitat for listed species. Considering the low ecological value of the on-site project site habitat and the absence of related projects in the surrounding area, the proposed Project would not result in significant cumulative effects.

4.3.8 Mitigation Program

Standard Conditions

No standard conditions are applicable.

Mitigation Measures

Please also refer to MM AES-1 in **Section 4.1: Aesthetics**.

MM BIO-1: Regardless of the results of focused burrowing owl surveys, a qualified biologist shall conduct a take avoidance preconstruction survey no less than 14 days prior to the onset of construction activities within the construction limits of the project site and a 500-foot buffer. A second survey shall be conducted within 24 hours prior to the onset of construction activities. Surveys shall be conducted at least seven days apart. The surveys shall assess the presence of burrowing owls and occupied nest burrows and be conducted in accordance with the most current California Department of Fish and Wildlife (CDFW) survey methods. If burrowing owls are not observed during the preconstruction survey, no additional conditions may be required to avoid impacts to burrowing owl. A preconstruction survey shall be repeated if Project activities are suspended or delayed more than 14 days from the second survey.

If burrowing owl is documented on site, occupied burrowing owl burrows shall not be disturbed without CDFW authorization. Disturbance avoidance buffers shall be determined and set up by a qualified biologist in accordance with the recommendations included in the BUOW Guidelines (CDFW 2012). A biologist shall be contracted to perform monitoring during all construction activities approximately every other day. The definitive frequency and duration of monitoring shall be dependent on whether it is the breeding versus non-breeding season and the efficacy of the exclusion buffers, as determined by a qualified biologist and in coordination with CDFW.

The project applicant shall submit at least one burrowing owl preconstruction survey report to the satisfaction of the City of South El Monte and CDFW to document compliance with this avoidance and minimization measure. For the purposes of this avoidance and minimization measure, "qualified biologist" is a biologist who meets the requirements set forth in the BUOW Guidelines (CDFW 2012).

MM BIO-2: If take avoidance pre-construction burrowing owl surveys are positive and avoidance is not possible, either directly or indirectly, the California Department of Fish and Wildlife (CDFW) shall be consulted and, if necessary, a California Endangered Species Act Incidental Take Permit (CESA ITP) shall be obtained authorizing take of burrowing owl incidental to approved project activities. All Conditions of Approval outlined in the CESA ITP shall be fully implemented and strictly followed. Conditions of Approval may include, but are not limited to, worker education program, construction/compliance monitoring, best management practices, CDFW notifications, compliance reporting, final mitigation reporting, take minimization measures, burrowing owl mortality reduction plan, burrow replacement plan, pre-construction surveys, burrow avoidance measures, burrow blockage requirements, burrow excavation requirements, operations and maintenance take avoidance measures, habitat management land acquisition, and endowment fund. If the burrowing owl is no longer a candidate or listed species under CESA at the time of Project construction, an ITP would not be required.

MM BIO-3: To avoid impacts to special-status resources and inadvertent disturbance to areas outside the limits of the Project activities, the following monitoring requirements and Best Management Practices (BMPs) shall be implemented:

a. To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbance activities, and all construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction. The use of whiskers with stakes or marking paint is recommended to maintain integrity of work limits.

b. With the exception of any burrowing owls, the qualified biologist shall flush any special-status wildlife species (i.e., avian or other mobile species) from suitable habitat areas within the project development footprint to the maximum extent practicable immediately (e.g., within 24 hours) prior to initial vegetation removal activities. The biologist shall flush wildlife by walking through habitat to be imminently removed.

c. Construction vehicles shall not exceed 15 miles per hour on unpaved roads adjacent to the project site or the right-of-way accessing the site.

d. Construction activities shall occur during daytime hours except where required. Permissible nighttime activities could include pouring of concrete for the warehouse foundation during early and/or nighttime hours.

e. If trash and debris need to be stored overnight during maintenance activities, fully covered trash receptacles that are animal-proof and weather-proof shall be used by the maintenance contractor to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day, but must be removed each night.

f. The operator shall not permit pets on or adjacent to construction sites.

g. At the end of each workday during construction and in the morning prior to the start of each workday during construction, the applicant or its contractors, shall cover all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45 degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) constructed of earth fill or wooden planks. The project biologist shall thoroughly inspect holes and trenches for trapped animals during biological monitoring.

h. The applicant, or its contractors, shall screen, cover, or elevate at least one foot above ground, all construction pipe, culverts, or similar structures with a diameter of three inches or greater that are stored on site overnight. These pipes, culverts, and similar structures shall be inspected by the project biologist for wildlife before such material is moved, buried, or capped.

i. The applicant, or its contractors, shall avoid the use of invasive plant species in the landscaping associated with the development. Invasive species with Moderate or High on the California Invasive Plant Council (Cal-IPC) list (https://www.cal-ipc.org/plants/inventory) are prohibited from use and shall be removed if found on site. The applicant or contractor shall refer to state resources for lists of appropriate native plant replacements (e.g., Calscape [https://www.calscape.org] and CNPS [https://www.cnps.org/gardening]).

MM BIO-4: Project impacts on non-native grassland (21.6 acres) shall be mitigated at a 0.5:1 ratio through the purchase of 10.8 acre of grassland habitat at an approved mitigation bank, such as the Petersen Ranch Mitigation Bank. Confirmation of the purchase of grassland habitat at an approved mitigation bank shall be provided to the City of South El Monte Community Development Department prior to the issuance of the first action or permit for site disturbance.

MM BIO-5: To ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3513 and to avoid potential impacts to nesting birds, vegetation clearing, and ground-disturbing activities shall be conducted outside of the bird nesting season (generally January 15 to August 31 for raptors and February 15 to August 31 for other bird species). If avoidance of the nesting season is not

feasible, then a qualified biologist shall conduct a nesting bird survey within seven days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, and grading. If the qualified biologist determines that no active bird or raptor nests occur, the activities shall be allowed to proceed without any further requirements.

If active nests of any species protected by the MBTA or CFGC are identified, the biologist shall establish suitable disturbance limit buffers around the nests marked using flagging or staking. The disturbance limit buffer size shall depend on the site conditions, level of activity within the buffer, and species observed. The disturbance limit buffer zones shall be avoided until the nests are no longer occupied. Any active nests shall be monitored by a qualified biologist during active construction, at a frequency determined using their best professional judgment, but not less than twice per week. If potential affects to nesting birds are observed, avoidance and minimization measures may be adjusted, and construction activities stopped or redirected by the qualified biologist using their best professional judgement to avoid take of nesting birds. Once a nest is no longer occupied and the juvenile birds can survive independently from the nest, the project can proceed without further regard to the nest site.

MM BIO-6: To avoid impacts on the pallid bat, any on-site abandoned structures and all trees with suitable roosting cavities shall be surveyed by a qualified biologist prior to demolition or removal. Pre-construction surveys shall take place no more than 14 days prior to the start of demolition activities. If active roosts are identified, a biological monitor shall be employed to direct avoidance measures.

If bats are detected during pre-construction surveys, biological monitoring shall be conducted by a qualified biologist to ensure that project activities do not result in direct take. The biologist shall be present for all demolition or tree removal activities in areas known or suspected to support roosting bats as determined by the qualified biologist. The biological monitor shall perform clearance surveys at the start of each workday in areas scheduled for immediate demolition. The monitor shall direct project activities away from special-status bat species, should they be found on site, to ensure that impacts on these species are avoided to the fullest extent possible. If present, bats are expected to flush from the project site at the onset of demolition activities. However, if they persist on site through demolition of non-roost site areas, consultation with the CDFW may be required.

4.3.9 Level of Significance After Mitigation

With implementation of the Mitigation Program, the proposed Project would not result in significant biological resources impacts on a project-specific or cumulative basis.

4.3.10 References

California Fish and Game Commission (CFGC). 2024. *Notice of Findings Western Burrowing Owl (Athene cunicularia hypugaea)*. Retrieved from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=227089&inline. Accessed January 2025.

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4.4 CULTURAL RESOURCES

4.4.1 Introduction

This EIR section provides contextual background information on cultural resources on or near the project site, including the area's prehistoric, ethnographic, and historical settings. The extent to which development of the proposed Project could impact existing historic or prehistoric resources is evaluated. A *Cultural Resources Assessment* was completed for the Project by Kimley-Horn and Associates in January 2025 and is included as **Appendix F** of this EIR.

Tribal cultural resources as defined in Public Resources Code (PRC) Section 21074 (sites, features, places, cultural landscapes, sacred places, and objectives with cultural value to a California Native American tribe) are addressed in **Section 4.16: Tribal Cultural Resources** of this EIR. Paleontological resources are addressed in **Section 4.6: Geology and Soils**.

4.4.2 Terminology

Key terms and concepts used in this section to describe and assess the potential cultural resource impacts are defined below:

Archeological Site. A site is defined by the National Register of Historic Places (NRHP) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activates occurred). Prehistoric archaeological sites generally represent the material remains of Native American groups and their activities dating to the period before European contact. In some cases, prehistoric sites may contain evidence of trade contact with Europeans. Ethnohistoric archaeological sites are defined as Native American settlements occupied after the arrival of European settlers in California. Historic archaeological sites reflect the activities of non-native populations during the Historic period.

Artifact. An object that has been made, modified, or used by a human being.

Cultural Resource. A cultural resource is a location of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include archaeological resources and built environment resources (sometimes known as historic architectural resources), and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas where significant human events occurred, even though evidence of the events no longer remains. Cultural resources also include places that are of traditional, cultural, or religious importance to social or cultural groups.

Historic Period. The period that begins with the arrival of the first non-native population and therefore varies by area.

Historical Resource. This term is used for the purposes of CEQA and is defined in the State CEQA Guidelines (14 California Code of Regulations [CCR] §15064.5) as: (1) a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in Public Resources Code (PRC) Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements which a lead agency

determines to by historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Historical resources may also include tribal cultural resources including sites, features, places, cultural landscapes, sacred places, objects, and/or archeological resources with value to a California Native American Tribe per PRC Section 21074.

Prehistoric Period. The era prior to 1772. The latter part of the prehistoric period (post-1542) is also referring to as the protohistoric period in some areas, which marks a transitional period during which native populations began to be influenced by European presence resulting in gradual changes to their lifeways.

Tribal Cultural Resource. This term refers to a site, feature, place, cultural landscape, sacred place, object, or archaeological resource with cultural value to a California Native American tribe that is listed or eligible for listing in national, California, or local registers. A lead agency also has the discretion to determine that a resource is a tribal cultural resource if the determination is supported by substantial evidence. Tribal cultural resources are addressed in **Section 4.16: Tribal Cultural Resources** of this EIR.

4.4.3 Regulatory Setting

Federal Regulations

National Historic Preservation Act of 1966

The National Historic Preservation Act (NHPA) was passed in 1966 and is codified in Title 16, Section 470 et seq. of the U.S. Code (USC). The NHPA declared a national policy of historic preservation and instituted a multifaceted program, administered by the U.S. Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The goal of the NHPA is to ensure federal agencies act as responsible stewards of our nation's resources when their actions affect historic properties.

Among the regulations of the NHPA, Section 106 requires federal agencies to consider the effects of their undertakings on historic properties and afford the Advisory Council on Historic Properties (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. See Title 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties."

Section 106 applies when two thresholds are met: 1) there is a federal or federally licensed action, including grants, licenses, and permits, and 2) that action has the potential to affect properties listed in or eligible for listing in the NRHP. Section 106 requires each federal agency to identify and assess the effects of its actions on historic resources. The responsible federal agency must consult with appropriate state and local officials, Indian Tribes, applicants for federal assistance and members of the public, and consider their views and concerns about historic preservation issues when making final project decisions. The agency should also plan to involve the public and identify any other potential consulting parties. If the agency determines that it has no undertaking or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.

Pursuant to Section 106, impacts to a cultural site or artifact must be declared "significant," "potentially significant" or "not significant." Under NHPA regulations, impacts to "significant" archeological sites must be mitigated for, while "not significant" archeological remains need not. A "potentially significant"

determination is used when there is not enough information to make a conclusive ruling. NHPA mitigation would not be necessary for archeological sites avoided during development.

National Register of Historic Places

Developed in 1981, pursuant to Title 36 CFR Section 60, the National Register of Historic Places (NRHP) was established by the NHPA, as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment" (Code of Federal Regulations [CFR] Title 36 §60.2). The NHPA also established the position of State Historic Preservation Officer and provided for the designation of State Review Boards; set up a mechanism to certify local governments to carry out the purposes of the NHPA; assisted Native American tribes to preserve their cultural heritage; and created the Advisory Council on Historic Preservation. The NRHP recognizes both historical-period and prehistoric archaeological properties that are significant at the national, state, and local levels.

To be eligible for listing in the NRHP, a resource must be deemed significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must meet one or more of the following four established criteria:

- Criterion A: Associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: Associated with the lives of persons significant in our past;
- Criterion C: Embody the distinctive characteristics of a type, period, method of construction that represent the work of a master, that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;
- Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history.

Unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for listing in the NRHP. In addition to meeting the criteria of significance, a property must have the integrity of location, design, setting, materials, workmanship, feeling, and association. Sites that meet one or more NRHP eligibility criteria but do not retain integrity are not eligible for the NRHP. Guidance regarding the integrity of location, design, setting, materials, workmanship, feeling, and association is provided by National Register Bulletin 15.[1]

National Environmental Policy Act

The National Environmental Policy Act (NEPA) establishes the federal policy of protecting significant historic, cultural, and natural aspects of our national heritage during federal project planning. All federal or federally assisted projects requiring action pursuant to Section 102 of NEPA must take into account the effects on cultural resources. According to the NEPA regulations, in considering whether an action may "significantly affect the quality of the human environment," an agency must consider, among other things, unique characteristics of the geographic area such as historic or cultural resources (40 Code of Federal Regulations [C.F.R.] §1501.3[d][2]) and the degree to which the action may adversely affect resources listed in or eligible for listing in the National Register of Historic Places (National Register). NEPA regulations also require that, to the fullest extent possible, agencies shall prepare draft environmental

[1] NRHP. (2002). National Register Bulletin 15. https://www.nrc.gov/docs/ML1912/ML19120A529.pdf. Accessed October 24, 2024.

documents concurrently with and integrated with environmental impact analyses and related surveys and studies required by the National Historic Preservation Act (NHPA). When Section 106 of the NHPA and NEPA are integrated, project actions that cause adverse effects under Section 106 are usually considered to be significant under NEPA.

State Regulations

California Public Resources Code

The PRC establishes the definition and criteria for historical resources. "Historical resources," according to PRC Section 5020.1(j), "includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annuals of California." Section 15064.5(a) of the State CEQA Guidelines states that "[g]enerally, a resource shall be considered by the Lead Agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources."

CEQA has established statutory requirements for the formal review and analysis of projects that fall under its jurisdiction. CEQA maintains that any property listed in, determined, or found eligible for listing in the CRHR is a "historical resource" and shall be considered historically significant. Pursuant to PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment." PRC Section 21083.2 additionally requires agencies to determine whether proposed projects would have effects on "unique archaeological resources."

Impacts to cultural resources are considered significant if a project (1) physically destroys or damages all or part of a resource; (2) changes the character of the use of the resource or physical feature within the setting of the resource that contributes to its significance; and/or (3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

The Lead Agency must concurrently determine whether a project will cause damage to a unique archaeological resource (as defined in PRC §21083.2[b]) and, if so, must make reasonable efforts to permit the resources to be preserved in place or left undisturbed. An archaeological resource must be determined to be "unique" or "historic" for an impact to the resource to be considered significant. Section 21083.2(g) of CEQA defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be demonstrated that without merely adding to the existing body of archaeological knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If a resource is neither unique nor historical, the effects of a project on that resource will not be considered significant effects on the environment (CEQA Guidelines §15064(C)(4)).

California Office of Historic Preservation (OHP)

The California State Office of Historic Preservation (OHP) is responsible for administering federally and State mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's archaeological and historical resources. The OHP manages four registration programs for historical resources: National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, and State Points of Historical Interest.

California Register of Historical Resources (CRHR)

In 1992, Assembly Bill (AB) 2881 was signed into law establishing the California Register of Historical Resources (CRHR). The CRHR, implemented in 1998, is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (Public Resources Code [PRC] §5024.1). The CRHR encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance.

Eligibility for the CRHR is determined by the California Office of Historic Preservation in a formal review process in which a resource is proposed for listing. A resource deemed eligible for the NRHP is typically deemed eligible for the CRHR. Certain resources are determined by the statute to be included in the CRHR, including California properties formally determined eligible for or listed in the NRHP, as well as State Landmarks and State Points of Interest. The CRHR is maintained by the Office of Historic Preservation's State Historic Preservation Officer.

A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission (SHRC) determines that it meets any of the following criteria, which are modeled on NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

According to CCR Section 7050(a), the types of resources eligible for nomination:

- **Building.** A resource, such as a house, barn, church, factory, hotel, or similar structure created principally to shelter or assist in carrying out any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn;
- **Site.** A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historical, cultural, or archaeological value regardless of the value of any existing building, structure, or object. A site need not be marked by physical remains if it is the location of a prehistoric event, and if no buildings, structures, or objects marked it at that time. Examples of

such sites are trails, designed landscapes, battlefields, habitation sites, Native American ceremonial areas, petroglyphs, and pictographs;

- **Structure.** The term "structure" is used to describe a construction made for a functional purpose rather than creating human shelter. Examples of structures include mines, bridges, and tunnels;
- **Object.** The term "object" is used to describe those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed, as opposed to a building or a structure. Although it may be moveable by nature or design, an object is associated with a specific setting or environment. Objects should be in a setting appropriate to their significant historic use, role, or character. Objects that are relocated to a museum are not eligible for listing in the California Register. Examples of objects include fountains, monuments, maritime resources, sculptures, and boundary markers; and
- **Historic district.** Historic districts are unified geographic entities that contain a concentration of historic buildings, structures, objects, or sites united historically, culturally, or architecturally. Historic districts are defined by precise geographic boundaries. Therefore, districts with unusual boundaries require a description of what lies immediately outside the area, in order to define the edge of the district and to explain the exclusion of adjoining areas. The district must meet at least one of the criteria for significance discussed in Section 4852(b)(1)-(4) of this chapter.

Under PRC Section 5024.1 and 14 CCR Section 4852(c), a cultural resource must retain integrity to be considered eligible for the CRHR. Specifically, it must retain sufficient character or appearance to be recognizable as a historical resource and convey reasons of significance. Integrity is evaluated with regard to the retention of such factors as location, design, setting, materials, workmanship, feeling, and association. Cultural sites that have been affected by ground-disturbing activities, such as agricultural activities and off-road vehicle use, often lack integrity because they have been directly damaged or removed from their original location, among other changes.

California Points of Historical Interest. California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific, technical, religious, experimental, or other value. No historical resource may be designated as both a California Historical Landmark and a Point of Historical Interest. If a Point of Historical Interest is subsequently granted status as a California Historical Landmark, the Point of Historical Interest designation is retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria. It must be:

- The first, last, only, or most significant of its type in the State or within the local geographic region (city or county);
- Associated with an individual or group having a profound influence on the history of the local area;
- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction; or
- One of the more notable works or the best-surviving work in the local region of a pioneer architect, designer, or master builder.

California Historical Landmarks. California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value by meeting at least one of the criteria listed below:

- The first, last, only, or most significant of its type in the State or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

California Code of Regulations

CCR Title 14 Section 1427 recognizes that "California's archaeological resources are endangered by urban development and population growth and by natural forces." Accordingly, the State Legislature finds that "these resources need to be preserved in order to illuminate and increase public knowledge concerning the historic and prehistoric past of California." Lastly, it states that any person "not the owner thereof, who willfully injures, disfigures, defaces or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

California Health and Safety Code Sections 7050.5 and 7052

California Health and Safety Code (HSC) Section 7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified. HSC Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

California Historical Building Code

The California Historical Building Code (CHBC) is intended to save California's architectural heritage by recognizing the unique construction issues inherent in maintaining and adaptively reusing historic buildings. The CHBC provides alternative building regulations for permitting repairs, alterations, and additions necessary for the preservation, rehabilitation, relocation, related construction, change of use, or continued use of a "qualified historical building or structure."

The California Health and Safety Code Section 18955 defines a "qualified historical building or structure" as "any structure or property, collection of structures, and their associated sites deemed of importance to the history, architecture, or culture of an area by an appropriate local or state governmental jurisdiction. This shall include structures on existing or future national, state, or local historical registers or official inventories, such as the NRHR, State Historical Landmarks, State Points of Historical Interest, and City or County registers or inventories of historical or architecturally significant sites, places, historic districts, or landmarks. This shall also include places, locations, or sites identified on these historical registers or official inventories and deemed of importance to the history, architecture, or culture of an area by an appropriate local or state governmental jurisdiction."

The CHBC's standards and regulations are intended to facilitate the rehabilitation or change of occupancy so as to preserve their original or restored elements and features, to encourage energy conservation and

a cost-effective approach to preservation, and to provide for reasonable safety from fire, seismic forces or other hazards for occupants and users of such buildings, structures, and properties and to provide reasonable availability and usability by the physically disabled.

Local Regulations

City of South El Monte General Plan[2]

The *City of South El Monte General Plan* (General Plan) Resources Element provides measures to protect and enhance Public Parks and Recreation, Groundwater Resources, Air Quality and Integrated Waste Management. The General Plan Resources Elements notes that "no historic or archaeologically significant sites have been located in City." No General Plan goals or policies are identified. Rather, the Resources Element addresses parks, groundwater management, air quality, and landfill capacity in a regional context.

City of South El Monte Municipal Code

Title 17, Chapter 03, Section 140 Historic Preservation.[3] The purpose of Section 17.03.140 of the South El Monte Code of Ordinances (Municipal Code) is described by the City "to provide special conditions and regulations for the protection, enhancement, perpetuation and use of places, buildings, structures, works of art, and other objects, having a special character or special historical or aesthetic interest or value, within the meaning of California Government Code Section 37361."

4.4.4 Existing Conditions

Natural Setting

The project site is situated in an alluvial fan in the southwestern San Gabriel Valley region of Southern California. The San Gabriel River and Rio Hondo River flow on opposite sides of this area known as the Whittier Narrows. Native Americans previously living in this area established campsites on the ridges overlooking the rivers. Geologic deposits underlying the project site consist of Holocene-age alluvial fan and valley sand and silt unconsolidated deposits (**Appendix F**). Vegetation on the project site consists mostly of non-native grassland and ornamental vegetation. The project site is a vacant property but was previously partially developed and contains remaining building foundations.

Prehistoric Setting

Archaeologists and ethnologists have long contemplated the cultural sequences that occurred before Spanish contact. William Wallace (1955) developed the first comprehensive California chronologies and defines four periods for the Southern California region. These periods are the Early Period, Millingstone Period, Intermediate Period, and Late Prehistoric Period, which generally follow the geologic time scale of Early, Middle and Late Holocene.

Early Holocene. A gradual warming of the environment was occurring during the Early Holocene. Archaeologists have recorded artifacts associated with hunting and plant processing at early Holocene sites, such as projectile points, bifaces, and groundstone tools.

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[2] City of South El Monte. 2000. *City of South El Monte General Plan -- Resources Element.* Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 2024.

[3] City of South El Monte. 2025. *City of South El Monte Code of Ordinances – Historic Preservation*. Retrieved form: https://ecode360.com/45035463?highlight=historic,historical&searchId=1987494698840312#45035463 . Accessed July 2024, August 2025.

Middle Holocene. The Millingstone Period during the Middle Holocene is characterized by new artifact types. The warming of the environment resulted in adaptations to changing environments and associated plant and animal resources.

Late Holocene. Archaeological sites from the Late Holocene contain increasingly diverse artifact assemblages. Increased population is evident and multiple family groups likely coexisted within the communities. Proximity to water was an important factor for the seasonal and permanent settlements. Late Prehistoric archaeological sites contained diverse artifact assemblages, including projectile points, ceramics, pendants, incised stones, and shell beads.

Please refer to **Section 4.16: Tribal Cultural Resources**, regarding Ethnographic Setting.

Historic Setting

The Contact/Historic-era California is generally divided into three periods: the Spanish or Mission Period (1769-1821), the Mexican or Rancho Period (1821-1848), and the American Period (1848 to present). Spanish explorers named this region *monte*, which means meadow or marsh. The nearby Missions San Gabriel and San Fernando were established in 1771 and 1797, respectively. The project site is located approximately seven miles south of the San Gabriel Mission.

In 1821, Mexico overthrew Spanish rule, and the Missions began to decline. By 1833, the Mexican government passed the Secularization Act and the Missions, reorganized as parish churches, lost their vast land holdings and released the indigenous people that remained. Soon after, indigenous people of the region found themselves working, often in near slave-like conditions, as agricultural laborers under the new Mexican regime. The project site is situated in the Potrero de Felipe Lugo land grant.

In 1848, the Treaty of Guadalupe Hidalgo was introduced, triggering the start of the American Period. In 1849, the Anglo population greatly increased in California as a result of the Gold Rush and, in 1850, California was accepted into the Union. As a result of land grants previously established under Mexican leadership that created large pastoral estates in California, as well as a high demand for beef during the Gold Rush, the State saw a cattle boom from 1849–1855. The increased Anglo population and pursuit of land and gold led to drastic conditions for the remaining indigenous communities, who were once again forced to provide labor or killed to make way for new residents. Eventually the beef market collapsed as a result of imported sheep and cattle from New Mexico and the mid-west, and many California ranchers lost their ranchos through foreclosure.

The Gold Rush lured miners to the region, and the abundance of water and rich farming land encouraged the first permanent Anglo settlement. The region encompassed agricultural development with numerous fruit orchards, walnut groves, truck farms, hay fields, and dairies. South El Monte was incorporated as a city in 1958 with 3,900 residents. The City's primary land uses today are industrial and residential.

Project Site and Surrounding Area

The project site is a vacant property but was previously partially developed and contains remaining building and radio tower foundations. Early maps of the project site indicate an ephemeral stream was located on the project site flowing northeast. No streams are present on the project site. According to the Phase I Environmental Site Assessment (see **Appendix J**), the project site was primarily used for agricultural uses from 1928 to 1938. Minimal changes occurred on the project site until 1948, when two buildings and three KRLA radio towers were constructed. Six radio towers are represented on the 1968

maps and subsequent maps, suggesting that three additional radio towers were constructed at a later date. The KRLA station became obsolete and was abandoned in 1987. The radio towers were removed in the late 1980s to early 1990s, and the site has remained vacant with the exception of the remaining structural foundations of the two buildings and the structural foundations of the radio towers.

Based on a records search conducted through the SCCIC, there are three previously recorded cultural resources within the study area (P-19-004828, P-19-191157, and P-19-192581). Resources P-19-004828 and P-19-191157 are both components of the transmitter site for the KRLA radio station and have the same recorded boundary as the project site. Neither resource had a formal eligibility evaluation for listing on the NRHP or CRHR and therefore assumed to be unevaluated. A brief description of the two potential cultural resources recorded on the site and a determination of eligibility for the NRHP is provided below. The third resource, P-19-192581, is located outside of the project site but within the study area, which includes the off-site improvement areas. Resource P-19-192581 is a Southern California Edison Company (SCE) regularly maintained transmission line. The transmission line was previously evaluated for NRHP and CRHR eligibility in 2010 and recommended not eligible (**Appendix F**).

Cultural Resource P-19-004828 was recorded in 2015 as historic-era ruins of the KRLA radio antenna array constructed circa 1959. The site record included the structural remnants of seven foundation footings (i.e., radio towers) and an auxiliary building (i.e., generator shack) that had been previously removed in the late 1980s to early 1990s. During the survey of the project site on April 23, 2024, the ancillary generator shack and concrete foundation footings for the radio towers were located and identified. Subsequent to conducting the survey, the generator shack was demolished at the request of the City due to public health and safety concerns. The concrete foundation of the generator shack remains. The cultural report associated with P-19-004828 was not on file at the South Central Coastal Information Center (SCICC) and no NRHP or CRHR eligibility evaluation was included on the site record. Therefore, the following is an evaluation based on significance criteria set forth under the NRHP and CRHR, as identified under Section 4.4.3, Regulatory Setting.

- Criterion A/1: The cultural resource was constructed as a transmitting site for the KRLA radio station and it is not associated with events that have made significant contributions to state or national history. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion A/1.
- Criterion B/2: The transmitting site was previously owned by several broadcasting stations and operated by KRLA engineers. The cultural resource is not associated with the lives of any persons significant to the past. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion B/2.
- Criterion C/3: This cultural resource was constructed using materials that are typical for concrete footings and foundations. The construction of the radio tower footings do not embody any unique characteristics of a type, period, or method of construction, and is not the work of a master. The radio towers were previously removed from the footings. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion C/3.
- Criterion D/4: The resource is not likely to yield important information about the prehistory or history of the region. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion D/4.

P-19-004828 is not recommended eligible for listing in the NRHP or CRHR. It does not meet the definition of a "Historical Resource" under CEQA or "Historic Property" under National Historic Preservation Act (NHPA).

Cultural Resource P-19-191157 was recorded in 2010 as a historic-age one-story utilitarian building that operated as a commercial facility constructed circa 1950. Based on historic aerial images, the transmitter building was demolished sometime after 2020. According to the site record, the building was clad in stucco with its window openings covered with plywood and operated as a commercial facility. The site record indicated that the resource had a significant loss of physical integrity and did not appear eligible for federal, State, or local listing. During the survey of the project site conducted on April 23, 2024, it was noted that the building has been demolished and only concrete foundations remained. No formal NRHP or CRHR eligibility evaluation was included on the site record. Therefore, the following is an evaluation based on significance criteria set forth under the NRHP and CRHR, as identified under *Section 4.4.3, Regulatory Setting*.

- Criterion A/1: The resource was constructed as a transmitting site for the KRLA radio station and it is not associated with events that have made significant contributions to state or national history. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion A/1.
- Criterion B/2: The transmitting site was previously owned by several broadcasting stations and operated by KRLA engineers. The resource is not associated with the lives of any persons significant to the past. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion B/2.
- Criterion C/3: This resource was constructed using materials that are typical for concrete foundations. The construction of the foundation does not embody any unique characteristics of a type, period, or method of construction, and is not the work of a master. The one-story stucco building was previously demolished and only the foundation is still present. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion C/3.
- Criterion D/4: The resource is not likely to yield important information about the prehistory or history of the region, in part because the one-story stucco building was previously demolished and only the foundation is present. Therefore, it is not recommended eligible for listing on either the NRHP or CRHR under criterion D/4.

P-19-191157 is not recommended eligible for listing in the NRHP or CRHR. It does not meet the definition of a "Historical Resource" under CEQA or "Historic Property" under NHPA.

4.4.5 Methodology

This analysis considers the *State CEQA Guidelines, Appendix G* thresholds, as described above, in determining whether Project implementation would result in any significant impacts concerning cultural resources. The evaluation was based on reviewing the regulations and determining their applicability to the Project. The intent of this EIR is to address any potential impacts to cultural resources from Project implementation using all available information known at the time of its preparation. Cultural resource information was acquired through a review of relevant planning documents including the General Plan and Municipal Code.

Additionally, an archaeological and historical resources records search was conducted on March 6, 2024, and January 15, 2025, through the SCICC which is one of eight regional informational centers that

comprise the California Historical Resources Information System (CHRIS) and houses information about historical resources within Ventura, Los Angeles, and Orange counties per CHRIS standards. CHRIS works under the direction of the California Office of Historic Preservation (OHP) and the SHRC.

Historical Maps and Aerial Photographs were also reviewed to understand past development on-site and in the area over time. An intensive-level pedestrian survey was conducted by Kimley-Horn archaeologist's Jessica Mauck, MA, RPA and Jamie Parra, MA RPA, on April 23, 2024, and January 21, 2025, for the project site, a 50-foot buffer, and off-site improvement areas. The building located immediately south of the project site was removed from the survey area, because there would be no impact to the surrounding built environment. The survey was conducted by walking parallel transects spaced approximately 15 meters apart oriented in a north-south direction using GPS technology. Ground visibility was good throughout the study area and averaged approximately 80 percent.

Determination that the Project would or would not result in "substantial" adverse effects concerning cultural resources considers the relevant policies and regulations established by federal, State, and local agencies and the Project's compliance with such policies.

4.4.6 Thresholds of Significance

In accordance with the *State CEQA Guidelines, Appendix G* thresholds, the Project would result in a significant impact to cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- Disturb any human remains, including those interred outside of formal cemeteries.

4.4.7 Project Impacts and Mitigation

Threshold 4.4-1:	**Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?** ***Level of Significance:*** Less than Significant with incorporation of MM CUL-1.

State CEQA Guidelines Section 15064.5 defines "historic resources" as resources listed in the California Register of Historical Resources, or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.[4] A resource included in a local register of historical resources, like the City Register, is also presumed to be historically or culturally significant. Generally, a resource is considered to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC SS5024.1, Title 14, §4852) including the following:

a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

b) Is associated with the lives of persons important in our past;

[4] PRC § 5020.1(k), § 5024.1(g).

c) 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; or

d) Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (PRC §5020.1(k)), or identified in a historical resources survey (PRC §5024.1(g)) does not preclude the City, as Lead Agency, from determining that the resource may be a historical resource under CEQA. State CEQA Guidelines Section 15064.5, defines a "substantial adverse change in a historical resource" as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The proposed Project would include grading and excavation over the entirety of the project site. There are three previously recorded cultural resources identified in the study area: P-19-004828, P-19-191157, and P-19-192581. As noted above, the first two resources are components of the transmitter site for the KRLA, including structural remnants of radio tower footings and foundations of a generator shack and transmitter building (**Appendix F**). As addressed under *Section 4.4.4, Existing Conditions*, neither resource was recommended eligible for listing under the NRHP or CRHR and therefore would not be considered a "Historical Resources" under CEQA. The third resource, P-19-192581, is a SCE transmission line that was previously recommended not eligible and similarly would not be considered a "Historical Resource" under CEQA. Identified in the SCCIC records search, 19 additional cultural resources were recorded in the 0.5-mile buffer and entirely consisted of historic-age buildings and structures on nearby residential streets and the Whittier Narrows Recreation Area. Therefore, Project implementation would not impact these resources. Additionally, no new resources were identified during the survey conducted of the project site. Therefore, Project implementation would not impact any known historical resources pursuant to CEQA Guidelines Section 15064.5.

Although no impacts are anticipated to historical resources under CEQA (there are no known historical resources on the project site; see above), MM CUL-1 addresses potential impacts to any unknown historical resources inadvertently discovered during grading and excavation activities. MM CUL-1 requires that an archaeologist monitor grading and excavation activities. The archaeologist would have the ability to temporarily halt or redirect work to permit the sampling, identification, and evaluation of any cultural resources (archaeological or historical) inadvertently discovered during excavation and grading activities, as appropriate. If any cultural resources are found to be potentially significant, the archaeologist would determine appropriate actions, in cooperation with the City and the affected Native American tribal representatives (regarding the significance of the resource and its potential as a Tribal Cultural Resource (TCR)). Tribal cultural resources are addressed in **Section 4.16: Tribal Cultural Resources** of this EIR. The Project would not result in impacts to unknown historical resources with implementation of MM CUL-1. Therefore, the Project would not result in substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 and impacts would be less than significant.

Threshold 4.4-2:	**Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?** ***Level of Significance:*** Less than Significant with incorporation of MM CUL-1.

No prehistoric archaeological resources have been recorded on the project site or were identified on the site as a result of the aforementioned site survey (**Appendix F**). Further, the extent of prior disturbance (i.e., prior development and associated grading and excavation) indicates there is low potential for intact buried cultural resources at the project site. Although low, there is the potential for Project implementation to unearth and impact an unknown, subsurface archaeological resource that could be determined a "Unique Archaeological Resource." Despite the low likelihood of discovery, if a "Unique Archaeological Resource" is discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. MM CUL-1 would address the discovery of any unrecorded archaeological resources during construction activities using preservation in place as the preferred manner of treatment. With the incorporation of mitigation, potential impacts to prehistoric archaeological resources would be less than significant.

Threshold 4.4-3:	**Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?**
	Level of Significance: Less than Significant Impact

There are no dedicated cemeteries on or near the project site. The disturbance of most Native American human remains is typically in association with prehistoric archaeological sites. As discussed previously, no archaeological resources were identified on or near the project site, and the aforementioned survey conducted did not identify any human remains (**Appendix F**). Additionally, the project site is highly disturbed due to prior development and associated grading and excavation. Given the absence of known archaeological resources on the site and the extent of existing disturbance, there is low potential for Project excavation and grading to encounter human remains. Despite the low likelihood of discovery, if previously unknown human remains are discovered during the Project's ground-disturbing activities, a substantial adverse change in the significance of such a resource could occur. Therefore, in the event human remains are encountered during excavation or disturbance activities, compliance with the California Health and Safety Code (HSC) Section 7050.5 and Public Resources Code (PRC) Section 5097.98 (discussed below), which is included as SC CUL-1, would avoid any significant impacts to human remains.

As outlined in SC CUL-1, HSC Section 7050.5 and PRC Section 5097.98 require proper treatment in accordance with applicable laws and describe the general provisions for the treatment of human remains. Specifically, HSC Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during site excavation. HSC Section 7050.5 also requires that all activities cease immediately and that a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the future development facilitated by the Project would implement the procedures set forth in PRC Section 5087.98, including evaluation by the County Coroner and notification of the NAHC in the unlikely event that Native American human remains are discovered during ground disturbing activities. The NAHC would designate the "Most Likely Descendent" of the unearthed human remains. If excavation results in the discovery of human remains, excavation would be halted near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated, and appropriate recommendations have been made for treatment and disposition of the remains. Therefore, following compliance with the established regulatory framework, specifically SC CUL- 1, future development facilitated by the Project would have a less than significant impact concerning human remains.

4.4.8 Cumulative Impacts

For purposes of cumulative impact analysis to cultural resources, the geographic context for cumulative analysis of the Project is regional and considers both direct and indirect impacts over a wide area. This geographic scope of analysis is appropriate because the archaeological and historical resources that could occur within this area are expected to be similar to those that could occur on the project site due to their similar environment, geology, and hydrology. Cultural resource impacts are often site-specific and not generally subject to cumulative impacts unless multiple projects impact a common resource, or a significant resource extends off the site, such as a historic townsite or district. With this consideration, the cumulative analyses for historical and archaeological resources considers whether the Project, in combination with the past, present, and reasonably foreseeable projects, could cumulatively affect any common cultural resources.

The Project could result in potential site-specific impacts to unknown cultural resources inadvertently discovered during Project construction, especially ground-disturbing activities including excavation and grading. However, implementation of MM CUL-1 would reduce the Project's potential impacts to historical and archaeological resources to less than significant and thus ensure site-specific impacts to cultural resources would not be cumulatively considerable. Other potential development projects and activities involving ground disturbance also have the potential to result in damage and/or loss to unknown cultural resources. Similar to the proposed Project, these projects and activities in the City and the region would be required to comply with all applicable State, federal, and local regulations concerning preservation, salvage, or handling of cultural resources. The Project's contribution to cumulative impacts to cultural resources (historical and archaeological resources) would not be cumulatively considerable and would be less than significant.

As discussed above, Project construction has the potential to disturb unknown human remains. Compliance with the HSC Section 7050.5 and PRC Section 5097.98, as outlined in SC CUL-1, would require proper treatment in accordance with applicable laws for human remains and reduce potential site-specific impacts to less than significant. Similar to the proposed Project, activities involving ground disturbance are required to comply with HSC Section 7050.5 and PRC Section 5097.98 which would reduce potential adverse impacts to human remains. Therefore, the Project's incremental effect is not cumulatively considerable when viewed in connection with the effects of other closely related past projects, the effects of other current projects, and the effects of probable future projects. Therefore, the Project's contribution to cumulative impacts to cultural resources (human remains) would not be cumulatively considerable and would be less than significant.

4.4.9 Mitigation Program

Standard Conditions

SC CUL-1: If human remains are encountered during the undertaking, California State Health and Safety Code Section 7050.5 states that excavation shall stop and no further disturbance shall occur within 100 feet of the discovery until the County Coroner has made a determination of origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the

MLD may inspect the site of the discovery within 48 hours of notification. If the NAHC is unable to identify an MLD, the MLD fails to make a recommendation, or the landowner or his/her authorized representative rejects the recommendation, the human remains and associated items will be interred on the property with appropriate dignity in a location that will not be subject to future disturbance.

Mitigation Measures

Please also refer to MM TCR-2 in **Section 4.16: Tribal Cultural Resources**, of this EIR.

MM CUL-1: In the event that cultural resources (archaeological or historical) are inadvertently unearthed or encountered during excavation and grading activities, all work within 60 feet of the find shall cease and an archaeologist, the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes, shall be contacted. The archaeologist shall meet the Secretary of Interior's professional qualifications in archaeology and will record and evaluate the resource for potential significance. The City of South El Monte, as the lead agency shall consult with the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes regarding the significance of the resource and its potential as a Tribal Cultural Resource (TCR) under CEQA. In the event of the discovery of a TCR, refer to Mitigation Measure (MM) TCR-2. The archaeologist shall determine if the resource meets the CEQA definition of historical (State CEQA Guidelines §15064.5(a)) and/or unique archaeological resources (Public Resources Code [PRC] §21083.2(g)). Should the archaeologist have concerns that the find is potentially significant, the archaeologist shall prepare a mitigation plan for review and approval by the City. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to State CEQA Guidelines Section 15064.5 shall be followed.

4.4.10 Level of Significance After Mitigation

With implementation of the Mitigation Program, the proposed Project would not result in significant impacts to cultural resources on a project-specific or cumulative basis.

4.4.11 References

Kimley-Horn and Associates, Inc. 2025. *Cultural Resources Assessment Report.* Included as **Appendix F** to this EIR.

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4.5 ENERGY

4.5.1 Introduction

This EIR section examines the existing setting as it relates to energy conservation, identifies associated regulatory conditions and requirements, and presents the criteria used to evaluate potential impacts related to use of fuel and energy upon implementation of the Project. Energy calculations for the Project are included in **Appendix G: Energy Calculations** of this EIR**.**

4.5.2 Regulatory Setting

Federal Regulations

National Energy Conservation Policy Act

The National Energy Conservation Policy Act serves as the underlying authority for federal energy management goals and requirements. Signed into law in 1978, it has been regularly updated and amended by subsequent laws and regulations. This Act is the foundation of most federal energy requirements.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 was passed to reduce the country's dependence on foreign petroleum and improve air quality. The Act includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. The Act requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in the Act. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the Energy Policy Act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy and Independence Security Act of 2007

The Energy Independence and Security Act (EISA; Public Law 110-140) was signed into law by former President George W. Bush on December 19, 2007. EISA's goal is to achieve energy security in the United States by increasing renewable fuel production, improving energy efficiency and performance, protecting consumers, improving vehicle fuel economy, and promoting research on greenhouse gas (GHG) capture and storage. Under the EISA, the Renewable Fuel Standard (RFS) program (RFS2) was expanded in several key ways:

- Expanded the RFS program to include diesel, in addition to gasoline;
- Increased the volume of renewable fuel required to be blended into transportation fuel;
- Established new categories of renewable fuel and set separate volume requirements for each; and
- Required the U.S. Environmental Protection Agency (U.S. EPA) to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

RFS2 lays the foundation for achieving significant reductions of GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of our nation's renewable fuels sector.

The EISA also includes a variety of new standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) regulates the interstate transmission of electricity, natural gas, and oil. FERC is the federal agency with jurisdiction over interstate electricity sales, wholesale electric rates, hydroelectric licensing, natural gas pricing, and oil pipeline rates. FERC also reviews and authorizes liquefied natural gas terminals, interstate natural gas pipelines, and non-federal hydropower projects. Electricity is run by the states; however, FERC has jurisdiction over certain matters.

State Regulations

Assembly Bill 32 and Senate Bill 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006." AB 32 codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels; the same requirement as under S-3-05) and requires the California Air Resources Board (CARB) to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of Statewide GHG emissions. Reductions in overall energy consumption have been implemented to reduce emissions.

In September 2016, then Governor Jerry Brown signed into legislation Senate Bill (SB) 32, which builds on AB 32 and requires the state to cut GHG emissions to 40 percent below 1990 levels by 2030. With SB 32, the Legislature also passed AB 197, which provides additional direction for updating the Scoping Plan to meet the 2030 GHG reduction target codified in SB 32. Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. Additional energy efficiency measures beyond the current regulations are needed to meet these goals as well as the AB 32 GHG reduction goal of reducing statewide GHG emissions to 1990 levels by 2020, the SB 32 goal of 40 percent below 1990 levels by 2030, and the AB 1279 goal of 85 percent below 1990 levels by 2045 (see **Section 4.7: Greenhouse Gas Emissions** for a discussion of AB 32, SB 32, and AB 1279). To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.

Advanced Clean Cars II

The Advanced Clean Cars II regulations will rapidly scale down light-duty-passenger, pickup truck, and sports utility vehicle emissions starting with the 2026 model year through 2035. The regulations will first

amend the Zero-emission Vehicle Regulation to require an increasing number of zero-emission vehicles and rely on currently available advanced vehicle technologies (i.e., battery-electric, hydrogen fuel cell electric and plug-in hybrid) to meet air quality and climate change emissions standards. Second, the Low-emission Vehicle Regulations were amended to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions. The regulations will substantially reduce air pollutants that cause climate change and threaten public health. In addition, the regulations will provide public health benefits of at least 12 billion dollars over the life of reductions by reducing premature deaths, hospitalizations and lost workdays associated with exposure to air pollution.

On January 13, 2025, CARB withdrew its requests for CAA waivers from the U.S. EPA needed to support four adopted vehicle emissions regulations: (1) the Advanced Clean Fleets Regulations; 2) the In-Use Locomotive Regulations; 3) part of the Commercial Harbor Craft and Ocean-Going Vessels At-Berth Regulations; and 4) part of the Transport Refrigeration Unit Engine Standards Regulations. Implementation of these regulations is currently unknown.

Advanced Clean Trucks

The Advanced Clean Trucks regulations is a manufacturers zero-emissions vehicle (ZEV) sales requirement and a one-time reporting requirement for fleets and large entities. The development and use of advanced clean trucks will help CARB achieve its emissions reduction strategies as outlined in the State Implementation Plan (SIP), Sustainable Freight Action Plan, SB 350, and AB 32.

Renewable Portfolio Standards[1]

In 2002, California established its Renewable Portfolio Standard program with the goal of increasing the annual percentage of renewable energy in the State's electricity mix by the equivalent of at least one percent of sales, with an aggregate total of 20 percent by 2017. The California Public Utilities Commission subsequently accelerated that goal to 2010 for retail sellers of electricity (Public Utilities Code §399.15(b)(1)). Then-Governor Schwarzenegger signed Executive Order S-14-08 in 2008, increasing the target to 33 percent renewable energy by 2020. In September 2009, Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs the California Air Resources Board (CARB) under its AB 32 authority to enact regulations to help the State meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. In September 2010, CARB adopted its Renewable Electricity Standard regulations, which require all of the State's load-serving entities to meet this target. In October 2015, then-Governor Brown signed into legislation SB 350, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. Signed in 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030.

SB 100 established a further goal to have an electric grid that is entirely powered by clean energy by 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. Approved in 2022, SB 1020 revised the State policy to provide that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035; 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040; 100 percent of all

[1] California Public Utilities Commission. 2021. *Renewable Portfolio Standard (RPS) Program.* Retrieved from: https://www.cpuc.ca.gov/rps/. Accessed August 2024.

retail sales of electricity to California end-use customers by December 31, 2045; and, 100 percent of electricity procured to serve all State agencies by December 31, 2035.

State of California Energy Plan

The California Energy Commission (CEC) is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

California Building Energy Efficiency Standards: Title 24, Part 6 (California Energy Code)

The Code California Energy Code (Title 24, Part 6) was created as part of the California Building Standards Code (Title 24 of the California Code of Regulations) by the California Building Standards Commission in 1978 to establish statewide building energy efficiency standards to reduce California's energy use. In general, Title 24 energy code is designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings. The CEC updates the Title 24 Energy Efficiency Standards every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Title 24 Energy Efficiency Standards conserve non-renewable resources, such as natural gas, and ensure renewable resources are extended as far as possible to reduce the need for constructing new power plants.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2022, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic (PV) and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

The Title 24 Energy Efficiency Standards include provisions applicable to all buildings, residential and non-residential, which describe requirements for documentation and certificates that the building meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances: air conditioning systems; heat pumps; water chillers; gas- and oil-fired boilers; cooling equipment; water heaters and equipment; pool and spa heaters and equipment; gas-fired equipment including furnaces and stoves/ovens; windows and exterior doors; joints and other building structure openings (envelope); insulation and cool roofs; lighting control devices; and solar PV systems.

The standards include additional mandatory requirements for space conditioning (cooling and heating), water heating, indoor and outdoor lighting systems, as well as equipment in non-residential, high-rise residential, and hotel or motel buildings. Mandatory requirements for low-rise residential buildings cover indoor and outdoor lighting, fireplaces, space cooling and heating equipment (including ducts and fans), and insulation of the structure, foundation, and water piping. The standards require solar PV systems for new homes. In addition to the mandatory requirements, the standards call for further energy efficiency that can be provided through a choice between performance and prescriptive compliance approaches. Separate sections apply to low-rise residential and to non-residential, high-rise residential, and hotel or

motel buildings. In buildings designed for mixed use (e.g., commercial and residential), each section must meet the standards applicable to that type of occupancy.

The performance approach set forth under these standards provides for the calculation of an energy budget for each building and allows flexibility in building systems and features to meet the budget. The energy budget addresses space-conditioning (cooling and heating), lighting, and water heating. Compliance with the budget is determined using a CEC-approved computer software energy model. The alternative prescriptive standards require demonstrating compliance with specific minimum efficiency for components of the building such as building envelope insulation R-values, fenestration (areas, U-factor and solar heat gain coefficients of windows and doors) and heating and cooling, water heating and lighting system design requirements. These requirements vary depending on the building's location in the State's 16 climate zones.

California Green Building Standards

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The CEC approved the 2022 California Green Building Standards Code on September 30, 2022, and the code went into effect on January 1, 2023.

2008 California Energy Action Plan

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the State of California's principal energy planning and policy document (CPUC and CEC, 2008). The plan continues the goals of the original Energy Action Plan, describes a coordinated implementation plan for State energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

CEQA Guidelines Appendix F

Public Resources Code (PRC) Section 21100(b)(3) and State CEQA Guidelines Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary use of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the California State Legislature adopted AB 1575, which created the CEC. The CEC's statutory mission is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct State responses to energy emergencies, and promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended PRC Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary use of energy caused by a project. In addition, State CEQA Guidelines Section 15126.4 was adopted in 1998

which requires that an EIR describe feasible mitigation measures which would minimize the inefficient and unnecessary use of energy. Thereafter, the State Resources Agency created State CEQA Guidelines Appendix F – Energy Conservation.

Pursuant to Appendix F, an EIR must include a "discussion of the potential energy impacts of proposed projects…"[2] However, because lead agencies have not consistently included such analysis in their EIRs, California's Natural Resources Agency amended Appendix F to the State CEQA Guidelines in 2009 "to ensure that lead agencies comply with the substantive directive in §21100(b)(3)." CEQA Guidelines Appendix F lists environmental impacts and mitigation measures that an EIR may include. What is required is a "discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." Potential impacts that may be discussed include:

- A project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of a project including construction, operation, maintenance, or removal. If appropriate, the energy intensiveness of materials may be discussed.
- The effects of a project on local and regional energy supplies and on requirements for additional capacity.
- The effects of a project on peak and base period demands for electricity and other forms of energy.
- The degree to which a project complies with existing energy standards.
- The effects of a project on energy resources.
- A project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

State CEQA Guidelines, Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary use of energy.

Executive Order B-55-18 to Achieve Carbon Neutrality

In April 2015, then Governor Jerry Brown issued Executive Order B-30-15, which established a GHG reduction target of 40 percent below 1990 levels by 2030. SB 350 (Chapter 547, Statutes of 2015) advanced these goals through two measures. First, the law increases the renewable power goal from 33 percent renewables by 2020 to 50 percent by 2030. Second, the law requires the CEC to establish annual targets to double energy efficiency in buildings by 2030. The law also requires the California Public Utilities Commission (CPUC) to direct electric utilities to establish annual efficiency targets and implement demand-reduction measures to achieve this goal. In 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

[2] California Association of Environmental Professionals (AEP). 2025. *California Environmental Quality Act, Appendix F Energy Conservation.* Retrieved from AEP website: https://www.califaep.org/docs/CEQA_Handbook_2025combined.pdf.

Executive Order B-30-15, Senate Bill 350, and Senate Bill 100

In April 2015, then Governor Jerry Brown issued Executive Order B-30-15, which established a GHG reduction target of 40 percent below 1990 levels by 2030. SB 350 (Chapter 547, Statutes of 2015) advanced these goals through two measures. First, the law increases the renewable power goal from 33 percent renewables by 2020 to 50 percent by 2030. Second, the law requires the CEC to establish annual targets to double energy efficiency in buildings by 2030. The law also requires the CPUC to direct electric utilities to establish annual efficiency targets and implement demand-reduction measures to achieve this goal. In 2018, SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Local Regulations

City of South El Monte General Plan

The South El Monte General Plan (General Plan) includes goals and policies to sustain and conserve energy consumption within the City. Continuing and enhancing energy efficiency and conservation strategies help residents and businesses save money, and conserve valuable resources needed to generate energy. Energy efficiency programs also help support the local economy and can make South El Monte more resilient to future disasters by decreasing stress on existing energy distribution networks. The following General Plan goals and policies have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project.

Public Health Safety and Environmental Justice Element

Goal 5	**Design Emergency Response to serve a range of community needs.**
Policy 5.2	Create Resilience Centers Throughout South El Monte.
Action 5.2A	Back-Up Power. Continue to ensure that critical City of South El Monte facilities have back-up energy sources, such as battery storage. Prioritize clean energy sources, such as solar, where feasible.

4.5.3 Existing Conditions

Electricity

Electricity as a utility is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy use is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

Southern California Edison (SCE) is the City's electricity provider. SCE provides electricity to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area.[3] SCE produces and purchases their energy from a mix of conventional and renewable generating sources. **Table 4.5-1: Energy Resources Used to Generate Electricity for SCE** identifies the SCE electric power mix in 2022 compared to the statewide 2022 power mix. According to the CEC, the total electricity demand for the SCE service area was 82,971 gigawatt hours (GWh),[4] while electricity use attributed to the County was approximately 66,921 GWh from residential and non-residential sectors.

Table 4.5-1: Energy Resources Used to Generate Electricity for SCE

Energy Resources	2022 SCE Power Mix	2022 CA Power Mix
Eligible Renewable:	33.2%	35.8%
Biomass and Biowaste	0.1%	2.1%
Geothermal	5.7%	4.7%
Eligible Hydroelectric	0.5%	1.1%
Solar	17.0%	17.0%
Wind	9.8%	10.8%
Coal	0.0%	2.1%
Large Hydroelectric	3.4%	9.2%
Natural Gas	24.7%	36.4%
Nuclear	8.3%	9.2%
Other	0.1%	0.1%
Unspecified Sources of Power[1]	30.3%	7.1%
Total	**100%**	**100%**

Note: Electricity from transactions that are not traceable to specific generation sources.

Source: SCE. 2022. *2022 Power Content Label, Southern California Edison*. Retrieved from: https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf. Accessed August 2024.

Table 4.5-2: Residential and Non-Residential Electricity Consumption for Los Angeles County identifies the residential and non-residential electricity demand between 2011 and 2022 in Los Angeles County. In 2011, residential uses comprised 29 percent of Los Angeles County's electricity demand, while non-residential uses comprised 71 percent. By 2022, these percentages changed to 34 percent and 66 percent, respectively, for residential and non-residential uses. Although total electricity demand has fluctuated from year to year, overall, between 2011 and 2022, Los Angeles County's total electricity demand increased by 0.5 percent. However, during that same time period, electricity demand from non-residential uses decreased by approximately 6 percent.

[3] SCE. 2023. *By the Numbers: Who We Serve*. https://www.sce.com/about-us/who-we-are. Accessed August 2024.

[4] California Energy Commission (CEC). 2022. *Electricity Consumption by Southern California Edison*. Workbook: California Electricity Consumption. Accessed August 2025.

Table 4.5-2: Residential and Non-Residential Electricity Consumption for Los Angeles County			
	Million Kilowatt-Hours		
Year	Residential Electricity Consumption (million kilowatt-hours)	Non-residential Electricity Consumption (million kilowatt-hours)	Total Electricity Consumption
2022	23,255.48	45,229.47	68,484.96
2021	22,092.42	43,910.86	66,003.29
2020	22,903.70	42,662.55	65,566.25
2019	20,687.72	46,054.26	66,741.98
2018	20,523.19	47,310.94	67,834.13
2017	20,673.08	47,918.36	68,591.44
2016	20,300.47	49,064.06	69,364.52
2015	20,443.49	49,017.13	69,460.62
2014	20,750.28	49,109.50	69,859.79
2013	20,618.15	47,662.08	68,280.24
2012	21,079.24	48,088.38	69,167.61
2011	20,064.34	48,051.27	68,115.61
Source: California Energy Commission. Retrieved from: Workbook: California Electricity Consumption. Accessed August 2025.			

Natural Gas

Southern California Gas Company (SoCalGas), which is the service provider for the City, serves approximately 21 million people in a 20,000-square-mile service territory. SoCalGas has four storage fields: Aliso Canyon, Honor Rancho, La Goleta, and Playa del Rey, as well as a combined storage capacity of approximately 134 billion cubic feet. According to the CEC, natural gas demand in the SoCalGas service area was 5,026 million therms in 2022.[5]

SoCalGas forecasts that the total demand for natural gas will decline at an annual rate of 0.7 percent per year from 2024 to 2040.[6] The decline in demand is due to reduced gas demand in the major market segment areas of residential, electric generation, commercial, and industrial; aggressive energy efficiency programs; and statewide efforts to minimize greenhouse gas emissions. **Table 4.5-3: Residential and Non-residential Natural Gas Consumption for Los Angeles County** identifies the residential and non-residential natural gas demand between 2011 and 2022.

In 2022, natural gas use in Los Angeles County was approximately 1.1 billion therms from residential uses and 1.7 billion therms for non-residential sectors.[7] Between 2011 and 2022, Los Angeles County's non-residential natural gas demand increased by approximately 0.7 percent.

[5] California Energy Commission (CEC). (ND). *Natural Gas Consumption by Southern California Gas*. Retrieved from: Natural Gas Consumption. Accessed August 2024, August 2025.

[6] California Gas and Electric Utilities. 2024. *2024 California Gas Report.* Retrieved from: https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf. Accessed November 2024.

[7] California Energy Commission (CEC). (ND). *Natural Gas Consumption by County*. Retrieved from: Natural Gas Consumption. Accessed August 2025, August 2025.

Table 4.5-3: Residential and Non-residential Natural Gas Consumption for Los Angeles County

Year	Million Therms		
	Residential Natural Gas Consumption	Non-residential Natural Gas Consumption	Total Natural Gas Consumption
2022	1,122.26	1,698.03	2,820.29
2021	1,137.58	1,745.19	2,882.77
2020	1,238.00	1,698.69	2,936.69
2019	1,235.73	1,812.59	3,048.32
2018	1,107.78	1,813.72	2,921.51
2017	1,115.46	1,840.58	2,956.04
2016	1,110.87	1,766.99	2,877.86
2015	1,084.70	1,676.34	2,761.05
2014	1,078.65	1,715.22	2,793.87
2013	1,321.88	1,743.55	3,065.43
2012	1,280.72	1,704.43	2,985.147
2011	1,368.98	1,686.18	3,055.158

Source: California Energy Commission. Natural Gas Consumption. Accessed August 2025.

Transportation Energy

Transportation energy demand in California is largely related to vehicular traffic (e.g., passenger vehicles, light duty trucks, semi-trucks, etc.), with most transportation-related energy demand currently met by gasoline and diesel fuel. In 2022, California consumed 14.5 billion gallons of gasoline and 3.17 billion gallons of diesel fuel based on data from California EMission FACtor (EMFAC). In Los Angeles County, approximately 3.8 billion gallons of gasoline and 516 million gallons of diesel fuel were consumed in 2022 based on EMFAC.

Gasoline and diesel fuel is supplied to City residents and non-residents by widely distributed service stations both inside and around the City. Annual automotive fuel consumption in Los Angeles County from 2011 to 2022 is shown in **Table 4.5-4: Annual Automotive Fuel Consumption in Los Angeles County**. As shown in the table, the County's gasoline consumption has increased 0.8 percent since 2011 and diesel consumption has increased 19 percent.

Table 4.5-4: Annual Automotive Fuel Consumption in Los Angeles County		
Year	**Gasoline Consumption (million gallons)**	**Diesel Fuel Consumption (million gallons)**
2022	3,774.8	516.2
2021	3,816.2	507.2
2020	3,381.6	491.6
2019	3,844.8	492.6
2018	3,914.7	494.5
2017	3,961.4	506.9
2016	3,990.3	489.9
2015	3,864.1	462.7
2014	3,754.1	457.3
2013	3,720.2	453.2
2012	3,714.7	430.4
2011	3,745.5	434.9
Source: California Air Resources Board. 2022. *EMFAC.* Retrieved from: https://arb.ca.gov/emfac/. Accessed August 2024.		

4.5.4 Methodology

This section analyzes energy use on three sources of energy that are relevant to the proposed Project, including electricity, natural gas, and transportation fuel for vehicle trips associated with the proposed development, as well as the fuel necessary for Project construction. The analysis of the Project's electricity and natural gas use is based on the California Emissions Estimator Model (CalEEMod), which quantifies energy use for occupancy. The results of CalEEMod are included in **Appendix G** to this EIR. Modeling related to Project energy use was based primarily on the default settings in CalEEMod. The amount of operational fuel use, including from medium- and heavy-duty truck trips, was estimated using CalEEMod outputs for the Project and CARB Emissions Factor (EMFAC) 2021 computer program for typical daily fuel use in Los Angeles County. Construction fuel was calculated based on CalEEMod emissions outputs and conversion ratios from the Climate Registry.

4.5.1 Thresholds of Significance

The City uses the thresholds of significance specified in *State CEQA Guidelines, Appendix G*. Impacts to energy conservation would be significant if the Project would:

- Result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

4.5.2 Project Impacts and Mitigation

Threshold 4.5-1:	**Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?** ***Level of Significance:*** Less than Significant Impact

Construction-Related Energy Use

Project construction would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, excavation, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements which specify that equipment not in use for more than five minutes must be turned off. Project construction equipment would also be required to comply with the latest U.S. EPA and CARB engine emissions standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is also growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[8]

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.[9]

As evaluated in this EIR, construction of the Project is expected to commence in 2025, would occur over approximately 12 months, and would use approximately 2,412 kWh of electricity, 13,351 gallons of gasoline, and 55,204 gallons of diesel.

Californians used 287,826 GWh of electricity in 2022, of which Los Angeles County used 68,484 GWh. The Project's construction electricity use would be approximately less than 0.01 percent of electricity used in the State and the County.

Californians are anticipated to use approximately 13.7 billion gallons of gasoline and approximately 3.18 billion gallons of diesel fuel by 2025. Los Angeles County annual gasoline fuel use in 2025 is anticipated to be 3.54 billion gallons and diesel fuel is anticipated to be 533 million gallons. The expected Project construction fuel use would represent approximately less than 0.01 percent of the projected gasoline use and approximately 0.01 percent of the projected diesel use in the State and in the County. It is noted that construction fuel use is temporary and would cease upon completion of construction activities.

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[8] World Green Building Council, *The Business Case for Green Building: A Review of the Costs and Benefits for Developers, Investors and Occupants.* Retrieved from: https://worldgbc.org/article/the-business-case-for-green-building-a-review-of-the-costs-and-benefits-for-developers-investors-and-occupants/. Accessed April 2025.

[9] Lin Chen, Mingyu Yang, Zhonghao Chen, Zhuolin Xie, Lepeng Huang, Ahmed I. Osman, Mohamed Farghali, Malindu Sandanayake, Engui Liu, Yong Han Ahn, Ala'a H. Al-Muhtaseb, David W. Rooney, Pow-Seng Yap, Conversion of waste into sustainable construction materials: A review of recent developments and prospects, Materials Today Sustainability, Volume 27, 2024, 100930, ISSN 2589-2347, Retrieved from: https://doi.org/10.1016/j.mtsust.2024.100930. Accessed April 2025.

Further, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption associated with the proposed Project would not be any more inefficient, wasteful, or unnecessary than other similar recreational and industrial developments. Therefore, based on the foregoing, a less than significant impact would occur.

General Construction Guidance

During construction, some incidental energy conservation would occur through compliance with State requirements that construction equipment not in use for more than five minutes be turned off. Construction equipment would also be required to comply with the latest U.S. EPA and CARB engine emissions standards. These engines use highly efficient combustion engines to minimize unnecessary fuel consumption. Project-related construction activities would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment) and electricity (e.g., power tools).

Construction activities associated with the Project would also be required to monitor air quality emissions using applicable regulatory guidance such as the *South Coast Air Quality Management District CEQA Guidelines*. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced as a result of monitoring and the efficient use of equipment and materials, this results in reduced energy consumption. There are no aspects of the Project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction.

There are no unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Therefore, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar projects of this nature. Therefore, based on the foregoing, impacts to energy resources associated with Project construction activities would be less than significant and no mitigation is required.

Operations

Implementation of the Project would permanently increase the demand for electricity and natural gas, primarily for building heating and cooling. However, the proposed Project would, at a minimum, comply with the requirements of the CALGreen and the City's Green Building Standards Code. The energy consumption associated with Project operations would occur from building energy (electricity and natural gas) use, water use, billboard use, and transportation-related fuel use. The methodology for each category is discussed below. Quantifications of operational energy use are provided for the Project. Estimated annual energy use during operations is shown in **Table 4.5-5: Annual Energy Use During Operations***.* The estimated energy demand associated with the Project is also compared to the current overall energy demand of the County to provide context for the projected changes in energy demand.

Petroleum Fuel

The gasoline and diesel fuel associated with on-road vehicular trips is calculated based on total vehicle miles traveled (VMT) calculated for the analyses within **Section 4.2: Air Quality** and **Section 4.7: Greenhouse Gas Emissions** and the average fuel efficiency from the EMFAC model. The total gasoline and diesel fuel associated with on-road trips would total approximately 327,146 gallons and 507,731 gallons of fuel per year, respectively (**Table 4.5-5**).

Table 4.5-5: Annual Energy Use During Operations			
Project Source	**Annual Operational Energy**	**Los Angeles County Annual Energy**	**Percentage Increase Countywide**
Electricity Use: GWh			
Area[1]	1.18	68,485	0.0017%
Water[1]	0.35		0.0005%
Billboard[2]	0.32		0.0005%
Total Electricity	1.86		0.0027%
Natural Gas Use: Therms			
Area[1]	42,757	2,820,285,935	0.0015%
Diesel Use: Gallons			
Mobile[3]	507,731	535,038,343	0.095%
Gasoline Use: Gallons			
Mobile[3]	327,146	3,446,400,365	0.009%

Notes:
1 The electricity, natural gas, and water usage are based on project-specific estimates and CalEEMod defaults.
2 The billboard electricity usage is based on the hourly electricity usage of a double-sided, 14' x 48' LED billboard.
3 Calculated based on the mobile source fuel use based on vehicle miles traveled (VMT) and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2026.

Sources: Refer to energy calculations in **Appendix G**. Gregory Young, *LEED AP, Illuminating the Issues Digital Signage and Philadelphia's Green Future*, 2010.

Electricity

The electricity use during Project operations is based on CalEEMod defaults. The operation of the proposed Project would use approximately 1.18 GWh of electricity per year (see **Table 4.5-5**). Under the standards in the 2022 Title 24 building code, industrial buildings are required to be more energy efficient than in prior Title 24 building codes. The electricity associated with operational water use is estimated based on the estimated annual water use and the energy intensity factor is the CalEEMod default energy intensity per gallon of water for Los Angeles County. Project water use is based on the CalEEMod default rates. The Project would use approximately 52.1 million gallons of water annually, which would require approximately 0.35 GWh per year for conveyance and treatment. The annual electricity associated with the operational billboard is estimated based on the hourly electricity usage of a double-sided, 14-foot x 48-foot light-emitting diode (LED) billboard.[10] In addition, energy savings would come from the use of high-quality LEDs and tighter brightness control settings, resulting in up to 85 percent reduction in overall power usage.[11]

Natural Gas

The methodology used to calculate the natural gas use associated with the Project is based on CalEEMod default rates. The Project could consume 4.28 million kBTUs (kilo British Thermal Units) or approximately 42,757 therms, of natural gas per year (see **Table 4.5-5**).

[10] Gregory Young. 2010. *LEED AP, Illuminating the Issues Digital Signage and Philadelphia's Green Future.*

[11] Energy Solutions. July 2014. *Digital Billboard Energy Use in California.*

Operational Energy Use Analysis

Operation of the Project conservatively assumes that it would annually use approximately 1.86 GWh of electricity, 42,757 therms of natural gas, 327,146 gallons of gasoline, and 507,731 gallons of diesel.

Californians used 287,826 GWh of electricity in 2022, of which Los Angeles County used 68,484 GWh. The Project's operational electricity use would represent approximately less than 0.01 percent of electricity used in the State and in the County. Regarding natural gas, Californians used 11,710 million therms of natural gas and 2,820 million therms of natural gas in Los Angeles County in 2022. Therefore, the Project's conservative operational natural gas use would represent approximately less than 0.01 percent of the natural gas use in the State and in the County.

When construction is projected to be completed in 2026, Californians are anticipated to use approximately 13.4 billion gallons of gasoline and approximately 3.18 billion gallons of diesel fuel. Los Angeles County annual gasoline fuel use in 2026 is anticipated to be 3.45 billion gallons and diesel fuel is anticipated to be 535 million gallons. Expected Project operational use of gasoline and diesel would represent approximately less than 0.01 percent of the projected gasoline use and projected diesel use in the State. Project operational use of gasoline and diesel would represent less than 0.01 percent of gasoline use and 0.1 percent of diesel use in the County, respectively.

Based on the California Energy Demand 2023 Baseline Forecast (January 2024),[12] SCE's total energy sales in 2026 will be 96,356 GWh of electricity. As such, the Project-related net annual electricity consumption of 1.86 GWh would represent less than 0.01 percent of SCE's projected sales in 2026. SCE would review the Project's estimated electricity consumption in order to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system.[13] Based on these factors, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand.

Based on the 2024 California Gas Report,[14] the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,428 million cubic feet per day in 2023.[1] Accordingly, the Project's conservative assumption of 42,757 therms (4,275,700 cf) of annual natural gas consumption would account for approximately less than 0.2 percent of the forecasted natural gas consumption in the SoCalGas planning area. As such, the potential use of natural gas by the Project is expected to fall within SoCalGas' projected consumption and supplies for the area. According to the U.S. Energy Information Administration, the United States currently has over 80 years of natural gas reserves based on 2018 consumption.[15]

Transportation fuels (gasoline and diesel) and emergency backup generator fuels (diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet 50 years of worldwide

[12] California Energy Commission. *CED 2022 Baseline Forecast – LSE and BA Tables High Demand Case*. Retrieved from: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update-2. Accessed August 2024.

[13] As part of the standard process for commercial and industrial building applications, an Engineering Analysis Report is submitted to SCE/SoCalGas. The Engineering Analysis Report will identify any power capacity shortfalls and outline SCE/SoCalGas's remediation plan, with potential impacts on the Project's power delivery timeline if limitations are found.

[14] California Gas and Electric Utilities. 2024. *2024 California Gas Repor*t.

[15] U.S. Energy Information Administration, Frequently Asked Questions, *How Much Natural Gas Does the United States Have, and How Long Will It Last?*, Retrieved from: https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed August 2024.

consumption.[16] As such, it is expected that existing and planned transportation fuel supplies (and emergency backup generator fuel supplies) would be sufficient to serve the Project's demand.

None of the Project's estimated energy uses would exceed one percent of their corresponding County use. Project operations would not substantially affect existing energy or fuel supplies or resources, as detailed above. The Project would comply with the applicable energy standards discussed below and new capacity would not be required. Impacts would be less than significant. Notwithstanding, the Project would implement MM GHG-2, which requires the installation of photovoltaic solar panels to offset 100 percent of its electricity demand, and MM GHG-5, which prohibits natural gas, to further reduce energy consumption (see **Section 4.7: Greenhouse Gas Emissions**).

Energy Efficiency Measures

As discussed above, California's Energy Efficiency Standards for Residential and Non-Residential Buildings create uniform building codes to reduce California's energy use and provide energy efficiency standards for residential and non-residential buildings. These standards are incorporated within the California Building Code and are expected to substantially reduce the growth in electricity and natural gas use. For example, requirements for energy-efficient lighting, heating and cooling systems, and green building materials are expected to save additional electricity and natural gas. These savings are cumulative, doubling as years go by.[17]

Regarding water energy conservation, the Project would incorporate drought-tolerant landscaping throughout portions of the site. Water-efficient irrigation controls would also be used in landscape areas. Buildings would incorporate water-efficient fixtures (e.g., low-flow toilets) and appliances to comply with Title 24.

Renewable Energy Sources

SCE is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase total procurement from eligible renewable energy resources to 50 percent by 2030. SB 100 revised the goal of the program to achieve the 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat.

The 2022 California Building Energy Efficiency Standards (Title 24, part 6) update includes prescriptive requirements to install solar photovoltaic (PV) systems as a part of newly constructed buildings. Therefore, renewable energy features would be incorporated into the proposed Project. The use of solar would increase the proposed Project's reliance on renewable energy sources to meet energy demand. The increased use of renewable energy would also reduce reliance on fossil fuels, reduce peak loads, and reduce impacts of relying on remote generation facilities.

[16] BP Global. 2022. *Statistical Review of World Energy*, 2022. Retrieved from: https://www.bp.com/content/dam/bp/business-sites/en/global/corporate/pdfs/energy-economics/statistical-review/bp-stats-review-2022-full-report.pdf. Accessed August 2024.

[17] Because the energy savings from previous years continue and new savings are added on top, the overall energy savings accumulate and grow exponentially —doubling every set period (e.g., every 10 years).

The Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Title 24 standards. The Project's energy consumption would exceed less than one percent of the corresponding energy sources within the County. Therefore, Project implementation would not constrain local or regional energy supplies and would not require the expansion or construction of new electricity generation and/or transmission facilities. As such, implementation of the proposed Project would not use large amounts of fuel or energy in an unnecessary, wasteful, or inefficient manner. Impacts would be less than significant and no mitigation is required. Notwithstanding, the Project would offset 100 percent of its electricity demand pursuant to MM GHG-2 (see **Section 4.7: Greenhouse Gas Emissions**).

Threshold 4.5-2	**Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?** ***Level of Significance:*** Less than Significant Impact

As discussed in Threshold 4.5-1, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards and the 2022 CALGreen building code. The Project would be required to comply with these existing energy standards. Compliance with State and local energy efficiency standards would ensure that the Project meets all applicable energy conservation policies and regulations. In addition, pursuant to mitigation measures to reduce GHG emissions, MM GHG-2 requires that 100 percent of the Project's electrical demand is offset by on-site solar and MM GHG-5 prohibits natural gas consumption. As such, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Potential impacts are considered less than significant and no mitigation is required.

4.5.3 Cumulative Impacts

Construction and operations associated with implementation of the Project would result in the use of energy, but not in a wasteful manner, and project-specific impacts would be less than significant. The use of energy would not be substantial in comparison to statewide electricity, natural gas, gasoline, and diesel demand; refer to **Table 4.5-5**. The cumulative energy service area includes the service territories of SCE and SoCalGas, within which the proposed Project and other foreseeable developments would draw electricity and natural gas, potentially contributing to cumulative regional energy demand. During operations, the Project-related annual electricity consumption would represent approximately less than 0.01 percent of SCE's projected sales in 2026. SCE would review the Project's estimated electricity consumption in order to ensure that the estimated power requirement would be part of the total load growth forecast for their service area and accounted for in the planned growth of the power system. The Project's natural gas consumption would account for approximately less than 0.01 percent of the forecasted natural gas consumption in the State and forecasted surplus of natural gas in the SoCalGas planning area. It should be noted that the planning projections of SCE and SoCalGas consider planned development for their service areas and are in and of themselves providing for cumulative growth. Therefore, it is likely that the cumulative growth associated with the related projects is already accounted for in the planning of future supplies to cover projected demand.

Further, transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, current crude oil production would be sufficient to meet 50 years of worldwide consumption. As such, it is expected that

existing and planned transportation fuel supplies would be sufficient to serve the Project's construction and operational demand. New capacity or supplies of energy resources would not be required. Additionally, the Project would be subject to compliance with all federal, State, and local requirements for energy efficiency.

The Project and foreseeable future development projects located within the cumulative study area (i.e., County) would be required to comply with the same applicable federal, State, and local measures aimed at reducing fossil fuel consumption and the conservation of energy. The anticipated Project impacts, in conjunction with cumulative development in the vicinity, would increase urbanization and result in increased energy use. Potential land use impacts are site-specific and require evaluation on a case-by-case basis. As noted above, the Project would not result in significant impacts to State or local plans for renewable energy or energy efficiency. Therefore, based on the foregoing, the Project's contribution to potential cumulative impacts would be less than significant and no mitigation is required.

4.5.4 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No mitigation measures are required. However, MM GHG-2 and MM GHG-5 in **Section 4.7: Greenhouse Gas Emissions** are applicable to the Project.

4.5.5 Level of Significance After Mitigation

Potential energy impacts would be less than significant.

4.5.6 References

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4.6 GEOLOGY AND SOILS

4.6.1 Introduction

This section of the EIR describes the project site's existing setting as it relates to geology and soils, and paleontological resources; identifies applicable regulatory conditions and requirements; presents the criteria used to evaluate potential impacts; and identifies measures to reduce or avoid significant impacts. Information used to prepare this section includes the *Geotechnical Investigation for the Proposed Warehouse at 825 Lexington-Gallatin Road El Monte, CA* (Geotechnical Report), prepared by Southern California Geotechnical, Inc. Additionally, a Paleontological Records Search was conducted by the Natural History Museum of Los Angeles County. The Geotechnical Report and Paleontological record search are both provided as **Appendix H: Geotechnical Report and Paleontological Resources Memorandum**.

4.6.2 Regulatory Setting

Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program (Program) which is coordinated through the Federal Emergency Management Agency, the United States Geological Survey (USGS), the National Science Foundation, and the National Institute of Standards and Technology. The purpose of the program is to establish measures for earthquake hazards reduction and promote the adoption of earthquake hazards reduction measures by federal, state, and local governments; national standards and model code organizations; architects and engineers; building owners; and others with a role in planning and constructing buildings, structures, and lifelines through (1) grants, contracts, cooperative agreements, and technical assistance; (2) development of standards, guidelines, and voluntary consensus codes for earthquake hazards reduction for buildings, structures, and lifelines; and (3) development and maintenance of a repository of information, including technical data, on seismic risk and hazards reduction. The program is intended to improve the understanding of earthquakes and their effects on communities, buildings, structures, and lifelines through interdisciplinary research that involves engineering, natural sciences, and social, economic, and decisions sciences.

Clean Water Act Section 402

Section 402 of the Clean Water Act authorizes the State Water Resources Control Board (SWRCB), a department of the California Environmental Protection Agency (CalEPA), to issue National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit (Water Quality Order 2022-0057-DWQ), referred to as the "General Construction Permit." Construction activities can comply with and be covered under the General Construction Permit provided they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. The SWPPP would also include an Erosion Control Plan that would identify specific measures to control on-site and off-site erosion from the time ground disturbing activities are initiated through completion of grading. The Erosion Control Plan is included with a project's grading plan and would be subject to approval by the City Engineer.

Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources

The Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources outlines methods for assessing potential impacts to fossils and mitigating impacts from development. Impact mitigation includes pre-project survey and salvage, monitoring and screen washing during excavation to salvage fossils, conservation and inventory, and final reports and specimen curation.

Measures for adequate protection or salvage of significant paleontological resources are applied to areas determined to contain rock units that have either a high or undetermined potential for containing significant fossils. Specific mitigation measures generally need not be developed for areas of low paleontological potential. Developers (public and private) and contractors should be made aware, however, that if there is not an on-site monitor it will be necessary to contact a qualified professional paleontologist if fossils are unearthed in the course of excavation. This contingency should be planned for in advance. In order to save time and project delays, in the advance planning phases of a project, the developer should contact a qualified professional paleontologist and arrange for the salvage of any unanticipated fossils. The paleontologist will then salvage the fossils and assess the necessity for further mitigation measures, if applicable. Decisions regarding the intensity of the paleontological resource impact mitigation program will be made by the project paleontologist on the basis of the significance of the paleontological resources, and their biostratigraphic, biochronologic, paleoecologic, taphonomic, and taxonomic attributes, not on the ability of a project proponent to fund the paleontological resource impact mitigation program.

All phases of mitigation must be supervised by a qualified professional paleontologist who maintains the necessary paleontological collecting permits and repository agreements. All field teams are to be supervised by a paleontologist qualified to deal with the significant resources that might be encountered. The lead agency must assure compliance with the measures developed to mitigate impacts of excavation. To assure compliance at the start of a project, a statement that confirms a site's paleontological potential, confirms the repository agreement with an established public institution, and describes the program for impact mitigation, must be deposited with the lead agency and contractor(s) before any ground disturbance begins. In many cases, it will be necessary to conduct a salvage program prior to grading to prevent damage to known paleontological resources and to avoid delays to construction schedules. The impact mitigation program must include preparation, identification, cataloging, and curation of any salvaged specimens. All field notes, photographs, stratigraphic sections, and other data associated with the recovery of the specimens must be deposited with the institution receiving the specimens. Since it is not professionally acceptable to salvage specimens without preparation and curation of specimens and associated data, costs for this phase of the program must be included in the project budget. The mitigation program must be reviewed and accepted by the lead agency. If a mitigation program is initiated early

during the course of project planning, construction delays due to paleontological salvage activities can be minimized or even completely avoided.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] 2621-2624, Division 2 Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures intended for human occupancy. The Alquist-Priolo Act's main purpose is to prohibit siting buildings used for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones, known as "Earthquake Fault Zones," delineating appropriately wide earthquake fault zones to encompass potentially active and recently active traces of faults. Local agencies must regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed human occupancy structures would not be constructed across active faults. A licensed geologist must prepare an evaluation and written report of a specific site. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically at least 50-foot setbacks are required).

California Building Standards Code

The 2022 California Building Code (CBC) is based on the 2021 International Building Code (IBC). The purpose of the CBC is to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. The CBC is another name for the body of regulations known as the California Code of Regulations (CCR), Title 24, Part 2, which is a part of the California Building Standards Code and establishes minimum requirements for a building's structural strength and stability to safeguard the public health, safety, and general welfare and are updated every three years. Title 24 is assigned to the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or they are not enforceable.

California Health and Safety Code

Section 19100 et seq. of the California Health and Safety Code establishes the State's regulations for earthquake protection. This section of the code requires structural designs to be capable of resisting likely stresses produced by phenomena such as strong winds and earthquakes.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990, PRC Sections 2690–2699, directs the California Department of Conservation, California Geological Survey (CGS) to delineate Seismic Hazard Zones. The purpose of the Seismic Hazards Mapping Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

Public Resources Code Section 5097.5

Requirements for paleontological resource management are included in PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which state:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.*

These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, and district) lands.

California Public Resource Code Section 5097.5

California Public Resources Code Division 5 – Parks and Monuments Chapter 1.7 – Archaeological, Paleontological, and Historical Sites Section 5097.5 states:

> *A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

Regional and Local

Los Angeles County Operation Area Emergency Operations Plan

The County of Los Angeles Operational Area Emergency Operations Plan (OAEOP) addresses both the County's planned response to extraordinary emergency situations impacting unincorporated areas of the County as well as Operational Area coordination.[1] The Los Angeles County Operational Area consists of the County and all political subdivisions within the geographical boundaries of Los Angeles County. South El Monte is one of 88 incorporated cities that are within the Los Angeles County Operational Area. The OAEOP facilitates multi-agency and multi-jurisdictional coordination during emergency operations, public information functions, resource management, and recovery efforts.

City of South El Monte General Plan

The *City of South El Monte General Plan* (General Plan) includes goals and policies to protect people and structures from geological hazards within the City. In addition to environmental justice and public health issues, the Public Health, Safety, and Environmental Justice Element identifies natural and manmade hazards within the City as well as measures to promote public safety and effective emergency response and recovery. The Public Health, Safety, and Environmental Justice Element was adopted on October 12, 2021, and includes the following goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project.

[1] County of Los Angeles. 2023. County of Los Angeles Operational Area Emergency Operations Plan. Retrieved from: https://ceo.lacounty.gov/wp-content/uploads/2023/11/County-of-Los-Angeles-OAEOP-2023-Final-for-Website.pdf. Accessed Nov 8, 2024.

Public Health, Safety, and Environmental Justice Element

Goal 1	**Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural hazards.**
Policy 1.2	Enforce Development Standards to Reduce Geologic Risk.
Goal 4	**Strengthen regional systems and fortify critical infrastructure.**
Policy 4.2	Advance Seismic Safety, Prioritizing the most Vulnerable Buildings, Infrastructure, and Systems.

South El Monte Code of Ordinances

Title 16, Chapter 40, Section 025 Soils Reports.[2] Title 16 of the South El Monte Code of Ordinances (Municipal Code) includes requirements for subdivisions of properties within the City. Municipal Code Section 16.40.025 includes requirements that address potential geological hazards associated with new development. It specifies that a subdivider is required to submit to the City Engineer and Building Official, a preliminary soils report concurrently when submitting improvement plans. This report must include recommendations for any required corrective action for the purpose of preventing structural damages to the subdivision improvements and proposed structures. The report must recommend any precautions required for erosion control, and prevention of sedimentation or damage to off-site properties. Recommendations included in the report and approved by the City Engineer are incorporated into the grading plans and specifications. The applicant must also submit a final soils report prepared by a registered civil engineer. This report must ensure compliance with all recommendations of the preliminary soils report and the specifications for a project as well as contain information relative to soils conditions encountered which differed from the ones described in the preliminary soils report, along with any corrections, additions, or modifications not shown on the approved plans. Additionally, a geologic investigation and report may be required depending on site-specific conditions. A Geotechnical Report has been prepared as a part of this EIR to fulfill this requirement.

4.6.3 Existing Conditions

Project Setting

The approximately 21-acre project site is primarily vacant property but was previously partially developed and contains remnant building and radio tower foundations. Topography of the site generally slopes downward from the east to the west at a gradient of less than one percent with elevations ranging from approximately 219 to 226 above mean sea level.

Regional Geologic Setting

The project site is in the San Gabriel Valley in Los Angeles County. The San Gabriel Valley is bordered by the San Gabriel Mountains to the north and west, and the Repetto Merced, Puente, and San Jose Hills to the south and east. The San Gabriel Valley was formed by downward movement along fault zones near the perimeter of the San Gabriel basin. Coincident uplift on opposite sides of the valley floor formed the surrounding San Gabriel Mountains and the Repetto, Merced, Puente, and San Jose Hills. Erosion of these surrounding highlands has gradually filled the basin with alluvial sediments. The project site is underlain by Quaternary-age alluvial deposits in a transition zone of reworked older alluvial debris between areas

[2] City of South El Monte. 2024. *City of South El Monte Code of Ordinances- Chapter 16 Improvement Plans and Agreements.* Retrieved from: City of South El Monte, CA IMPROVEMENT PLANS AND AGREEMENTS. Accessed July 2024.

of recent alluvium to the north and west and older alluvium to the east. These alluviums consist of gravel, sand, silt and clay deposits.

The City is bordered on two sites by the Rio Hondo River and the San Gabriel River. Whittier Narrows Recreation area, just south of the project site, is a flood control feature formed by an erosional gap between the Puente and Merced Hills.

Site Geologic Setting

Geologic Materials

The project site consists of undocumented fills overlying natural soils. The fill soils generally consist of very loose to loose sandy silts with varying clay content and occasional silty sands. The fill soils possess a mottled and disturbed appearance resulting in their classification as artificial fill. The project site's natural soils generally consist of loose to medium dense silty sands, sandy silts, and sands with varying clay, silt and fine gravel content.

Groundwater

As detailed in the Geotechnical Investigation, **Appendix H,** borings and pore pressure dissipation tests conducted on April 11, 2023, at the project site indicate groundwater levels at a depth of 30 to 38 feet below ground surface (bgs). The depth to historically high ground water levels in the vicinity of the project site was indicated to be 2 feet bgs in 1998 based on the Open File Report 98-15 from the Seismic Hazard Zone Report for the El Monte 7.5-Minute Quadrangle. To determine more recent high groundwater levels near the project site, the Geotechnical Report included a search of the California Department of Water Resources, Water Data Library Station Map database. In 2012, a monitoring well approximately 2,350 feet southeast of the project site reported a groundwater level of 19 feet bgs.

Corrosive Soils

The project site soils are considered to be mildly corrosive to ferrous metals. Therefore, corrosion protection is expected to be required for any cast iron or ductile iron pipes, as well as steel in reinforced concrete.

Faulting and Seismicity

There are no known active or potentially active faults across the project site. South El Monte does not contain any recorded faults or fault zones.[3] According to the Alquist-Priolo Fault Zone and Seismic Hazard Zone Map, the project site is not located in a Fault Zone. However, there are numerous active faults located in the regional area. The San Andreas Fault is a major fault that runs across much of California, and traverses Los Angeles County approximately 30 miles east of South El Monte. This fault is capable of generating up to an 8.3 magnitude earthquake, which would cause significant ground shaking and have the potential for ground failures and structure damage. In addition to the San Andreas Fault, there are many smaller faults in Los Angeles County. The closest active fault is the East Montebello Fault, which is about 1.4 miles to the east of the project site. Other nearby active faults include the Raymond Fault, which is about 6.6 miles to the north/northwest of the project site, and the Whittier Fault, which is about 5.0 miles to the south/southeast of the project site. The faults proximate to the project site are identified on

[3] City of South El Monte. 2021. *City of South EL Monte General Plan Public Health, Safety, and Environmental Justice Element*. Retrieved from: cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 4, 2024.

Table 4.6-1: Regional Faults and Seismicity. The closest fault, the East Montebello Fault is located approximately 1.4 miles east of the project site.

Table 4.6-1: Regional Faults and Seismicity

Fault Segment	Approximate Distance from Project Site (miles)	Direction From Site
Raymond Fault	6.6	North/Northwest
East Montebello Fault	1.4	East
Whittier Fault	5.0	South/Southeast

Source: City of South El Monte. 2021. *City of South EL Monte General Plan Public Health, Safety, and Environmental Justice Element*. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 4, 2024.

Seismically-Related Ground Failure. No areas within the City have been determined to be at high risk of landslides due to South El Monte's relatively flat topography; refer to landslide section below for additional information. The Geotechnical Report concluded that significant fault rupture on the project site is considered low; therefore, the potential for seismically-related ground failure such as landslides is also considered low.

The project site is located within a liquefaction hazard zone. Therefore, a liquefaction analysis was conducted for the project site; refer to liquefaction section below for additional information. The liquefaction analysis for the project site found that differential settlements of up to 3.6 inches could occur during a liquefaction-inducing seismic event.

Surface Fault Rupture. Fault rupture is the surface displacement that occurs when movement on a fault deep within the earth breaks through to the surface. Fault rupture and displacement almost always follows preexisting faults, which are zones of weakness; however, not all earthquakes result in surface rupture (i.e., earthquakes that occur on blind thrusts do not result in surface fault rupture. Rupture may occur suddenly during an earthquake or slowly in the form of fault creep). In addition to damage caused by ground shaking from an earthquake, fault rupture is also damaging to buildings and other structures due to the differential ground surface displacement and deformation that occurs from the fault offset. This leads to damage or collapse of structures across this zone. Fault rupture displacements in large earthquakes can range from several feet to greater than 15 feet. Surface fault rupture would not occur at the project site due to no known active or potentially active faults that cross the project site.

Ground Shaking. An earthquake is classified by the amount of energy released, which traditionally has been quantified using the Richter scale (M_L). However, seismologists most commonly use the Moment Magnitude (M_W) scale because it provides a more accurate measurement for major and great earthquake sizes For earthquakes of less than M_W 7.0, the Moment and Richter Magnitude scales are nearly identical. For earthquake magnitudes greater than M_W 7.0, readings on the Moment Magnitude scale are slightly greater than a corresponding Richter Magnitude.

The intensity of seismic shaking, or strong ground motion, during an earthquake is dependent on the distance between a site and the earthquake epicenter, the magnitude, and the geologic conditions underlying and surrounding a site. Earthquakes occurring on faults closest to a project site would most likely generate the largest ground motion. However, there are no known active or potentially active faults that cross the project site.

Liquefaction. Liquefaction tends to occur in loose, saturated fine-grained sands, coarse silts, or clays with low plasticity. The liquefaction process typically occurs at depths less than 50 feet below the ground surface, although liquefaction can occur at deeper intervals, given the right conditions. The most susceptible zone occurs at depths shallower than 30 feet below the ground surface.

For liquefaction to occur, there must be proper soil type, soil saturation, and cyclic accelerations of sufficient magnitude to progressively increase the water pressures within the soil mass. Non-cohesive soil shear strength is developed by the point-to-point contact of soil grains. As the water pressures increase in the void spaces surrounding the soil grains, soil particles become supported more by water than point-to-point contact. When water pressures increase sufficiently, soil grains lose the strength to hold to each other and the soils begin to liquefy.

Liquefaction can lead to several types of ground failure, depending on slope conditions and the geological and hydrological settings. The four most common types of ground failure are lateral spreads, flow failures, ground oscillation, and loss of bearing strength.

According to the State of California Earthquake Zones of Required Investigation, El Monte Quadrangle map, the project site is in a Liquefaction Hazard Zone. Therefore, the Geotechnical Report included a liquefaction analysis that was conducted in accordance with the requirements of Special Publication 117A and currently accepted practices; see **Appendix H** for liquefaction analysis methodology. The liquefaction analysis performed on the project site identified potentially liquefiable soils. During the investigation, liquefaction potential on the project site was conservatively analyzed with respect to historic high groundwater level, which was estimated to be at a depth of approximately 2 feet bgs in 1998 in the vicinity of the project site. It is noted that more recent testing in the general area (approximately 2,350 feet from the southeast of the projects site) has recorded high groundwater levels at approximately 19 feet bgs in 2012. Based on the most recent site-specific borings and pore dissipation tests, groundwater was considered to be at approximately 30 to 38 feet bgs.

While recent groundwater levels are anticipated to be lower, based on the most conservative analysis (a groundwater level of 2 feet bgs), the results of the liquefaction analysis indicate that there are potentially liquefiable soils present within the zone of influence of new building foundations of the proposed Project. Consequences of liquefaction within the zone of influence of the building foundation could result in the loss of bearing capacity and/or slab failure absent mitigation.

Landslides. Landslides are gravity-driven movements of earth materials that may include rock, soil, unconsolidated sediment, or combinations of such materials. The primary factors influencing the stability of a slope are the nature of underlying soil or bedrock, the slope geometry (height and steepness), and rainfall. The presence of historic landslide deposits is a good indicator of future landslides. Landslides are commonly triggered by unusually high rainfall and the resulting soil saturation, by earthquakes, or a combination of these conditions.

According to the Seismic Hazard Zones Map from the California Geological Survey,[4] the site is not located within a Zone of Required Investigation for earthquake-induced landslides. Additionally, the General Plan states that significant landslides have occurred in cities surrounding South El Monte, but there is no history

[4] State of California Department of Conservation. (ND). Earthquake Zones of Required Investigation. Retrieved from: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed November 31, 2024.

of landslides in the City itself.[5] Further, no areas in the City have been determined to be at high risk of landslides due to South El Monte's relatively flat topography.

Lateral Spreading. Lateral spreading generally is a phenomenon where blocks of intact, non-liquefied soil move downslope on a liquefied substrate of large areal extent. For lateral spreading to occur, a sloping site with an open face within or at some distance from the site typically exists and there is a potential for liquefaction to occur near the base of the open face. No significant slopes or free faces are present within several hundred feet from the project site; therefore, lateral spreading is not considered to be a concern for this Project.

Soil Expansion. Expansive soils can undergo significant volume change with changes in moisture content. In general, expansive soils shrink and harden when dried, and swell and soften when wetted. Such changes can cause distress to building foundations and structures, slabs on grade, pavements, and other surface improvements. Expansive soils contain minerals such as clays, which are capable of absorbing water. The project site's natural soils consist predominantly of sandy silts and silty sands with occasional clay content. The Geotechnical Report conducted laboratory testing for expansion potential of the on-site soils in accordance with ASTM D-4829. The soils were found to have very low expansion potential; therefore, soil expansion is not considered to be a concern for this Project and no recommendations were warranted for expansive soils.

Subsidence. The project site is not located within a widespread area of recorded subsidence due to groundwater withdrawal/pumping (historical and current) across California.[6] Subsidence is a potential hazard in areas where there are significant thicknesses of alluvial soils and where groundwater withdrawal is anticipated. Shrinkage/subsidence testing was performed on the soils from the project site and found that the estimated shrinkage of the individual soil layers is highly variable, ranging from 8 to 22 percent shrinkage. Therefore, minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement and machinery working. The subsidence is estimated to be approximately 0.15 feet. The actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects.

Collapse. Collapsible soils are soils that are characterized by low density and low moisture content and undergo settlement upon wetting even without the application of additional load. When wet, these soils cause a net volume loss of the soil deposit that manifests at the ground surface as subsidence or settlement. The soils were found to have very low expansive potential with a low potential for collapse.

Soil Erosion. Soil erosion is the process by which soil particles are removed from a land surface by wind, water, or gravity. Topsoil is the uppermost layer of soil and is usually the top six to eight inches. Topsoil contains the highest concentration of organic matter and microorganisms and is the layer where plants generally concentrate their roots in. Topsoil erosion is a concerning because when topsoil is blown or washed away, it makes plant life or agricultural production more difficult. Based on the granular content of the soils at the project site, some of the soils would be susceptible to erosion.

[5] City of South El Monte. 2021. *City of South EL Monte General Plan Public Health, Safety, and Environmental Justice Element*. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 4, 2024.

[6] U.S. Geological Service. 2024. *Areas of Land Subsidence in California*. Retrieved from: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed November 4, 2024.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the Earth and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area. The Resources Element of the General Plan does not identify any known paleontological resources.

4.6.4 Methodology

The technical analyses supporting the geotechnical impact conclusions in the following section and the paleontological impact analysis used data provided in **Appendix H**. Data from these reports was supplemented through literature review and application of policies and guidelines of the General Plan for geology, soils, and paleontological resources.

The proposed Project is evaluated against the significance criteria/thresholds, as the basis for determining the impact's level of significance concerning geology and soils. In addition to project design features, this analysis considers the existing regulatory framework (i.e., laws, ordinances, regulations, and standards) that avoid or reduce a potentially significant environmental impact. Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended, to avoid or reduce the proposed Project's potentially significant environmental impacts.

4.6.5 Thresholds of Significance

The City uses the thresholds of significance that are specified in *State CEQA Guidelines, Appendix G*. Impacts related to geology, soils, and paleontological resources would be significant if the Project would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.
- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.
- Result in substantial soil erosion or loss of topsoil.
- 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.
- 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.
- Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

As addressed in **Section 1.5: Summary of Effects with No Impact,** the City has determined that the proposed Project would not have a significant impact on the following threshold for the reasons stated below, and that no further analysis was required:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the 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 faults or strong seismic ground shaking.

There are no known active or potentially active faults at the project site, and the site is not within an Alquist-Priolo Earthquake Fault Zone as designated by the CGS. The nearest Alquist-Priolo Earthquake Fault Zone is located roughly three miles northwest of the project site. Therefore, the Project would not directly, or indirectly, cause potential substantial adverse effects involving rupture of a known earthquake fault.

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

The project site is located on relatively flat ground and is not adjacent to any areas with steep slopes. Additionally, the site is not located within a Zone of Required Investigation for earthquake-induced landslides. The General Plan identifies no history of landslides in the City. Therefore, given landslides are not anticipated due to the project site's location and topography, Project implementation would not expose people or structures to potential substantial adverse effects involving landslides, and no loss, injury, or death involving landslides would occur.

- Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?

The proposed Project would connect to the City's sanitary sewer system, and there would be no septic systems constructed as part of the Project. **Section 4.17: Utilities and Service Systems** of this EIR addresses wastewater service and facilities.

4.6.6 Project Impacts and Mitigation

Threshold 4.6-1:	**Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**
	Level of Significance: Less than Significant with incorporation of MM GEO-1.

A preliminary geotechnical investigation was prepared for the proposed Project. The geotechnical investigation concluded that while there are no known active or potentially active faults or Alquist-Priolo Earthquake Fault Zones at the project site, there are numerous faults in the region which could cause ground shaking. The nearest Alquist-Priolo Earthquake Fault Zone is approximately three miles northwest of the project site. **Table 4.6-1** identifies that the nearest faults to the project site are the East Montebello fault, the Whitter fault, and the Raymond fault, which are located approximately 1.4 miles to the east, 5.0 miles to the south, and 6.6 miles to the north of the project site, respectively. Rupture of any of these faults or of an unknown fault in the region could cause seismic ground shaking.

State laws and local ordinances require that, prior to construction, potential seismic hazards be identified and mitigated, as needed, to protect public health and safety from substantial risks through appropriate engineering practices. Project construction would be required to conform to CBC and California Health and Safety Code seismic design requirements (or applicable adopted code at the time of plan submittal or grading and building permit issuance for construction). The building and safety standards established by these codes have been developed to address structural integrity during a seismic event. To further reduce potential impacts associated with seismic activity, the Project would implement Standard Condition (SC) GEO-1, which would require the Project Applicant to provide a design-level geotechnical

investigation for review and approval by the City. The Project would also be required to implement Mitigation Measure (MM) GEO-1, which requires City review of all project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits relative to the Geotechnical Investigation recommendations. Compliance with SC GEO-1 and MM-GEO 1 and applicable regulations would reduce potential impacts related to strong seismic ground shaking to a less than significant level.

Threshold 4.6-2:	**Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**
	Level of Significance: Less than Significant with incorporation of MM GEO-1.

Liquefaction is the loss of strength where loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, characteristics of the subsurface soils, in-situ stress condition, and the depth to groundwater. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. According to the State of California Earthquake Zones of Required Investigation, El Monte Quadrangle map, the project site is located in a Liquefaction Hazard Zone. Therefore, the Geotechnical Report included a liquefaction analysis that was conducted in accordance with the requirements of Special Publication 117A and currently accepted practices.

The results of the liquefaction analysis identified potentially liquefiable soils at the project site. Further settlement analyses were conducted for each of the potentially liquefiable soil strata. The analysis found that settlements of up to 3.6± inches should be expected to occur during a liquefaction inducing seismic event. The consequences of soil liquefaction occurring within the zone of influence of a foundation can result in the loss of bearing capacity and/or punching failure. Therefore, the Geotechnical Report provides recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The report concludes Project construction is feasible from a geotechnical standpoint provided the Investigation's recommendations are followed and implemented during construction. Compacted structural fill below the building foundation would provide increased strength and a reduction of the liquefaction potential of the near surface soils and other localized reduction of bearing capacity that could occur during a liquefaction-inducing seismic event. The Geotechnical Report recommends remedial grading of the soils that would be significantly influenced by the foundations of the proposed warehouse. Implementation of that recommendation has been included as a requirement under MM-GEO 1. Following the completion of the required remedial grading, potential for liquefaction-induced settlements would be reduced to a less than significant level.

As discussed under Threshold 4.6-1, SC GEO-1 requires a design-level geotechnical analysis and MM-GEO 1 requires City review of all construction plans to verify compliance with standard engineering practices, the CBC, and the Geotechnical Report's recommendations, including but not limited to, the aforementioned remedial grading. Therefore, although the project site is susceptible to seismically-related ground failure such as liquefaction, implementation of SC GEO-1 and MM GEO-1 would mitigate potential impacts to a less than significant level.

Threshold 4.6-3:	**Would the Project result in substantial soil erosion or the loss of topsoil?**
	Level of Significance: Less than Significant Impact

Soil erosion occurs when surface materials are worn away from the earth's surface due to land disturbance and/or natural factors such as wind and precipitation. The potential for soil erosion is determined by characteristics including soil texture and content, surface roughness, vegetation cover, and slope grade and length. Wind erosion typically occurs when fine-grained non-cohesive soils are exposed to high-velocity winds, while water erosion tends to occur when loose soils on moderate to steep slopes are exposed to high-intensity storm events.

On-site surface soils consist predominately of undocumented fill overlying natural soils. The fill soils generally consist of very loose to loose sandy silts with varying clay content and occasional silty sands. The project site's natural soils generally consist of loose to medium dense silty sands, sandy silts, and sands with varying clay, silt and fine gravel content. The Geotechnical Report found that based on the granular content, some of the on-site soils would be susceptible to erosion. Remedial grading would be performed at the warehouse building pad area to remove all of the undocumented artificial fill soils and a portion of the near-surface native alluvium. The removal of the existing undocumented artificial fill and the near-surface alluvium would therefore reduce the potential for such erosion by removing loose soils.

During grading and construction, topsoil would be exposed resulting in potential wind and water erosion. Construction projects that involve the disturbance of one or more acres of soil, including clearing, grading, and ground disturbances such as stockpiling or excavation, are required to obtain coverage under the State Water Resources Control Board General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit). The Construction General Permit requires developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and installing erosion-control and sediment-control best management practices (BMPs) to control potential construction-related erosion.

Section 4.9: Hydrology and Water Quality identifies the NPDES compliance requirements for the proposed Project. The NPDES permit would require the Project to prepare and implement a SWPPP and erosion control plan that includes construction erosion control BMPs. Typical SWPPP erosion BMPs include, but are not limited to, stabilization of construction entrances, straw wattles on embankments, and sediment filters on existing inlets. Hydroseeding may be required for areas of the site that may remain undeveloped subsequent to the construction of the warehouse component of the Project. The BMPs would be required to meet or exceed measures required by the NPDES Construction General Permit to control potential construction-related pollutants and would comply with the South El Monte Municipal Code Section 8.44.110 – Standard urban stormwater mitigation plan (SUSMP) and low impact development (LID) requirements for new development and redevelopment projects. Therefore, compliance with applicable State and federal regulations (i.e., the NPDES Construction General Permit) would minimize soil erosion and topsoil loss. Project construction soil erosion and topsoil loss would be relatively low, and impacts would be less than significant.

With Project development, approximately 10.5 acres of the eastern portion of the site would be primarily impervious surfaces. Upon completion of construction, the eastern portion of the project site would be substantially covered with pavement, the warehouse building, and landscaping that would reduce the potential for wind and water erosion. Pervious areas would be landscaped to prevent soil erosion; the remainder of the warehouse site would be impervious and therefore not subject to soil erosion.

The remaining approximately 10.7 acres on the northwestern portion of the project site would be improved by the City for public park use. The Project Applicant does not propose the construction or operation of the City park; therefore, specific information regarding final design and construction of improvements on the City park site is not known at this time. The Project Applicant would conduct limited

site preparation for the future City park prior to development of the public City park improvements by the City, including site grading. For the future City park improvements, the EIR has assumed that the future park would include two athletic fields, open lawn areas, restroom facilities, and surface parking (see **Section 3.0: Project Description**). The Project requires excavation of the future City park site in order to raise the finished grade of the warehouse portion above the spillway activation elevation using the excavated material. As addressed in **Section 3.0: Project Description,** the Project includes the construction of storage and drainage improvements for the required volume of potential flood waters from the Whittier Flood Control Basin (Storage Basin Improvements). The Storage Basin Improvements are subject to approval by USACE pursuant to the Section 408 Program, which is intended to verify that changes to an authorized USACE Civil Works project would not be injurious to the public interest and would not impair the usefulness of the applicable USACE project.

This EIR analysis assumes that the City park component of the project site could remain excavated but graded until the City finalizes construction plans for the public park at a future date. To lessen erosion impacts, the Project is subject to compliance with SCAQMD Rule 403 – Fugitive Dust. As identified in **Section 4.2: Air Quality**, Rule 403 governs emissions of fugitive dust during and after construction. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Additionally, Rule 403 requires that any portion of a construction site that remains inactive for longer than a period of three months be seeded and watered until grass cover is grown and soils are stabilized. Further, as mentioned above, the NPDES permit would require the Project to prepare and implement a SWPPP and erosion control plan that includes construction erosion controlling BMPs. BMPs include, but are not limited to, stabilization of construction entrances, straw wattles on embankments, sediment filters on existing inlets, and hydroseeding.

While the final design of the City park is presently unknown, the EIR and technical studies prepared analyze a conceptual plan of the future public park with two athletic fields, open lawn areas, surface parking, and restroom facilities. Therefore, it can be reasonably assumed that upon completion of construction of the park component, the City park site would be substantially covered with landscaping (athletic fields and lawn areas) and limited impervious surfaces (parking and restroom facilities) to reduce the potential for wind and water soil erosion. Accordingly, the Project would not result in substantial soil erosion or loss of topsoil. Due to required compliance with the SWPPP erosion control plan and construction-erosion BMPs, South El Monte Municipal Code Section 8.44.110, and SCAQMD Rule 403 - Fugitive Dust, impacts associated with soil erosion and loss of topsoil would be less than significant.

Threshold 4.6-4:	**Would the Project 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?**
	Level of Significance: Less than Significant with incorporation of MM GEO-1.

Landslides. The project site is not subject to landslides due to location and topography. In addition, the site is not located in a zone identified as being susceptible to landslides. The General Plan states that significant landslides have occurred in cities surrounding South El Monte, but there is no history of landslides in the City. Further, no areas in the City have been determined to be at high risk of landslides

due to South El Monte's relatively flat topography. Therefore, given no landslides would occur due to project site and area location and topography, there would be no impact as a result of landslides.

Lateral Spreading. Lateral spreading generally is a phenomenon where blocks of intact, non-liquefied soil move downslope on a liquefied substrate of large areal extent. For lateral spreading to occur, a sloping site with an open face within or at some distance from the site typically exists and there is a potential for liquefaction to occur near the base of the open face. The Geotechnical Report noted that no significant slopes or free faces are present within several hundred feet from the proposed structure. Therefore, lateral spreading is not considered to be a concern for this Project. Therefore, given the lack of slopes and free faces in the vicinity of the project site, impacts from lateral spreading would be less than significant.

Subsidence. Soil subsidence is characterized by sinking or descending soils that occur as the result of a heavy load being placed on underlying sediments and may be triggered by seismic events. Seismically-induced settlement depends on the relative subsurface soil density. Settlements from collapsible soils can be relatively large and damaging to improvements. The project site is not located within a widespread area of recorded subsidence due to groundwater withdrawal/pumping (historical and current). However, shrinkage/subsidence testing was performed on the soils from the project site and found that the estimated shrinkage of the individual soil layers is highly variable, ranging from 8 to 22 percent shrinkage. Therefore, minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement and machinery working. The subsidence is estimated to be approximately 0.15 feet. The actual amount of subsidence is expected to be variable and would be dependent on the type of machinery used, repetitions of use, and dynamic effects.

Project construction would remove unsuitable soils based on the Geotechnical Report recommendations per MM GEO-1. MM GEO-1 requires City review and approval of all construction plans to verify compliance with standard engineering practices, the CBC, and the Geotechnical Report's recommendations, including but not limited to, the aforementioned removal of unsuitable soils. Therefore, although minor subsidence is expected to occur in the soils below the zone of removal, implementation of MM GEO-1 would mitigate potential impacts to a less than significant level.

Liquefaction. As previously mentioned in Threshold 4.6-2, the project site is located in a Liquefaction Hazard Zone. The results of the liquefaction analysis provided in the Geotechnical Report identified potentially liquefiable soils at the project site and the recommended remedial grading of the soils that would be significantly influenced by the foundations of the proposed warehouse. MM-GEO 1 requires City review of all construction plans to verify compliance with standard engineering practices, the California Building Code, and the Geotechnical Engineering Investigation Report's recommendations, including but not limited to the aforementioned remedial grading. Following compliance with standard engineering practices, the established regulatory framework (i.e., CBC), and the Geotechnical Reports recommendations (MM GEO-1), the Project would not be located on a geologic unit or soil that would become unstable and potentially result in subsidence. Therefore, with implementation of MM GEO-1, impacts would be less than significant.

Collapse. Collapsible soils are soils that are characterized by low density and low moisture content and undergo settlement upon wetting even without the application of additional load. When wet, these soils cause a net volume loss of the soil deposit that manifests at the ground surface as subsidence or settlement. Collapse potential of the soils at the project site were analyzed and found to have very low expansive potential, and thus, low potential for collapse. Therefore, given the low expansion potential of soils at project site, impacts from collapse would be less than significant.

Corrosive Soils. Corrosive soils can react with construction materials such as concrete and ferrous metals. Concrete and steel are affected by sulfates, chlorides, and other adverse minerals in the soil and water. Corrosive soils could impact design parameters associated with protection of buried steel and concrete Project elements. The results of the corrosivity testing provided in the Geotechnical Report identified that the project site soils are considered to be mildly corrosive to ferrous metals. Therefore, corrosion protection is expected to be required for any cast iron or ductile iron pipes, as well as steel in reinforced concrete. MM-GEO 1 requires City review of all construction plans to verify compliance with standard engineering practices, the California Building Code, and the Geotechnical Engineering Investigation Report's recommendations, including but not limited to the aforementioned corrosion protection. Following compliance with standard engineering practices, the established regulatory framework (i.e., CBC), and the Geotechnical Reports recommendations (MM GEO-1), the Project would not be located on a geologic unit or soil that would become unstable or that would become unstable as a result of the Project. Therefore, with implementation of MM GEO-1, impacts would be less than significant.

Threshold 4.6-5:	**Would the Project 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?** ***Level of Significance:*** Less than Significant Impact

Soils that expand and contract in volume ("shrink-swell" pattern) are considered to be expansive and may cause damage to aboveground infrastructure as a result of density changes that shift overlying materials. Fine-grain clay sediments are most likely to exhibit shrink-swell patterns in response to changing moisture levels. According to the Geotechnical Report, near-surface soils at the project site consist of sandy silts and silty sands with occasional clay content. Laboratory testing was performed on the soil from the project site and the soils were found to have very low expansion potential. Therefore, given soil expansion is unlikely due to the site's existing soil composition, impacts from expansive soils would be less than significant.

Threshold 4.6-6:	**Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?** ***Level of Significance:*** Less than Significant Impact with implementation of MM GEO-2.

The approximately 21-acre project site is mostly vacant and currently undeveloped. A portion of the project site was previously developed and radio tower footings and foundations of prior buildings are present on the site. There are no unique geological features on the site.

A paleontological records search from the Natural History Museum of Los Angeles County was prepared for the Project. According to the record search results, no known fossil localities lie directly within the project site. Although no fossil localities were noted on the project site, the record search did identify other fossil localities that were found in the greater San Gabriel Valley area with similar sedimentary deposits. As discussed above, the project site was previously developed and there are remaining foundations on the project site. However, because a portion of the project site has never been developed and similar fossil have been found in the San Gabriel Valley area, there is a possibility that construction activities could reveal unidentified paleontological resources.

In the event previously unknown paleontological resources are unearthed during Project construction, significant impacts could occur. Therefore, implementation of MM GEO-2, which addresses the actions to be taken should paleontological resources be found, is required to reduce potential impacts to paleontological resources to a less than significant level.

4.6.7 Cumulative Impacts

Southern California is a seismically active region with a range of geologic and soil conditions. These conditions can vary widely within a limited geographical area due to factors, including differences in landforms and proximity to fault zones, among others. Therefore, while geotechnical impacts may be associated with cumulative development, by the impacts' very nature (i.e., landslides and expansive and compressible soils), the constraints are typically site-specific and there is low, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area, such as citywide development. Additionally, while seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. For example, development within the site or surrounding area would not alter geologic events or soil features/characteristics (such as ground-shaking, seismic intensity, or soil expansion); therefore, the Project would not affect the level of intensity at which a seismic event on an adjacent site is experienced. However, Project development and future development in the area may expose more persons or structures to seismic hazards.

In accordance with the thresholds of significance, impacts associated with seismic events and hazards would be considered significant if the effects of an earthquake on a property could not be mitigated by an engineered solution. The significance criteria do not require elimination of structural damage potential from seismic hazards. Instead, the criteria require an evaluation of whether the seismic conditions on a site can be overcome through engineering design solutions that would reduce the substantial risk of exposing people or structures to loss, injury, or death to less than significant.

The project site is not in an Alquist-Priolo Earthquake Fault Zone, or landslide, or preliminary fault rupture study area. While the project site is located within a liquefaction zone, implementation of MM GEO-1, would reduce impacts from liquefaction to less than significant. In addition, the proposed Project would be required to be constructed in compliance with applicable codes and in accordance with applicable mitigation measures pursuant to the Mitigation Program set forth in this EIR, which are designed to reduce the exposure of people or structures to substantial risk of loss, injury, or death related to geological conditions or seismic events.

Similar to the project, future projects would be required to be constructed in compliance with applicable codes and in accordance with applicable mitigation measures. As detailed above, the Project would result in a less than significant geology and soils impact with mitigation incorporated. Accordingly, the Project's contribution to any cumulative impact related to the exposure of people or structures to potential substantial adverse effects involving fault rupture, ground shaking, or ground failure, as well as unstable geologic units or expansive soil, would not be cumulatively considerable and the cumulative impact would be reduced to a level of less than significant.

Similar to the Project, future projects would be required to follow City of South El Monte Building standards, SCAQMD's requirements for dust control, and Regional Water Quality Control Board regulations pertaining to surface water runoff and water quality (which would require BMPs) for construction projects greater than one acre of disturbance, would prevent significant cumulative impacts related to erosion, loss of topsoil, and other geological impacts. Therefore, the Project's contribution to

any cumulative impact related to soil erosion would not be cumulatively considerable and the cumulative impact would be reduced to a level of less than significant.

Potential impacts related to unstable soils or geologic units and on-site and off-site landslides, lateral spreading, subsidence, liquefaction, or collapse are site-specific. The analysis concluded that the project site is not subject to landslides due to location and topography and is not located in a zone identified as being susceptible to landslides. The Geotechnical Report concluded the lateral spreading and collapse is not considered to be a concern at the Project site. To mitigate impacts from subsidence and liquefaction, the project would require implementation of MM GEO-1 to reduce impacts to less than significant. Similar to the Project, future projects would be required to perform a site-specific Geotechnical Investigation and undergo City review of all construction plans to verify compliance with standard engineering practices, the California Building Code, and the Geotechnical Report's recommendations. Therefore, proposed project-related impacts would be less than significant with mitigation incorporated and the Project's potential impacts related to unstable soils or geologic units and on and off-site landslides, lateral spreading, subsidence, liquefaction or collapse would not be cumulatively considerable with mitigation.

The potential cumulative impact related to paleontological resources is typically site-specific. The analysis herein determined that the proposed Project would potentially result in significant impacts related to the destruction of a unique paleontological resource given that the project site may contain soils conducive for paleontological resources. MM GEO-2 would address this potential issue and reduce potential impacts to below a significant level. Therefore, proposed project-related impacts to paleontological resources would be less than significant with mitigation and the Project's contribution to any cumulative impact related to paleontological resources would not be cumulatively considerable with mitigation and the cumulative impact would therefore be less than significant.

As detailed above, all Project impacts related to geology and soils, including paleontological resources, would be less than significant with implementation of required standard conditions and mitigation measures. Accordingly, the Project's contribution to any cumulative impact related to geology and soils would not be cumulatively considerable and the cumulative impact would be less than significant.

4.6.8 Mitigation Program

Standard Conditions

SC GEO-1: The Applicant shall submit to the City of South El Monte Building and Safety Department for review and approval, a site-specific design-level geotechnical investigation prepared for the project site by a registered geotechnical engineer. The investigation shall comply with all applicable State and local code requirements and:

a) Include an analysis of the expected ground motions at the site from known active faults using accepted methodologies;

b) Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable City amendments, to ensure that structures can withstand ground accelerations expected from known active faults; and

c) Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding related improvements.

Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigation in the site-specific investigations. The structural engineer shall review the site-specific investigations, provide any additional necessary measures to meet Building Code requirements, and incorporate all applicable recommendations from the investigation in the structural design plans and shall ensure that all structural plans for the Project meet current Building Code requirements.

The City's registered geotechnical engineer or third-party registered engineer retained to review the geotechnical reports shall review each site-specific geotechnical investigation, approve the final report, and require compliance with all geotechnical requirements contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and all other relevant construction permits.

The City shall review all Project plans for grading, foundations, structural, infrastructure and all other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements.

Mitigation Measures

MM GEO-1 Prior to the issuance of the first grading permit, the City of South El Monte Building and Safety Department shall review all Project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits to ensure compliance with the applicable recommendations from the Geotechnical Investigation. This shall include recommendations related to the discovery of groundwater, wet soils, or unstable soils during grading, stabilization, dewatering, fill materials, and foundations.

MM GEO-2 Prior to the issuance of the first grading permit for ground-disturbing activities, the Applicant shall provide evidence to the City of South El Monte Building and Safety Department that a qualified paleontologist has been retained. The selection of the qualified paleontologist shall be subject to the acceptance of the City. If paleontological resources are encountered, the contractor shall immediately cease all earth-moving activities within a 100-foot radius of the area of discovery. The qualified paleontologist shall be contacted to evaluate the significance of the finding and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements under State CEQA Guidelines Section 15064.5 shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

4.6.9 Level of Significance After Mitigation

Compliance with the mitigation program would preclude significant impacts related to geology and soils and paleontological resources.

4.6.10 References

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4.7 GREENHOUSE GAS EMISSIONS

4.7.1 Introduction

This section of the EIR evaluates whether the Project would generate greenhouse gas (GHG) emissions that could have a significant effect on the environment and evaluates the Project's potential to conflict with an applicable plan adopted for the purpose of reducing GHG emissions. Mitigation to avoid/reduce impacts is identified, as needed. The Greenhouse Gas Emissions Assessment is summarized in this EIR section and provided as **Appendix I: Greenhouse Gas Emissions Assessment**.

4.7.2 Regulatory Setting

Federal Regulations

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (U.S. EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and

light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 miles per gallon [mpg]), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

On September 27, 2019, the U.S. EPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019.) The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California.

On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two which sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration has repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

As of April 1, 2022, the CAFE standards require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026. The new CAFE standards for model year 2024-2026 will reduce fuel use by more than 200 billion gallons through 2050, as compared to continuing under the old standards.

State Regulations

California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO_2 equivalents (CO2e) in the world and produced 459 million gross metric tons of CO2e in 2013. In the State, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation but also provide GHG reductions. This section describes the major provisions of the legislation.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs the CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resources Board Scoping Plan

CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual"). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program. Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).

- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gases with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years. The mobile Source Strategy includes increasing ZEV buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 million metric tons of CO_2e ($MMTCO_2e$) to 545 $MMTCO_2e$. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-led GHG emissions reduction measures already in place. When this lower million metric tons of CO_2e ($MMTCO_2e$) to 545 $MMTCO_2e$. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan. The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other federal actions.

Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects. CARB specifically states that Appendix D does not address other land uses (e.g., industrial). However, CARB plans to explore new approaches for other land use types in the future. As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

CARB Advanced Clean Truck Regulation

CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- Zero-Emission Truck Sales: Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.

- Company and Fleet Reporting: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

On January 13, 2025, CARB withdrew its requests for CAA waivers from the U.S. EPA needed to support four adopted vehicle emissions regulations: (1) the Advanced Clean Fleets Regulations; 2) the In-Use Locomotive Regulations; 3) part of the Commercial Harbor Craft and Ocean-Going Vessels At-Berth Regulations; and 4) part of the Transport Refrigeration Unit Engine Standards Regulations. Implementation of these regulations is currently unknown.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions. In 2018, the U.S. EPA proposed the SAFE Vehicles Rule, which would roll back fuel economy standards and revoke California's waiver. However, in December 2021, the NHTSA repealed the SAFE Vehicle Rule Part One.

SB 1368 (Emission Performance Standards)

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

SB 1078, SB 107, and SBX1-2 (Renewable Electricity Standards)

SB 1078 (2002) required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, then-Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SBX1-2 (2011) codified the 33 percent by 2020 goal.

SB 350 (Clean Energy and Pollution Reduction Act of 2015)

Signed into law on October 7, 2015, SB 350 implements the goals of Executive Order B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40% by 2024, and 25% by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms)

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants (TACs) and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40% below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

AB 1346 (Air Pollution: Small Off-Road Engines)

Signed into law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent

feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement and support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

SB 1020 (100 Percent Clean Electric Grid)

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

Signed on September 16, 2022, AB 1757 requires State agencies to develop a range of targets for natural carbon sequestration and nature-based climate solutions that reduce GHG emissions to meet the 2030, 2038, and 2045 goals which would be integrated into a scoping plan addressing natural and working lands.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies. They are not legally enforceable for the local governments or the private sector.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target.

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S-01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission (CEC), CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-

cycle carbon intensity" of transportation fuels. CARB adopted the Low Carbon Fuel Standard on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's RPS to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2e (MMTCO2e). The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant State agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires State agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new zero emission vehicles (ZEVs) "towards the target of 100 percent." The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production

facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, §§1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The CEC adopted the 2022 Energy Code on August 11, 2021, which was subsequently approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption across California. For example, the 2022 Title 24 standards require efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

Regional Regulations

South Coast Air Quality Management District Rule 2202 (On-Road Motor Vehicle Mitigation Options)

Rule 2202 was amended by the South Coast Air Quality Management District (SCAQMD) Governing Board on August 4, 2023, to reduce mobile source emissions generated by employee commutes. This rule applies to employers with 250 or more employees in the SCAQMD. Rule 2202 provides approved mobile source emission reduction measures that comply with the FCAA and California Clean Air Act (CCAA) requirements, Health and Safety Code Section 40458, and Section 182(d)(1)(B) of the FCAA and requires employers to submit an annual registration demonstrating compliance with the rule.

South Coast Air Quality Management District Rule 2305 (Warehouse Indirect Source Rule)

Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021, to reduce NOX and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. Rule 2305 would also reduce GHG emissions. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouse's WAIRE (Warehouse Actions and Investments to Reduce Emissions) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report that includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install onsite energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

South Coast Air Quality Management District Thresholds

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Working Group has proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, the Project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD has adopted a threshold of 10,000 metric tons of CO2e (MTCO2e) per year for industrial projects and a 3,000 MTCO2e threshold was proposed for non-industrial projects but has not been adopted. During Working Group Meeting #7 it was explained that this threshold was derived using a 90 percent capture rate of a large sampling of industrial facilities. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). The Working Group indicated that the 10,000 MTCO2e per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for

this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening Thresholds

When the tiered approach is applied to a proposed project and the project is found not to comply with Tier 1 or Tier 2, a project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because the SCAQMD anticipated that CARB would adopt a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted and the interim threshold remains in effect.

For projects for which SCAQMD is not the lead agency, no screening thresholds have been formally adopted. However, the SCAQMD Working Group recommended a threshold of 10,000 $MTCO_2e$/year for industrial projects and 3,000 $MTCO_2e$/year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).

Southern California Association of Governments

On April 4, 2024, SCAG's Regional Council adopted the *2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy* [RTP/SCS] or Connect SoCal. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions.

Local Regulations

City of South El Monte General Plan

The South El Monte General Plan (General Plan) does not contain any goals or policies related to greenhouse gas emissions.

City of South El Monte Municipal Code

The South El Monte Code of Ordinances (Municipal Code) does not contain any regulations related to greenhouse gas emissions.

4.7.3 Existing Conditions

Certain gases in the earth's atmosphere classified as GHGs play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation

is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere. **Table 4.7-1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

Table 4.7-1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The Global Warming Potential of N_2O is 298.

Table 4.7-1: Description of Greenhouse Gases

Greenhouse Gas	Description
`Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF_6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacturing for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.

Source: Compiled from U.S. EPA, *Overview of Greenhouse Gases*, (https://www.epa.gov/ghgemissions/overview-greenhouse-gases), 2018; U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018; Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007; National Research Council, Advancing the Science of Climate Change, 2010; U.S. EPA, *Methane and Nitrous Oxide Emission from Natural Sources*, April 2010.

4.7.4 Methodology

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis of global climate change; however, a project-level analysis of GHG emissions (i.e., construction and operational emissions) informs whether a project could have a cumulatively considerable impact on global climate change. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from

approximately 27 gigatonnes (Gt) of CO_2/year to nearly 49 $GtCO_2$/year. As such, the geographic extent of climate change and GHG emissions cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix I**. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

The Project's operational GHG emissions would be generated by area and on-site sources including landscaping maintenance activity and use of consumer products, electrical generation for consumption, vehicular traffic (mobile sources), billboard operations (on-site electrical consumption), off-road equipment (forklifts and yard trucks), diesel-powered backup emergency generator (conservatively assumed for purposes of this EIR analysis), water supply consumption and generation of wastewater and associated treatment, and solid waste disposal.

4.7.5 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G Environmental Checklist Form*. Impacts concerning greenhouse gas emissions would be significant if the Project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" a project's GHG emissions.[1]

SCAQMD Thresholds

On December 5, 2008, the SCAQMD Governing Board adopted a 10,000 $MTCO_2e$ industrial threshold for projects where the SCAQMD is the lead agency. During the GHG CEQA Significance Threshold Working Group Meeting #15, the SCAQMD noted that it was considering extending the industrial GHG significance threshold for use by all lead agencies. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. However, the SCAQMD has

[1] 14 California Code of Regulations, Section 15064.4a

not announced when staff is expecting to present GHG thresholds for land use projects where the SCAQMD is not the lead agency to the governing board. During Meeting #8, the Working Group defined industrial uses as production, manufacturing, and fabrication activities or storage and distribution (e.g., warehouse, transfer facility, etc.). Additionally, the SCAQMD GHG Significance Threshold Stakeholder Working Group has specified that a warehouse is considered to be an industrial project for purposes of the GHG emissions analysis for a warehouse project. Further, the Working Group indicated that the 10,000 $MTCO_2e$ per year threshold applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.). Although the screening threshold for industrial projects is 10,000 $MTCO_2e$ per year, this analysis conservatively uses 3,000 $MTCO_2e$ per year as the Project GHG threshold.

4.7.6 Project Impacts and Mitigation

Threshold 4.7-1:	**Would the Project generate greenhouse gas emissions, either directly or indirectly, that could have a significant impact on the environment?**
	***Level of Significance*:** Significant and Unavoidable Impact. Emissions would be reduced but would remain significant and unavoidable with the incorporation of MM GHG-1 through MM GHG-9.

Short Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment used to build the Project is depicted in **Table 4.7-2: Construction-Related Greenhouse Gas Emissions**.

Table 4.7-2: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Construction	681
30-Year Amortized Construction	**23**

Source: CalEEMod version 2022.1. Refer to **Appendix I** for model outputs.

The Project would result in the generation of approximately 681 $MTCO_2e$ over the course of construction (**Table 4.7-2**). Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions.[2] The amortized Project construction emissions would be 23 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

It is also noted that in response to the increase in warehouse development in California, the State of California Department of Justice issued a memorandum in March 2021, entitled *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (Memorandum). The Memorandum encourages warehouse projects to implement certain best practices, one of which is that construction equipment not in use for more than three minutes be turned off.

[2] The amortization period of 30-years is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Long Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, solid waste generation, and the energy required to convey water to, and wastewater from the Project. Total GHG emissions associated with the Project are summarized in **Table 4.7-3: Operational Greenhouse Gas Emissions**.

Table 4.7-3: Operational Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year	
	Unmitigated	**Mitigated**
Construction Amortized Over 30 Years	23	23
Area Source[1]	5	0
Electricity[2]	287	1
Natural Gas[2]	227	0
Mobile – Trucks	5,267	5,267
Mobile – Passenger Cars	2,405	2,405
Billboard[2]	51	0
Off-Road – Forklifts[3]	63	20
Off-Road – Yard Trucks[3]	111	35
Emergency Generators[3]	6	6
Waste[4]	65	16
Water and Wastewater	155	155
Refrigerants	0	0
Total Project Emissions	**8,665**	**7,928**
Threshold	*3,000*	*3,000*
Exceeds Threshold?	**Yes**	**Yes**

Notes:
1. **MM GHG-1** requires landscaping equipment to be 100 percent electrically powered.
2. **MM GHG-2** requires the installation of photovoltaic solar panels to offset energy emissions. **MM GHG-3** requires buildings to meet or exceed CALGreen Tier 2 standards. **MM GHG-4** requires appliances to be ENERGY-STAR certified. **MM GHG-5** requires all appliances and end uses to be 100 percent electrically powered.
3. **MM GHG-8** requires forklifts and yard trucks to be 100 percent electrically powered and standard emergency generators to be Tier 4 certified.
4. **MM GHG-6** requires the Project to divert 75 percent of waste from landfills.

Source: CalEEMod version 2022.1. Refer to **Appendix I** for model outputs.

Below is a description of the primary sources of operational emissions:

- **Area Sources**. Area source emissions occur from architectural coatings, landscaping equipment, and consumer products. Landscaping is anticipated to occur throughout the project site. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions.
- **Electricity**. Electricity emissions would be generated from the Project's electricity consumption including building energy, parking lot lighting, and athletic fields lighting.
- **Natural Gas.** Natural gas emissions would occur from the Project's natural gas consumption.

- **Mobile Sources**. Mobiles sources from the Project were calculated with CalEEMod based on the trip generation for the Project from the S*outh El Monte Athletic Fields and Business Park Project Transportation Study,* prepared by Kimley-Horn and Associates, Inc. (2025). It is conservatively estimated for purposes of this EIR analysis that the Project would generate up to approximately 1,997 total daily vehicle trips, of which the City park component would generate approximately 810 passenger vehicles and the warehouse component of the Project would generate approximately 1,187 passenger vehicles and 320 truck vehicles.

  Adjustments were made in CalEEMod to reflect the warehouse truck trip lengths and fleet mix characteristics. The warehouse truck trip lengths were adjusted to 33.2 miles, based on the distance to the Ports of Los Angeles and Long Beach, as well as CARB estimates for drayage trucks. Trucks are classified by type (or axle configuration) into light heavy-duty trucks (LHDT), medium heavy-duty trucks (MHDT), and heavy heavy-duty trucks (HHDT), reflecting a mix of large trucks with 2, 3, and 4 or more axles. To better represent warehouse-specific operations, the warehouse fleet mix was adjusted to represent 17 percent LHDT, 23 percent MHDT, and 60 percent HHDT. In total, the warehouse component of the Project would generate 320 truck trips.

- **Digital Billboard***.* Billboard emissions would be generated by electricity usage and were calculated separated from CalEEMod; refer to **Appendix G**.

- **Emergency Backup Generators**. It is unknown at this time whether the warehouse component would include an emergency backup generator. For the purposes of this EIR analysis, it is conservatively assumed that the warehouse component of the Project would include an emergency backup generator. A backup generator would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with this equipment were included to be conservative. Emissions from an emergency backup generator for the warehouse was calculated separately from CalEEMod using default emission rates; refer to **Appendix I**. If a backup generator is ultimately proposed, the end user would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions if and when a backup generator is in use.

- **Off-Road Equipment.** Operational off-road emissions would be generated by off-road cargo handling equipment used during operational activities. For this Project, it was assumed that the warehouses would include five diesel forklifts and one diesel yard truck per SCAQMD data. The forklifts and yard trucks GHG emissions were based on CARB OFFROAD emissions data.

- **Solid Waste**. Solid waste releases GHG emissions in the form of methane when these materials decompose.

- **Water and Wastewater**. GHG emissions from water demand would occur from electricity consumption associated with water conveyance and treatment.

- **Refrigerants**. Air conditioning and refrigerator equipment typically generate GHG emissions. The proposed Project would not include cold storage. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022.

Table 4.7-3 shows that the Project's unmitigated emissions would be approximately 8,665 $MTCO_2e$ annually from operations with amortized construction. Project-related GHG emissions would exceed the 3,000 $MTCO_2e$ per year threshold. It should be noted that the majority of the unmitigated GHG emissions (89%) are associated with non-construction related mobile sources. Fuel efficiency and emission standards are regulated at the State level and those regulations are becoming more stringent over the years to reduce mobile source emissions. However, because emissions of motor vehicles are controlled by State and federal standards; neither the Project Applicant nor the City has control over these standards.

The Project would implement MM GHG-1 through MM GHG-6 and MM GHG-8, which are included as emissions reductions credits in **Table 4.7-3**. MM GHG-1 requires landscaping equipment to be 100 percent electrically powered. MM GHG-2 requires the installation of photovoltaic solar panels to offset energy emissions. MM GHG-3 requires the Project to meet or exceed CALGreen Tier 2 standards to further improve energy efficiency. MM GHG-4 requires appliances to be Energy-Star certified. MM GHG-5 requires appliances and end uses to be 100 percent electrically powered. MM GHG-6 requires the Project to divert 75 percent of waste from landfills. MM GHG-8 requires forklifts and yard trucks to be 100 percent electrically powered and standard emergency generators to be Tier 4 certified.

It should be noted that GHG emissions shown in **Table 4.7-3** conservatively do not include emissions reduction credits from MM GHG-7, MM GHG-8, or MM GHG-9. As explained in more detail below, MM GHG-7 and MM GHG-9 require the preparation of a Transportation Demand Management (TDM) program and Water Use Efficiency and Conservation Plan for the Project, respectively. These requirements have been included in the EIR as required mitigation measures rather than Project design features (i.e., automatic GHG emissions reductions) because the amount of GHG emissions reductions that would result from implementation of these mitigation measures cannot be precisely determined at this time. Therefore, the GHG emissions presented in the table represent a conservative worst-case scenario. The Project would also be required to comply with Laws, Ordinances, and Regulations (LOR) GHG-1 through LOR GHG-8 which would be required by local, State, or federal regulations or laws.

Table 4.7-3 shows that implementation of these mitigation measures would reduce GHG emissions to 7,928 $MTCO_2e$. The majority of the Project's GHG emissions are generated by mobile emissions. Additional mitigation to reduce the Project's mobile emissions is not feasible due to the limited ability of the City to address emissions resulting from mobile sources and/or emissions generated by cars and trucks outside of the City's limits. As with all land use projects, the Project's mobile and transportation related GHG emissions are a function of two parameters: emissions control technology and VMT.

CARB is directly responsible for regulating mobile and transportation source emissions in the State. Regarding the first parameter, California addresses emissions control technology through a variety of legislation and regulatory schemes, including the State's Low Carbon Fuel Standard (LCFS) (Executive Order S-01-07), a regulatory program designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. The regulatory standards are expressed in terms of the "carbon intensity" of gasoline and diesel fuel and their substitutes. Different types of fuels are evaluated to determine their "life cycle emissions" which include the emissions associated with producing, transporting, and using the fuels. Each fuel is then given a carbon intensity score and compared against a declining carbon intensity benchmark for each year. Providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets these declining benchmarks for each annual compliance period.

In 2018, CARB approved amendments to the LCFS, which strengthened the carbon intensity benchmarks through 2030 to ensure they are in-line with California's 2030 GHG emission reduction target enacted through SB 32. CARB is also implementing additional transportation sector regulations such as Advanced Clean Cars II, Advanced Clean Trucks, and Advanced Clean Fleets. This ensures that the transportation sector is meeting its obligations to achieve California's GHG reduction targets. The Project would be required to comply with these regulations through vehicle manufacturer compliance. The State is also implementing legislation and regulations to address the second parameter affecting transportation related GHG emissions by controlling for VMT. Examples of this include SB 375, which links land use and transportation funding and provides one incentive for regions to achieve reductions in VMT, and SB 743, which discourages VMT increases for passenger car trips above a region-specific benchmark.

Additional mitigation to further reduce the Project's non-mobile emissions would be speculative. The Project's mitigation measures and LORs address non-mobile emissions to the maximum extent possible, by designing the warehouse to provide environmental design features, incorporate energy and water conservation measures, and provide electrical, heating, ventilation, lighting, and power systems that meet CALGreen Standards (MM GHG-2 requires the installation of photovoltaic solar panels to offset energy emissions, LOR GHG-7 requires the installation of future EVSE equipment [as described in Section 3.0, the Project would provide 51 EV capable parking stalls]). MM GHG-3 requires the Project to meet or exceed CALGreen Tier 2 standards, which exceeds code requirements. MM GHG-4 requires appliances to be Energy-Star certified. MM GHG-5 requires all appliances and end uses to be 100 percent electrically powered). Further, the project would be required to divert 75 percent of solid waste from landfills (MM GHG-6). The State is addressing the remaining energy-related GHG emissions through SB 100 and SB 1020, which requires 100 percent clean electricity retail sales by 2045. Additionally, SB 905 requires the State to use carbon removal, carbon capture, utilization, and sequestration technologies and AB 1757 requires nature-based sequestration in natural working lands.

It should be noted that the Project would be required to comply with SCAQMD Rule 2305 which would directly reduce air quality emissions or to otherwise facilitate emissions reductions. Alternatively, warehouse operators can choose to pay a mitigation fee. Funds from the mitigation fee are used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby. Although Rule 2305 focuses on air quality pollutant emissions, the rule would facilitate cleaner vehicles and supporting infrastructure that would also result in GHG emission reductions.

Warehouse owners and operators are required to earn WAIRE Points each year.[3] WAIRE points are a menu-based system earned by emission reduction measures. Warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. WAIRE points can be earned by completing actions from a menu that can include acquiring and using natural gas, Near-Zero Emissions and/or Zero-Emissions on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. Conservatively, this analysis and the GHG emissions results presented in **Table 4.7-3** do not take credit for these potential reductions. Compliance with Rule 2305 would likely reduce emissions below what is currently analyzed.

Mitigated GHG emissions would exceed the 3,000 $MTCO_2e$ per year threshold despite implementation of all feasible mitigation (**Table 4.7-3**). Therefore, project-related GHG emissions would be significant and unavoidable.

[3] SCAQMD, *Rule 2305. Warehouse Indirect Source Rule – Warehouse Actions And Investments To Reduce Emissions (WAIRE) Program*, https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf. Accessed June 24, 2025.

Threshold 4.7-2: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?

***Level of Significance*:** Less than Significant Impact

The Governor's Office of Land Use and Climate Innovation (formerly the California Office of Planning and Research) encourages lead agencies to analyze and make use of programmatic mitigation plans and programs when conducting individual project consistency analyses. On a statewide level, the Climate Change Scoping Plan provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's RTP/SCS contains measures to achieve VMT and GHG reductions required under SB 375. The City does not have a programmatic mitigation plan to rely on, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. This analysis addresses consistency with the strategies and goals of the Scoping Plan and RTP/SCS. If the project is designed in accordance with these policies and regulations, the Project would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reduction (e.g., AB 32, SB 32, and SB 375). Consistency with statewide measures such as SB 32 and the aforementioned Executive Orders are not analyzed herein as they are not applicable to individual development projects.

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of, performance-based standards included in the regulations outlined in the applicable portions of AB 32's *2022 Climate Change Scoping Plan* and SCAG's 2024-2050 RTP/SCS.

Consistency with the 2022 CARB Scoping Plan

Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with any local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission (ZE) transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. Statewide strategies to reduce GHG emissions in the 2022 Scoping Plan include:

- Implementing SB 100 (achieve 100 percent clean electricity by 2045);
- Achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and

- Implementing the Advanced Clean Fleets regulation to deploy zero-emission vehicle (ZEV) buses and trucks.

Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. The Project would be required to comply with the 2022 Scoping Plan Statewide strategies, discussed above.

Approximately 96 percent of the Project's mitigated GHG emissions are from mobile sources, which would be reduced with implementation of the required mitigation (**Table 4.7-3**). The Project's GHG emissions would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that the City has no control over vehicle emissions. However, these emissions would decline in the future due to State-wide measures discussed above, as well as cleaner technology and fleet turnover.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Consistency with SCAG RTP/SCS (Connect SoCal)

On April 4, 2024, SCAG's Regional Council adopted the *2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy* (RTP/SCS) or Connect SoCal. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under SB 375, SCAG's RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and 19 percent by 2035.[4]

Implementation of the RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and State funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions.

The RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS are also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources

[4] California Air Resources Board, *SB 375 Regional Targets*, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-375-regional-targets, accessed August 2025.

are the most potent source of emissions, and therefore project comparison to the RTP/SCS is an appropriate indicator of whether the project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project's consistency with the Connect SoCal goals is provided in **Table 4.7-4: Connect SoCal Consistency**.

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in **Table 4.7-4** the proposed Project would be consistent with the stated goals of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's GHG emission reduction target of 19 percent by the year 2035 or the post-2020 mobile source GHG reduction targets.

Table 4.7-4: Connect SoCal Consistency	
SCAG Goals	**Compliance**
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**N/A**. This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**N/A**. This is not a project-specific policy and is therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds.	**N/A**. This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent**. The project site is located in an urban area in proximity to existing community services. Specifically, the project site is located near the Foothill Transit Line 269 stop at Lexington-Gallatin Rd and Santa Anita Ave and has immediate access to and from State Route 60 (SR-60) and existing truck routes (Santa Anita Ave and Durfee Ave from Peck Rd to the western City limits and from Slack Rd to the northern City limits).
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	**N/A**. The Project does not propose residential uses.
Environment: Create a healthy region for the people of today and tomorrow.	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent**. The Project would not exceed SCAQMD's regional or localized air quality thresholds (see **Section 4.2: Air Quality**). Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's localized significance thresholds (LSTs) would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts. Additionally, the Project's Health Risk Assessment determined potential health risks associated with Toxic Air Contaminants resulting from implementation of the proposed Project would be less than significant. As discussed under Threshold 4.7-1, the Project would require all feasible mitigation to reduce GHG emissions. The Project would implement MMs GHG-1 through GHG-9. MM GHG-1 requires landscaping equipment to be 100 percent electrically powered. MM GHG-2 requires the installation of photovoltaic solar panels to offset energy emissions. MM GHG-3 requires the Project to meet or exceed CALGreen Tier 2 standards to further improve energy efficiency. MM GHG-4 requires appliances to be Energy-Star Certified. MM GHG-5 requires appliances to be 100 percent electrically powered. MM GHG-6 requires the Project to divert 75 percent of waste from landfills. MM GHG-7 requires the preparation of a Commute Trip Reduction program. MM GHG-8 requires forklifts and yard trucks to be 100 percent electrically powered and standard emergency generators

Table 4.7-4: Connect SoCal Consistency	
SCAG Goals	**Compliance**
	to be Tier 4 certified. MM GHG-9 requires implementation of a Water Use Efficiency and Conservation Plan. Therefore, the Project would not result in health impacts and would implement all feasible mitigation to reduce GHG emissions.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**Consistent**. While the Project is not a transportation improvement project, the project site is located in a developed area in close proximity to the Ports of Los Angeles and Long Beach and the regional highway system, which would reduce VMT in the region. Thus, the Project would reduce GHG and air quality emissions when compared to warehouse developments located further from the Ports of Los Angeles and Long Beach and the regional highway system. Additionally, the reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques such as compliance with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen). The Project would also reduce mobile emissions from implementation of MM GHG-7, which requires the preparation of a Transportation Demand Management (TDM) program to reduce single-occupant vehicle trips and encourage public transit. Although the Project would exceed the SCAQMD's 3,000 $MTCO_2e$ threshold, which is conservatively used in this analysis, the Project would implement all feasible mitigation to reduce air quality and GHG emissions (i.e., MM GHG-1 through MM GHG-9). Therefore, the Project would support the RTP/SCS goal of integrating the region's development pattern and transportation network to improve air quality and reduce GHGs.
Conserve the region's resources.	**Consistent**. The project site is vacant and is not designated for agricultural uses, natural resources, or conservation. Therefore, Project development would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	**Consistent**. The Project proposes a warehouse and City public park in an urban area, which would create jobs in close proximity to residential uses; refer to **Section 4.12: Population and Housing**. Therefore, the location of the Project would improve access to jobs opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent**. The Project includes a warehouse use that would support goods movement and provide employment opportunities to the local area. As summarized above, the Project would result in less than significant air quality and health risk impacts.
N/A = Not Applicable Sources: SCAG, *Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy)*, 2024.	

4.7.7 Cumulative Impacts

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence global climate change or result in a substantial contribution to the global GHG inventory. The State CEQA Guidelines generally address GHG emissions as a cumulative impact because of the global nature of climate change. As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself". As such, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. Although the Project would exceed the SCAQMD's 3,000 $MTCO_2e$ threshold, which is conservatively used in this EIR analysis, the Project would implement all feasible mitigation to reduce GHG emissions (i.e., MM GHG-1 through MM GHG-9). Further, the Project would be consistent with CARB's 2022 Scoping Plan and SCAG's RTP/SCS (Connect SoCal). Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

4.7.8 Mitigation Program

The Project would be subject to compliance with relevant laws, ordinances, and regulations and the following mitigations measures.

Standard Conditions

No standard conditions are identified.

Laws, Ordinances, and Regulations

Laws, Ordinances, and Regulations (LORs) are existing requirements that are based on local, State, or federal regulations or laws that are frequently required independently of CEQA review. Typical LORs and requirements include compliance with the provisions of the Building Code, SCAQMD Rules, etc. The City may impose additional conditions during the approval process, as appropriate. Because LORs are neither Project specific nor a result of development of the Project, they are not considered to be either Project Design Features or Mitigation Measures. However, they are included in the Mitigation Program to comprehensively identify Project requirements.

LOR GHG-1 Require diesel powered construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449.

LOR GHG-2 Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

LOR GHG-3 In accordance with California Title 24 Standards, buildings will be designed to have 15 percent of the roof area "solar ready" that will structurally accommodate later installation of rooftop solar panels. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy.

LOR GHG-4 Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

LOR GHG-5 Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

LOR GHG-6 Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410 of the California Green Building Standards Code Part 11.

LOR GHG-7 To facilitate future installation of electric vehicle supply equipment (EVSE), construction shall comply with Section 5.106.5.3 (nonresidential electric vehicle charging) of the California Green Building Standards Code Part 11.

LOR GHG-8 Tenants of the warehouse shall comply with the South Coast Air Quality Management District (SCAQMD) Warehouse Indirect Source Rule (Rule 2305). This rule is expected to reduce NO_X and PM_{10} emissions during operations. Compliance with Rule 2305 is enforced by the SCAQMD through their reporting process and is required for all warehouse projects greater than 100,000 square feet.

Mitigation Measures

MM GHG-1 **Electric Landscape Equipment.** Prior to the issuance of a tenant occupancy permit for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division shall confirm that tenant lease agreements include contractual language that all handheld landscaping equipment used on site shall be 100 percent electrically powered. The warehouse building, as well as the parking lots for the future City park and warehouse components, shall be equipped with exterior electrical outlets to accommodate this requirement. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable. Therefore, this mitigation measure is applicable to the warehouse and City park.

MM GHG-2 **On-Site Renewable Electricity Generation.** The Project shall install solar photovoltaic (PV) panels or other source of renewable energy generation on the site or otherwise acquire energy from the local utility that has been generated by renewable sources, that would provide 100 percent of the expected building load. (i.e., the Title 24 electricity demand and the plug-load, anticipated to be approximately 5.75 kilowatt hours per year [kWh/year] per square foot).[5] This mitigation measure is only applicable to the warehouse.

MM GHG-3 **CALGreen Tier 2.** Prior to the issuance of a building permit, the Project Applicant or successor in interest, and the City (as applicable) shall provide documentation to the City of South El Monte Community Development Department, Building and Safety Division demonstrating the following:

[5] The expected electricity demand is based on CalEEMod; refer to **Appendix I**.

- The warehouse shall be designed to achieve Leadership in Energy and Environmental Design (LEED) certification to meet or exceed CALGreen Tier 2 standards in effect at the time of building permit application.
- The Project (warehouse and City park) shall provide facilities to support electric charging stations per the Tier 2 standards in Section A5.106.5.3 (Nonresidential Voluntary Measures) of the 2022 CALGreen Code.

MM GHG-4 **On-site Electricity Efficiency.** Prior to the issuance of tenant occupancy permits for the warehouse, the Planning Division shall confirm that tenant lease agreements include contractual language that appliances used on site shall be ENERGY-STAR Certified. This mitigation measure is only applicable to the warehouse.

MM GHG-5 **Require All-Electric Development.** Prior to the issuance of building permits for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division shall confirm that building plans require the Project to use all-electric appliances and end uses instead of natural gas. The Project shall not include natural gas utility lines or connections. This mitigation measure is only applicable to the warehouse.

MM GHG-6 **Solid Waste Diversion.** The warehouse shall divert a minimum of 75 percent of landfill waste. Prior to issuance of a tenant occupancy permit for the warehouse by the City of South El Monte Community Development Department, Planning Division, a recyclables collection and load area shall be constructed in compliance with City standards for recyclable collection and loading areas. This mitigation measure applies only to tenant permits for the warehouse and not the warehouse building shell[6] approvals. The diversion plan shall also comply with the established solid waste and recycling laws including AB 939 and AB 341.

The City park shall divert a minimum of 50 percent of land fill waste in compliance with AB 75 and AB 939. In addition, a recyclables collection and load area shall be constructed in compliance with City standards for recyclable collection and loading areas.

MM GHG-7 Prior to issuance of tenant occupancy permits for the warehouse, the tenant/facility operator shall prepare and submit a Transportation Demand Management (TDM) program detailing strategies that would reduce the use of single occupant vehicles by employees by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. The TDM shall include, but is not limited to the following:

- Provide a transportation information center and on-site TDM coordinator to educate residents, employers, employees, and visitors of surrounding transportation options.
- Promote bicycling and walking through design features such as showers for employees, self-service bicycle repair area, etc. around the project site.

[6] Components of the building shell include the floor, walls, roof, doors, and windows.

- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support, such as ride-matching services.
- Incorporate incentives for using alternative travel modes, such as preferential load/unload areas or convenient designated parking spaces for carpool/vanpool users.

This mitigation measure applies only to tenant occupancy and not the building shell[7] approvals. Therefore, this mitigation measure is only applicable to the warehouse.

MM GHG-8 **Non-Diesel Off-road And Emergency Equipment.** Prior to the issuance of a tenant occupancy permit for the warehouse, the City of South El Monte Community Development Department, Building and Safety Division shall confirm that the Project plans and specifications show the following:

- All outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, and forklifts) are zero emission/powered by electricity. The building shall include the necessary charging stations for cargo handling equipment. Note that SCAQMD Rule 2305 (Warehouse Indirect Source Rule) Warehouse Actions and Investments to Reduce Emissions (WAIRE) points may be earned for electric/zero emission yard truck/hostler usage. This mitigation measure applies only to tenant improvements and not the building shell approvals.
- Any and all standard emergency generators shall meet California Air Resources Board Tier 4 Final emissions standards. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification) and CARB or SCAQMD operating permit (if applicable) shall be provided to the City.

This mitigation measure is only applicable to the warehouse.

MM-GHG 9 **Water Use Efficiency and Conservation Plan.** The Project Applicant or designee shall implement a Water Use Efficiency and Conservation Plan that includes the following minimum requirements:

Indoor Conservation Features and Operations*:*

- **Install low-flow Fixtures**: Install low-flow toilets at 1.28 gallons per flush, faucets at 1.2 gallons per minute, showerheads at 1.8 gallons per minute, kitchen faucets at 1.8 gallons per minute. In common areas, install faucets at 0.5 gallon per minute and urinals at max of 0.25 gallon per minute/flush. (These fixtures use less water while maintaining efficient performance.)
- **Install dual-flush toilets**: These toilets offer two flush options: one for liquid waste less than 1 gallons per minute and another for solid waste at 1.28 gallons per minute. (This allows the appropriate use of water for flushing needs.)
- **Use water-efficient appliances**: The Project Applicant or designee shall install energy-efficient and water-saving appliances with the ENERGY STAR label only.

[7] Ibid.

- **The Project will capture and reuse HVAC condensation**: The Project Applicant or designee shall direct condensation from air conditioning units to water plants or for other non-potable uses.
- **Good housekeeping and regular maintenance**: The Project Applicant or designee shall regularly check and maintain plumbing fixtures, irrigation systems, and appliances to ensure they are functioning efficiently and not wasting water.

Outdoor Conservation Features and Operations:

- **Install only "Smart Irrigation Systems" for community landscaping**: The Project Applicant or designee shall use smart sprinkler systems that adjust watering schedules based on weather conditions, soil moisture, and plant needs to avoid over- or wasteful watering. The Project Applicant or designee shall also incorporate seasonal specific controls to ensure watering occurs during the most efficient times of day.
- **Adjustable Water Pressure Regulator**: The Project Applicant or designee shall install pressure regulators to maintain optimal water pressure, preventing overuse and leaks.
- **Drought-tolerant landscaping**: The Project Applicant or designee shall include native and drought-tolerant vegetation that requires less water to thrive and is known to survive in the City of South El Monte. The Project Applicant or designee shall replace drought-tolerant landscaping if it dies through enforceable Project CC&Rs.

This mitigation measure is applicable to the warehouse and City park (i.e., restroom facilities and landscaped areas).

4.7.9 Level of Significance After Mitigation

With implementation of MM GHG-1 through MM GHG-9**,** the Project's GHG emissions would be considered significant and unavoidable. The Project would be consistent with plans and regulations adopted for the purpose of reducing GHG emissions (Impact 4.7-2). Nonetheless, overall GHG impacts would be significant and unavoidable. No additional feasible mitigation measures are available that can reduce impacts to a less than significant level.

4.7.10 References

Kimley-Horn and Associates, Inc. 2025. *Greenhouse Gas Emissions Assessment*. Included as **Appendix I** to this EIR.

4.8 HAZARDS AND HAZARDOUS MATERIALS

4.8.1 Introduction

This section of the EIR describes the potential hazards (other than geologic, flood, and wildfire hazards) associated with the project site, infrastructure, activities, and materials that could impact human health and the environment. The analysis in this section is based on the Phase I Environmental Site Assessment (ESA) prepared by Partner Engineering and Science, Inc., dated March 2025, which is included as **Appendix J** of this EIR.

4.8.2 Regulatory Setting

Federal Regulations

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 is a United States federal law that aims to reduce the impact of disasters on communities and promote preparedness. It focuses on several key areas, including hazard mitigation planning, grants for mitigation projects, and the establishment of a National Mitigation Framework. The act encourages local communities to develop and implement hazard mitigation plans to identify and reduce risks. It also provides funding for projects that aim to mitigate the effects of disasters, such as flood control measures or building retrofits. Additionally, the act establishes the National Mitigation Framework, which serves as a guide for federal agencies and stakeholders to coordinate and collaborate on mitigation efforts.

Federal Emergency Management Act

The Federal Emergency Management Act establishes and outlines the responsibilities and authorities of the Federal Emergency Management Agency (FEMA). The act aims to coordinate and support the nation's preparedness, response, recovery, and mitigation efforts for all types of disasters, including natural disasters and emergencies caused by terrorism. FEMA is tasked with providing assistance and resources to state, local, tribal, and territorial governments, as well as to individuals and communities affected by disasters. The act also authorizes FEMA to administer various programs, such as the National Flood Insurance Program and the Hazard Mitigation Assistance Program, which provide funding and support for disaster preparedness and mitigation initiatives. Additionally, the act establishes the National Incident Management Assistance Teams to assist with coordination during large-scale incidents and authorizes the president to declare a major disaster or emergency, enabling the release of federal resources and assistance to affected areas.

Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act (RCRA) established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous wastes. Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for UST installations installed after December 22, 1988, as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed. In California, the U.S. EPA has delegated many of the RCRA requirements to California Department of Toxic Substances Control (DTSC).

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(U.S. Code Title 42, Chapter 103), commonly known as Superfund, was enacted by Congress on December 11, 1980. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the National Contingency Plan (NCP). The NCP (Title 40, Code of Federal Regulation [CFR], Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL) which is the list of sites of national priority among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and the National Priorities List

The U.S. EPA also maintains the Comprehensive Environmental Response Compensation (CERCLIS) and Liability Information System list. This list contains sites that are either proposed to be or on the National Priorities List (NPL), as well as sites that are in the screening and assessment phase for possible inclusion on the NPL. The NPL is a list of the worst hazardous waste sites that have been identified by Superfund. There are no NPL sites on the project site.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted to inform communities and residents of chemical hazards in their area. Businesses are required to report the locations and quantities of chemicals stored on-site to both State and local agencies. EPCRA requires the U.S. EPA to maintain and publish a digital database list of toxic chemical releases and other waste management activities reported by certain industry groups and federal facilities. This database, known as the Toxic Release Inventory, gives the community more power to hold companies accountable for their chemical management.

Hazardous Materials Transportation Act

The U.S. Department of Transportation (DOT) receives authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified (49 U.S.C. 5101 et seq.). The DOT is the primary regulatory authority for the interstate transport of hazardous materials and establishes regulations for safe handling procedures (i.e., packaging, marking, labeling, and routing).

The Pipeline and Hazardous Material Safety Administration was delegated the responsibility to prepare the hazardous material regulations, which are contained in Code of Federal Regulations (CFR)Title 49, Parts 100-180. CFR Title 49, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous material requirements. Under the HMTA, the Secretary of Transportation “may

authorize any officer employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties related to (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "persons" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce."

Clean Water Act/Spill Prevention, Control and Countermeasure Rule

The Clean Water Act (CWA) (33 U.S.C. §1251 et seq.) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). In California, the NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the Los Angeles RWQCB.

Section 402 of the CWA authorizes the California State Water Resources Control Board (SWRCB) to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit."

Construction activities can comply with and be covered under the General Construction Permit provided that they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters;
- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

NPDES regulations are administered by the RWQCB. Projects that disturb one or more acres are required to obtain NPDES coverage under the Construction General Permits.

Section 311 of the CWA establishes the Spill Prevention, Control and Countermeasure Rule, which sets forth requirements for the prevention of, preparedness for, and response to oil discharges at specific non-transportation-related facilities. The goal of this regulation is to prevent oil from reaching navigable waters and adjoining shorelines, and to contain discharges of oil. The regulation requires these facilities to develop and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans and establishes procedures, methods, and equipment requirements.

Occupational Safety and Health Administration

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. To establish standards for workplace health and safety, OSHA also created the National Institute for Occupational Safety and Health as the research institution for OSHA. The Administration is a division of the U.S. Department of Labor that oversees the

administration of OSHA and enforces standards in all states. OSHA standards are listed in Title 29 CFR Part 1910.

OSHA's Hazardous Waste Operations and Emergency Response Standard applies to five groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances (including hazardous waste) and who are engaged in clean-up operations; corrective actions; voluntary clean-up operations; operations involving hazardous wastes treatment, storage, and disposal facilities; and emergency response operations.

Regulation of Polychlorinated Biphenyls

The Toxic Substances Control Act of 1976 (United States Code [USC], §2605 Title 15) banned the manufacture, processing, distribution, and use of polychlorinated biphenyls (PCBs) in enclosed systems. PCBs are considered hazardous materials because of their toxicity. They have been shown to cause cancer in animals, along with effects on the immune, reproductive, nervous, and endocrine systems, and studies have shown evidence of similar effects in humans.

The U.S. EPA Region 9 PCB Program regulates remediation of PCBs in several states, including California. The Code of Federal Regulations, Title 40, Section 761.30(a)(1)(vi)(A) states that all owners of electrical transformers containing PCBs must register their transformers with the U.S. EPA. Specified electrical equipment manufactured between July 1, 1978, and July 1, 1998, that does not contain PCBs must be marked by the manufacturer with the statement "No PCBs" (§761.40[g]). Transformers and other items manufactured before July 1, 1978, containing PCBs, must be marked as such.

State Regulations

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) has jurisdiction over hazardous materials and wastes at the State level. DTSC is the department of CalEPA responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. DTSC regulates hazardous waste in California primarily under the authority of the federal and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Although similar to RCRA, the California Hazardous Waste Control Law and its associated regulations define hazardous waste more broadly and regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the U.S. EPA are called "non-RCRA hazardous wastes." Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists contaminated drinking water wells, sites listed by the SWRCB as having UST leaks and have had a discharge of hazardous wastes or materials into the water or groundwater and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

DTSC directive enforcement is handled at the local level, in this case the San Bernardino County Department of Environmental Health (DEH). The RWQCB also has the authority to implement regulations regarding the management of soil and groundwater investigation.

CalFire Strategic Fire Plan 2024

CalFire uses this plan to direct and guide its fire management activities for the State Responsibility Area throughout California. CalFire's mission is to serve and safeguard the people and protect the property and

resources of California. CalFire responds to fires of all types and emergencies such as vehicle accidents, floods, earthquakes, hazardous material spills, and others within the State Responsibility Area. CalFire provides direction for fire prevention using fire resource assessments, a variety of available data, mapping, and other tools. The plan emphasizes "pre-fire" management, which is a process to assess alternatives to protect assets from unacceptable risk of wildland fire damage and focus on those actions that can be taken in advance of a wildland fire to potentially reduce the severity of the fire and ensure safety. Pre-fire management activities include prescribed burning, fuel breaks, forest health treatments and removal of hazardous vegetation.

CalFire has mapped fire threat potential throughout California. It ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The rankings include moderate, high, and very high fire hazard severity.

California Fire Code

CCR, Title 24, also known as the California Building Standards Code, contains the California Fire Code (CFC), included as Title 24, Part 9. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution.

The CFC, Chapter 9 of Title 24 of the CCR, was created by the California Building Standards Commission based on the International Fire Code and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

California Water Code

The California Water Code is a collection of laws and regulations that govern the management and use of water resources within the State of California. It covers various aspects related to water rights, water quality, water supply, water conservation, and water infrastructure. The code outlines the responsibilities of state agencies, local governments, and water districts in managing and protecting California's water resources. Additionally, it addresses issues such as groundwater management, water pollution control, flood control, and water infrastructure development. The California Water Code plays a crucial role in ensuring the sustainable and efficient use of water in California.

Emergency Management Mutual Aid System

The Emergency Management Mutual Aid System (EMMAS) is a collaborative framework that enables jurisdictions and agencies to request and provide assistance during emergencies. It facilitates the sharing of resources, such as personnel, equipment, and expertise, to enhance the overall effectiveness of emergency response and recovery efforts. EMMAS operates through mutual aid agreements, promoting interoperability, coordination, and a seamless integration of resources from different jurisdictions. Its main goal is to ensure a coordinated and efficient response to emergencies that surpass the capabilities of a single jurisdiction.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The California Health and Safety Code, Division 20, Chapter 6.95, known as the Hazardous Materials Release Response Plans and Inventory Act or the Business Plan Act, requires businesses using hazardous materials to prepare a Business Plan that describes their facilities, inventories, emergency response plans, and training programs. Businesses must submit this information to the County Department of Environmental Health (DEH). The DEH verifies the information and provides it to agencies responsible for protection of public health and safety and the environment. Business Plans are required to include emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, including, but not limited to the following:

- Immediate notification to the administering agency and to the appropriate local emergency rescue personnel.
- Procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to persons, property, or the environment.
- Evacuation plans and procedures, including immediate notice, for the business site.

Business Plans are also required to include training for all new employees, and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State hazardous waste management program, which is similar to but more stringent than the federal RCRA program. The act is implemented by regulations contained in CCR Title 26, which requires the identification of the following for proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

Safe Drinking Water and Toxic Enforcement Act of 1986

The Safe Drinking Water and Toxic Enforcement Act of 1986, commonly referred to as Proposition 65, requires businesses to provide warnings to individuals about potential exposure to chemicals known to cause cancer, birth defects, or other reproductive harm. Proposition 65 mandates that businesses notify consumers if their products or environments contain any of the listed chemicals above certain threshold levels. The goal of Proposition 65 is to inform individuals about potential risks and allow them to make informed decisions regarding their exposure to these chemicals.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (“Tiered Permitting”); Aboveground Petroleum Storage Tank (i.e., SPCC); Hazardous

Materials Release Response Plans and Inventory Program (i.e., Hazardous Materials Disclosure or "Community-Right-To-Know"); California Accidental Release Prevention Program (Cal ARP); Underground Storage Tank (UST) Program; and Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA. The project site is located within the City of South El Monte, who contracts with the Los Angeles County Fire Department (LACFD) for fire and the Los Angeles County Sheriff's Department (LACSD) for law enforcement services. The designated CUPA for Los Angeles County is the LACFD's Health Hazardous Materials Division.

Department of Toxic Substance Control

The DTSC is a department of CalEPA and is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. California Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites; Department of Health Services lists of contaminated drinking water wells; sites listed by the SWRCB as having UST leaks and have had a discharge of hazardous wastes or materials into the water or groundwater; and lists from local regulatory agencies of sites that have had a known migration of hazardous wastes and/or materials.

California Office of Emergency Services

To protect the public health and safety and the environment, the California Office of Emergency Services is responsible for establishing and managing statewide standards for business and area plans relating to the handling and release or threatened release of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) needs to be available to firefighters, public safety officers, and regulatory agencies. The information must be included in these institutions' business plans to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of these materials into the workplace and environment.

These regulations are covered under Chapter 6.95 of the California Health and Safety Code Article 1 – Hazardous Materials Release Response and Inventory Program (§§25500 to 25520) and Article 2 – Hazardous Materials Management (§§25531 to 25543.3). CCR Title 19, Public Safety, Division 2, Office of Emergency Services, Chapter 4 – Hazardous Material Release Reporting, Inventory, and Response Plans, Article 4 (Minimum Standards for Business Plans) establishes minimum statewide standards for Hazardous Materials Business Plans and requires: (1) a hazardous material inventory in accordance with Sections 2729.2 to 2729.7; (2) emergency response plans and procedures in accordance with Section 2731; and (3) training program information in accordance with Section 2732. Business plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the State. Business which use, handle, or store a hazardous material or an extremely hazardous material in

quantities greater than or equal to 500 pounds of a solid substance, 55 gallons of a liquid, 200 cubic feet of compressed gas, a hazardous compressed gas in any amount, or hazardous waste in any quantity are required to prepare a Hazardous Materials Business Plans (HMBP).

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR §§337-340). These regulations also specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. In addition, Cal/OSHA regulates medical and/or infectious waste.

The Geological Energy Management Division

The Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR), oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal energy wells. GIS data published by CalGEM includes regular updates to well locations and status, oil field boundaries, lease boundaries, and district boundaries.

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

In California, Section 31303 of the California Vehicle Code states that any hazardous material being moved from one location to another must use the route with the least travel time. This, in practice, means major roads and highways, although secondary roads are permitted to be used for local delivery. These policies are enforced by both the California Highway Patrol and the California Department of Transportation (Caltrans).

Tanner Act

The Tanner Act (AB 2948) was adopted in 1986 and governs the preparation of hazardous waste management plans and sites the location of hazardous waste facilities in the State of California. The Act also requires that each county adopts a Hazardous Waste Management Plan which needs to include provisions that define the planning process for waste management, the permit process for new or expanded facilities, and the appeal process to the State available for certain local decision.

California Accidental Release Prevention (CalARP) Program

The California Accidental Release and Prevention (CalARP) program was implemented in 1997, and its purpose is to prevent accidental release of substances that can cause harm to the public and environment and minimize damage if releases do occur. CalARP requires facilities that handle, manufacture, use, or store any regulated substances above threshold quantities to submit a Risk Management Plan and proactively prevent and prepare for accidental releases. The Cal EPA oversees the implementation of CalARP at the State level while CUPAs and/or participating agencies implement CalARP program at the local level.

Regional and Local Regulations

South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Los Angeles County and the urban portions of San Bernardino, Orange, and Riverside counties. The agency's primary responsibility is ensuring that State and

federal ambient air quality standards are attained and maintained in the Southern California Air Basin (SCAB). The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, and many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction. The following is a list of SCAQMD rules that are required of construction activities associated with the Project.

Rule 403 (Fugitive Dust) – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

b) All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.

c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the workday to remove soil from pavement.

Rule 1166 – This rule sets requirements to control the emission of volatile organic compounds (VOC) from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

2020 County of Los Angeles All-Hazards Mitigation Plan

Adopted in 2020, Los Angeles County's All-Hazards Mitigation Plan (AHMP) identifies existing and potential hazards, assesses the risks associated with them, and outlines strategies and actions the County will take to minimize effects associated with those hazards. The AHMP planning area is defined as unincorporated Los Angeles County. However, the plan's risk assessment includes unincorporated Los Angeles County and the municipalities within Supervisorial Districts 1 through 5.[1] South El Monte is located within Supervisorial District 1.[2] Hazards identified in the AHMP include climate change, dam failure, earthquakes, flood, landslide, tsunami, and wildfire.

Los Angeles County Office of Emergency Services

The Los Angeles County Office of Emergency Services maintains and updates the Los Angeles County Operational Area Emergency Response Plan for unincorporated Los Angeles County, including the City. The County OEM coordinates local response and relief activities in the Emergency Operation Center, and

[1] County of Los Angeles. 2020. *2020 County of Los Angeles All Hazards Mitigation Plan, Chapter 3*. Retrieved from: https://ceo.lacounty.gov/wp-content/uploads/2023/08/County-of-Los-Angeles-All-Hazards-Mitigation-Plan-APPROVED-05-2020.pdf. Accessed November 2024.

[2] Ibid, Tables 3-1 and 3-2.

works closely with local, state, and federal partners to support planning and training and to provide information and coordinate assistance.[3]

Los Angeles Regional Water Quality Control Board

The Los Angeles Regional Water Quality Control Board (RWQCB) regulates State water quality standards for Los Angeles and Ventura counties, inclusive of South El Monte. Beneficial uses and water quality objectives for surface water and groundwater resources in the area are established in the water quality control plans of each of the nine RWQCBs and mandated by the State Porter-Cologne Act and CWA. The RWQCB also implements the CCWA Section 303(d) total maximum daily load (TMDL) process, which consists of identifying candidate water bodies where water quality is impaired by the presence of pollutants. The TMDL process is implemented to determine the assimilative capacity of the water body for the pollutants of concern and to establish equitable allocation of the allowable pollutant loading within the watershed. CCWA Section 401 requires an applicant pursuing a federal permit to conduct any activity that may result in a discharge of a pollutant to obtain a water quality certification (or waiver) from the applicable RWQCB.

The RWQCB primarily implements basin plan policies through issuing waste discharge requirements for waste discharges to land and water. The RWQCB is also responsible for administering the NPDES permit program, which is designed to manage and monitor point and non-point source pollution. NPDES storm water permits for general construction activity are required for projects that disturb more than one acre of land. Municipal NPDES storm water permits are required for urban areas with populations greater than 100,000.

Los Angeles County Fire Department

The City contracts with the LACFD for fire services.[4] LACFD is one of six contract counties (Los Angeles, Kern, Ventura, Orange, Santa Barbara, and Marin), which have executed a contract with the State to provide wildland fire protection on State Responsibility Areas (SRA).[5] LACFD has the responsibility as a contract county to implement the CalFire Strategic Plan 2024 in the County. As such, LACFD functionally operates as a CalFire unit and is responsible for all Strategic Fire Plan activities within the County. As previously noted, LACFD's Health Hazardous Materials Division is the designated CUPA who administers the Unified Program and responds to hazardous materials spills, unauthorized releases or emergency incidents involving hazardous materials and wastes in the County.[6]

Los Angeles County Fire Department 2024 Unit Fire Plan

The LACFD *2024 Unit Fire Plan* identifies and prioritizes pre-fire and post-fire management strategies and tactics meant to reduce the loss of values at risk in the County. The LACFD 2022 Strategic Fire Plan also

[3] Ibid, Table 5-1.

[4] City of South El Monte. 2021. *City of South El Monte General Plan Public Health, Safety, and Environmental Justice Element, Page 40.* Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 2024.

[5] Los Angeles County Fire Department. 2024. *Los Angeles County Fire Department 2024 Unit Fire Plan2 Strategic Fire Plan, page 3.* Retrieved from: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-plan/2024/2024-los-angeles-county-unit-fire-plan.pdf?rev=0a4be908a0fe4a6d960aed53aa09f900&hash=93938B5B098172DF384EB36D7097D037. Accessed August 2025.

[6] Los Angeles County Fire Department. 2024. Certified Unified Program Agency (CUPA). Retrieved from: https://fire.lacounty.gov/cupa-programs/. Accessed November 2024.

identifies goals focused on enhancing protection of lives, property, and natural resources from wildland fire, as well as improving environmental resilience to wildland fires.[7]

City of South El Monte General Plan

The *City of South El Monte General Plan* (General Plan) Public Health, Safety, and Environmental Justice Element includes goals and policies related to hazards and hazardous materials. The following list includes General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project.

Public Health, Safety, and Environmental Justice Element

Goal 1	**Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural hazards.**
Policy 1.4	Implement Programs and Standards to Mitigate Fire Risk and Secondary Impacts.
Goal 2	**Promote a community safe from human-cause hazards.**
Policy 2.3	Limit the Potential Hazards from the Transportation and Disposal of Hazardous Waste.
Goal 4	**Strengthen regional systems and fortify critical infrastructure.**
Policy 4.1	Maintain and Repair the Community's Infrastructure to Minimize the Potential for System Failure Because of a Disaster.

City of South El Monte Code of Ordinances

Title 8, Chapter 8.04 County Health Code Adopted. This chapter adopts the County's Health Code by reference as the City's Health Code.

Title 8, Chapter 8.32 Hazardous Materials. This chapter defines "dangerous and hazardous materials" and establishes liability for cleanup and abatement for dangerous and hazardous materials deposited on any City property.

Title 15, Chapter 15.14 Fire Code. The City has adopted the Los Angeles County Fire Code as amended and in effect on or before January 1, 2023. The City has adopted to 2022 California Fire Code.

Title 12, Chapter 12.08 Public Improvements Affecting Roadways. This chapter establishes permit requirements and procedures for installation of public improvements on any roadway within the city.

City of South El Monte Environmental Services Division

The City's Environmental Services Division addresses all matters related to solid waste collection, hazardous waste and recycling programs provided to the residents and businesses of the City. This includes contract management for the City's waste hauler to provide services such as solid waste collection, management of a variety of recycling grant programs, providing special outreach and educational programs relating to solid waste and recycling.

[7] Los Angeles County Fire Department. 2024. *Los Angeles County Fire Department 2024 Unit Fire Plan2 Strategic Fire Plan, page 3.* Retrieved from: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-plan/2024/2024-los-angeles-county-unit-fire-plan.pdf?rev=0a4be908a0fe4a6d960aed53aa09f900&hash=93938B5B098172DF384EB36D7097D037. Accessed August 2025.

4.8.3 Existing Conditions

Current Use

The project site is relatively flat and gently slopes with an elevation of approximately 219 feet above mean sea level (msl) in the western corner and 226 msl in the eastern corner. The existing topography slopes generally from southeast to northwest at a gradient of less than one percent. The project site is primarily vacant apart from the scattered remnants of previous uses (including a building pad foundation and radio tower footings/pile caps). The project site is primarily populated by non-native grasses with sparse patches of ornamental vegetation. There are no on-site operations.

The project site is within U.S. Army Corps of Engineers (USACE) reservoir flowage easement area associated with the spillway activation elevation of the Whittier Narrows Dam. In a major flood event, flood waters can be released from the Whittier Narrows Dam to avoid safety issues and prevent Dam failure on flowage easement lands. The USACE has an easement across the entire project site to "overflow, flood and submerge" all or a portion of the project site in connection with the Whittier Flood Control Basin project (USACE Easement) pursuant to the covenants and conditions provided in an order and judgement entered on September 8, 1955 in an action by the United States of America in Case No. 9103, recorded October 9, 1958 in Book M131, Page 58, Official Records (Order). The Order requires written consent from the USACE for the "the type and location of any structure and/or appurtenance thereto" in the USACE Easement.

Current Use of Adjacent Properties

The project site is situated in the southwestern portion of the City. Whittier Narrows Recreation Area is located southwest of the project in unincorporated Los Angeles County (**Figure 3-2: Vicinity Map**). State Route 60 (SR-60) is just north of the project site, specifically at the Santa Anita Avenue interchange. The project site is approximately two miles northeast of the Whittier Narrows Dam. **Table 4.8-1: Adjacent Properties** summarizes the land uses adjacent to the project site.

Table 4.8-1: Adjacent Properties

Direction Relative to the Project Site	Description
Northeast	Construction yard which abuts the southern portion of SR-60
Northwest	Santa Anita Avenue with Whittier Narrows parking lot and SR-60
South	The Los Angeles County Parks and Recreation Maximo Training Center, Santa Anita Avenue, and Lexington-Gallatin Road
Southeast	Lexington-Gallatin Road and Whittier Narrows Recreation and residential properties south of the roadway
Southwest	Santa Anita Avenue with Whittier Narrows Recreation west of Santa Anita Avenue
East	Lexington-Gallatin Road and single-family residential properties on the southern side of the roadway

Source: See **Section 3.2.1: Surrounding Land Uses**.

Historical Use of Site

According to the Phase I ESA, the project site was primarily used for agricultural uses from 1928 to 1938. Minimal changes occurred on the project site until 1948, when two buildings and three KRLA radio towers were constructed. Six radio towers are represented on the 1968 maps and subsequent maps, suggesting that three additional radio towers were constructed at a later date. The KRLA station became obsolete

and was abandoned in 1987. The radio towers were removed in the late 1980s to early 1990s, and the site has remained vacant with the exception of the remaining remnant structural foundations of the two buildings and radio towers.

Off-site land uses to the west (i.e., Whittier Narrows Recreation) and northeast (i.e., unpaved construction yard) have generally remained unchanged since 1928. By 1926, scattered farmhouses were developed to the southeast and east. Between 1928 and 1938, Lexington-Gallatin Road was constructed adjacent to the project site. Between 1952 and 1964, the scattered farmhouses southeast of the project site were removed and the Los Angeles County Parks and Recreation buildings east of the project site were constructed. By 1972, SR-60 and Santa Anita Avenue were constructed north and west of the project site, and the Legg Lakes were constructed within the Whittier Narrows Recreation Area. By 1977, the Whittier Narrows Picnic area and Los Angeles County and Recreation Maximo Training Center were constructed south and southeast of the project site. The single-family residential properties to the east near SR-60 have gradually developed since 1926 with many of the residences dating to the 1990s.

Phase I Environmental Site Assessment

A Phase I ESA was prepared by Partner Engineering and Science, Inc. in March 2025. This investigation included site reconnaissance, review of regulatory databases, aerial photographs, City directories, and topographic maps (see **Appendix J).**

Database Review

The Phase I ESA database review identified the project site was listed as "AT&T Mobility - LAC033-01 South El Monte" and "New Cingular Wireless." AT&T Mobility - LAC033-01 South El Monte, listed at 825 Lexington-Gallatin Road, is identified in the RCRA NonGen, CERS, CERS Haz Waste, FINDs, and ECHO databases. The Phase I ESA did not identify any RCRA violations listed for this facility. New Cingular Wireless, also listed at 825 Lexington-Gallatin Road, is identified in the HWTS database as a Satellite Telecommunications facility. The Phase I ESA determined these listings are not considered to be an environmental concern due to their current regulatory status and lack of listings in other databases indicating violations and/or a prior release.

The Phase I ESA database review also considered the potential and likelihood of contamination from adjoining and nearby sites and identified the following facilities adjacent to the project site.

Los Angeles County, Parks and Recreation, Whittier Narrows Recreation Area, Universal Waste Systems, Inc. is located adjacent to the project site at 823 Lexington-Gallatin Road and is hydrologically down-gradient of the project site. This facility is listed in the State Well Investigation Program (CA WIP), CERS, CERS Tanks, UST, HIST UST, and RCRA NonGen database. The Phase I ESA did not identify any RCRA violations listed. The CA WIP listing indicates that this facility was investigated by the RWQCB as a suspected contributor to the San Gabriel Valley Superfund Site. RWQCB investigations identified one 1,000-gallon fuel UST was identified at the site. LACFD last inspected the facility on November 19, 2019, and violations were listed for failure to annually review and electronically certify the business plan and hazardous material inventory. The facility returned to compliance on April 6, 2020. The facility's status is listed as "historical" indicating RWQCB has completed their investigations and any necessary actions have been concluded, which signifies that the case is resolved or inactive. Therefore, the Phase I ESA determined this facility is not considered to be an environmental concern due to its regulatory status.

San Gabriel Valley (Area 1) National Priority List (NPL) is part of the San Gabriel Valley Superfund site, which is an 11-square-mile area of contaminated groundwater in Los Angeles. The project site is located

within the boundaries of the San Gabriel Valley (Area 1) NPL site's Whittier Narrows Operable Unit (OU) and adjacent to the South El Monte OU. The San Gabriel Valley (Area 1) NPL is one of four Superfund sites in the 170-square-mile San Gabriel Valley. The Whittier Narrows OU is one of eight OUs established by the U.S. EPA for the San Gabriel Valley Superfund site. Multiple potentially responsible parties contaminated over 30 square miles of groundwater under the San Gabriel Valley with volatile organic compounds (VOCs) and industrial solvents. Groundwater is contaminated with trichloroethylene (TCE), perchloroethylene (PCE), and carbon tetrachloride (CTC). Many public wells in this area exceed the U.S. EPA Suggested No Adverse Response Levels (SNARL) for TCE and PCE. Groundwater contamination was first detected in 1979. San Gabriel Valley (Area 1) NPL cleanup, operation and maintenance activities, and monitoring are ongoing.

In 2013, the U.S. EPA conducted a five-year review of the Whittier Narrows and South El Monte OUs interim remedies to ensure they are functioning as intended by the IROD and are protecting public health and the environment. The overall protectiveness determination for the San Gabriel Valley Area 1 Superfund Site interim remedy is deferred, and a protectiveness determination at the South El Monte OU cannot be made until further information is obtained. It is important to note that although the project site is within the Whittier Narrows OU and adjacent to the South El Monte OU, it is not considered a source nor is it within a source area.

The primary contaminant in the Whittier Narrows OU is PCE. In the Whittier Narrows OU shallow zone (27 to 29 feet below ground surface [bgs]), 2011 analytical data results from sampling indicate PCE concentrations are below the maximum containment level (MCL) throughout the Whittier Narrows OU and the extent of contamination has shrunk dramatically and continues to decline since construction of the 1999 interim remedy system. According to the Phase I ESA, there are currently no shallow zone MCL exceedances in the Whittier Narrows OU, indicating that continued extraction is not needed to meet the goals of this hydraulic containment remedy. Additionally, the project site is not located within the shallow zone PCE contamination zone (**Appendix J**).

In the intermediate zone (between 150 to 600 feet bgs), PCE concentrations have generally been declining in the in the upgradient portions of the Whittier Narrows OU; however, reductions have been less consistent as compared to the shallow zone, and several zones remain near or slightly above the MCL. According to the Phase I ESA, the project site is in the intermediate zone with a groundwater plume between 150-300 and 450-600 feet bgs containing a PCE contamination range of 0.5 to 5 µg/L. Therefore, based on the confirmed groundwater contamination in the vicinity of the project site, the Phase I ESA determined this listing is considered a recognized environmental condition (REC).

General Environmental Concerns

Asbestos-Containing Materials (ACM). Asbestos is a mineral fiber that was most commonly used prior to 1980 in various building construction materials (e.g., floor tiles, roofing materials, thermal system insulation, mastics) for insulation, strength, and fire-retardant purposes. When repair, remodeling, or demolition activities damage or disturb asbestos, microscopic fibers become airborne and can be inhaled into the lungs. Because only the foundations of previously demolished buildings remain, asbestos-containing materials would not be present.

Lead-Based Paint (LBP). Historically, lead was used as a pigment and drying agent in oil-based paint. In 1978, the federal government banned the consumer use of lead-containing paint. Therefore, structures

constructed prior to 1978 are more likely to have lead-based paint.[8] Because there are no structures on the project site, lead-based paint would not be present.

Radon. Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The U.S. EPA has prepared a map to assist national, State, and local organizations to target their resources and to implement radon-resistant building codes. The project site is located within Zone 2 on the U.S. EPA's Radon Zones map. Zone 2 indicates areas where average indoor radon levels are between 2.0 and 4.0 picocuries per liter (pCi/L). Radon levels in Zone 2 would not pose a significant health risk because the Project does not involve residential uses, where occupants typically spend long periods in enclosed spaces, leading to higher exposure. Therefore, radon is not considered to be a significant environmental concern for the project site.

Recommendations

The Phase I ESA determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) NPL Whittier Narrows OU listing is considered a Recognized Environmental Condition (REC). A REC is the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or that pose a material threat of a future release.

As it relates to the identified REC, the Phase I ESA concluded that there is no further investigation related to current and future use of the project site required at this time, due to the following:

- The project site is not a source and is not within the source area.
- Current data indicates VOCs in shallow groundwater do not exceed drinking water standards.
- The availability of a public water supply (on-site groundwater will not be used for drinking).
- The ongoing remedial actions within the San Gabriel Valley (Area 1) NPL, identification of responsible parties, and regulatory oversight by the U.S. EPA.

4.8.4 Methodology

In determining whether Project implementation would result in impacts concerning hazards or hazardous materials, this analysis considers the recommendations of State CEQA Guidelines Appendix G. The evaluation was based on a review of regulations and a determination of the applicability of the regulations within the project area. The baseline conditions and impact analyses are based on review of Phase I ESA (**Appendix J**), analysis of aerial and ground-level photographs, and review of various data available in public records, including local planning documents. The determination that the proposed Project will or will not result in a significant impact with respect to hazards and hazardous materials considers the type of development proposed and whether or not past or current uses on the site have the potential to pose a risk to the proposed Project.

4.8.5 Thresholds of Significance

The following significance criteria for hazards and hazardous materials were derived from the Environmental Checklist in the *State CEQA Guidelines, Appendix G*. An impact of a project could be considered significant and may require mitigation if it meets one of the following criteria.

[8] U.S. EPA. 2024. *Protect Your Family from Sources of Lead.* Retrieved from: https://www.epa.gov/lead/protect-your-family-sources-lead. Accessed November 2024.

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- 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.
- Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school.
- 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, create a significant hazard to the public or environment.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

As addressed in **Section 1.5: Summary of Effects With No Impact**, the City has determined that the Project would not have a significant impact on the following thresholds for the reasons stated below, and that no further analysis was required.

- 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, result in a safety hazard or excessive noise for people residing or working in the project area.

The San Gabriel Valley Airport is located at 4233 Santa Anita Avenue in the City of El Monte approximately three miles northeast of the project site. According to the Los Angeles County ALUCP, the project site is not located within the San Gabriel Valley Airports Influence Area. Therefore, the project would not result in an airport-related safety hazard or excessive noise for people residing or working at the project site, and no impact would occur.

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

According to CAL FIRE, there are no wildfire Fire Hazard Severity Zones (FHSZ) in the City. The project site is within an identified Local Responsibility Area (LRA).[9] LRAs are incorporated cities, urban regions, agriculture lands, and portions of the desert where the local government is responsible for wildfire protection. The nearest Very High FHSZ is in a LRA approximately 0.7 mile southeast of the project site (the 2025 maps show portions of Durfee Avenue and Rosemead Boulevard as Very High FHSZs but not the property adjacent to the roadways. Land east and west of San Gabriel Boulevard, approximately 1.2 miles to the west is designated Very High FHSZ. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Threshold 4.8-1:	**Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
	Level of Significance: Less than Significant Impact

Construction

Project construction activities would involve the transport, use, and disposal of hazardous materials including fuels, paints, mechanical fluids, and solvents. Should a spill or other hazardous materials incident

[9] CAL FIRE, *Fire Hazard Severity Zone Viewer*, Retrieved from: Compare old and new LRA FHSZ | Fire Hazard Severity Zone and Local PIO Viewer App. Accessed May 22, 2025.

occur, construction staff would be required to be well versed in handling such a situation, including containment and who to contact if such a situation occurs. Pursuant to OSHA regulations (29 CFR. Part 1910.120), standard accident training for cleaning up small spills would be provided to all individuals prior to their work with hazardous substances, and the appropriate types and amounts of spill cleanup materials and personal protective equipment would be immediately available.

Transport, use, and disposal of hazardous materials during construction would be similar to other construction projects and would not be present in such a quantity or used in a manner that would pose a significant hazard to the public. Further, the Project would comply with the Hazardous Materials Transportation Act and Hazardous Materials Release Response Plans and Inventory Act, which address safe handling procedures and emergency response procedures in the event of an accidental release. Transport, use, and disposal of these potentially hazardous materials would be temporary and cease upon completion of Project construction.

Compliance with the regulatory framework would ensure Project construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction. Therefore, compliance with State and federal regulations, hazardous material impacts related to construction materials would be mitigated to a less than significant level.

Operations

The routine transport, use, and disposal of hazardous materials can result in hazards to people and the environment due to the potential for accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and hazardous material storage and distribution facilities. At full buildout, the Project would include one warehouse building, a City public park, and associated infrastructure improvements. While the future tenants of the warehouse building are not currently known, the Project is not anticipated to use significant quantities of hazardous materials or to generate significant quantities of hazardous materials requiring transport or disposal of hazardous materials. Section 17.09.020 of the City Municipal Code prohibits "industrial uses when such uses are determined to be hazardous in nature, either by virtue of process or product or through the emission of hazardous effluents, offensive odors or pollutants" in the applicable Manufacturing (M) zoning district. The proposed Project would be expected to use limited hazardous materials and substances which are routinely used by other businesses such as cleaners, paints, solvents, and fertilizers and pesticides for site landscaping.

The routine transport, use, and disposal of these materials would be required to adhere to federal, State, and local regulations for transport, use, and disposal of hazardous substances, such as the Hazardous Materials Transportation Act and Hazardous Materials Release Response Plans and Inventory Act, which address safe handling procedures and emergency response procedures in the event of an accidental release. Further, compliance with various U.S. EPA, State Department of Health Services, and SCAQMD regulations ensure that hazardous materials/waste users, generators, and transporters provide operational safety and measures to reduce threats to public health and safety. Therefore, given the insignificant amount of regularly transported hazardous materials and compliance with applicable state and Federal regulations, project operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a less than significant impact would occur.

Threshold 4.8-2:	**Would the Project 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?** ***Level of Significance:*** Less than Significant with incorporation of MM GEO-1 in **Section 4.6: Geology and Soils** and MM HYD-1 in **Section 4.9: Hydrology and Water Quality**.

Construction

As discussed above, the Phase I ESA identified a REC associated with the project site. The Phase I ESA determined that although the project site is not considered a source nor is it within a source area for the San Gabriel Valley (Area 1) NPL, the project site's location within the Whittier Narrows OU and confirmed groundwater contamination represents a REC. According to the Phase I ESA, the project site is located in an intermediate zone with a groundwater plume between 150-300 and 450-600 feet bgs containing a PCE contamination range of 0.5 to 5 µg/L.

Project construction would require demolition of the remnant building foundations and radio tower footings and excavation up to 10 feet bgs to accommodate Storage Basin Improvements associated with the Project. Therefore, construction activities would not reach the PCE contamination range of 150 to 300 and 450 to 600 feet bgs and would not result in a release of hazardous materials into the environment. As outlined above, the project site is not located within the Whittier Narrows OU shallow zone with PCE contamination ranging from 27 to 29 feet bgs, regardless proposed excavation is not anticipated to reach the shallow zone contamination range either. As discussed in **Section 4.6: Geology and Soils**, construction excavation could potentially encounter groundwater due to the historic high groundwater levels in the vicinity of the project site, which have ranged from approximately 2 feet bgs in 1998 to 19 feet bgs in 2012. As detailed in the Geotechnical Investigation, recent groundwater levels at the project site were determined to be at a depth of 30 to 38 feet bgs, based on borings conducted on April 11, 2023 (**Appendix G**). Although Project excavation would not reach either the intermediate or shallow PCE contamination ranges, there is the potential for construction grading and excavation to encounter contaminated groundwater due to historical high groundwater levels and the project site's location within the Whittier Narrows OU and proximity to the South El Monte OU. Therefore, Project construction would implement MM GEO-1 which requires City Building and Safety Department review of all project construction plans to ensure compliance with various Geotechnical Investigation recommendations related to the discovery of groundwater, wet soils, or unstable soils during grading, stabilization, dewatering, fill materials, and foundations. The Project would also be required to implement MM HYD-1 which requires the Project Applicant to obtain coverage under the Los Angeles RWQCB General NPDES Permits Order No. R4-2023-0429: Groundwater Discharges from Construction and project Dewatering to Surface Waters, which requires sampling, treatment, and disposal of all extracted water if any groundwater is extracted. Through compliance with established regulatory framework and implementation of mitigation measures, project grading and excavation would not 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. Impacts would be less than significant with mitigation.

Operations

At full buildout, the Project would include one warehouse building, a City public park, and associated infrastructure improvements. While the future tenants of the building are not currently known, the

Project is not anticipated to use significant quantities of hazardous materials or to generate significant quantities of hazardous materials requiring transport or disposal of hazardous materials. Section 17.09.020 of the City Municipal Code prohibits "industrial uses when such uses are determined to be hazardous in nature, either by virtue of process or product or through the emission of hazardous effluents, offensive odors or pollutants" in the applicable Manufacturing (M) zoning district. As concluded in Threshold 4.8-1, operations associated with the warehouse would be expected to use limited hazardous materials and substances that are routinely used by other businesses and would be required to adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Therefore, given the insignificant amount of regularly transported hazardous materials and compliance with applicable State and federal regulations, Project operations would not 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, and a less than significant impact would occur.

Threshold 4.8-3:	**Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?** ***Level of Significance:*** Less than Significant with incorporation of MM GEO-1 in **Section 4.6: Geology and Soils** and MM HYD-1 in Section **4.9: Hydrology and Water Quality**.

The nearest school to the project site is South El Monte High School, located at 1001 Durfee Avenue, approximately 0.2 mile southeast of the project site.

Construction

Project construction would require; demolition of remnant building foundations and radio tower footings, excavation and grading of the future City park area to raise the finished grade of the warehouse area, construction of the warehouse, Storage Basin Improvements, and future construction of the City park site, all of which could involve handling of limited quantities of hazardous materials on and off the project site. As concluded in Threshold 4.8-1, transport, use, and disposal of hazardous materials during construction would not be present in such a quantity or used in a manner that would pose a significant hazard to the public and would cease upon completion of construction. Further, should a spill or other hazardous materials incident occur, construction staff would be required to be well versed in handling such a situation, including containment and who to contact if such a situation occurs. Pursuant to OSHA regulations (29 CFR. Part 1910.120), standard accident training for cleaning up small spills would be provided to all individuals prior to their work with hazardous substances, and the appropriate types and amounts of spill cleanup materials and personal protective equipment would be immediately available. Therefore, with mitigation construction would not result in a significant hazard to the public.

As concluded in Threshold 4.8-2, site grading and excavation could potentially encounter contaminated groundwater due to the historic high groundwater levels in the vicinity of the project site, and the project site's location within the Whittier Narrows OU and proximity to the South El Monte OU. However, through implementation of MM GEO-1 and MM HYD-1, Project grading and excavation would not create a significant hazard within one-quarter mile of an existing or known proposed school.

Further, as concluded in **Section 4.2: Air Quality**, buildout of the proposed Project would not expose residential, student, park, or worker receptors to toxic air contaminant (TAC) concentrations in

exceedance of established standards or include long-term sources of odors or other emissions (such as those leading to odors). Therefore, Project construction would not emit hazardous emissions within one-quarter mile of an existing school, and through compliance established regulatory framework and implementation of MM GEO-1 and MM HYD-1, handling of hazardous or acutely hazardous materials, substances, or waste during construction within one-quarter mile of an existing school would not create a significant hazard, and impacts would be less than significant with the incorporation of mitigation.

Operations

At full buildout, the Project would include one warehouse building, a City public park, and associated infrastructure improvements within one-quarter mile of an existing school. While the future tenants of the warehouse building are not currently known, the Project is not anticipated to handle significant quantities of hazardous materials or to generate significant quantities of hazardous materials requiring transport or disposal of hazardous materials. Section 17.09.020 of the City Municipal Code prohibits "industrial uses when such uses are determined to be hazardous in nature, either by virtue of process or product or through the emission of hazardous effluents, offensive odors or pollutants" in the applicable Manufacturing (M) zoning district. As concluded in Threshold 4.8-1, Project operations would be expected to use limited hazardous materials and substances and would be required to adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Therefore, given the insignificant amount of regularly transported hazardous materials and compliance with applicable state and Federal regulations, handling of hazardous or acutely hazardous materials, substances, or waste during project operations within one-quarter mile of an existing school would not create a significant hazard, and impacts would be less than significant. Further, as concluded in **Section 4.2: Air Quality**, buildout of the proposed Project would not expose residential, student, recreational, or worker receptors to TAC concentrations in exceedance of established standards or include long-term sources of odors or other emissions (such as those leading to odors), and impacts would be less than significant. Therefore, project operations would not emit hazardous emissions within one-quarter mile of an existing school and given the insignificant amount of hazardous materials which would be handled on the site and compliance with applicable State and federal regulations, handling of hazardous or acutely hazardous materials, substances, or waste during project operations within one-quarter mile of an existing school would result in a less than significant impact.

Threshold 4.8-4:	**Would the project 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?** ***Level of Significance:*** Less than Significant with incorporation of MM GEO-1 in **Section 4.6: Geology and Soils** and MM HYD-1 in **Section 4.9: Hydrology and Water Quality**.

California Government Code Section 65962.5 requires DTSC to compile a list of hazardous waste facilities that are subject to corrective action. As discussed above, the project site is located within the San Gabriel Valley (Area 1) NPL Whittier Narrows OU and is adjacent to the South El Monte OU. The Phase I ESA determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) NPL Whittier Narrows OU listing is considered to represent a REC. However, because the project site is not a source and is not located in a source area, ongoing remedial actions, identification of responsible parties, and regulatory oversight by the U.S. EPA, no further action related to current and

future use of the project site is anticipated. Further, as concluded in Threshold 4.8-2, with implementation of MM GEO-1 and MM HYD-1, the Project would not create a significant hazard to the public or the environment. Therefore, implementation of the Project would not create a significant hazard to the public or the environment; impacts would be less than significant with mitigation.

Threshold 4.8-5:	**Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**
	Level of Significance: Less than Significant Impact

Construction

The project site is in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The City's General Plan Public Health, Safety, and Environmental Justice Element establishes the emergency evacuation routes for the City. These routes are SR-60, I-10, I-605, Rosemead Boulevard, Garvey Avenue, Santa Anita Avenue, Durfee Avenue, Rush Street, and Peck Road.[10] The project site is adjacent to SR-60, specifically at the Santa Anita Avenue interchange and Santa Anita Avenue to the north and west. Construction activities are expected to be primarily contained within the project site boundaries and would not require the complete closure of any public or private streets or roadways during construction. Any lane closures during construction would be temporary and project construction would be required to comply with City Code Section 12.08.050: Improvements – New Construction, which requires the City's traffic engineer to review and approve proposed public improvements for compliance with accepted traffic management standards, inclusive of a construction management plan and haul route plan. Compliance with local regulations would ensure emergency access to the project site and adjacent streets would be maintained during Project construction. Therefore, construction would not impair implementation of or physically interfere with a City adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

The project site is located approximately two miles northeast of the Whittier Narrows Dam and within USACE reservoir flowage easement lands associated with the spillway activation elevation of the Whittier Narrows Dam. In a major flood event, flood waters can be released from the Whittier Narrows Dam to avoid safety issues and prevent Dam failure on flowage easement lands. Accordingly, the Project includes the construction of Storage Basin Improvements, which are subject to approval by USACE pursuant to the Section 408 Program. Project construction would also require demolition of remnant building foundations and floor slabs, excavation and grading of the future City park area and fill of the warehouse area, construction of the warehouse, and future construction of improvements on the City park site. As concluded in **Section 4.9: Hydrology and Water Quality**, these activities could temporarily alter the existing drainage pattern of the site and could result in flooding, additional and/or polluted runoff, or impede/redirect flood flows if drainage is not properly controlled. However, potential flooding related to flood waters from the Whittier Flood Control Basin would be avoided pursuant to the Storage Basin Improvements approved by USACE, which would be completed prior to construction of the warehouse building and prior to future construction of improvements in the City park area. Additionally, preparation of a SWPPP in compliance with the NPDES Construction General Permit, included as SC HYD-1, as verified during the City's construction permitting process, would ensure that Project construction-related impacts related to potential flooding, additional and/or polluted runoff, or impeded/redirected flood flows would not occur and project construction would not impair implementation of or physically interfere with an

[10] City of South El Monte. 2021. *City of South El Monte General Plan Public Health, Safety, and Environmental Justice Element,* page 24.

adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

Operations

Vehicular access to the proposed warehouse would be provided via two 40-foot driveways on Lexington-Gallatin Road for both truck loading/unloading and vehicle parking. Access to the future City park component is conceptually proposed to be from one new 26-foot driveway off Santa Anita Avenue. All driveway improvements would be constructed pursuant to City requirements and no changes to the existing roadway network would occur. Operation of the proposed Project would increase the number of structures and employees in the area; however, as addressed in **Section 4.12: Population and Housing**, the Project would not directly or indirectly induce substantial unplanned population growth in the City and anticipated employment would be less than what was assumed in the General Plan under the existing Commercial (C) designation for employees on the project site. As noted in **Section 4.13: Public Services** and in the General Plan Public Health, Safety, and Environmental Justice Element, the City's response capacity currently meets the needs of the community.[11] Therefore, given the population growth associated with the employees generated by the proposed Project would be less than what was assumed by the General Plan (which includes the City's Public Health, Safety, and Environmental Justice Element), Project operations would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

The project site is located approximately 2 miles northeast of the Whittier Narrows Dam and within USACE reservoir flowage easement lands associated with the spillway activation elevation of the Whittier Narrows Dam. As previously addressed, the Project includes the construction of Storage Basin Improvements, which are subject to approval by USACE pursuant to the Section 408 Program. In a major flood event, flood waters can be released from the Dam to avoid safety issues and prevent Dam failure on flowage easement lands. The Project would be developed to maintain and improve existing flood storage capacity on the site by balancing the cut and fill up to the spillway activation elevation of the Whittier Narrows Dam. The Project proposes to excavate within the future City park portion of the project site and raise the finished grade of the warehouse portion above the spillway activation elevation using the excavated material per USACE requirements. The excavated area would serve as a detention basin for flood waters associated with the Whittier Narrows Dam. The Storage Basin Improvements include but are not limited to the (i) installation of a new storage basin approximately three to ten feet below the existing grade of Santa Anita Avenue and (ii) installation of a new gravity storm drain connection for the new storage basin, which would connect to an existing County Flood Control District pipeline along the northern property line. Similar to existing conditions, storm water would flow in a westerly direction to a proposed 30-inch reinforced concrete pipe (RCP) gravity storm drain which would connect to an existing 90-inch RCP Los Angeles County Flood Control District storm drain along Santa Anita Avenue near the northwestern property line. Storm water would then travel from the public system and discharge into the nearby Legg Lakes. The warehouse finished floor elevation would be raised to approximately 229 feet. Therefore, because the Project would be developed to maintain and improve existing flood storage capacity on site and would include Storage Basin Improvements approved by USACE, Project implementation would not impair implementation of or physically interfere with a USACE adopted emergency response plan or an emergency evacuation plan, and impacts would be less than significant.

[11] City of South El Monte. 2021. *City of South El Monte Public Health, Safety, and Environmental Justice Element,* page 40.

4.8.6 Cumulative Impacts

Impacts associated with hazardous materials are often site-specific and localized. The EIR evaluates Recognized Environmental Conditions (RECs) in connection with the project site and surrounding area. The database reviews the findings of various governmental database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons within a search radius of up to one mile from the site and serves as the basis for defining the cumulative study area. Generally, any past projects would not combine with a proposed project to cause a cumulative hazardous materials effect because these past projects have been required to complete applicable remediation efforts.

The environmental concerns associated with hazardous materials are typically site-specific, with the exception of the San Gabriel Valley (Area 1) NPL Whittier Narrows OU. Concerning the San Gabriel Valley (Area 1) NPL Whittier Narrows OU, the Project would not disturb the underlying affected groundwater plume as the Project does not propose to excavate to a depth associated with PCE contamination for either the shallow or intermediate zone. Additionally, while there is the potential for contaminated groundwater to be encountered during Project construction activities, due to historical high groundwater levels and the project site's location within the Whittier Narrows OU and proximity to the South El Monte OU, the Project would comply with MM GEO-1 and MM HYD-1 which requires compliance with the Geotechnical Investigation recommendations and sampling, treatment, and disposal of all extracted water if any groundwater is extracted. Through compliance with established regulatory framework and implementation of mitigation measures, the Project's grading and excavation would not create a significant hazard to the public or the environment.

Each project is required to address any issues related to hazardous materials or wastes. Cumulative development projects would be required to assess potential hazardous materials impacts on the development site prior to grading. The project and other cumulative projects would be required to comply with laws and regulations governing hazardous materials and hazardous wastes used and generated as described previously. Projects must adhere to applicable regulations for the use, transport, and disposal of hazardous materials and implement mitigation in compliance with federal, State, and local regulations to protect against site contamination by hazardous materials. Compliance with all applicable regulations related to hazardous materials and applicable mitigation measures would ensure that the routine transport, use, or disposal of hazardous materials would not result in adverse impacts. Additionally, site-specific investigations would be conducted at sites where contaminated soils or groundwater could occur to minimize the exposure of workers and the public to hazardous substances.

With compliance to applicable federal, State, and local regulations governing hazardous materials, and implementation of MM GEO-1 and MM HYD-1, the potential risks associated with hazardous wastes would be reduced to a level of less than significant. The incremental effects of the proposed Project related to hazards and hazardous materials are anticipated to be minimal, and any effects would be site-specific. All Project impacts related to hazardous materials would be less than significant with implementation of required mitigation measures. Therefore, the Project would not result in incremental effects to hazards with respect to hazardous materials that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. Therefore, the project would not result in cumulatively considerable impacts to or from hazards or hazardous materials and the cumulative impact would therefore be less than significant.

4.8.7 Mitigation Program

Standard Conditions

No standard conditions are applicable.

Mitigation Measures

MM GEO-1 in **Section 4.6: Geology and Soils** and MM HYD-1 in **Section 4.9: Hydrology and Water Quality** are applicable to the Project. No additional mitigation measures are required.

4.8.8 Level of Significance After Mitigation

With implementation of the Mitigation Program set forth in this EIR section, potential impacts related to hazardous materials would be reduced to a level considered less than significant.

4.8.9 References

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U.S. Environmental Protection Agency (U.S. EPA). 2024. *Protect Your Family from Sources of Lead.* Retrieved from: https://www.epa.gov/lead/protect-your-family-sources-lead. Accessed November 2024.

4.9 HYDROLOGY AND WATER QUALITY

4.9.1 Introduction

This section of the EIR identifies and analyzes the hydrologic conditions while assessing the potential impact the Project could have through site development. The pre-development conditions of the water and drainage systems proximate to the project area were used as a baseline with which to compare potential impacts associated with the Project and will inform the degree of impact that the proposed Project could have on those existing hydrologic systems. Federal, State, regional, and local regulations provide further context regarding the area's hydrologic resources. A Preliminary Hydrology and Hydraulics Study and a Preliminary Low Impact Development Plan (LID) are summarized in this section and included in their entirety in **Appendix K** and **Appendix L**, respectively, of this EIR.

4.9.2 Regulatory Setting

Federal Regulations

Clean Water Act

The Clean Water Act (CWA), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Important applicable sections of the CWA are as follows:

- Section 301 prohibits the discharge of any pollutant by any person, except as in compliance with Sections 302, 306, 307, 318, 402, and 404 of the CWA. Sections 303 and 304 provide for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity which may result in a discharge to "waters of the United States" to obtain certification from the State that the discharge will comply with other provisions of the CWA. The Regional Water Quality Control Board (RWQCB) provides certification.
- Section 402 establishes the National Pollution Discharge Elimination System (NPDES) a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the United States. This permit program is administered by the RWQCB and is discussed later in this section.
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the U.S. Army Corps of Engineers (USACE).

Rivers and Harbors Act of 1899

Section 14 of the Rivers and Harbors Act of 1899, as amended, codified at 33 USC 408 (Section 408). Section 408 authorizes the Secretary of the Army, on the recommendation of the Chief of Engineers, to grant permission for the alteration or occupation or use of a USACE project if the Secretary determines that the activity will not be injurious to the public interest and will not impair the usefulness of the project.

The USACE Section 408 program allows another party, such as a local government, company, or individual, to alter a USACE Civil Works project. Given the widespread locations of these projects, many embedded within communities, over time there may be a need to either alter or occupy these projects and their associated lands. Reasons for alterations could include improvements to the projects, relocation of part

of the project, or installing utilities or other non-project features. The proposed Project requires a Section 408 permit.

Federal Emergency Management Agency (FEMA)

The Federal Emergency Management Agency (FEMA) is responsible for determining flood elevations and floodplain boundaries based on USACE studies and approved agency studies. FEMA also is responsible for distributing the Flood Insurance Rate Maps (FIRM), which are used in the National Flood Insurance Program. These maps identify the location of special flood hazard areas, including the 100-year flood zone. FEMA allows nonresidential development in special flood hazard areas; however, construction activities are restricted depending upon the potential for flooding within each area. Federal regulations governing development in a Special Flood Hazard Area are set forth in 44 Code of Federal Regulations (CFR) 60. The regulations enable FEMA to require municipalities that participate in the National Flood Insurance Program to adopt certain flood hazard reduction standards for construction and development in 100-year floodplains. Section 60.3(c)(2) of the National Flood Insurance Program regulations requires that the lowest occupied floor of a residential structure be elevated to, or above, the 100-year flood elevation (the base flood elevation). In addition, the Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 mandate the purchase of flood insurance as a condition of federal or federally-related financial assistance for acquisition and/or construction of buildings in special flood hazard areas.

State Regulations

California Porter-Cologne Water Quality Control Act

The State of California's Porter-Cologne Water Quality Control Act (California Water Code Section 13000, et seq.) provides the basis for water quality regulation within California. The Act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the State. Waste discharge requirements (WDR) resulting from the report are issued by the RWQCB, as discussed below. In practice, these requirements are typically integrated within the National Pollutant Discharge Elimination System (NPDES) permitting process. The State Water Resources Control Board (SWRCB) carries out its water quality protection authority through the adoption of specific Water Quality Control Plans (Basin Plans). These plans establish water quality standards for particular bodies of water. California water quality standards are composed of three parts: the designation of beneficial uses of water, water quality objectives to protect those uses, and implementation programs designed to achieve and maintain compliance with the water quality objectives.

Clean Water Act Section 402

Section 402 of the Clean Water Act authorizes the SWRCB, a department of the California Environmental Protection Agency (CalEPA), to issue NPDES General Construction Storm Water Permit (Water Quality Order 99-08-DWQ), referred to as the "General Construction Permit." Construction activities can comply with and be covered under the General Construction Permit provided they:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation; and
- Perform inspections of all BMPs.

The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the construction site discharges directly to a water body listed on the 303(d) list for sediment. Increased compliance tasks under the adopted 2009 Construction General Permit include project risk evaluation, effluent monitoring, receiving water monitoring, electronic data submission of the SWPPP and all other permit registration documents, and a Rain Event Action Plan, which must be designed to protect all exposed portions of a project site within 48 hours prior to any likely precipitation event. The SWPPP would also include an Erosion Control Plan that would identify specific measures to control on-site and off-site erosion from the time ground disturbing activities are initiated through completion of grading.

Sustainable Groundwater Management Act

In 2014, California adopted the Sustainable Groundwater Management Act (SGMA) to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agencies (GSAs) be formed for all high and medium priority basins in the State. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results: significant groundwater-level declines, groundwater-storage reductions, seawater intrusion, water-quality degradation, land subsidence, and surface-water depletions; these are also referred to as sustainability indicators.

SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, this would be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The latest basin prioritization project, SGMA 2019 Basin Prioritization, was completed in December 2019. SGMA 2019 Basin Prioritization identified 94 basins/sub-basins as medium or high priority. The project site is within a "very low priority" California Statewide Groundwater Elevation Monitoring groundwater basin that is also part of an adjudicated groundwater[1]. Basins prioritized as low- or very low priority are not required to form a GSA and prepare a GSP. However, these basins are still encouraged to form GSAs and develop GSPs, update existing groundwater management plans, and coordinate with others to develop a new groundwater management plan in accordance with Water Code Section 10750 et seq.

Regional and Local Regulations

Los Angeles Regional Water Quality Control Board

The Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB) regulates State water quality standards in Los Angeles and Ventura counties, inclusive of the City of South El Monte. Beneficial uses and water quality objectives for surface water and groundwater resources in the area are established in the water quality control plans of each RWQCB and mandated by the State Porter-Cologne Act and CWA. The RWQCB also implements the CCWA Section 303(d) total maximum daily load (TMDL) process, which consists of identifying candidate water bodies where water quality is impaired by the presence of

[1] California Department of Water Resources. 2020. *SGMA Basin Prioritization Dashboard.* Retrieved from: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed November 10, 2024.

pollutants. The TMDL process is implemented to determine the assimilative capacity of the water body for the pollutants of concern and to establish equitable allocation of the allowable pollutant loading within the watershed. CWA Section 401 requires an applicant pursuing a federal permit to conduct any activity that may result in a discharge of a pollutant to obtain a water quality certification (or waiver) from the applicable RWQCB.

The RWQCB primarily implements basin plan policies through issuing waste discharge requirements for waste discharges to land and water. The RWQCB is also responsible for administering the NPDES permit program, which is designed to manage and monitor point and non-point source pollution. NPDES stormwater permits for general construction activity are required for projects that disturb more than one acre of land. Municipal NPDES stormwater permits are required for urban areas with populations greater than 100,000. In addition, projects that involve the California Department of Transportation (Caltrans) are required to comply with the Caltrans statewide NPDES permit and associated Stormwater Management Plan (SEMP). Caltrans implements the SEMP in coordination with the RWQCB.

County Waste Discharge Requirements

The Los Angeles County Flood Control District (LACFCD), the County of Los Angeles, and South El Monte along with 83 other incorporated cities therein (Permittees) discharge pollutants from their respective municipal separate storm sewer (drain) systems (MS4s). Stormwater and non-stormwater enter and are conveyed through the MS4 and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide waste discharge requirements (WDRs) contained in Order No. R4-2012-0175, as amended by R4-2012-0175-A01 (NPDES Permit No. CAS004001), *Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, Except Discharges Originating from the City of Long Beach MS4*, which was adopted November 8, 2012. The MS4 Permit Order provides the revised WDRs for MS4 discharges within the Los Angeles County watersheds, which includes South El Monte. Los Angeles County uses its Low Impact Development (LID) Ordinance to require that projects comply with NPDES MS4 Permit water quality requirements. The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all "New Development" and "Redevelopment" projects subject to the Order. New development and redevelopment projects/activities subject to Los Angeles County's LID Ordinance include all development projects equal to 1.0 acre or greater of disturbed area and residential new or redeveloped projects that create, add, or replace 10,000 sf or greater impervious surface area.

County of Los Angeles Hydrology Manual

The project site is within a watershed that the County classifies as the Los Angeles River Watershed. The LACFCD is responsible for providing flood protection, water conservation, recreation, and aesthetic enhancement within this entire watershed. The Los Angeles County Department of Public Works (LACDPW) developed the "Hydrology Manual" (January 2006) ("2006 Hydrology Manual"), which establishes the LACDPW hydrologic design procedures based on historic rainfall and runoff data collected within the County. The Project is required to use the 2006 Hydrology Manual and accompanying hydrologic tools including the HydroCalc Calculator to calculate existing and proposed Project discharges and volumes.

County of Los Angeles Department of Public Works Low Impact Development Standards Manual

The County's Department of Public Works prepared the Low Impact Development Standards Manual (February 2014)[2] (LID Standards Manual) to comply with NPDES MS4 Permit requirements for stormwater and non-stormwater discharges from the MS4 within the County's coastal watershed (CAS004001, Order No. R42012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

Los Angeles Regional Water Quality Control Board Dewatering Permit

On December 21, 2023, the Los Angeles RWQCB issued General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2023-0429, NPDES No. CAG994004) (Groundwater Discharge Permit). The Groundwater Discharge Permit regulates construction dewatering and discharges of groundwater to surface waters during excavation. It specifies the discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater dewatering during construction activities. Dischargers are required to collect and analyze representative groundwater samples for all constituents listed in the Groundwater Discharge Permit. Based on the results, dischargers would be required to provide treatment for any toxic compounds detected above the applicable screening levels. To obtain coverage under the Groundwater Discharge Permit, each permittee must submit a Notice of Intent to begin the application process.

Los Angeles County Watershed Management Programs

The Los Angeles County MS4 Permit allows Permittees the flexibility to develop Watershed Management Programs (WMPs) or Enhanced Watershed Programs (EWMPs) to implement the requirements of the Permit on a watershed scale through customized strategies, control measures, and best management practices (BMPs). The City is a member. Participation in a Watershed Management Program is voluntary and allows a Permittee to address the highest watershed priorities, including complying with the requirements of Part V.A. (Receiving Water Limitations), Part VI.E (Total Maximum Daily Load Provisions) and Attachments L through R, by customizing the control measures in Parts III.A.4 (Prohibitions - Non-Storm Water Discharges) and VI.D (Minimum Control Measures).

The City of South El Monte is a participating member of the Upper Los Angeles River EWMP Group[3]. The Upper Los Angeles River EWMP Group consists of the City of Los Angeles as the coordinating agency, and the following participating members; County of Los Angeles, Los Angeles County Flood Control District, and the Cities of Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Canada Flintridge, Montebello, Monterey Park, Pasadena, Rosemead, San Gabriel, South El Monte, South Pasadena, San Marino, and Temple City.

[2] County of Los Angeles Department of Public Works. 2014. *Low Impact Development Standards Manua*l. Retrieved from: Los Angeles County Low Impact Development (LID) Manual.pdf (lacounty.gov), Accessed November 11, 2024.

[3] Los Angeles Regional Water Quality Control Boards.2017. *Upper Los Angeles River Watershed Management Group*. Retrieved from: https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/los_angeles/upper_losangeles/index.html. Accessed November 11, 2024.

San Gabriel Valley Water Company 2020 Urban Water Management Plan and Water Shortage Contingency

The City is a part of the San Gabriel Valley Water Company (SGVWC) service area. Pursuant to the UWMP Act, SGVWC prepares and adopts an Urban Water Management Plan (UWMP) every five years. SGVWC's most recent update was the San Gabriel Valley Water Company's 2020 UWMP and Water Shortage Contingency, which was adopted on July 1, 2021.

South El Monte General Plan

During project review, approval and permitting, the City requires new development projects to address the quality and quantity of stormwater runoff through the incorporation of permanent (post-construction) BMPs into a project's design. The *South El Monte General Plan* (General Plan) Environmental Justice, Health, and Safety Element and the Resource Element includes policies related to stormwater runoff and water quality. The following General Plan goals and policies have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project:

Environmental Justice, Health, and Safety Element

Goal 1 **Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural hazards.**

Policy 1.3 Minimize Flooding Risks through Appropriate Siting and Protection of Structures and Occupants.

Policy 4.1 Maintain and Repair the Community's Infrastructure to Minimize the Potential for System Failure Because of a Disaster.

Resources Element

Goal 3 **Ensure that City residents and businesses are provided with a reliable, safe domestic water source.**

Policy 3.1 Continue to participate in the National Pollution Discharge Elimination Systems (NPDES) program under the direction of the Los Angeles County Department of Public Works.

Policy 3.2 Support Federal government efforts to reduce contamination within the San Gabriel groundwater basin.

City of South El Monte Municipal Code

Title 8, Chapter 8.44 – Stormwater Management and Discharge Control. This chapter contains requirements that address reducing pollutants in stormwater discharges to protect and enhance the water quality of local watercourses in a manner consistent with the federal CWA, the Porter-Cologne Water Quality Control Act, and the municipal NPDES permit. This chapter is also intended to confirm and consolidate the City's legal authority necessary to control discharges to and from those portions of the MS4 over which it has jurisdiction as required by the municipal NPDES permit. Chapter 8.44.110 specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through the Standard Urban Stormwater Mitigation Plan (SUSMP). SUSMP conditions assigned by the City are all applicable LID requirements as an element of the SUSMP.

Title 16, Chapter 16.12 - Design and Improvement Requirements. This chapter notes that all projects that include a subdivision must incorporate appropriate erosion and sediment control measures as required by the City engineer. Additionally, any easement for drainage or flood control must be improved as specified by the City engineer and any groundwater or waterways must conform with the requirements of the RWQCB, the California Department of Fish and Wildlife, and the California Department of Public Health.

Title 16, Chapter 12.050: Public Utilities and Utility Easements. Section 16.12.050 of the Municipal Code provides requirements for public utility connections including electricity, gas, water, sewer, storm drain, and telecommunications services.

4.9.3 Existing Conditions

Regional Hydrology

The proposed Project would be located within the Los Angeles River Watershed. This watershed is one of the largest in the Region at 824 square miles; the river is 55 miles long. It is also one of the most diverse in terms of land use patterns. Approximately 324 square miles of the watershed are covered by forest or open space land including the area near the headwaters which originate in the Santa Monica, Santa Susana, and San Gabriel Mountains. The rest of the watershed is highly developed.

Site Hydrology

The project site is a vacant and currently undeveloped property. A part of the project site was previously developed and radio tower footings and foundations of two prior buildings are present on the site (see **Section 4.4: Cultural Resources**). The project site is within a USACE flowage easement used for additional storage for the Whitter Narrows Dam. The project site is approximately two miles northeast of the Whittier Narrows Dam. As addressed in **Section 3.0: Project Description**, the Project includes the construction of storage and drainage improvements for the required volume of potential flood waters from the Whittier Flood Control Basin (Storage Basin Improvements). The Storage Basin Improvements are subject to approval by USACE pursuant to the Section 408 Program, which is intended to verify that changes to an authorized USACE Civil Works project will not be injurious to the public interest and will not impair the usefulness of the applicable USACE project.

Most of the project site is pervious with moderate slopes that generally run from southeast to northwest at a gradient of less than one percent with elevations ranging from 219 to 226 above mean sea level (msl). Under existing conditions during a storm event, water would flow in a northwesterly direction towards Santa Anita Avenue. On-site stormwater would collect and eventually spill onto Santa Anita Avenue, finding its way into an existing public catch basin near the northwest corner of the site. The water then travels from that public system into the nearby Legg Lakes.

Precipitation frequency for the project site was estimated based on the Los Angeles County Hydrology Map. It is assumed that the project site would experience a precipitation depth of 5.96 inches for a 50-year, 24-hour storm event. Soil conditions also affect infiltration and stormwater runoff on-site. The project site has a hydrologic soil group classification of A and B. Group A Soils have a high infiltration rate (low runoff potential) when thoroughly wet. These consist primarily of deep, well-drained to excessively drained sands or gravelly sands. These soils have a high rate of water transmission. Group B Soils have a moderate infiltration rate when thoroughly wet and consist largely of sand and sandy loam with minimal amounts of clay. These soils have a moderately low runoff potential (**Appendix K**).

Surface Water Resources

The nearest surface water is Whittier Narrows Recreation Area/Legg Lakes. Legg Lakes are located west of the project site. The San Gabriel River is approximately 0.50 mile southeast of the site. No natural surface water bodies, streams, or retention ponds are on the project site.

Groundwater Resources

San Gabriel Valley Water Company (SGVWC) is a retail water supplier that serves all or portions of the cities of Arcadia, Baldwin Park, El Monte, Industry, Irwindale, La Puente, Montebello, Monterey Park, Pico Rivera, Rosemead, San Gabriel, Santa Fe Springs, South El Monte, West Covina, Whittier, and the unincorporated areas of Los Angeles County.[4] The SGVWC has a service area of approximately 45 square miles and provides water utility service to a populations of approximately 273,024 people. SGVWC's water supply sources include groundwater pumped from the Main San Gabriel Basin (Main Basin) and Central Basin; treated, imported surface water purchased from Metropolitan Water District of Southern California (MWD) through Central Basin Municipal Water District, and recycled water.

As detailed in the Geotechnical Investigation (**Appendix H**), borings and pressure dissipation tests conducted on April 11, 2023, at the project site indicated groundwater levels at a depth of 30 to 38 feet bgs. The depth to historically high ground water levels in the vicinity of the project site was recorded be 2 feet bgs in 1998 based on the Open File Report 98-15 from the Seismic Hazard Zone Report for the El Monte 7.5-Minute Quadrangle. To determine more recent high groundwater levels near the project site, the Geotechnical Investigation included a search of the California Department of Water Resources, Water Data Library Station Map database. In 2012, a monitoring well approximately 2,350 feet southeast of the project site reported a high groundwater level of 19 feet bgs.

Flood Hazard

The project site is covered by Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1670F. The project area does not fall within a FEMA-mapped special flood hazard area. The site is classified as Zone X, which is an area of Minimal Flood Hazard.

As noted above, the project site is located on USACE flowage easement lands used for additional storage for the Whitter-Narrows Dam. As explained in **Section 3.0: Project Description,** USACE has an easement across the project site to "overflow, flood and submerge" all or a portion of the project site in connection with the Whittier Flood Control Basin project (USACE Easement) pursuant to the covenants and conditions provided in an order and judgement entered on September 8, 1955 in an action by the United States of America in Case No. 9103, recorded October 9, 1958 in Book M131, Page 58, Official Records (Order). The Order requires written consent from the USACE for the "the type and location of any structure and/or appurtenance thereto" in the USACE Easement. Approval of the Project by USACE is required pursuant to the USACE Section 408 Program (Section 408 Program), which is codified at United States Code Title 33 Section 40. The purpose of the Section 408 Program is to verify that changes to an authorized USACE Civil Works project will not be injurious to the public interest and will not impair the usefulness of the applicable USACE project. Flowage easement land is non-federal land on which the United States government has acquired certain perpetual rights, including the right to overflow, flood and submerge the land; the right to prohibit structures for human habitation; and the right to approve all other

[4] San Gabriel Valley Water Company. 2021. *Final 2020 Urban Water Management Plan and Water Shortage Contingency.* Retrieved from: 2020 Urban Water Management Plan and Water Shortage Contingency Plan - San Gabriel Valley Water Company. Accessed November 6, 2024; August 2025.

structures proposed for construction within the flowage easement. As part of the USACE Section 408 Program, existing storage volumes on the project site cannot be compromised.

Water Quality

The Phase I Environmental Site Assessment (ESA) prepared for the Project determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) National Priorities List (NPL) Whittier Narrows Operable Unit (OU) listing is considered to represent a recognized environmental condition (REC) (**Appendix J**). A REC is the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. As addressed in **Section 4.8: Hazards and Hazardous Materials**, the Phase I Environmental Site Assessment (ESA) concluded that because the project site is not a source or a site source area, current data indicates VOCs in shallow groundwater are not above drinking water standards, availability of public water supply for the Project (meaning that groundwater would not be used as drinking water for the Project), ongoing remedial actions, identification of responsible parties, and regulatory oversight by U.S. EPA, no remedial actions would be required for the use of the site as proposed by the Project.

4.9.4 Methodology

A Preliminary Hydrology and Hydraulics Study, included as **Appendix K,** was prepared to assess the potential impacts on water and groundwater resources as a result of the proposed Project. The pre-development conditions of the water and drainage systems around the project site were used as a baseline with which to compare potential impacts on existing hydrologic systems. Hydrologic calculations for this Project have been conducted per requirements as outlined in the Los Angeles County Department of Publics Works Hydrology Manual. A 50-year storm event was used to model the peak flow rates due to the site's sump condition necessary to treat the 50-year storm. The proposed Project was modeled using a C value based on the calculated impervious/pervious areas of the site. The County's HydroCalc software was used to determine the peak flow rates and time of concentration for the Project. The site has been modeled with detailed drainage sub-areas to obtain accurate, final-level results. Hydraulic calculations were performed for the main storm drains, using Flowmaster, a software program developed by Bentley. The software uses Manning's equation to determine flow based on friction slopes for design. A friction slope of 0.4 percent was used to determine the full flow capacity each storm drain assuming they are run at a minimum slope. The on-site storm drains were sized based on the calculated 50-year flows being conveyed compared to the pipe capacity. An allowable discharge of 0.82 cubic feet per second per acre (cfs/acre) was issued by Los Angeles County Flood Control District.

The Preliminary Low Impact Development Plan, included as **Appendix L**, was prepared to identify BMPs to manage and capture stormwater runoff in compliance with requirements of the City of South El Monte Municipal Code and Los Angeles Regional Water Quality Control Board Municipal NPDES Permit (MS4 Permit).

4.9.5 Thresholds of Significance

The City uses thresholds of significance specified in *State CEQA Guidelines, Appendix G*. Impacts concerning hydrology and water quality would be significant if the Project would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.
- 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:
    - Result in substantial erosion or siltation on- or off-site.
    - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
    - 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.
    - Impede or redirect flood flows.
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation.
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.6 Project Impacts and Mitigation

Threshold 4.9-1:	**Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?** ***Level of Significance*:** Less than Significant with implementation of MM HYD-1.

Construction

Implementation of the proposed Project includes the demolition of the remnant building foundations, floor slabs and pavement, site preparation, grading and excavation, stockpiling of materials, import and export of soils and debris, construction of the warehouse building and future construction of improvements for the City park, infrastructure improvements, Drainage Basement Improvements, and landscaping. These activities would expose and loosen previously stabilized soils and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. In addition, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Project construction-related activities 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 installed and maintained during construction to remove and minimize on-site pollutants from the site.

Construction activities subject to the Construction General Permit for Stormwater Discharge Associated with Construction Activity (Construction General Permit) includes any construction or demolition activity, including, but not limited to, clearing, grading, grubbing, or excavation, or any other activity that results in a land disturbance of equal to or greater than one acre. The proposed Project would disturb more than one acre of land surface and would therefore be required to obtain coverage under the NPDES stormwater program. A Storm Water Pollution Prevention Plan (SWPPP) consistent with California State Water Resources Control Board, NPDES Construction General Permit is required to minimize pollution of downstream stormwater.

To obtain coverage under the Construction General Permit, the Project Applicant is required to file with the State Water Board, Permit Registration Documents that include a Notice of Intent (NOI) and other compliance-related documents. The Construction General Permit requires the development and implementation of a SWPPP and monitoring plan, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment BMPs are designed to trap sediment once it has been mobilized. Compliance with the NPDES, included as Standard Condition (SC) HYD-1, which would be verified during the City's construction permitting process, would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Additionally, the Project would be required to comply with Municipal Code Chapter 8.44, Stormwater Management and Discharge Control, which sets forth requirements for the construction and operation of developments within the City to ensure compliance with the City's current NPDES permit and to reduce pollutant loading in stormwater discharges by the maximum extent practicable. Compliance with any conditions and requirements established by the City to meet federal and State water quality requirements related to stormwater runoff would be verified during the plan check process. Municipal Code Chapter 8.44 contains guidelines on structural and non-structural BMPs for meeting the NPDES goals. These requirements would ensure that potential Project impacts would be less than significant and avoid violation of any water quality standards or waste discharge requirements.

Project excavation is anticipated to reach approximately 10 feet bgs to lower the elevation of the future City park area to allow for the Storage Basin Improvements to maintain on-site flood storage capacity in compliance with USACE reservoir flowage easement lands. Groundwater depth can fluctuate due to rainfall. Therefore, due to the historically high groundwater levels in the vicinity of the project site, there is a potential for groundwater to be encountered during construction (excavation and grading) and for groundwater dewatering to be required. If contaminated, release of dewatered groundwater to surface waters could introduce contaminants to surface waters, thereby degrading surface or groundwater quality. In the event that groundwater or perched groundwater is encountered during construction and groundwater dewatering is necessary, dewatering activities would be required to be completed in compliance with the Groundwater Discharge Permit, as specified in MM HYD-1. The Groundwater Discharge Permit would require testing and treatment as necessary for any groundwater encountered during groundwater dewatering prior to release to surface waters to ensure that discharges do not contain pollutants. Compliance with the requirements of the Groundwater Discharge Permit, as specified in MM HYD-1, would mitigate potential impacts to a less than significant level.

With implementation of MM HYD-1 and compliance with NPDES and South El Monte Municipal Code requirements, the Project's construction-related activities would not violate any water quality standards

or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant; mitigation would be provided if dewatering is required and would reduce potential impacts to less than significant level.

Operations

Project operations would introduce potential pollutants associated with the proposed uses, including various chemicals routinely used by other businesses, from cleaners, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into surface waters, it could result in degradation of water quality and impact on the LACFCD's stormwater drainage system. The future City park component of the Project would largely remain as a grassy area (assumed to consist of athletic fields and open lawn areas) that is pervious and self-treating. See Threshold 4.9-3i for additional description of the future City park proposed drainage. The management and treatment of stormwater from the Project components (warehouse and City public park) would be kept separate to the maximum extent practicable to prevent intermingling of flows. Further described in Threshold 4.9-3ii)iii)iv), runoff from the warehouse component of the Project would be released to flow through a dedicated earthen channel (4-foot-wide bottom with 3:1 side slopes) that is isolated from the remaining future City park area and ultimately discharged to an existing 90-inch reinforced concrete pipe (RCP) LACFCD storm drain line.

As noted above, the LACFCD, the County of Los Angeles, South El Monte and 83 other incorporated cities within the County (Permittees) discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the respective MS4s and discharged to Los Angeles Region surface water bodies. These discharges are regulated under countywide WDRs contained in Order No. R4-2012-0175 (NPDES Permit No. CAS004001). All the proposed Project components would be required to comply with the Los Angeles County Municipal NPDES Permit (MS4 Permit), for which a Preliminary Low Impact Development Plan (LID) was prepared to identify BMPs to protect surface water quality (see **Appendix L**). Additionally, included as SC HYD-2, the City's Municipal Code Chapter 8.44.110, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through a standard urban stormwater mitigation plan (SUSMP). SUSMP conditions assigned by the City would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses.

The MS4 Permit identifies the use of infiltration BMPs to assist in recharge of groundwater. However, on-site soils have poor infiltration rates and as discussed in **Section 4.6: Geology and Soils**, the project site is located within a liquefaction zone. Therefore, it has been determined that infiltration BMPs are not feasible as identified in the Preliminary LID Plan (**Appendix L**). Therefore, the warehouse component of the Project instead proposes the use of biofiltration BMPs, treatment control BMPs, non-structural source control BMPs, and structural source control BMPs to treat the 85th percentile storm event. See Threshold 4.9-3ii for a description of existing and proposed site drainage.

The warehouse portion of the Project would use biofiltration BMPs to provide treatment of stormwater runoff and minimize pollutants of concern. The warehouse portion of the Project would implement two WetlandMOD (or approved equal) stormwater biofiltration systems to provide treatment of stormwater runoff. Water would enter the detention chamber through the on-site inlets and would be routed to the underground detention system. Stormwater would then be pumped into the WetlandMOD system for treatment. The WetlandMODs consist of a manufactured planter box with engineering soil, media, planting, and an underdrain. The system has been sized for a 96-hour drawdown time. Because the inlet

orifice has been sized to treat the 85th percentile storm, during a larger storm event, stormwater would not be allowed to enter the WetlandMOD system and would be routed to the detention tank. Additional BMPs to treat stormwater quality include catch basin insert filters to remove debris and large sediment particles, landscape design and management, litter control, and efficient irrigation systems. It is also a requirement of the City to provide routine maintenance of the stormwater facilities. Facilities would be inspected prior to the rainy season and after each runoff producing storm event. Sediment and debris would be removed from the pre-treatment system to maintain its effectiveness. The underground detention tank would be routinely inspected, and sediment buildup would be removed to maintain efficient operation. The Final LID Plans would be coordinated with the City to satisfy the Project's water quality requirements, compliance with the MS4 Permit, and LID BMPs.

There are no known existing structural or LID BMPs on the project site to treat stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the Project's proposed BMP system would result in the treatment of the entire required volume for the project site and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, the Project's stormwater infrastructure would capture and treat stormwater flows and would not adversely impact water quality standards.

Following compliance with NPDES and Municipal Code requirements, the Project's operational activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant impact with mitigation should dewatering be required.

Threshold 4.9-2:	**Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**
	Level of Significance: Less than Significant with implementation of MM HYD-1.

Construction

As described previously, there is a potential for groundwater to be encountered during construction if excavation and grading would occur when there are historically high ground water levels, as previously documented in the vicinity of the project site. Any groundwater dewatering would be temporary and limited to the excavation area. Due to the size of the project site as compared to the water basin, and the limited scope of excavation anticipated, the volume of groundwater removed, if encountered, would not be substantial and would not decrease groundwater supplies or impede groundwater management. MM HYD-1 would require the proposed Project to comply with the requirements of Groundwater Discharge Permit, including testing and treatment, if necessary, that would be implemented through the RWQCB and the City's development permitting process. Therefore, any dewatering activities during construction would result in less than significant impact to groundwater supplies.

Operations

Concerning the Project's potential to decrease groundwater supplies, as discussed in detail in **Section 4.17: Utilities and Service Systems**, the Project's total estimated water demand would be approximately 77,087 gallons per day (gpd) or 86.35 acre-feet per year (AFY). Water demand for the

warehouse component would total approximately 42,174 gpd or 47.24 AFY while the estimated water demand for the City park component would total approximately 34,913 gallons per day or 39.11 AFY. According to the SGVWC 2020 UWMP, the available water supply would meet projected demand during normal, dry, and multiple dry years through 2045; see **Table 4.17-3**, **Table 4.17-4**, and **Table 4.17-5**. Therefore, the operation of the Project would not substantially decrease groundwater supplies.

The Project does not propose the use of wells or other groundwater extraction activities. Although the Project would result in additional impervious surfaces, the majority of the future City park component of the Project would be left pervious and therefore would not result in a substantial change to groundwater recharge in this area. In addition, as described previously the on-site soils have a low infiltration rate due to soil conditions, historically high groundwater level, and presence within a liquefaction zone. Therefore, it can be reasonably assumed significant infiltration of water to the existing groundwater basin is neither currently occurring at a substantial rate nor would it occur as a result of the proposed Project. Therefore, the proposed Project would not significantly impact local groundwater recharge or impede sustainable groundwater management of the basin. Impacts would be less than significant and no mitigation would be required.

Threshold 4.9-3:	**Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:** **i) result in substantial erosion or siltation on- or off-site** ***Level of Significance:*** Less than Significant Impact

Construction

Project construction would require Storage Basin Improvements, demolition of the remnant building foundations and floor slabs, excavation of the future City park site up to 10 feet bgs, use of the fill material for the warehouse site, and construction of the warehouse and future construction of improvements for the City park. The proposed Project does not contain nor is adjacent to a stream or river. However, construction activities could expose and loosen building materials and sediment, which has the potential to mix with stormwater runoff and result in erosion or siltation off of the site.

Compliance with the NPDES and Municipal Code require the preparation of a project-specific SWPPP, included as SC HYD-1. The SWPPP is required to address site specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Common types of construction BMPs include, but are not limited to, stabilization of construction entrances, straw wattles on embankments, sediment filters on existing inlets, stockpile management, spill prevention and control, and hydroseeding.

As the future City park portion of the project site could be constructed at a future date, erosion-control and sediment-control measures, as required through the NPDES, would be implemented by the Applicant and/or the City to ensure substantial erosion or siltation on-or off-site would not occur. Specific to this area, BMPs could include hydroseeding, jute netting on embankments for erosion control, and rock riprap along the earthen channel. Additionally, as addressed in **Section 4.2: Air Quality**, SCAQMD Rule 403 – Fugitive Dust, governs emissions of fugitive dust during and after construction. Compliance requires that portions of a construction site that remain inactive for longer than a period of three months must be

seeded and watered until grass cover is grown and soils are stabilized. Therefore, further reducing potential erosion or siltation on or off the site if construction of the improvements for the City park occurs three months or more after excavation and grading.

Therefore, compliance with the City's Municipal Code, SCAQMD, and NPDES Construction General Permit and preparation of a SWPPP, per SC HYD-1, would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities. Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be less than significant.

Operations

Under existing conditions during a storm event, water flows in the northwesterly direction towards Santa Anita Avenue. On-site stormwater collects and eventually spills onto Santa Anita Avenue, finding its way into an existing public catch basin near the northwest corner of the site. The water then travels from that public system into the nearby Legg Lakes in the Whittier Narrows Recreation Area.

As previously identified, the future City park component of the Project would largely remain as a grassy area that is pervious and self-treating. Similar to existing conditions, drainage of this area would be directed to an existing 90-inch RCP LACFCD storm drain line, which ultimately discharges into Legg Lakes. The drainage pattern on this portion of the project site would not be altered in a way that would result in substantial erosion or siltation.

The proposed Project would be required to comply with the Los Angeles MS4 Permit, for which a Preliminary LID Plan was prepared to identify BMPs to manage stormwater runoff, included as **Appendix L**. Additionally, Municipal Code Chapter 8.44.110 specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through a SUSM. SUSMP conditions assigned by the City would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs for specific types of uses.

Runoff from the warehouse component of the Project would include the installation of catch basins, two WetlandMODs, and a detention tank to capture and treat on-site stormwater runoff. The WetlandMODs would be designed to treat up to the 85th percentile storm event as required by the LACFCD. Catch basin insert filters would be installed on all on-site catch basins to pre-treat stormwater. These systems would detain and treat water prior to discharging into the LACFCD storm drain. As part of the permit approval process, the Final LID Plan, SUMSP, and proposed drainage and water quality design and engineering plans would be reviewed by the City to ensure that the site-specific design limits the potential for erosion and siltation and to ensure compliance with the NPDES, MS4 Permit, and the City's Municipal Code. Therefore, compliance with the established regulatory framework would ensure that Project impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

Threshold 4.9-3:	**Would the Project 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:** **ii) increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;** **iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or** **iv) impede or redirect flood flows.** ***Level of Significance:*** Less than Significant with implementation of MM HYD-1.

Construction

Construction of the proposed Project would require Storage Basin Improvements, demolition activities related to the remnant foundations, excavation of the future City park area and fill of the warehouse area, and construction of the warehouse and future construction of improvements for a City public park. These activities could temporarily alter the existing drainage pattern of the site and could result in flooding, additional and/or polluted runoff, or impede/redirect flood flows if drainage is not properly controlled.

However, as described previously, compliance with the NPDES Construction General Permit and Municipal Code requires the preparation of a project-specific SWPPP, included as SC HYD-1. The SWPPP is required to address site-specific conditions related to drainage and polluted runoff related to construction of the proposed Project. The SWPPP would also include BMPs, in accordance with the City's Municipal Code, to eliminate the potential of flooding, alteration of a drainage pattern, and polluted or additional runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Preparation of a SWPPP in compliance with the NPDES Construction General Permit, included as SC HYD-1, as verified during the City's construction permitting process, would ensure that Project construction-related impacts related to potential flooding, additional and/or polluted runoff, or impeded/redirected flood flows would not occur.

Additionally, in the event that groundwater or perched groundwater is encountered during construction and groundwater dewatering is necessary, it would be completed in compliance with the Groundwater Discharge Permit, as specified in MM HYD-1. The Groundwater Discharge Permit would prevent substantial additional sources of polluted runoff being discharged to the storm drain system through implementation of construction BMPs that target pollutants of concern in runoff from the project site as well as testing and treatment (if required) of groundwater prior to its discharge to surface waters. Therefore, implementation of MM HYD-1 would ensure potential impacts associated with Project construction would be less than significant.

Operations

The project site is located within USACE reservoir flowage easement lands associated with the Whittier Narrows Dam. Per USACE requirements, the Project would include Storage Basin Improvements, including excavation of the future City park area of the site by approximately 10 feet to maintain and improve the existing flood storage capacity of the property. The Project would be designed such that finished grade elevations of the future City park area would have the same or higher water storage capacity as compared to the existing conditions, see Table 3 in **Appendix K.** Therefore, implementation would not impede or

redirect flood flows on the project site associated with the USACE flowage easement. Compliance with the USACE Section 408 Permit would ensure the future City park portion of the project site would not impede or redirect flood flows and this impact would be less than significant.

The future City park would largely remain as a grassy area that is pervious and self-treating. Similar to existing conditions, drainage of this area would be directed to the existing 90-inch RCP LACFCD storm drain line, which ultimately discharges into Legg Lakes. The drainage pattern on this portion of the project site would not be altered in a way that would result in substantial flooding or additional and/or polluted runoff.

The warehouse component of the Project would introduce impervious surfaces, which could increase surface runoff on the site compared to existing conditions. These proposed changes may impact infiltration rates, drainage patterns, and the rate and amount of stormwater runoff. Although the drainage pattern changes in the proposed condition, project site flow on the warehouse component of project site ultimately discharges into Legg Lake to the northwest via the existing 90-inch RCP LACFCD storm drain line, as it does under existing conditions.

Stormwater from the warehouse component of the Project would initially enter the drainage system through an inlet/catch basin and would be conveyed to the treatment system via a private storm drain line. The stormwater would be treated via two WetlandMODs before continuing to a 5-foot high by 400 linear foot detention tank designed to mitigate the allowable discharge to the existing 90-inch RCP LACFCD storm drain line in a high event storm. Any runoff greater than the treatment capacity of the WetlandMODs would bypass the structure and continue to the detention tank. From the detention tank, water would be released to flow through a dedicated earthen channel (4-foot-wide bottom with 3:1 side slopes) that is isolated from the remaining future City park. Eventually the channel would guide stormwater from the warehouse component of the Project to a concrete headwall that would connect to the existing 90-inch RCP LACFCD storm drain line located along Santa Anita Avenue near the northwest project site boundary. As described in **Section 3.0: Project Description**, the outlet headwall from the City park to the 90-inch pipe may require a flap gate to prevent backwater from the 90-inch pipe entering the future City park. With these improvements, the Project would not substantially alter the site's existing drainage pattern through the addition of impervious surfaces.

While stormwater from the two Project components would be kept separate to the maximum extent practicable, both components would discharge into the 90-inch RCP LACFCD. The Project would be designed to ensure flows from both components of the Project would not exceed the capacity or allowable discharge into the 90-inch RCP LACFCD storm drain line (**Appendix K**). As the future City park component of the Project would not be designed to detain flows, the detention tank associated with the warehouse would be designed to release 8.10 cubic feet per second (cfs) to ensure any combined flows remain under the 17.33 cfs allowable discharge for the 90-inch RCP LACFCD storm drain line, based on peak flows for a 50-year storm event. Therefore, the Project would not alter the drainage pattern in such a way that would exceed capacity of existing stormwater drainage systems. See **Table 4.9-1: Flow Comparison** for the allowable discharge compared to the proposed conditions.

Table 4.9-1: Flow Comparison

Scenario	Area (ac)	Impervious (%)	Tc	Q50 (cfs)
Future City Park Component	11.26	16%	20 min	**8.26**
Warehouse Component: Unrestricted	9.88	93%	11 min	21.63
Warehouse Component: Restricted Detention Tank	-	-		**8.10**
Allowable Discharge into 90-inch Reinforced Concrete Pipe	*21.14*	-		*17.33*
Proposed Combined	21.14			**16.36**

ac = acre; Tc = Time of concentration; cfs = cubic feet per second; Q50 = 50-year storm event
Source: **Appendix K,** Hydrology Study

Further, the proposed Project would be required to comply the Los Angeles County Municipal NPDES Permit (MS4 Permit), for which a Preliminary LID has been prepared to identify BMPs to protect surface water quality; see **Appendix L**. Additionally, Municipal Code Chapter 8.44.110, specifies that new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through a standard urban stormwater mitigation plan (SUSMP). Included as SC HYD-2, the Project would be required to prepare a SUSMP, conditions of which would be assigned by the City and would consist of LID BMPs, source control BMPs, and structural and nonstructural BMPs. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Therefore, compliance with the NPDES and the City of South El Monte's Municipal Code requirements would ensure operation of the Project would not 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: result in substantial on-site or off-site erosion or siltation; substantially increase the rate or amount of surface runoff in a manner which would result in on-site or off-site flooding; 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 impeded or redirect flood flows.

Threshold 4.9-4: **Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?**

Level of Significance: Less than Significant Impact

The project site is not within a FEMA-mapped special flood hazard area. The site is classified as Zone X, which is an area of Minimal Flood Hazard.

However, the project site is located on flowage easement lands used for additional storage for the Whitter Narrows Dam. USACE has an easement across the project site to "overflow, flood and submerge" all or a portion of the project site in connection with the Whittier Flood Control Basin project (USACE Easement). As part of the USACE Section 408 Program, existing storage volumes on the site cannot be compromised. The Project includes the construction of storage and drainage improvements for the required volume of potential flood waters from the Whittier Flood Control Basin (Storage Basin Improvements). These include excavation within the future City park portion of the project site approximately 10 feet and raise the

finished grade of the warehouse portion to approximately 229 feet, above the spillway activation elevation using the excavated material per USACE requirements. The proposed 6- to-12-foot-high retention basin would be surrounded by 2.5h:1v (horizontal to vertical) to 3h:1v earthen slopes. The warehouse finished floor elevation would be approximately 229 feet and retention basin elevation within the future City park area would have a minimum elevation of approximately 213 feet. Therefore, the Project would be designed such that finished grade elevations of the future City park area would have the same or higher water storage capacity as compared to the existing conditions. Raising the elevation of the warehouse component above the spillway activation elevation would ensure the warehouse and associated structures and equipment would not result in inundation. The excavation of the future City park area would ensure that should flood waters be released from the Whitter Narrows Dam, they would be captured on that portion of the project site. Approval of the Project by USACE is required pursuant to the USACE Section 408 Program. The purpose of the Section 408 Program is to verify that changes to an authorized USACE Civil Works project will not be injurious to the public interest and will not impair the usefulness of the applicable USACE project.

For further discussion of flood flow management see the discussion above under Threshold 4.9-3 ii), iii) and iv).

The Project would be required to comply with the USACE Section 408 program and obtain appropriate permits for development of flowage easement lands. As noted above, the on-site flood storage would be captured on the future City park portion of the project site. This area would not include any habitable structures, propane or fuel storage tanks, and as required by USACE, would not include any elements with the potential to result in pollution or interference with the operation of the Whittier Narrows Dam. Therefore, while flooding on the future City park portion of the project site could occur due to USACE reservoir flowage easement lands, compliance with USACE Section 408 Permit, NPDES, and the City's Municipal Code would ensure Project inundation would not result in the release of pollutants.

The project site is approximately 20 miles from the Pacific Ocean, and outside of the Tsunami Hazard Zone.[5] Therefore, the project site would not be inundated by a tsunami that could result in the release of pollutants, and impacts would not occur. Seiches are the oscillation of large bodies of standing water, such as lakes, which can occur in response to ground shaking. The nearest water body is Legg Lakes located approximately 230 feet west of the future City park area of the Project, on the west side of Santa Anita Avenue within the Whittier Narrows Recreation Area. While the Project is located in the vicinity of a water body the proposed future City park and warehouse uses would not involve the use of acutely hazardous materials. While the Project would involve the use of normal and routine use of small amounts of maintenance and janitorial materials such as cleaners, paints, solvents, and fertilizers and pesticides for site landscaping, all materials would be handled in accordance with applicable regulations for such materials. The handling, use, storage, transport, and disposal of such materials be required to comply with existing regulations of several agencies including the U.S. EPA, Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health (Cal-OSHA), and the U.S. Department of Transportation. Please also refer to **Section 4.9: Hazards and Hazardous Materials**. Therefore, compliance with the existing regulatory framework would ensure the proper storage of

[5] California Geological Survey. ND. *Tsunami Hazard Area Map*, Retrieved from: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles. Accessed November 11, 2024.

potential pollutants and therefore is not at risk of release if a seiche event were to occur on the site. Therefore, impacts would be less than significant and no mitigation would be required.

Threshold 4.9-5:	**Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**
	Level of Significance: Less than Significant with implementation of MM HYD-1.

As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit (implemented through SC HYD-1) and a RWQCB Groundwater Discharge Permit (implemented through MM HYD-1) would serve to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Therefore, construction of the proposed Project would not conflict or obstruct implementation of a water quality control plan.

Also, as described previously, the Project would be required to implement a LID Plan, per the Los Angeles County NPDES MS4 Permit, which would identify BMPs also in compliance with the Municipal Code Section 8.44.110 – Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) requirements for new development and redevelopment projects. The MS4 Permit, LID Plan, and applicable BMPs, included as SC HYD-2, would be verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed Project would not result in adverse impacts concerning water quality. Further, concerning the Project's potential to conflict with a groundwater management plan, as discussed in detail in **Section 4.17: Utilities and Service Systems**, SGVWC would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the proposed Project would be consistent with the groundwater management plan and would not conflict with or obstruct its implementation. Therefore, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant.

4.9.7 Cumulative Impacts

Water Quality

The geographic scope for cumulative impacts related to hydrology and water quality includes the Los Angeles River Watershed because cumulative projects could incrementally result in water quality impacts. Similar to the proposed Project, cumulative projects in the City would be required to comply with water quality control measures within the NPDES General Construction Permit that requires implementation of a SWPPP and BMPs that help reduce impacts of pollutants on water quality. The NPDES Permit is mandated by the State and specific guidelines are established in the Los Angeles RWQCB to reduce effects of local projects. Additionally, the Project would comply with Los Angeles County NPDES MS4 Permit, for which a LID Plan would be prepared to identify BMPs. Additionally, the City's Municipal Code Chapter 8.44.110 specifies that all new development subject to the MS4 Permit must comply with post-construction runoff pollution reduction BMPs implemented through a SUSMP. Compliance would the MS4 Permit, LID Plan, SUSMP, and applicable BMPs would be verified as part of the City's permitting approval process and therefore result in a less than significant impact. Projects within the cumulative study area would also be required to comply with applicable federal, State, and local water quality control guidelines listed above which would reduce cumulative impacts to less than significant. The Project would not contribute to a cumulatively considerable significant impact.

Drainage Alteration

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the project area, from capture of runoff through final discharge points. The Project and other cumulative projects considered in the cumulative analysis would not create a significant cumulative impact when added together. Projects must comply with State and local regulations concerning stormwater runoff and treatment. These regulations ensure that significant cumulative impacts would not occur. As noted above, the Project would result in an increase in impervious surfaces, therefore potentially altering drainage patterns and increasing stormwater runoff. However, the Project would include installation of a drainage network, consisting of two WetlandMODs (or approved equal) and one detention basin, to detain and treat stormwater runoff, in accordance with allowable discharges per the LACFCD. As a result, the proposed Project would not generate runoff significant enough that when combined with runoff from other projects, to create a significant cumulative impact concerning drainage, erosion, siltation, flooding, or pollutant release due to inundation.

Groundwater Basin: Groundwater Supply and Groundwater Management Plans

The cumulative projects within the San Gabriel Valley Water Company Urban Water Management Plan service area would be required to comply with the State and the Los Angeles RWQCB requirements for protection of groundwater resources. The Project would not result in a cumulatively considerable decrease in groundwater supplies or interfere substantially with groundwater supplies or recharge. As described previously, there is a potential for groundwater to be encountered during construction if excavation and grading would occur when there are historically high ground water levels, as previously documented in the vicinity of the project site. Due to the size of the project site as compared to the water basin, and the limited scope of excavation anticipated, the volume of groundwater removed, if encountered, would not be substantial and would not decrease groundwater supplies or impede groundwater management. Project activities would not extract groundwater during Project operations. The increase in water demand associated with the proposed project would represent a nominal portion of SGVWC's projected water demand increase. Therefore, the increase in water demand generated by project implementation can be accommodated by the SGVWC. As a result, the proposed Project would not generate impacts related to the groundwater basin and thus would not make a cumulatively considerable contribution to significant cumulative impacts on the groundwater basin. Therefore, cumulative impacts related to the groundwater basin would be less than significant.

4.9.8 Mitigation Program

Standard Conditions

SC HYD-1: Prior to issuance of any grading or demolition permits, the Applicant shall provide the City Building and Safety Division evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resources Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

SC HYD-2: Prior to issuance of the first grading permit, the Applicant shall submit to the City Engineer for approval, a Standard Urban Stormwater Mitigation Plan (SUMP) in

compliance with South El Monte Municipal Code Section 8.44.110, specifically identifying Best Management Practices (BMPs) that shall be incorporated into the Project to control storm water and non-storm water pollutants during and after construction. To ensure compliance, a legal and fiduciary enforcement mechanism in the form of a SUMP shall be executed with the City. This agreement shall additionally be recorded in the office of the County Recorder for the County of Los Angeles. It shall specify BMPs specific to the project site, which shall be integrated into the storm water conveyance plan.

Mitigation Measures

MM HYD-1: Groundwater Dewatering Permits. Prior to initiation of excavation activities, the Project Applicant shall obtain coverage under the Los Angeles Regional Water Resource Control Board (RWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles And Ventura Counties (Order No. R4-2023-0429, NPDES No. CAG994004), or any other subsequent permit for dewatering activities, and provide evidence of coverage to the City of South El Monte Building and Safety Department. This shall include submission of a Notice of Intent (NOI) for coverage under the permit to the Los Angeles RWQCB at least 45 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Los Angeles RWQCB.

4.9.9 Level of Significance After Mitigation

Impacts related to hydrology and water quality would be less than significant.

4.9.10 References

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4.10 LAND USE AND PLANNING

4.10.1 Introduction

This section of the EIR describes the land use conditions for the project site and discusses potential land use impacts that could result from implementation of the proposed Project. The pre-development condition of the project site and surrounding area was used as the baseline which to compare potential impacts associated with the Project. The Project's potential to result in land use impacts is based on existing land uses of the project site and surrounding area in the context of applicable federal, State, and local regulations.

4.10.2 Regulatory Setting

State Regulations

California State Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law Sections 65000 to 66499.58. State law delegates most of the State's local land use and development decisions to cities and counties and describes laws pertaining to the regulation of land uses by local governments, including subdivisions and zoning. Each city and county must adopt a comprehensive, long-term general plan; there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

Senate Bill 375

Senate Bill (SB) 375, approved by then Governor Schwarzenegger in 2008, is intended to address climate change by promoting sustainable land use and transportation planning by reducing vehicle miles traveled (VMT) and promoting more sustainable and efficient transportation systems within California. The bill requires regional agencies to develop and implement a Sustainable Communities Strategy (SCS) as part of their regional transportation plans. The purpose of the SCS is to reduce greenhouse gas emissions (GHG), promote compact development, and increase transportation options. SB 375 encourages collaboration between local governments, transportation agencies, and other stakeholders to achieve these goals.

Regional Regulations

Southern California Association of Governments

Southern California Association of Governments (SCAG) is a council of governments representing Los Angeles, Riverside, Orange, San Bernardino, Ventura, and Imperial counties. SCAG is the federally recognized Metropolitan Planning Organization (MPO) for this region. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and State law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. SCAG has developed the Regional Comprehensive Plan, the Regional

Housing Needs Assessment, and the Regional Transportation Plan /Sustainability Communities Strategy (RTP/SCS or Connect SoCal).

SCAG 2020-2024 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal is a living, evolving blueprint for the region's future which is updated every four years (previously updated April 2024). The City of Rialto is a member jurisdiction of the San Bernardino Council of Governments (SBCOG) and a participating agency in SCAG's Connect SoCal. Section 4.9.2 of the 2020-2045 RTP/SCS identifies ten goals that fall into four categories: economy, mobility, environment and healthy/complete communities.

1. The goals include the following: Encourage regional economic prosperity and global competitiveness;
2. Improve mobility, accessibility, reliability, and travel safety for people and goods;
3. Enhance the preservation, security, and resilience of the regional transportation system;
4. Increase person and goods movement and travel choices within the transportation system;
5. Reduce greenhouse gas emissions and improve air quality;
6. Support healthy and equitable communities;
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network;
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel;
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options; and
10. Promote conservation of natural and agricultural lands and restoration of habitats.

The Regional Housing Needs Assessment is discussed in **Section 4.13: Population and Housing**.

SCAG Intergovernmental Review Program

SCAG's Intergovernmental Review Program provides informational resources to regionally significant plans, projects, and programs per CEQA Guidelines Section 15206: Projects of Statewide, Regional, or Areawide Significance,[1] to facilitate review for these projects' consistency with SCAG's adopted regional plans, to be determined by the lead agencies. Informational resources include regional goals and policies, and jurisdictional-level growth forecasts and mitigation measures.

Local Regulations

City of South El Monte General Plan

The South El Monte General Plan (General Plan) has been prepared to help the City to look forward to the year 2020 by setting forth goals and policies addressing economic development, land use, circulation,

[1] The Lead Agency shall determine that a proposed project is of statewide, regional, or areawide significance if the project meets various criteria, including "A proposed local general plan, element, or amendment thereof for which an EIR was prepared" (State CEQA Guidelines §15206(b)(1)).

housing, and related issues that affect the quality of life in South El Monte. The General Plan focuses on the opportunities the City has to build upon its strong industrial base and to expand housing choices for existing and future residents. The plan also responds to the long-term circulation needs associated with growth activity, demands for commercial and public services, and public safety needs.

The General Plan has the following elements: Land Use Element, Economic Development Element, Circulation Element, Housing Element, Resources Element, and the Public Safety Element, which are described further below.

Land Use Element. The Land Use Element addresses the physical development and appearance of the City. Land use goals and policies contained in this element designate the general distribution, location, and extent of land to be used for housing, businesses, industry, and public and private open space. This element includes descriptions of the populations densities and building intensities permitted within the various land use categories.

Economic Development Element. The Economic Development Element addresses economic development opportunities, business retention and attraction, regional serving economic development, local serving economic development, and job creation for South El Monte residents.

Circulation Element. The Circulation Element identifies the issues, goals, and policies associated with all modes of transit in South EL Monte. The element focuses on providing safe, efficient, and adequate circulation system, throughout the City, and reducing regional traffic congestion. The systems and programs defined in this element are consistent with the Land use policy that the systems will accommodate future demands associated with future populations and land use patterns.

Housing Element. The Housing Element addresses the comprehensive housing needs in South El Monte for the 8-year planning period (2021–2029). It provides an analysis of the local housing needs for all income levels, details barriers to providing needed housing, and identifies a set of strategies for meeting the housing need within the planning period. State law, which requires all local governments to update their Housing Elements every 8 years. The City's 2021-2029 Housing Element was adopted by the City on October 12, 2021.

Public Health, Safety, and Environmental Justice Element. The Public Health, Safety, and Environmental Justice Element of the General Plan (adopted October 12, 2021) guides the City toward being a safer and healthier place for everyone. This element combines two State-required elements: Safety and Environmental Justice. This element prioritizes actions that address the greatest health risks to the City over the next 20 years. It guides how the City is designed, regulated, and built to ensure that people can access healthy food and places to play, that the air is clean, and that hazards will not impact important buildings and services.

Resources Element. The Resources Element addresses natural resources as well as resources created by people to meet the recreational needs of City residents. This element addresses the following local recreation resources and issues relevant to South El Monte: parks, groundwater management, air quality, and landfill capacity. The Resources Element focuses on preserving and protecting these valuable resources.

City of South El Monte Code of Ordinances

South El Monte Municipal Code Title 16. South El Monte Municipal Code (Municipal Code) Title 16 functions as the City's subdivision regulations pursuant to the Subdivision Map Act (Government Code

§§66414 through §§66424 and §66424.5). Title 16 contains requirements pertaining to required dedications and improvements, lot subdivision and merging, and associated fees. All subdivisions and lot merges within the City must comply with these provisions.

South El Monte Municipal Code Title 17. Municipal Code Title 17 functions as the City's Zoning Ordinance. The City's Zoning Ordinance divides the City into areas, called zoning districts, and establishes regulations for each district with respect to permitted uses, allowable density, building height, development character, etc. The Zoning Ordinance consists of a map which delineates the district boundaries and text which explains the purpose of areas, specific permitted and conditional uses, and establishes development and performance standards. The Zoning Ordinance serves as the primary implementation tool for the Land Use Element and the goals and policies it contains. The Comprehensive Zoning Code Update was adopted on April 23, 2024.

4.10.3 Existing Conditions

Existing and Surrounding Land Uses

The approximately 21-acre project site is located at 825 Lexington-Gallatin Road, just within the southwestern boundary of the City of South El Monte in Los Angeles County. The project site is primarily populated by non-native grasses with sparse patches of ornamental vegetation. Apart from the scattered remains of previous uses (including building foundations and radio tower footings/pile caps), the site is undeveloped. Minimal changes occurred on the project site until 1948, when two buildings and three KRLA radio towers were constructed. Six radio towers are represented on the 1968 maps and subsequent maps, suggesting that three additional radio towers were constructed at a later date. The KRLA station became obsolete and was abandoned in 1987. The radio towers were removed in the late 1980s to early 1990s, and the site has remained vacant with the exception of the remaining structural foundations of the two buildings and the structural foundations of the radio towers.

Whittier Narrows Recreation Area is located southwest of the project site in unincorporated Los Angeles County. State Route 60 (SR-60) is located just north of the project site, specifically at the Santa Anita Avenue interchange. The project site is located approximately two miles northeast of the Whittier Narrows Dam and is within U.S. Army Corps of Engineers (USACE) reservoir flowage easement area; see **Section 3.0: Project Description**.

General Plan and Zoning Designations

General Plan. The project site has an existing General Plan land use designation of Commercial (C) (**Figure 3-3: Existing Land Use Designation** in **Section 3.0: Project Description**). The Commercial (C) category includes a broad range of retail, professional office, and service-oriented business activities designed to serve both the local residential and business communities, as well as to meet regional shopping and service needs. The maximum permitted Floor Area Ratio (FAR) under the Commercial (C) land use designation is 0.50. The Project would require a General Plan Amendment from the existing Commercial (C) designation to Commercial-Manufacturing (C-M), which allows general commercial and limited manufacturing uses to co-locate (**Figure 3-4: Proposed Land Use Designation** in **Section 3.0: Project Description**). Permitted uses include all uses allowed under the Commercial designation as well as uses including but not limited to warehousing and distribution uses. The maximum permitted FAR under the land use designation is 0.75. The Project would be an allowed use under the C-M General Plan land use designation.

Zoning. The project site is currently zoned Commercial (C), which is intended to provide areas throughout the City in which commercial facilities designed to serve a broad area with a wide range of commercial services may be located (**Figure 3-5: Existing Zoning District** in **Section 3.0: Project Description**). Municipal Code Section 17.06.020 outlines the permitted uses under the C zone; warehouses are not a permitted use in the C zone. The Project would require a zone change to the Manufacturing (M) zone (**Figure 3-6: Proposed Zoning District** in **Section 3.0: Project Description**). The M Zone is intended to provide for and encourage the development of industrial uses in suitable areas throughout the City.

As set forth in Municipal Code Section 17.09.020, warehousing and recreational facilities, including but not limited to athletic facilities, are principally permitted uses in the M zone. Pursuant to Municipal Code Table 17.15.070-A, freestanding exterior lighted signs are permitted in the Commercial and Manufacturing zoning districts. The proposed Development Agreement would address the fact that the digital billboard would be located on what is currently entirely private property and therefore, City Municipal Code Section 17.15.090 (regulations of off-site signs) does not apply. A freeway adjacent billboard would also require approval from Caltrans.

4.10.4 Methodology

The pre-development conditions of the project site and surrounding area are used as the baseline to compare potential impacts associated with the Project. The analysis of the project site is based on the conditions of the site when the Notice of Preparation (NOP) was published. The proposed Project is evaluated against the significance criteria below, as the basis for determining the level of impacts related to land use and planning. This analysis considers existing regulations, laws and standards that serve to avoid or reduce potential environmental impacts.

4.10.5 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G*. Impacts to land use and planning would be significant if the Project would:

- 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.

As addressed in **Section 1.5: Summary of Effects with No Impact**, the City has determined that the proposed Project would not have significant impact on the following threshold for the reasons stated below, and that no further analysis was required:

- Physically divide an established community

Examples of projects that could physically divide an established community include a new freeway or highway that traverses an established neighborhood. The project site is within an urbanized and established area of the City. The project site is generally bordered by Lexington-Gallatin Road and Santa Anita Avenue and is separated from SR-60 by a vacant parcel. There is an existing residential neighborhood northeast of the project site adjacent to SR-60 that is accessed from Lexington-Gallatin Road. The Project does not propose any new streets or other physical barriers that could physically divide an established community. Therefore, no impact would occur.

4.10.6 Project Impacts and Mitigation

Threshold 4.10-1:	**Would the Project 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?**
	Level of Significance: Less than Significant Impact

Connect SoCal Goal Analysis

Project relevant RTP/SCS policies for land use and planning are addressed below.

- GOAL 5: Reduce greenhouse gas emissions and improve air quality.
- GOAL 6: Support healthy and equitable communities

Consistent with Goal 5, the project site is located near existing transit routes (i.e., Foothill Transit has a bus stop at the intersection of Lexington-Gallatin Road and Santa Anita Avenue, which is located approximately 600 feet southwest of the project site). The project site also has immediate access to SR-60 and existing truck routes (Santa Anita Avenue and Durfee Avenue from Peck Road to the western City limits and from Slack Road to the northern City limits). As described in **Section 4.12: Population and Housing** approximately 88 percent of South El Monte residents commute to places of employment outside the City. The location of the Project within an urban area would place an employment center proximate to existing residential uses including those south of Lexington-Gallatin Road and north of SR-60. Locating an employment center in the City and near existing residential uses would potentially reduce local trip lengths required for existing residents to travel to work, thereby reducing mobile emissions. Additionally, consistent with Goals 6, the Project does not exceed localized or regional thresholds. Based on the Friant Ranch decision, projects that do not exceed the South Coast Air Quality District's Local Significance Thresholds (SCAQMD's LSTs) would not violate air quality standards or contribute substantially to an existing or projected air quality violation and would not result in criteria pollutant health impacts, thereby supporting healthy communities. Additionally, implementation of the Project would result in the development of a warehouse on currently vacant land and provide additional employment opportunities which would support the City and regional economies and thereby equitable communities. Therefore, the Project is consistent with applicable goals of the 2020-2045 RTP/SCS. Connect SoCal is discussed further in **Section 4.2: Air Quality**, **Section 4.5: Energy**, **Section 4.7: Greenhouse Gas Emissions**, **4.12: Population and Housing**, and **Section 4.15: Transportation** of this EIR.

City of South El Monte General Plan Consistency Analysis

General plan goals and policies relevant to the Project are addressed in **Table 4.10-1: General Plan Consistency Analysis**. As indicated in the table, the Project would be consistent with applicable South El Monte General Plan policies. Therefore, the proposed Project would not result in a change in, or conflict with any General Plan policy that would result in potentially significant impacts adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
Land Use Element	
Goal 3: Accommodate new development that is compatible with and complements existing land uses.	
Policy 3.3: Require that industrial development provide adequate buffers (such as decorative walls and landscaped setbacks) at the designated boundaries with adjacent residential and commercial uses to prevent impacts on residences and commercial businesses due to noise, traffic, parking, light and glare, and differences in scale; to ensure privacy; and to provide visual compatibility.	**Consistent.** With respect to the warehouse component, the Project would include a 14-foot-high decorative concrete tilt-up screen wall along Lexington-Gallatin Road and along the east and west sides of the secured truck parking lot to visually screen the this component of the Project, specifically the truck loading area, from public view. This part of the site is across from Whittier Narrows picnic area; single-family residences are located northeast of Lexington-Gallatin Road.
Policy 3.4: Require that the external lighting of commercial and industrial properties be confined to the site to avoid adverse impacts on adjacent land uses due to light spillover or glare.	As addressed in **Section 4.11: Noise**, mitigation is required during construction including the installation of a 10-foot-high temporary construction noise barrier; noise shielding and muffling of construction equipment, the enclosure of all stationary outdoor mechanical equipment (e.g., generators, compressors), and locating the construction staging areas as far from noise-sensitive uses as reasonably possible and technically feasible. Project operations would not result in significant impacts. With respect to traffic and parking, all parking would be provided on the project site. Based on the significance criteria used by the City, the Project would not result in significant traffic impacts. See **Section 4.15: Transportation**. Landscaping would be provided along the project site frontage of Lexington-Gallatin Road, along the west elevation of the building, along the northeast and northwest property lines, and internal to the site. The City's landscaping guidelines outlined in Section 17.09.070 of the Municipal Code require 5 percent site coverage; the Project proposes approximately 56,470 sf or approximately 12.7% site coverage. Landscaping would be focused near parking lot areas, driveway entries, and along the warehouse site perimeter to provide visual screening. Development of the remainder of the site with a future City park adjacent to Whittier Narrows Recreation Area would provide for additional open space including grass lawn areas and athletic fields. As addressed in **Section 4.1: Aesthetics**, the Project would result in a less than significant aesthetics impact with mitigation incorporated and the Project would be in compliance with Municipal Code Section 17.09.100 and all lighting would be directed onto the site and oriented away from off-site land uses.

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
Goal 4: Work toward the gradual elimination of residential land uses within areas designated and zoned for industrial use and development.	
Policy 4.3: Require that industrial development provide adequate buffers (such as decorative walls and landscaped setbacks) at the designated boundaries with adjacent existing residential uses so as to prevent impacts on residences due to noise, traffic, parking, light and glare, and differences in scale.	**Consistent.** See response to Policy 3.3 and Policy 3.4.
Goal 5: Create a sense of identity and place for South El Monte within the San Gabriel Valley	
Policy 5.6: Upgrade visual quality of edge conditions between industrial and residential uses through street tree planting and on-site landscaping.	**Consistent.** See response to Policy 3.3 and Policy 3.4.
Resources Element	
Goal 1: Provide local public park space at a ratio of 2 acres of park land per 1,000 City residents.	
Policy 1.3: Continue to provide South El Monte residents with access to regional recreation resources.	**Consistent**. The project site is located near regional park and recreational facilities, including the Whittier Narrows Regional Park, Nature Center, and Santa Fe Dam Recreation Area, which total approximately 1,927 acres of park and recreational facilities. Dedication of the 10.7 acres to the City for future City park use would provide the community with an additional park and recreational facility to serve the City's population.
Goal 3: Ensure that City residents and businesses are provided with a reliable, safe domestic water source.	
Policy 3.1: Continue to participate in the National Pollution Discharge Elimination Systems (NPDES) program under the direction of the Los Angeles County Department of Public Works.	**Consistent.** As discussed in **Section 4.6: Hydrology and Water Quality**, the Project would disturb more than one acre of land surface and would therefore be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) storm water program. Construction activities would be required to prepare Storm Water Pollution Prevention Plan (SWPPP) consistent with California State Water Resources Control Board's NPDES Construction General Permit to minimize pollution of downstream stormwater. Compliance with the NPDES, included as SC HYD-1, which would be verified during the City's construction permitting process, to ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Further, the Project would be in compliance with Municipal Code Chapter 8.44, which contains guidelines on structural and non-structural BMPs for meeting the NPDES goals.
Policy 3.2: Support federal government efforts to reduce contamination within the San Gabriel groundwater basin.	**Consistent.** As addressed in **Section 4.8: Hazards and Hazardous Materials** and **Section 4.9: Hydrology and Water Quality**, the project site is proximate to the U.S. EPA designated Whittier Narrows as an Operational Unit (OU) specifically to address groundwater contamination flowing out of the San Gabriel Basin, through Whittier

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
	Narrows, into the Montebello Forebay portion of the Central Basin. Because the project site is not a source and is not located in a source area, ongoing remedial actions, identification of responsible parties, and regulatory oversight by the U.S. EPA, no further action related to current and future use of the project site is be required. Following compliance with MM HYD-1, NPDES, and Municipal Code requirements, the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Accordingly, the Project would be consistent with Policy 3.2.
Goal 4: Achieve broad-based participation in water conservation programs.	
Policy 4.1: Provide residents and businesses with information about landscaping and irrigation systems that reduce water use.	**Consistent.** As described in **Section 3.0: Project Description**, and shown on **Figure 3-12: Conceptual Landscape Plans**, landscaping for the warehouse site would be provided along Lexington-Gallatin Road in front of the proposed screen wall, along the west elevation of the building, along the northeast and northwest property lines, and internal to the site. The City's landscaping guidelines in the Municipal Code require 5 percent site coverage, the Project proposes approximately 56,470 sf or approximately 12.7% site coverage. Landscaping would be focused near parking lot areas, driveway entries, and along the project site perimeter. The reminder of the project site would be a public park. The proposed Project would be in compliance with Municipal Code Section 17.11.160, which establishes standards of design, installation, and maintenance of water efficient landscaping and Chapter 8.46 that establishes water conservation measures to reduce water consumption in the City through conservation, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water in the City to avoid and minimize the effects of drought.
Policy 4.2: Establish regulations that require new developments to incorporate water-saving plumbing fixtures.	**Consistent**. The proposed Project would be developed in accordance with Chapter 15.04, City of South El Monte Plumbing Code, which adopts the Los Angeles County Plumbing Code in its entirety. The Project would incorporate applicable water-saving plumbing fixtures as required by the code. Further, as described in **Section 4.7: Greenhouse Gas Emissions**, the Project would implement MM GHG-10, which requires the Project applicant to implement a Water Use Efficiency and Conservation Plan which outlines indoor and outdoor water conservation features.
Goal 5: Improve air quality for future generations of South El Monte residents	
Policy 5.1: Continue to improve traffic flow within the City	**Consistent.** As addressed in **Section 14.15: Transportation**, the net change in Countywide Vehicle Miles Traveled (VMT) was used to determine the project-generated VMT for the proposed warehouse land use. The proposed City park would

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
	screen out from providing a full VMT analysis. Project-generated VMT is the assessment based on trips and trip distances of project-specific trip purposes. The Project's effect on VMT is an estimate of how VMT within the County will change once a project is built and new and existing traffic is redistributed. The proposed Project would result in a net reduction of total VMT in the County under both the existing and cumulative conditions (**Table 4.15-1**). The proposed Project would connect to the existing circulation system, including SR-60, and implement the City's traffic engineering design standards. In addition, the proposed Project would provide new facilities, such as sidewalks to improve pedestrian mobility; and would not conflict with a plan, ordinance, or policy addressing circulation.
Policy 5.2: Review the zoning regulations annually to identify whether revisions are required to accommodate and encourage the use of alternative-fuel vehicles (e.g., electric cars)	**Consistent.** The Project would comply with the City's Green Building Standards Code and applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11), which includes requirements for water efficiency, construction waste reduction, recycling, and electrical vehicle facilitation. As noted in **Section 3.0: Project Description**, the Project would also provide 51 EV capable parking stalls.
Public Health, Safety, and Environmental Justice Element	
Goal 1: Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural hazards.	
Policy 1.2: Enforce Development Standards to Reduce Geologic Risk.	**Consistent.** As addressed in **Section 4.6: Geology and Soils**, the Project would implement MM GEO-1, which requires the City to review all project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits relative to the Geotechnical Investigation recommendations. Compliance with MM-GEO 1 and applicable regulations would reduce geologic risks.
Policy 1.3: Minimize flooding risks through appropriate siting and protection of structures and occupants.	**Consistent**. As noted in **Section 4.9: Hydrology and Water Quality**, the project site is covered by Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 06037C1670F. The project area does not fall within a FEMA-mapped special flood hazard area. The site is classified as Zone X, which is an area of Minimal Flood Hazard. Additionally, the project site is located with the USACE reservoir flowage easement area associated with the spillway action elevation of the Whitter-Narrows dam. Flowage easement land is non-federal land on which the United States government has acquired certain perpetual rights, including the right to overflow, flood and submerge the land, the right to prohibit structures for human habitation, and the right to approve all other structures proposed for construction within the flowage easement. The excavation of the future City park area would ensure flood water released from the Whitter-Narrows Dam would be captured on that portion of the project site. The Project would be required to comply with the

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
	US Army Corps of Engineers (USACE) Section 408 program and obtain appropriate permits for development of flowage easement lands. This area would not include any habitable structures, propane or fuel storage tanks, and as required by USACE, would not include any elements with the potential to result in pollution or interference with the operation of the Whittier Narrows Dam.
Policy 1.4: Implement Programs and Standards to Mitigate Fire Risk and Secondary Impacts	**Consistent.** As addressed in **Section 4.13: Public Services**, the Project would include three public fire hydrants located on the warehouse building frontage on Lexington-Gallatin Road. The Project would tie into existing infrastructure and would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, emergency water sources, or power lines that could exacerbate fire risk in the area. Fire protection services in the City are provided by the Los Angeles County Fire Department (LACFD), with local reliance on the LA County Fire Station 90 located at 10115 Rush Street, 0.9 mile north of the project site. Further, all driveways have been designed to accommodate the required turning radius for fire engines and would not impair emergency fire service access. As part of the development review process, the LACFD Fire Prevention Division would review the proposed warehouse site plan and determine if access and water system requirements, which would enhance the proposed development's fire protection, are adequate. Additionally, the Project would be required to comply with standard LACFD conditions of approval. The Project would conform with the then-current California Building Code and California Fire Code which would require fire suppression systems such as sprinklers and fire curtains. The Project would be required to comply with applicable City, County, and State code requirements for fire protection and be subject to pay any applicable fees.
Goal 2: Promote a community safe from human-caused hazards	
Policy 2.1: Reduce localized air pollution exposure near major roads	**Consistent**. As discussed in **Section 4.2: Air Quality**, the localized construction and operational effects from Project on-site emissions were evaluated in accordance with the South Coast Air Quality Management District's (SCAQMD) LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling. Construction and operational emissions for the proposed Project would not result in any significant effects relating to localized air pollutant concentrations (**Table 4.2-11** and **Table 4.2-12**).
Policy 2.4: Support remediation and pollution prevention efforts that arise from industrial, roadway, and household sources.	**Consistent**. Project implementation would not result in significant impacts to sensitive receptors. As analyzed in **Section 4.2: Air Quality**, project-related emissions would not exceed the SCAQMD significance thresholds for any of the

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
	criteria pollutants. As discussed in **Section 4.8: Hazards and Hazardous Materials**, Project implementation would comply with existing federal, State, and local hazardous material and waste handling regulations and therefore result in less than significant impact to sensitive land uses in the area. Finally, as discussed in **Section 4.17: Utilities and Service Systems**, the Project would comply with applicable local, State and federal regulations regarding solid waste, including those of South El Monte. Therefore, the Project would support remediation and pollution prevention efforts that may arise from industrial sources.
Goal 4: Strengthen regional systems and fortify critical infrastructure.	
Policy 4.1: Maintain and Repair the Community's Infrastructure to Minimize the Potential for System Failure Because of a Disaster	**Consistent.** As addressed in **Section 4.6: Geology and Soils**, the Project would implement SC GEO-1, which would require the Project Applicant to submit to the City of South El Monte Building and Safety Department for review and approval, a site-specific design-level geotechnical investigation prepared for the project site by a registered geotechnical engineer. Additionally, the Project would implement MM GEO-1, which requires City review of all project plans for grading, foundation, structural, infrastructure, and all other relevant construction permits relative to the Geotechnical Investigation recommendations.
Policy 4.2: Advance Seismic Safety, Prioritizing the most Vulnerable Buildings, Infrastructure, and Systems.	
Goal 3: Minimize the adverse effects of excessive or unusual noise on the City's residential and business populations	
Policy 3.1: Use the noise/land use compatibility standards presented in Table PS-1 as a guide for future planning and development decisions. (See Table 4.11-5: Noise/Land Use Compatibility Chart.)	**Consistent.** As discussed in **Section 4.11: Noise**, an Acoustical Assessment was prepared for the Project. The assessment summarizes existing conditions and the relevant regulatory framework; discusses the Project's potential noise and vibration impacts; and identifies mitigation to avoid or minimize impacts, as needed. The Acoustical Assessment is summarized in **Section 4.11: Noise** and provided as **Appendix M: Acoustical Assessment**. The Acoustical Assessment analyzed the Project's noise impacts were analyzed against the noise/land use compatibility standards of the City and the County. As described in **Section 4.11: Noise**, Project construction and operation would be mitigated to a less than significant level.
Policy 3.2: Enforce the City's noise ordinance using both City code enforcement and law enforcement personnel	**Consistent**. As discussed in **Section 4.11: Noise**, the Project would result in less than significant construction and operational noise impacts with incorporation of MM NOI-1.
Goal 5: Design emergency response to serve a range of community needs.	
Policy 5.1: Strengthen Emergency Services Preparedness and Response	**Consistent.** As addressed in **Section 4.8: Hazards and Hazardous Materials**, the project site is in an urbanized area where adequate circulation and access are provided to facilitate emergency response. The City's General Plan Public Health,

Table 4.10-1: General Plan Consistency Analysis	
General Plan Policies	**Project Consistency**
	Safety, and Environmental Justice Element establishes the emergency evacuation routes for the City. Project construction would be required to comply with City Code Section 12.08.050: Improvements – New Construction, which requires the City's traffic engineer to review and approve proposed public improvements for compliance with accepted traffic management standards. Compliance with local regulations would ensure emergency access to the project site and adjacent roadways would be maintained during Project construction. As discussed in **Section 4.14: Public Services**, as part of the development review process, the LACFD Fire Prevention Division would review the site plan for the warehouse component and City park component. The Project would be required to comply with standard LACFD conditions of approval. Further, prior to commencement of construction activities, Project plans would be reviewed by the LASD to ensure compliance with applicable regulations associated with emergency access, site signage, lighting, perimeter control, and other crime safety preventative measures, as identified in SC PS-1. SC PS-2 requires the Applicant to contract with a security service to provide security during construction and may include additional security measures, such as the installation of temporary fencing.

South El Monte Municipal Code

South El Monte Municipal Code Title 16 functions as the City's provisions under the Subdivision Map Act. As discussed in **Chapter 3.0**, the Project proposes subdividing the 21-acre parcel into two parcels to allow for the development of the warehouse on one parcel and the future City park on the other parcel. Therefore, the Project is subject to Municipal Code Title 16.

Municipal Code Title 17 functions as the City's Zoning Ordinance, which identifies the permitted land uses on all parcels in the City through assigned land use designations and associated land use regulations and development standards. The City's Zoning Map identifies the project site as Commercial (C). As discussed in **Section 3.0**, the Project proposes a zone change to the Manufacturing (M) zone. The M Zone is intended to provide for and encourage the development of industrial uses in suitable areas throughout the City and warehousing and recreational uses, including but not limited to athletic facilities, are principally permitted uses. Therefore, the Project would be subject to and consistent with Municipal Code Chapter 17.09, Industrial Zones. Pursuant to Municipal Code Table 17.15.070-A, freestanding exterior lighted signs are permitted in the Commercial and Manufacturing zoning districts. The proposed Development Agreement would address the fact that the digital billboard would be located on what is currently entirely private property and therefore, City Municipal Code Section 17.15.090 (regulations of off-site signs) does not apply. As shown in **Table 4.10-2*:* Property Development Standards for the Manufacturing (M) Zone**, the Project would comply with the development standards for the M zone as outlined in Municipal Code Section 17.09.050, Property Development Standards. Following approval of the requested zone change, the Project would not conflict with Municipal Code Title 17.

Table 4.10-2: Property Development Standards for the Manufacturing (M) Zone Consistency

Standard	Required per M Zone[1]	Proposed Project
Minimum Lot Area	10,000 sf	922,391 sf
Maximum Building Coverage	No maximum building coverage	49% (warehouse only)
Minimum Lot Width	100 feet	1,007 feet
Minimum Lot Depth	100 feet	710 feet
Maximum Building Height	No Maximum	45 feet
Accessory Buildings and Structures	Shall conform to the standards contained in Chapter 17.12 of the Municipal Code	No accessory structures proposed

Note:
[1]. Per South El Monte Municipal Code § 17.09.050
Source: City of South El Monte. (2024). South El Monte Municipal Code, Title 17. Retrieved from: https://ecode360.com/45041799#45041815. Accessed May 15, 2025.

As assessed above, the proposed Project is consistent with pertinent land use planning and policy documents, including Connect SoCal, the South El Monte General Plan, and the South El Monte Municipal Code. Therefore, the proposed Project would have a less than significant impact on a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation measures are required.

4.10.7 Cumulative Impacts

For purposes of the land use and planning impact analysis, cumulative impacts are considered for cumulative development within the City of South El Monte and nearby areas of the County. The Project

requires a General Plan Amendment and zone change (see above) and would be consistent with applicable land use goals and policies of the City. Although other changes in land use plans and regulations may have occurred with past and present projects in the area and may be necessary for individual future projects, such changes have been, and would be, required to demonstrate consistency with the General Plan and other City policies such that no significant adverse cumulative impact has occurred or would occur from such changes. Given that the proposed Project would be consistent with the land use policies of the applicable plans (subject to the aforementioned General Plan Amendment and zone change), the Project would not combine with any past, present, or reasonably foreseeable future projects to cause a significant adverse cumulative land use impact based on a conflict with a plan or policy. Any associated physical impacts are covered in the individual topic sections addressed in this EIR for the proposed Project. It is also anticipated that local and regional growth for cumulative projects would also be subject to review for consistency with adopted land use plans and policies by the County of Los Angeles and City of South El Monte, as applicable, in accordance with the requirements of CEQA, the State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Therefore, no significant cumulative impacts associated with plans and policies are anticipated. Based on the foregoing, the Project would not contribute (or contribute considerably) to any cumulative impacts associated with plan or policy inconsistency and therefore, cumulative impacts would be less than significant.

4.10.8 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No additional mitigation is required.

4.10.9 Level of Significance After Mitigation

No significant impacts related to land use have been identified.

4.10.10 References

South El Monte, City of. 2024. *City of South El Monte Code of Ordinances*. Retrieved from: https://ecode360.com/SO5015. Accessed November 11, 2024.

_____. 2020, as amended. *City of South El Monte General Plan*. Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed November 11, 2024.

Southern California Association of Governments. 2024. *Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*. Retrieved from: https://scag.ca.gov/connect-socal. Accessed November 12, 2024.

4.11 NOISE

4.11.1 Introduction

This section of the EIR evaluates the Project's potential impacts concerning noise and vibration. The noise and vibration analysis summarizes existing conditions and the relevant regulatory framework, discusses the Project's potential noise and vibration impacts, and identifies mitigation to avoid or minimize impacts, as needed. The Acoustical Assessment is summarized in this EIR section and provided as **Appendix M: Acoustical Assessment**.

4.11.2 Acoustic Fundamentals

Sound and Environmental Noise

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. The fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this ambient noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micro-pascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness. **Table 4.11-1: Typical Noise Levels** provides typical noise levels.

Noise Descriptions

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. The equivalent noise level (L_{eq}) represents the equivalent continuous sound pressure level over the measurement period, while the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of sound energy during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM Most commonly, environmental sounds are described in terms of L_{eq} that has the same acoustical energy as the summation of all the time-varying events. Each is applicable to this analysis and defined in **Table 4.11-2: Definitions of Acoustical Terms**.

Table 4.11-1: Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	– 110 –	Rock Band
Jet fly-over at 1,000 feet		
	– 100 –	
Gas lawnmower at 3 feet		
	– 90 –	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	– 80 –	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower, 100 feet	**– 70 –**	Vacuum cleaner at 10 feet
Commercial area		Normal Speech at 3 feet
Heavy traffic at 300 feet	**– 60 –**	
		Large business office
Quiet urban daytime	**– 50 –**	Dishwasher in next room
Quiet urban nighttime	**– 40 –**	Theater, large conference room (background)
Quiet suburban nighttime		
	– 30 –	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	– 20 –	
		Broadcast/recording studio
	– 10 –	
Lowest threshold of human hearing	**– 0 –**	Lowest threshold of human hearing

Source: California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

Table 4.11-2: Definitions of Acoustical Terms

Term	Definitions
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascals is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound is below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
Maximum Noise Level (L_{max}) Minimum Noise Level (L_{min})	The maximum and minimum dBA during the measurement period.
Exceeded Noise Levels (L_{01}, L_{10}, L_{50}, L_{90})	The dBA values that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day-Night Noise Level (L_{dn})	A 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity at nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level (CNEL)	A 24-hour average L_{eq} with a 5 dBA weighting during the hours of 7:00 AM to 10:00 PM and a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

The A-weighted decibel (dBA) sound level scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this document are in terms of dBA, but are expressed as dB, unless otherwise noted.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of approximately 5 dBA.

Sound Propagation and Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed when soft ground conditions exist between the source and receptor locations. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed in this EIR analysis.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 15 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted:

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration (OSHA) has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance.

Ground-Borne Vibration

Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment used during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is vibration decibels (VdB) (the vibration velocity level in decibel scale). Other methods are the peak particle velocity (PPV) and the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave and expressed in terms of inches-per-second (in/sec). The RMS velocity is defined as the average of the squared amplitude of the signal and is expressed in terms of VdB. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 4.11-3: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations displays the reactions of people and the effects on buildings produced by continuous vibration levels. The human annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Table 4.11-3: Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.08	Readily Perceptible	--	--
0.1	Begins to Annoy	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	Annoying	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry
0.4	Unpleasant	--	--
0.5	--	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel, or timber (no plaster)

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit Administration, Transit Noise and Vibration Assessment Manual, 2018.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground-borne vibration are planes, trains, and construction activities such as earth-moving, which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) was used to evaluate construction-generated vibration for building damage and human complaints.

Ground-Borne Noise

Ground-borne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings. The relationship between ground-borne vibration and ground-borne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, ground-borne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a ground-borne noise level that is approximately 50 decibels lower than the velocity level. For ground-borne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the ground-borne noise level will be approximately 35 dB lower than the velocity level. For ground-borne vibration that cause high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the ground-borne noise level will be approximately 20 dB lower than the velocity level. The Federal Transit Administration (FTA) provides a ground-borne noise threshold of 43 dBA for infrequent vibration events in Category 2 buildings such as residences and buildings where people normally sleep. For frequent and occasional vibratory events, the FTA established ground-borne noise thresholds of 35 dBA and 38 dBA, respectively.

4.11.3 Regulatory Setting

Federal Regulations

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the *Transit Noise and Vibration Impact Assessment Manual* to provide guidance on procedures for assessing impacts at different stages of transit project development. The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential physical damage from construction. The guidance document establishes criteria for evaluating the potential for damage to various structural categories from vibration.

State Regulations

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of "Normally Acceptable," "Conditionally Acceptable," "Normally Unacceptable," and "Clearly Unacceptable" noise levels for various land use types.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are

applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, hotel rooms, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings and habitable rooms (including hotels), the acceptable interior noise limit for new construction is 45 dBA CNEL.

Assembly Bill 1307

On September 7, 2023, Governor Newsom signed AB 1307, which added section 21085 to the Public Resources Code to read, in pertinent part, "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment".

Local Regulations

Although the project site is fully located within the City, sensitive receptors near the project site are located within both the City and County. Therefore, both the City and County standards are discussed.

Los Angeles County Code

The County has adopted regulations to manage unnecessary, excessive, and intrusive noise, as outlined in the County's Noise Control Ordinance (Chapter 12.08 of the Los Angeles County Code [County Code]). The County Code establishes exterior noise standards to regulate fixed noise sources, such as mechanical equipment, within various land use zones. It specifies that operational noise from these sources must not exceed the noise levels identified in **Table 4.11-4: Los Angeles County Exterior Operational Noise Standards**, or the existing ambient noise level, whichever is greater.

Table 4.11-4: Los Angeles County Exterior Operational Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor property)	Time Interval	Exterior Noise Level (dBA)
I	Noise-sensitive area	Anytime	45
II	Residential properties	10:00 PM to 7:00 AM (nighttime)	45
		7:00 AM to 10:00 PM (daytime)	50
III	Commercial properties	10:00 PM to 7:00 AM (nighttime)	55
		7:00 AM to 10:00 PM (daytime)	60
IV	Industrial properties	Anytime	70

Source: Los Angeles County, *Los Angeles County Code*, *Section 12.08.390 - Exterior noise standards*, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO. Accessed May 2025.

Section 12.08.390 of the County Code also states that no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards:

- Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level; or, if the ambient noise level exceeded for 50 percent of the time of the measurement duration

(L_{50}) exceeds the foregoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.

- Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level plus 5 dB; or, if the ambient noise level exceeded for 25 percent of the time of the measurement duration (L_{25}) exceeds the foregoing level, then the ambient L_{25} becomes the exterior noise level for Standard No. 2.
- Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 5 minutes in any hour. Standard No. 3 shall be the applicable noise level plus 20 dB; or, if the ambient noise level exceeded for 8.3 percent of the time of the measurement duration ($L_{8.3}$) exceeds the foregoing level, then the ambient $L_{8.3}$ becomes the exterior noise level for Standard No. 3.
- Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 1 minute in any hour. Standard No. 4 shall be the applicable noise level plus 15 dB; or, if the ambient noise level exceeded for 1.7 percent of the time of the measurement duration ($L_{1.7}$) exceeds the foregoing level, then the ambient $L_{1.7}$ becomes the exterior noise level for Standard No. 4.
- Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level plus 20 dB; or, if the highest ambient noise level that occurred at the site (L_0) exceeds the foregoing level, then the ambient L_0 becomes the exterior noise level for Standard No. 5.

The County Code also identifies specific restrictions regarding construction noise. Construction noise limits are included in County Code Section 12.08.440, Noise Control. Pursuant to the County Code, the operation of equipment used in construction, repair, alteration, drilling, or demolition work is prohibited between the hours of 7:00 PM and 7:00 AM, Monday through Friday; before 8:00 AM or after 6:00 PM on Saturday; and anytime on Sundays or legal holidays if such noise would create a noise disturbance across a residential or commercial real-property line. **Table 4.11-5: Los Angeles County Construction Noise Standards** identifies the maximum noise levels at the affected buildings allowed by the County Code.

County Code Section 12.08.560 provides a ground-borne vibration limit as to not exceed the vibration human perception threshold of 0.01 in/sec over the range of 1 to 100 hertz (80 VdB).

Table 4.11-5: Los Angeles County Construction Noise Standards			
Time	**Single-Family Residential (dBA)**	**Multi-Family Residential (dBA)**	**Semi-Residential/ Commercial (dBA)**
At Residential Structures			
Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75	80	85
Daily, 8:00 PM to 7:00 AM, and all day Sunday and legal holidays	60	64	70
Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60	65	70
Daily, 8:00 PM to 7:00 AM and all day Sunday and legal holidays	50	55	60
At Business Structures			
Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment:			
Daily, including Sundays and legal holidays, all hours	85 (All Structures)		
Source: Los Angeles County, *Los Angeles County Code*, *Section 12.08.440 - Construction noise*, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO. Accessed May 2025.			

Los Angeles County General Plan

The Noise Element of the Los Angeles County General Plan 2035 (County General Plan), adopted October 6, 2015, aims to reduce and limit the exposure of the general public to excessive noise levels. The Noise Element sets goals and policies for the management of noise in unincorporated areas of the County. The below goals and policies are applicable to the proposed Project:

Goal N 1 **The reduction of excessive noise impacts.**

Policy N 1.3 Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).

Policy N 1.4 Enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards and other applicable noise standards.

Policy N 1.6 Ensure cumulative impacts related to noise do not exceed health-based safety margins.

Policy N 1.7 Utilize traffic management and noise suppression techniques to minimize noise from traffic and transportation systems.

Policy N 1.9 Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 dBA CNEL and above, when unavoidable impacts are identified.

Policy N 1.11 Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/ light industrial uses.

South El Monte General Plan

The South El Monte General Plan (General Plan) Public Safety Element addresses the relationship between noise and land use planning. The Public Safety Element notes that early consideration of the relationship between noise sources and noise receptors is one way to minimize noise effects in the City. Some areas of the City experiencing noise impacts may require improvements. City General Plan goals and policies that directly address reducing and avoiding noise or vibration impacts that are applicable to the proposed Project are as follows:

Goal 3 **Minimize the adverse effects of excessive or unusual noise on the City's residential and business populations.**

Policy 3.1 Use the noise/land use compatibility standards presented in Table PS-1 as a guide for future planning and development decisions. (See **Table 4.11-6: Land Use Noise Compatibility**.)

Policy 3-2 Enforce the City's noise ordinance using both City code enforcement and law enforcement personnel.

City of South El Monte Municipal Code

The City has adopted regulations to control unnecessary, excessive, and annoying noise, as set forth in the City's Noise Ordinance (Chapter VIII, Health and Safety, of the South El Monte Municipal Code [Municipal Code]). The City's Noise Ordinance establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

Table 4.11-6: Land Use Noise Compatibility

Land Use Category		Community Noise Equivalent Level (CNEL)						
Categories	**Land Uses**	**<55**	**55-60**	**60-65**	**65-70**	**70-75**	**75-80**	**>80**
Residential	Single-Family, Duplex, Multiple Family, Mobile Homes	A	B	C	C	C	D	D
Mixed Use	Residential, Retail, and Service Commercial	A	B	B	C	C	C	D
Commercial	Hotel, Motel, Transient Lodging	A	A	A	B	B	B	C
Commercial	General Retail, Bank, Restaurant, Entertainment	A	A	A	B	B	B	C
Commercial Commercial Manufacturing Industrial Public Facilities	Professional Office, Research and Development, City Hall	A	A	A	B	B	C	D
Commercial Commercial Manufacturing Public Facilities	Automobile Sales and Services, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Public Facilities	Hospital, Church, Library, Schools	A	B	B	C	C	D	D
Parks	Parks	A	A	A	B	C	D	D

CNEL: community noise equivalent level.
Zone A: Clearly Compatible— Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
Zone B: Normally Compatible— New construction or development should be undertaken only after detailed analysis of the noise reduction requirements and are made and needed noise insulation features in the design are determined. Conventional construction with closed windows and fresh air supply systems or air conditioning will normally suffice.
Zone C: Normally Incompatible— Potential noise impacts exist. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.
Zone D: Clearly Incompatible— New construction or development should generally not be undertaken.

Source: City of South El Monte, General Plan, Public Safety Element, October 2000.

Municipal Code Section 8.20.020. With regards to exterior noise levels, Municipal Code Section 8.20.020 specifies baseline noise values in **Table 4.11-7: City Exterior Noise Limits by Zone** and **Table 4.11-8: City Exterior Noise Limits by Use** and prohibits exterior noise registered by another property that exceeds:

A. The exterior noise limit outlined in **Table 4.11-7** and **Table 4.11-8** for a cumulative period more than 30 minutes in any hour; or

B. the exterior noise limit outlined in **Table 4.11-7** and **Table 4.11-8** plus 5 dBA for a cumulative period of more than 15 minutes in an hour; or

C. the exterior noise limit outlined in **Table 4.11-7** and **Table 4.11-8** plus 10 dBA for a cumulative period of more than 1 minute in any hour; or

D. the exterior noise limit as outlined in **Table 4.11-7** and **Table 4.11-8** plus 15 dBA for a cumulative period of more than 1 minute in any hour; or

E. the exterior noise limit as outlined in **Table 4.11-7** and **Table 4.11-8** plus 20 dBA for any period of time.

With respect to steady offensive noises such as a whine, screech, or hum, or a repetitive noise (e.g., hammering or riveting, or music or speech conveying information content), the exterior noise limit

identified in the tables must be reduced by 5 dBA. Where the measured ambient noise level exceeds the allowable exterior noise limits, Municipal Code Section 8.20.020 states that the exterior noise level shall be adjusted in 5 dBA increments to encompass or reflect the measured ambient noise level.

Table 4.11-7: City Exterior Noise Limits by Zone

Receiving Land Zoning Categories	Time Period	Noise Level Standard (dBA)
One-or two-family residential zone	10:00 PM to 7:00 AM	45
	7:00 AM to 10:00 PM	55
Multiple dwelling residential zone, public zone	10:00 PM to 7:00 AM	50
	7:00 AM to 10:00 PM	60
Commercial zone or commercial manufacturing zone	10:00 PM to 7:00 AM	55
	7:00 AM to 10:00 PM	60
Manufacturing zone	anytime	70

Source: City of South El Monte, Municipal Code, Section 8.20.020, Exterior Noise Limits, https://ecode360.com/44542750?highlight=noise,noises&searchId=1878241043397576#44542739. Accessed July 2024.

Table 4.11-8: City Exterior Noise Limits by Use

Land Use Categories	Time Period	Noise Level Standard (dBA)
Property partially or entirely developed for one- or two-family residential uses	10:00 PM to 7:00 AM	45
Property partially or entirely developed for multi-family residential uses	10:00 PM to 7:00 AM	50

Source: City of South El Monte, Municipal Code, Section 8.20.020, Exterior Noise Limits, https://ecode360.com/44542750?highlight=noise,noises&searchId=1878241043397576#44542739. Accessed July 2024.

With respect to vibration from operable instruments, Municipal Code Section 8.20.020 states no person shall operate or permit the operation of any device or machine that creates a vibration above the vibration perception threshold of 0.01 in/sec over the range of 1 to 100 hertz (80 VdB).

Municipal Code Section 8.20.030. With regards to loading and unloading, Municipal Code Section 8.20.030 prohibits loading and unloading between the hours of 10:00 PM to 7:00 AM, such that a noise disturbance is registered across the property line by a property developed or partially developed for residential use.

With respect to speakers, musical instruments, motorized vehicles, and other sounds in public spaces, Municipal Code Section 8.20.030 prohibits a noise disturbance that exceeds 95 dBA as registered by a slow response sound level meter unless a sign stating, "WARNING! SOUND LEVELS WITHIN MAY CAUSE HEARING IMPAIRMENT" is present.

With respect to construction and construction equipment noise, Municipal Code Section 8.20.030 prohibits construction between the hours of 10:00 PM and 7:00 AM Monday through Friday, or at any time on weekends and nationally recognized holidays (i.e., construction is allowed Monday through Friday between 7:00 AM and 10:00 PM), such that a noise disturbance is registered across the property line by a property developed or partially developed for residential use.

4.11.4 Existing Conditions

Existing Noise Sources

The project site is currently impacted by various noise sources. Mobile sources of noise, including traffic along Santa Anita Avenue, Lexington-Gallatin Road, and State Route 60 (SR-60) are the most common and prominent existing sources of noise in the area. The primary stationary noise sources in the project vicinity are those associated with the surrounding residential, educational (South El Monte High School), and recreational uses. Such stationary noise sources include mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment), idling vehicles, music playing, dogs barking, and people talking and parking lot activities (cars parking, open and closing doors, etc.). The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Mobile Traffic Noise

Existing roadway noise levels were calculated for the roadway segments in the project vicinity using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and existing traffic volumes calculated for the Project as included in **Appendix M**. The noise prediction model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (also referred to as energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The Caltrans data indicates that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along roadway segments in proximity to the project site are included in **Table 4.11-9: Existing Traffic Noise Levels**.

Table 4.11-9: Existing Traffic Noise Levels

Roadway Segment	Existing Conditions	
	ADT	dBA CNEL at 100 feet from Roadway Centerline
Durfee Avenue		
Rosemead Boulevard to Santa Anita Avenue	18,745	64.7
Santa Anita Avenue to Peck Road	16,587	64.2
Santa Anita Avenue		
SR- 60 to Lexington-Gallatin Road	10,823	61.1
Lexington-Gallatin Road to Durfee Avenue	8,852	60.2
Lexington-Gallatin Road		
East of Santa Anita Avenue	1,079	48.7

ADT = average daily traffic; dBA = A-weighted decibels; CNEL = day-night noise level;

Source: Refer to **Appendix M** for traffic noise modeling assumptions and results.

Noise Measurements

To quantify existing ambient noise levels in the project area, five short-term (10-minute) measurements were taken on July 30, 2024, and one long-term (24-hour) measurement was taken on July 30 to July 31, 2024; see **Appendix M** for additional details regarding how the ambient noise measurements were taken. The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses adjacent to the project site. The 10-minute daytime measurements were

taken between 9:18 AM and 10:43 AM on July 30, 2024. The 24-hour measurement was taken between 11:15 AM on July 30, 2024, to 11:25 AM the following day. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels measured at each location are listed in **Table 4.11-10: Existing Noise Measurement Locations and Measurements** and shown on **Figure 4.11-1: Noise Measurement Locations**.

Table 4.11-10: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L_{eq} (dBA)	Nighttime Average L_{eq} (dBA)[1]	Long term Average L_{eq} (dBA)
ST-1	Inside Whittier Narrows Recreation area, near SR-60, northwest of project site (recreational uses)	9:18 AM – 9:28 AM	10 minutes	60.6	–	–
ST-2	End of cul-de-sac on Lexington-Gallatin Road, near SR-60, east of project site (residential uses)	10:33 AM – 10:43 AM	10 minutes	64.7	–	–
ST-3	End of cul-de-sac on Andrews Street, east of project site (recreational and residential uses)	10:18 AM– 10:28 AM	10 minutes	52.2	–	–
ST-4	Northwest corner of Whittier Narrows Recreation area picnic and disk golf course area, south of project site (recreational uses)	9:53 AM– 10:03 AM	10 minutes	54.2	–	–
ST-5	Inside Whittier Narrows Recreation area, southwest of project site (recreational uses)	9:36 AM – 9:46 AM	10 minutes	53.0	–	–
LT-1	Adjacent to the southeastern corner of project site on Lexington-Gallatin Road (recreational and residential uses)	July 30, 2024 9:45 AM– July 31, 2024 9:55 AM	24 hours	58.4	62.3	60.3

1. The long-term noise measurement was taken in a recreational and residential area, approximately 637 feet to the south of SR-60. The primary nighttime noise source would be the traffic traveling along SR-60. Free-flowing traffic during nighttime hours generate noise levels greater than peak traffic conditions during daytime hours. Source: California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol,* September 2013, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed May 2025.

Source: Noise measurements taken by Kimley-Horn and Associates, July 30, 2024. See **Appendix M** for noise measurement results.



Figure 4.11-1: Noise Measurement Locations

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Noise sensitive receptors typically include residences, dormitories, hotels, transient lodging, houses of worship, hospitals, schools, and places of assembly. Sensitive receptors near the project site are listed in **Table 4.11-11: Sensitive Receptors** and shown in **Figure 4.11-2: Noise Receptor Locations**.

Table 4.11-11: Sensitive Receptors

Receptor Description	Distance[1] and Direction from Project Site
1- Whittier Narrows Recreation area[2]	40 feet to the southeast
2- Future City Park[3]	40 feet to the west
3- Single-family Residences	230 feet to the east
4- Ramada by Wyndham South El Monte	800 feet to the north
5- Single-family Residences	1,040 feet to the north
6- South El Monte High School	1,250 feet to the southeast
7- Shiveley Park	1,750 feet to the north
8- South El Monte Library	2,600 feet to the north
9- New Temple Park	2,600 feet to the northeast
10- New Temple Elementary School	2,700 feet to the northeast

1. Distance measured from the property line of the project site to the nearest receptor property line (all numbers are approximate).
2. Whittier Narrows Recreation Area park receptors (i.e., sensitive receptors), would be located as close as 40 feet from the project site. However, the Whittier Narrows Recreation Area also includes commercial/office receptors (i.e., non-sensitive receptor), which are located as close as 20 feet from the project site.
3. The proposed Project would include the future development of a recreational park by the City that would be exposed to noise associated with the future operation of the proposed warehouse component. Therefore, this analysis considers the future recreational use as a sensitive receptor.

Source: Google Earth, 2024.

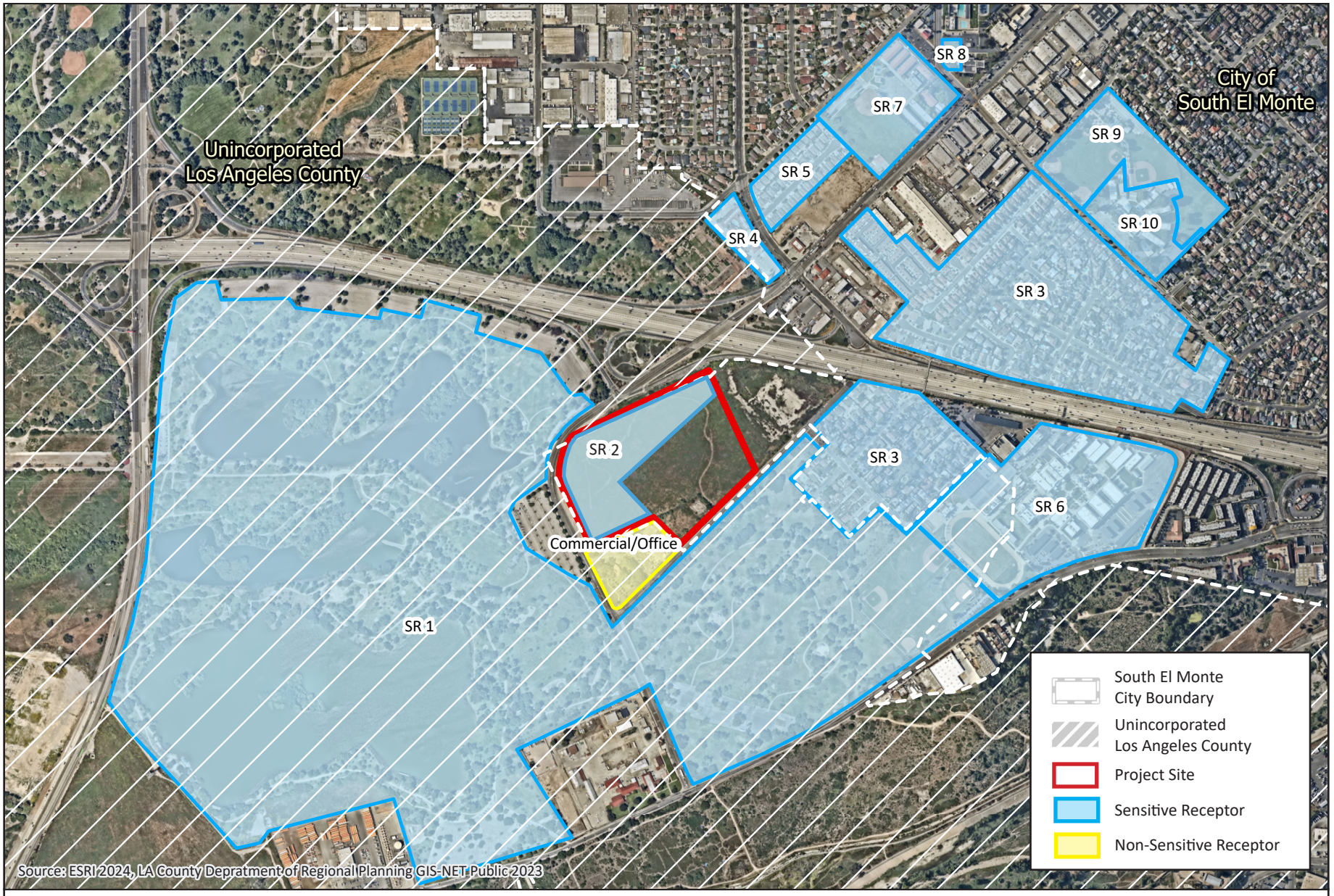


Figure 4.11-2: Noise Receptor Locations

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

4.11.5 Methodology

Construction Noise

Construction noise levels were based on typical noise levels generated by construction equipment published by the FTA and FHWA. Construction noise is assessed in dBA L_{eq}. This unit is appropriate because L_{eq} can be used to describe the noise level from the operation of each piece of equipment separately, and the levels can be combined to represent the noise level from all equipment operating concurrently during a given period.

Construction noise was modeled using the FHWA Roadway Construction Noise Model (RCNM). Reference noise levels are used to estimate operational noise levels at nearby sensitive receptors based on a standard noise attenuation rate of 6 dB per doubling of distance (line-of-sight method of sound attenuation for point sources of noise). Noise level estimates do not account for the presence of intervening structures or topography, which may reduce noise levels at receptor locations. Therefore, the noise levels presented herein represent a conservative, reasonable worst-case estimate of actual temporary construction noise.

Operational Noise

The analysis of the Existing and Existing Plus Project noise environments is based on noise prediction modeling and empirical observations. Reference noise level data are used to estimate the Project operational noise impacts from stationary sources. Noise levels were collected from published sources from similar types of activities and used to estimate noise levels expected with the Project's stationary sources. The reference noise levels are used to represent a worst-case noise environment as noise level from stationary sources can vary throughout the day.

An analysis was conducted of the Project's effect on traffic noise conditions at off-site land uses. Without Project traffic noise levels were compared to With Project traffic noise levels. The environmental baseline is the Without Project condition. The Without Project and With Project traffic noise levels in the Project vicinity were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD-77-108). The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures (walls and buildings), barriers, and topography. The noise attenuating effects of changes in elevation, topography, and intervening structures were not included in the model. Therefore, the modeling effort is considered a conservative representation of the roadway noise.

Vibration

Ground-borne vibration levels associated with construction activities for the Project were evaluated utilizing typical ground-borne vibration levels associated with construction equipment, obtained from FTA published data for construction equipment. Potential ground-borne vibration impacts related to building/structure damage and interference with sensitive existing operations were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria for structural damage.

Construction vibration levels were calculated using the following formula:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance

PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

D = the distance from the equipment to the receiver

Additionally, the following formula was utilized for human annoyance:

$$L_{v.distance} = L_{vref} - 30\log(D/25)$$

where: $L_{v.distance}$ = the rms velocity level adjusted for distance, VdB

L_{vref} = the source reference vibration level at 25 ft in VdB from Table 7-4 of the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

D = the distance from the equipment to the receiver

4.11.6 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines Appendix G Environmental Checklist Form*. Impacts concerning noise and vibration would be significant if the Project would:

- Generate 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.
- Generate excessive ground-borne vibration or ground-borne noise levels.

As addressed in Section 1.4, Summary of Effects With No Impact, the City has determined that the Project would not have a significant impact on the following threshold for the reasons stated below and that no further analysis was required:

- 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, expose people residing or working in the project area to excessive noise levels.

The project site is located approximately 2.9 miles south of the San Gabriel Valley Airport and is not located within the airport's influence area or noise contours. The project site is not located within an existing or projected noise contour associated with any private or public airport. Therefore, the Project would not expose people residing or working in the project area to excessive airport or airstrip-related noise levels.

Noise

Although the project site is located in the City, sensitive receptors near the project site are located in both the City and unincorporated portions of the County. Specifically, the nearest residential receptors (SR-3) are located in the City and the commercial/office receptors and Whittier Narrows Recreation area receptors (SR-1) are located in the County (**Figure 4.11-2**). Therefore, both the City and County standards are discussed.

Construction Noise Threshold

City Receptors. Pursuant to Municipal Code Section 8.20.030, construction that causes a registered noise disturbance at a residential use is prohibited between the hours of 10:00 PM and 7:00 AM Monday through Friday, or at any time on weekends and nationally recognized holidays. The City does not establish quantitative construction noise standards. Therefore, this analysis uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential receptors to evaluate construction noise impacts.

County Receptors. The County Code establishes specific regulations for construction-related noise in Chapter 12.08.440. Under these provisions, the operation of construction equipment, repair, alteration, drilling, or demolition is prohibited between the hours of 7:00 PM and 7:00 AM, Monday through Friday; before 8:00 AM or after 6:00 PM on Saturdays; and at any time on Sundays or legal holidays, if such activity creates a noise disturbance across a residential or commercial real-property line. Noise limits vary by the type of equipment (mobile or stationary), the duration of activity, and the adjacent land use. **Table 4.11-7** identifies the County's maximum allowable construction noise levels at affected buildings, based on land use and time of day.

Operational Noise

A change in noise levels of less than 3 dBA is not discernible to the general population. According to Caltrans, an increase in average noise levels of 1 dBA cannot be perceived by humans, an increase of 3 dBA is considered barely perceptible, and an increase of 5 dBA is considered readily perceptible to most people.[1] The City and County have not defined a "substantial increase" in ambient noise levels. Therefore, this analysis uses 5 dBA above ambient as the substantial increase threshold.

Stationary Noise

City Receptors. Operational noise impacts on the residential receptors are evaluated based on the standards within the City's Noise Ordinance (Municipal Code, Chapter 8: Health and Safety) and City General Plan, as well as the substantial increase threshold. An operational stationary noise impact would occur if both the City's noise standard and the substantial increase threshold are exceeded at receptors located in the City.

County Receptors. Operational noise impacts on the commercial/office receptors and recreational receptors are evaluated based on standards within County Code Section 12.08 or the ambient noise level, whichever is greater; refer to **Table 4.11-4**. An operational stationary noise impact would occur if both the County's noise standard and the substantial increase threshold are exceeded at receptors located in the County.

Traffic Noise

City Receptors. The Project's potential effect on traffic noise conditions at off-site land uses is evaluated based on the "Clearly Compatible" standard in the City General Plan; refer to **Table 4.11-6**. A traffic noise impact would occur if both the City's noise standard and the substantial increase threshold are exceeded at receptors located in the City.

County Receptors. The Project's potential effect on traffic noise conditions at off-site noise-sensitive land uses is evaluated based on County General Plan Policy N 1.9, which identifies the standard as 65 dBA CNEL.

[1] Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* September 2013, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, Accessed June 24, 2025.

A traffic noise impact would occur if both the County's noise standard and the substantial increase threshold are exceeded at receptors located within the County.

Vibration

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used, the location of that equipment relative to the receptor, and the operations involved.

City Receptors. Although the City has established a human annoyance criterion, the City has not established a structural damage criterion. Municipal Code Section 8.20.020 states no person shall operate or permit the operation of any device or machine that creates a vibration above the vibration perception threshold of 0.01 in/sec over the range of 1 to 100 hertz (80 VdB). The FTA guidelines state that engineered buildings built with concrete and masonry can withstand vibration levels up to 0.3 in/sec PPV and not experience vibration damage. Therefore, this analysis uses the City's 80 VdB human annoyance criterion and the FTA's 0.3 in/sec PPV structural damage criterion for receptors located in the City.

County Receptors. Although the County has established a human annoyance criterion, the County has not established a structural damage criterion. County Code Section 12.08.560 provides a ground-borne vibration limit as to not exceed the vibration human perception threshold of 0.01 in/sec over the range of 1 to 100 hertz (80 VdB). The FTA guidelines state that engineered buildings built with concrete and masonry can withstand vibration levels up to 0.3 in/sec PPV and not experience vibration damage. Therefore, this analysis uses the County's 80 VdB human annoyance criterion and the FTA's 0.3 in/sec PPV structural damage criterion for receptors located in the County.

4.11.7 Project Impacts and Mitigation

Threshold 4.11-1	**Would the Project generate 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?** ***Level of Significance:*** Less than Significant with Implementation of SC NOI-1 and MM NOI-1.

Construction

On-Site Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the receptors near the construction site. The nearest receptors are the residential receptors (SR-3) located approximately 230 feet to the southeast and the commercial/office receptors (a non-sensitive receptor located within the Whittier Narrows Recreation area) located approximately 20 feet to the south of the project site.[2] Although Whittier Narrows Recreation area (SR-1) is located approximately 40 feet to the southeast of the project site, the

[2] Although commercial uses are not considered sensitive receptors, this analysis conservatively includes the estimated construction noise level at the commercial uses located within Whittier Narrows Recreation area.

County and FTA have not defined construction noise thresholds for recreational receptors. Therefore, construction noise levels were not quantified for Whittier Narrows Recreation area (SR-1) but have been quantified for the commercial/office receptors within the Whittier Narrows Recreation area; refer to **Figure 4.11-2** for receptor locations.

Construction activities would include USACE detention basin improvements, demolition, site preparation, grading, building construction, infrastructure improvements, paving, and architectural coating applications. Such activities would require dozers, excavators, and concrete saws during demolition; dozers and tractors during site preparation; graders, excavators, tractors, dozers, and scrapers during grading; forklifts, cranes, generators, tractors, and welders during building construction; pavers, rollers, and paving equipment during paving; and air compressors during architectural coating applications. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute, such as dropping large pieces of equipment or the hydraulic movement of machinery lifts. Noise levels associated with individual construction equipment operating at full power are identified in **Table 4.11-12: Project Construction Equipment Noise Levels**.

Table 4.11-12: Project Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA L_{max}) at 50 feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Graders	85
Loader	80
Pavers	85
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84

1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$
Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. Pursuant to Municipal Code 8.20.030, construction noise is prohibited between the hours of 10:00 PM and 7:00 AM Monday through Friday, or at any time on weekends and nationally recognized holidays. The nearest receptors to the project site are residential receptors located within the

City and commercial/office receptors located within the County (**Figure 4.11-2**). The Project would adhere to the allowable hours of construction identified in Municipal Code Section 8.20.030 (7:00 AM to 10:00 PM). It should be noted that County Code Section 12.08.440 identifies allowable hours of construction (7:00 AM to 7:00 PM) but only if such activity creates a noise disturbance across a commercial property line. The commercial/office use located to the south of the project site would not be operational past 6:00 PM, and therefore, Project construction activities would not create a noise disturbance at the commercial/office use past 6:00 PM. Therefore, Project construction activities would not be subject to allowable hours of construction identified in County Code Section 12.08.440.

Because the City has not established quantitative construction noise standards, this analysis conservatively uses the FTA's threshold of 80 dBA (8-hour L_{eq}) for residential receptors.[3] The County has established 85 dBA as the construction noise threshold for nonscheduled operation of construction mobile equipment at business structures. Therefore, noise generated from scheduled Project construction was conservatively analyzed against the County's threshold for the commercial/office receptors.

The FHWA RCNM was used to calculate noise levels during construction activities; refer to **Appendix M**. Noise levels were calculated for each construction phase and are based on the equipment used, distance to the nearest property/receptor, and acoustical use factor for equipment. The modeled receptor locations represent the closest existing receiving land uses to Project construction activities. Noise levels at other receptors surrounding the project site would be located further away and would experience lower construction noise levels than the closest receptors modeled.

Table 4.11-13: Project Construction Noise Levels shows the estimated exterior noise levels at the nearest receptors for each construction phase. The nearest noise receptors to the project site are the commercial/office receptors located approximately 20 feet to the south (non-sensitive receptors located within the Whittier Narrows Recreation area) and residential receptors (SR-3) located approximately 230 feet to the southeast of the project site. Since there is no defined FTA construction noise threshold for recreational receptors and sensitive receptors at parks would not have a long exposure duration for noise (i.e., recreational receptors do not typically spend more than a few hours at parks, etc.), construction noise levels were not quantified for the Whittier Narrows Recreation area (SR-1).

Following a more conservative approach than the FTA methodology, the loudest piece of equipment is assumed to operate at the property line nearest to the receptor while all other equipment anticipated for each individual construction phase is assumed to operate at the center of the project site. This methodology accounts for equipment operating throughout the project site and not at a fixed location for extended periods of time. Therefore, the distance used in the RCNM model was measured from the property line of the project site to the nearest receptor for the loudest piece of equipment and measured from the center of the construction area to the receptor for all other pieces of equipment. The equipment for the construction phases that are anticipated to overlap, such as demolition/site preparation and building construction/infrastructure improvements/paving, have been combined to represent the worst-case scenario construction noise levels.

As identified in **Table 4.11-13**, the worst-case scenario construction noise levels at the nearest commercial/office receptors would occur during the overlapping demolition and site preparation phases

[3] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 7-3, Page 179, September 2018.

and would be up to 92.5 dBA L_{eq}. The table shows the worst-case scenario construction noise level at the nearest residential use would occur during the overlapping building construction, infrastructure improvements, and paving phases and would be up to 78.5 dBA L_{eq}. The unmitigated construction noise level would not exceed the FTA standard (80 dBA L_{eq}) at the residential receptors, but would exceed the County standard (85 dBA L_{eq}) at the commercial/office receptors. Therefore, mitigation is necessary to reduce noise impacts at the commercial/office receptors to the south of the project site. The mitigation would also help reduce noise impacts at the Whitter Narrows Recreation area, for which there is no established County or FTA standard.

Mitigation Measure (MM) NOI-1 requires a 10-foot-high temporary noise barrier along the construction site perimeter adjacent to the commercial/office receptors to the south; see **Figure 4.11-3: Construction Noise Barrier Location**. A 10-foot-high temporary noise barrier would reduce construction noise levels by approximately 13 dBA at the commercial/office receptors (**Table 4.11-13**). Therefore, the mitigated worst-case construction noise level at the commercial/office receptors to the south would be 79.5 dBA L_{eq} and would not exceed the County construction threshold of 85 dBA L_{eq}. Project construction would not result in temporary noise levels in exceedance of standards established by the County and FTA.

As there are no established construction thresholds related to temporary increases in ambient noise, the following analysis is provided for informational purposes only. As shown in **Table 4.11-13**, temporary construction noise levels would exceed the existing measured ambient noise levels at residential and commercial/office receptors. In order to minimize temporary increases in ambient noise due to construction, the Project, inclusive of the warehouse and the City park, would be subject to Standard Condition of Approval (SC) NOI-1.

The FHWA states that muffler systems can reduce noise levels by 10 dBA or more. Noise dampening material attached to construction equipment to dampen/shield noise emanating from equipment engines can provide noise level reductions of between 10 and 20 dBA. **Table 4.11-14: Project Construction Noise Levels Over Ambient** includes the maximum construction noise levels at each studied receptor and potential reductions provided by SC NOI-1. Generally, an increase of 10 dBA is considered a doubling of loudness, which has been used as the applicable threshold for informational purposes since there are no established thresholds related to temporary increases in ambient noise during construction.[4] As shown in the table, with implementation of SC NOI-1 and MM NOI-1, maximum Project construction noise levels would only exceed the existing ambient noise level at the commercial/office use to the south by 5.3 dBA L_{eq} and would only exceed the existing ambient noise level at residential receptors to the southeast of the project site by 6.3 dBA L_{eq}. Therefore, Project construction would not result in a doubling of loudness because the net increase would be well below 10 dBA.

[4] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

Table 4.11-13: Project Construction Noise Levels

Construction Phase	Land Use[1]	Ambient Noise Level (dBA L_{eq})	Receptor Location			Exterior Noise Level without Mitigation (dBA L_{eq})	Exterior Noise Level with Mitigation (dBA L_{eq})[4]	Noise Threshold (dBA L_{eq})[5]	Exceeded?
			Direction	Distance to Project site (feet)[2]	Distance to Center Construction Area (feet)[2,3]				
Individual Construction Phases									
Demolition	Commercial/Office	54.2	South	20	428	90.6	77.6	85	**No**
	Residential	52.2	Southeast	230	890	69.7	69.7	80	**No**
Site Preparation	Commercial/Office	54.2	South	20	428	88.0	75.0	85	**No**
	Residential	52.2	Southeast	230	890	67.8	67.8	80	**No**
Grading	Commercial/Office	54.2	South	20	428	89.0	76.0	85	**No**
	Residential	52.2	Southeast	230	890	68.9	68.9	80	**No**
Building Construction	Commercial/Office	54.2	South	20	455	88.0	75.0	85	**No**
	Residential	52.2	Southeast	230	650	69.2	69.2	80	**No**
Infrastructure Improvements	Commercial/Office	54.2	West	N/A[6]	1,203	54.3	54.3	85	**No**
	Residential	52.2	East	N/A[6]	85	77.3	77.3	80	**No**
Paving	Commercial/Office	54.2	South	20	455	90.0	77.0	85	**No**
	Residential	52.2	Southeast	230	650	69.5	69.5	80	**No**
Architectural Coating	Commercial/Office	54.2	South	20	455	81.7	68.7	85	**No**
	Residential	52.2	Southeast	230	650	60.5	60.5	80	**No**
Overlapping Construction Phases									
Demolition/ Site Preparation	Commercial/Office	54.2	-	-	-	92.5	79.5	85	**No**
	Residential	52.2	-	-	-	71.9	78.5	80	**No**
Building Construction/ Infrastructure Improvements/ Paving	Commercial/Office	54.2	-	-	-	92.1	79.1	85	**No**
	Residential	52.2	-	-	-	78.5	78.5	80	**No**

1. The Whittier Narrows Recreation area (SR-1) was not analyzed because the County has not established construction noise thresholds for recreational receptors. The FTA has also not established a noise threshold for recreational receptors. Sensitive receptors at this use would not have a long exposure duration to construction noise levels.
2. For a conservative, worst-case exterior noise level estimation, it is assumed for all phases except for infrastructure improvements that the loudest piece of equipment would operate near the property line and all other equipment would operate at the center of the construction area. Since the infrastructure improvements phase would occur off-site, all of the equipment was measured from the center of the construction area.
3. The construction area for demolition, site preparation, and grading phases was considered to be the project site boundary. The warehouse boundary represents the construction area for building construction, paving, and architectural coating. The construction area for the infrastructure improvements was assumed to be located at the nearest utility connection point along Lexington-Gallatin Road.

4. Mitigation Measure NOI-1 requires a 10-foot temporary noise barrier along the property line adjacent to the commercial/office receptors within the Whitter Narrows Recreation Area to the southwest as depicted in **Figure 4.11-3**. Based on noise attenuation calculations data from the Noise Tools.net *Sound Propagation Level Calculator* (https://noisetools.net/barriercalculator, accessed November 2024), a 10-foot-high noise barrier would reduce on-site construction noise levels by approximately 13 dBA at the commercial/office receptors within Whittier Narrows Recreation area.
5. The residential receptors are located in the City and the commercial/office receptors are located in the County. The City does not have a quantitative noise threshold for construction and only limits the hours of the construction activities. Therefore, the FTA's construction noise threshold is conservatively used for the residential receptors (FTA, *Transit Noise and Vibration Impact Assessment Manual*, September 2018). The County has established a construction noise threshold for nonscheduled operation of construction mobile equipment at business structures (85 dBA; refer to County Code Section 12.08.440). Therefore, the commercial/office receptors were conservatively analyzed against the County's threshold.
6. Infrastructure improvements, including sewer main and water main extensions, are off-site improvements that would occur within roadway right-of-way.

Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to **Appendix M** for noise modeling results.



Figure 4.11-3: Construction Noise Barrier Location

South El Monte Athletic Fields and Business Park Project

Not to scale

Kimley»Horn

Table 4.11-14: Project Construction Noise Levels Over Ambient

Receptor	Ambient Noise Level (dBA L_{eq})[1]	Maximum Exterior Noise Level with Mitigation (dBA L_{eq})[2]	Maximum Exterior Noise Level with SC NOI-1 (dBA L_{eq})[3]	Project Construction Noise over Ambient (dBA L_{eq})
Commercial/Office	54.2	79.5	59.1	5.3
Residential	52.2	78.5	58.5	6.3

1. See **Table 4.11-10** for representative ambient noise levels.
2. Mitigation Measure NOI-1 requires a 10-foot temporary noise barrier along the property line adjacent to the commercial/office receptors within the Whitter Narrows Recreation area to the southwest as depicted in **Figure 4.11-3**. Although Mitigation Measure NOI-1 does not apply to the infrastructure improvements phase, unmitigated noise levels would remain below the maximum noise levels generated during the overlapping construction phases with mitigation; refer to **Table 4.11-13**. Therefore, the maximum mitigated overlapping construction phase noise levels are presented in this table.
3. Muffling systems can provide reductions of at least 10 dBA and noise dampening material can provide reductions of at least 10 dBA.

Construction equipment would operate throughout the project site and the associated noise levels would not occur at a fixed location for extended periods of time. Construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Further, construction activities that could cause a registered noise disturbance at a residential use would only occur during daytime hours and are a typical part of living in an urban environment. Impacts would be less than significant with implementation of MM NOI-1. The less than significant impact would be further reduced with implementation of SC NOI-1.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the project site during the Project's construction. Haul trucks would travel to and from the project site using Lexington-Gallatin Road and Santa Anita Avenue. Although construction workers would arrive from various directions, worker trips would likely all use Lexington-Gallatin Road and Santa Anita Avenue to arrive at to the project site. It is reasonable to assume that workers would already have arrived at the project site to begin grading activities prior to the arrival of haul trucks. The greatest contributor to on-road traffic noise during construction would be haul trucks arriving from SR-60 to the project site along Lexington-Gallatin Road and Santa Anita Avenue. Therefore, this analysis reasonably focuses on noise generated by haul trucks. According to modeling assumptions included in the Air Quality Assessment prepared by Kimley-Horn in 2025, the construction phase with the highest assumed number of haul trucks would be grading, when it is conservatively assumed there would be up to 59 daily haul truck trips accessing the project site. A heavy-duty truck passing by a receptor is assumed to generate a noise level of 70 dBA at 50 feet. Conservatively assuming the worst-case scenario that all 59 haul trucks would pass through the same roadway segment along Lexington-Gallatin Road and Santa Anita Avenue within a 15-minute period, the estimated noise level from the grading phase haul truck trips would be 66.3 dBA L_{eq} at 50 feet from the roadway centerline. This worst-case noise level would not exceed the FTA's Noise and Vibration Thresholds significance criterion of 80 dBA L_{eq} for residential uses and the County's construction noise threshold of 85 dBA L_{eq} for commercial receptors. Impacts would be less than significant and no mitigation is required.

Operations

The proposed Project consists of a warehouse building and a future City public park development. Implementation of the proposed Project would create new sources of noise. The major noise sources associated with the Project that would potentially impact existing nearby residences include the following:

- Mechanical equipment;
- Truck and loading dock noise: slow moving trucks on the project site; approaching and leaving the loading areas;
- Activities at the loading areas (i.e., maneuvering and idling trucks, equipment noise);
- Parking lot noise (i.e., car door slamming, car radios, engine start-up, and car pass-by);
- Recreational activities at the City park; sports games and practice noise; and
- Off-site traffic noise.

Mechanical Equipment Noise

With respect to the warehouse use, potential stationary noise sources related to long-term operations would include mechanical equipment (e.g., HVAC equipment) located on the rooftop. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet. It is conservatively assumed that the warehouse's mechanical equipment would be located within a portion of the rooftop nearest to each receptor and would not be shielded. The nearest receptors to equipment on the warehouse roof are the commercial/office receptors approximately 70 feet to the west, future City park (SR-2) approximately 80 feet to the west of the warehouse building, Whittier Narrows Recreation area (SR-1) approximately 216 feet to the southeast, and residential receptors (SR-3) approximately 370 feet to the southeast; refer to **Figure 4.11-2**.[5,6] As shown in **Table 4.11-15: Daytime On-Site Composite Noise Levels** and **Table 4.11-16: Nighttime On-Site Composite Noise Levels**, the noise levels from mechanical equipment would not exceed the City or County noise standards at any receptor. The proposed City park is not anticipated to use mechanical equipment that would generate significant noise levels. Impacts would be less than significant and no mitigation is required.

Truck and Loading Dock Noise

Truck Loading Activities. During loading and unloading activities associated with the warehouse, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting and braking activities; backing up toward the docks; dropping down the dock ramps; and maneuvering away from the docks. Loading or unloading activities would occur along the southeastern side of the project site.

[5] Commercial uses are not considered sensitive receptors; however, this analysis conservatively includes the estimated operational noise level at the commercial uses located within Whittier Narrows Recreation area.

[6] The distances listed in **Table 4.11-11** represent the distance from the project site property line to the nearest sensitive receptor property line. The distances from the operational noise sources to the nearest sensitive receptors are based on the project site plan.

Table 4.11-15: Daytime On-Site Composite Noise Levels

Receptor[1]	Mechanical Equipment (dBA L_{eq})	Truck Loading (dBA L_{eq})[2]	Cargo Forklifts (dBA L_{eq})[2]	Backup Alarms (dBA L_{eq})[2]	Sports Games and Events (dBA L_{eq})	Combined Parking (dBA L_{eq})	Combined Noise at Receptor (dBA L_{eq})[3]	Ambient Level (dBA L_{eq})[4]	Ambient + Project Noise at Receptor (dBA L_{eq})	Incremental Increase (dBA L_{eq})	Noise Standard (dBA)[5]	Significant?
SR-1: Whittier Narrows Recreation Area	39.3	37.9	34.0	54.9	47.5	43.3	56.1	54.2	58.3	4.1	65	No
SR-2: Future City Park	47.9	40.5	36.7	47.9	0.0	48.0	53.1	53.0	56.0	3.0	65	No
SR-3: Residential Receptors	34.6	35.1	31.2	46.4	40.2	32.5	48.0	52.2	53.6	1.4	55	No
Commercial/ Office Receptors	49.1	41.1	37.3	50.7	56.8	42.8	58.5	54.2	59.9	5.7	60	No

1. The proposed Project would include the future development of a City park, which would be exposed to operational noise associated with the proposed warehouse component. The nearest residential and recreational receptors would be exposed to the operational noise associated with the future City park and the warehouse. Refer to **Figure 4.11-2** for the receptor locations.
2. Noise levels for truck loading, cargo forklifts, and truck backup alarms account for the proposed 14-foot-high screening wall and 8-foot-high sliding gate surrounding the truck court area. The following noise level reductions were applied based on partial noise barrier calculations (refer to **Appendix M**):
   - 14 dBA at the Whittier Narrows Recreation area to the southeast;
   - 11 dBA at the future (on-site) park;
   - 11 dBA at the residential receptors to the southeast; and
   - 12 dBA at the commercial/office receptors to the south.
3. Noise levels for all operational sources were logarithmically added together and conservatively assumed to operate in a simultaneous, constant manner.
4. Ambient noise measurements were taken by Kimley-Horn and Associates on July 30, 2024, and are shown in Table 4.11-10.
5. The future city park receptors and residential receptors are located in the City and the Whittier Narrows Recreation area receptors and commercial/office receptors are located in the County. Therefore, the applicable City or County standards were applied to each receptor:
   - City: The City's Municipal Code has not established noise standards for recreational receptors. Therefore, the City General Plan land use standard for recreational receptors of 65 dBA has been used in this analysis for the future city park. Municipal Code Section 8.20.020 establishes a daytime exterior noise standard of 55 dBA for residentially zoned properties.
   - County: The County Code has not established noise standards for recreational receptors. Therefore, the State land use compatibility standards for recreational receptors of 65 dBA has been used in this analysis for the Whittier Narrows Recreation area receptor, which is consistent with the City General Plan land use standard. County Code Section 12.08.390 establishes a daytime exterior noise standard of 60 dBA for commercial properties.

Sources: City of South El Monte, General Plan, Public Safety Element, October 2000; and City of South El Monte, Municipal Code, Section 8.20.020, Exterior Noise Limits, https://ecode360.com/44542750?highlight=noise,noises&searchId=1878241043397576#44542739; and Los Angeles County, *Los Angeles County Code, Chapter 12.08 - Noise Control*, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO. Accessed May 2025..

Table 4.11-16: Nighttime On-site Composite Noise Levels

Receptor[1]	Mechanical Equipment (dBA L_{eq})	Truck Loading (dBA L_{eq})[2]	Cargo Forklifts (dBA L_{eq})[2]	Backup Alarms (dBA L_{eq})[2]	Sports Games and Events (dBA L_{eq})	Combined Parking (dBA L_{eq})	Combined Noise at Receptor (dBA L_{eq})[3]	Ambient Level (dBA L_{eq})[4]	Ambient + Project Noise at Receptor (dBA L_{eq})	Incremental Increase (dBA L_{eq})	Noise Standard (dBA)[5]	Significant?
SR-1: Whittier Narrows Recreation area	39.3	37.9	34.0	54.9	0.0	43.3	55.4	62.3	63.1	0.8	65	No
SR-2: Future City Park	47.9	40.5	36.7	47.9	0.0	48.0	53.1	62.3	62.8	0.5	65	No
SR-3: Residential Receptors	34.6	35.1	31.2	46.4	0.0	32.5	47.3	62.3	62.4	0.1	65	No
Commercial/ Office Receptor	49.1	41.1	37.3	50.7	0.0	42.8	53.7	62.3	62.9	0.6	62.3	No

1. The proposed Project would include the development of a future City park, which would be exposed to operational noise associated with the proposed warehouse component. The nearest residential and recreational receptors would be exposed to the operational noise associated with the future City park and the warehouse. Refer to **Figure 4.11-2** for the receptor locations.
2. Noise levels for truck loading, cargo forklifts, and truck backup alarms account for the proposed 14-foot-high screening wall and 8-foot-high sliding gate surrounding the truck court area. The following noise level reductions were applied based on partial noise barrier calculations (refer to **Appendix M**):
   - 14 dBA at the Whittier Narrows Recreation area to the southeast;
   - 11 dBA at the future (on-site) park;
   - 11 dBA at the residential receptors to the southeast; and
   - 12 dBA at the commercial/office receptors to the south.
3. Noise levels for all operational sources were logarithmically added together and conservatively assumed to operate in a simultaneous, constant manner.
4. Ambient noise measurements were taken by Kimley-Horn and Associates on July 30, 2024, and are shown in **Table 4.11-10**.
5. The future city park receptors and residential receptors are located in the City and the Whittier Narrows Recreation area receptors and commercial/office receptors are located in the County. Therefore, the applicable City or County standards were applied to each receptor:
   - City: The City's Municipal Code has not established noise standards for recreational receptors. Therefore, the City General Plan land use standard for recreational receptors of 65 dBA has been used in this analysis for the future city park. The City's Municipal Code Section 8.20.020 has established an adjusted nighttime exterior noise standard of 65 dBA for residentially zoned properties, based on the ambient noise level.
   - County: The County Code has not established noise standards for recreational receptors. Therefore, the State land use compatibility standards for recreational receptors of 65 dBA has been used in this analysis for the Whittier Narrows Recreation area receptor, which is consistent with the City General Plan land use standard. County Code Section 12.08.390 states that the nighttime exterior noise standard for commercial receptors is 55 dBA or the existing ambient noise level, whichever is greater. Therefore, this analysis uses the existing ambient noise level (62.3 dBA) as the nighttime exterior noise standard for the commercial/office use.

Sources: City of South El Monte, General Plan, Public Safety Element, October 2000; and City of South El Monte, Municipal Code, Section 8.20.020, Exterior Noise Limits, https://ecode360.com/44542750?highlight=noise,noises&searchId=1878241043397576#44542739; and Los Angeles County, *Los Angeles County Code*, *Chapter 12.08 - Noise Control*, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO. Accessed May 2025.

Typically, heavy truck and loading dock operations generate a noise level of 64.4 dBA at a distance of 50 feet. The nearest receptors to the loading docks are the commercial/office receptors approximately 183 feet to the west, Whittier Narrows Recreation area (SR-1) approximately 212 feet to the southeast, future City park (SR-2) approximately 220 feet to the west, and the residential receptors (SR-3) approximately 412 feet to the southeast. As identified in **Table 4.11-15** and **Table 4.11-16**, the noise levels from loading and unloading trucks at the warehouse would not exceed the City or County noise standards at any receptor. The loading dock doors would have protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior loading activities to negligible noise levels outside of the warehouse building. Therefore, interior loading and associated activities would comply with Municipal Code Section 8.20.030 during nighttime hours. Impacts would be less than significant and no mitigation is required.

Cargo Forklift Operations. It is also noted that cargo forklifts could be used at the warehouse outdoor loading dock area during daytime and nighttime hours for truck loading/unloading activities. Cargo forklifts generate noise levels of approximately 85 dBA at 3 feet. The nearest receptors to where cargo forklifts would operate at the warehouse are the commercial/office receptors approximately 183 feet to the southwest (from the cargo forklifts), Whittier Narrows Recreation area (SR-1) approximately 212 feet to the southeast, future City park (SR-2) approximately 220 feet to the west, and residential receptors (SR-3) approximately 412 feet to the southeast. The noise levels from operating cargo forklifts would not exceed the City or County's noise standards at any receptors (**Table 4.11-15** and **Table 4.11-16**). Impacts would be less than significant and no mitigation is required.

Truck Back-Up Alarms. Medium- and heavy-duty trucks reversing into loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at one meter (3.28 feet) from the source. The nearest receptors to the loading dock area where trucks would be reversing are the Whittier Narrows Recreation area (SR-1) approximately 83 feet to the southeast, commercial/office receptors approximately 170 feet to the west, future City park (SR-2) approximately 263 feet to the west, and residential receptors (SR-3) approximately 312 feet to the southeast. The noise levels from truck back-up alarms would not exceed the City or County noise standards at any receptors (see **Table 4.11-15** and **Table 4.11-16**). Additionally, back-up beeper noise is short in duration and would occur intermittently throughout the day/night. Impacts would be less than significant and no mitigation is required.

Recreational Activities and Special Events

Potential noise sources related to the long-term operations of the recreational athletic fields conservatively assumed for the future City park (see **Section 3.0: Project Description**) would include sports games and practices, which typically generate noise levels of approximately 74 dBA at 20 feet from the center of the athletic field. It is conservatively assumed that a game or practice would occur at the athletic field closest to the receptors. The nearest receptors to the proposed athletic fields are commercial/office receptors approximately 145 feet to the south, Whittier Narrows Recreation area (SR-1) approximately 412 feet to the southeast, and residential receptors (SR-3) approximately 985 feet to the southeast. Field lighting would be turned off by 10:00 PM, therefore, this analysis accounts for sports games and practices that could occur during daytime hours (i.e., from 7:00 AM to 10:00 PM). The noise levels from sports games and practices would not exceed the City or County noise standards at any receptors (see **Table 4.11-15**). Given the nature of the future recreational park use (conservatively

assumed to include athletic fields), it is assumed that there would be no permanent on-site speakers. It is possible that portable speakers may be brought to the site for special events. However, the frequency of special events is uncertain and any such events would be required to obtain a Group Use Permit (pursuant to Municipal Code, Chapter 12, Streets, Sidewalks, and Public Places) that would require the event to comply with the City's noise standards. Impacts would be less than significant, and no mitigation is required.

Parking Noise

Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA. Conversations in parking areas may also be an annoyance to sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech. It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} metric, which are averaged over the entire duration of a time period.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the warehouse and City park parking lots, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. The Project's peak hourly noise level that would be generated by the parking lots for the warehouse and future City park components was estimated using the following FTA equation for a parking lot:

$$L_{eq(h)} = SEL_{ref} + 10 \log (NA/1{,}000) - 35.6$$

Where:

$L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

NA = number of automobiles per hour

35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour

Parking for the warehouse would be provided along the western and eastern boundary of the warehouse site. The warehouse component is expected to have 155 peak hour trips.[7] Using the FTA's reference noise level of 92 dBA SEL at 50 feet from the noise source, the Project's highest peak hour vehicle trips would generate noise levels of approximately 48.3 dBA L_{eq} at 50 feet from the warehouse parking lot. The nearest receptors to the parking lot for the warehouse are the Whittier Narrows Recreation area (SR-1) approximately 90 feet to the southeast, future City park (SR-2) approximately 52 feet to the west, commercial/office use approximately 112 feet to the west, and the residential receptors (SR-3) approximately 312 feet to the southeast.

Parking for the future City park is conceptually proposed to be located on the eastern boundary adjacent to the warehouse component. The future City park is forecasted to have 75 peak hour trips. Using the FTA's reference noise level of 92 dBA SEL at 50 feet from the noise source, the Project's highest peak hour

[7] Kimley-Horn and Associates, Inc., *South El Monte Athletic Fields and Business Park Project Vehicle Miles Traveled Memorandum,* 2025.

vehicle trips would generate noise levels of approximately 48.3 dBA L_{eq} at 50 feet from the parking lot. The nearest receptors to the City park parking lot are the commercial/office receptors approximately 124 feet to the south, Whittier Narrows Recreation area (SR-1) approximately 395 feet to the south, and residential receptors (SR-3) approximately 782 feet to the southeast.

The worst-case parking lot noise scenario was quantified by conservatively combining the noise from the warehouse and City park components parking lots. As identified in **Table 4.11-15** and **Table 4.11-16**, the noise level from cars in the parking lots would not exceed the City or County's noise standards at any receptor. Actual noise levels over time resulting from parking lot activities would be far lower than the reference levels identified above, as parking lot noise would be dispersed through the on-site parking lots. It is also noted that parking lot noise occurs at the surrounding Whittier Narrows Recreation area under existing conditions. Parking lot noise would be consistent with the existing noise in the vicinity and would be partially masked by background noise from traffic along surrounding roadways and SR-60. Impacts would be less than significant and no mitigation is required.

Composite Operational Noise

Given the warehouse is assumed to operate 7 days a week, 24 hours per day and the conservatively assumed recreational activity at the future City park, the potential maximum Project-related noise level increase at the nearest receptors was conservatively quantified by combining the daytime and nighttime noise levels from the warehouse and City park's various operational noise sources (i.e., composite noise level). It is conservatively assumed in this EIR that all the equipment and operational activity at the project site would occur in a constant, simultaneous manner. However, noise sources would actually occur intermittently throughout the day (except for the warehouse HVAC which may operate in a steady-state manner).

As shown in **Table 4.11-15** and **Table 4.11-16**, daytime and nighttime composite ambient plus project noise levels would not exceed both the substantial increase threshold (5 dBA) and the noise standard at any of the receptors; refer to **Section 4.11.6**, **Thresholds of Significance**. Impacts would be less than significant and no mitigation is required.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. The Project is forecast to increase average daily traffic volumes, which would result in noise increases on Project study area roadways. Traffic noise levels on roadways primarily affected by project-generated trips were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling shown in **Table 4.11-17: Opening Year and Opening Year Plus Project Traffic Noise Levels**, was conducted for conditions with and without the Project.

As shown in **Table 4.11-17**, traffic-generated noise levels on study area roadways would range between 52.3 dBA CNEL and 65.0 dBA CNEL at 100 feet from the roadway centerline. The Project would result in a maximum increase of 3.4 dBA CNEL along Lexington-Gallatin Road (east of Santa Anita Avenue), which would not exceed the substantial increase threshold (5 dBA). Additionally, Plus Project traffic noise levels remain within the County and City's "Clearly Compatible" noise standard. Impacts would be less than significant and no mitigation is required.

Table 4.11-17: Opening Year and Opening Year Plus Project Traffic Noise Levels

Roadway Segment	Opening Year		Opening Year + Project		Land Use Compatibility Standards		Substantial Increase Threshold (dBA CNEL)	Difference between Opening Year + Project and Opening Year (dBA CNEL)	Significant Impact[2]
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]	Land Use[2]	Clearly Compatible			
Durfee Avenue between Rosemead Boulevard to Santa Anita Avenue	20,063	65.0	20,271	65.0	Park (County)	65	5	0.0	**No**
Durfee Avenue between Santa Anita Avenue to Peck Road	17,750	64.5	18,010	64.6	School (City)	55	5	0.1	**No**
Santa Anita Avenue between SR-60 to Lexington-Gallatin Road	9,513	60.6	11,032	61.2	Park (County)	65	5	0.6	**No**
Santa Anita Avenue between Lexington-Gallatin Road to Durfee Avenue	8,988	60.3	9,456	60.5	Park (County)	65	5	0.2	**No**
Lexington-Gallatin Road east of Santa Anita Avenue	1,150	48.9	2,496	52.3	Residential (City) Park (County)	65	5	3.4	**No**

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level

1. Traffic noise levels are at 100 feet from the roadway centerline. The actual sound level at any receptor location is dependent upon such factors as the source-to-receptor distance and the presence of intervening structures, barriers, and topography.
2. The identified land use represents the lowest land use compatibility standard along the referenced roadway segment.
3. Potential impacts occur when the incremental increase exceeds the substantial increase threshold (5 dBA) and the land use compatibility standard is exceeded (i.e., both must occur).

Sources: Refer to **Appendix M** for traffic noise modeling results; City of South El Monte, General Plan, Public Safety Element, October 2021; and Los Angeles County, *Los Angeles County General Plan 2035*, *Noise Element*, adopted October 6, 2015.

Threshold 4.11-2:	**Would the project expose persons to or generate excessive ground borne vibration or ground borne noise levels?**
	Level of Significance: Less than Significant Impact

Construction

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The types of potential construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The City does not provide numerical vibration standards for construction activities. As the nearest structure is a commercial/office building located within the Whittier Narrows Recreation area and adjacent to the project site western property line, this impact discussion uses the structural damage criterion of 0.3 in/sec PPV for commercial buildings and the human annoyance criterion of 80 VdB; refer to Section 4.11.6, Thresholds of Significance.

Table 4.11-18: Typical Construction Equipment Vibration Levels lists the reference vibration levels for typical construction equipment (measured at 25 feet). The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Equipment expected to be used at the project site that FTA guidance includes reference vibration levels for include loaded haul trucks, large bulldozer, small bulldozer, jackhammer, hoe ram, and vibratory roller. Haul trucks are assumed to be staged at locations within the warehouse boundaries that would provide ease of access/egress from the project site and onto the roadway network. Loaded trucks would travel on roads at distances greater than 25 feet from structures. A vibratory roller could be used during the construction of the parking lots for the warehouse and future City park components.

Table 4.11-18: Typical Construction Equipment Vibration Levels

Equipment	Structural Damage		Human Annoyance
	Reference Level PPV at 25 Feet (in/sec)	PPV at 20 Feet (in/sec)[1]	VdB at 105 Feet[2]
Vibratory Roller	0.210	0.293	75
Large Bulldozer	0.089	0.124	68
Hoe Ram	0.089	0.124	68
Loaded Trucks	0.076	0.106	67
Jackhammer	0.035	0.049	60
Small Bulldozer	0.003	0.004	39
Structural Damage Threshold	-	**0.30**	-
Human Annoyance Threshold	-	-	**80**
Exceeds Thresholds?	-	**No**	**No**

- = Not Applicable

1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
   where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
   PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.
   D = the distance from the equipment to the receiver

2. Calculated using the following formula: $L_{v.distance} = L_{vref} - 30\log(D/25)$
   where: $L_{v.distance}$ = the rms velocity level adjusted for distance, VdB
   L_{vref} = the source reference vibration level at 25 ft in VdB from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.
   D = the distance from the equipment to the receiver

Sources: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018; City of South El Monte, *Municipal Code*, *Section 8.20.020*, *Exterior Noise Limits*, https://ecode360.com/44542750?highlight=noise,noises&searchId=1878241043397576#44542739, accessed July 2024.; and Los Angeles County, *Los Angeles County Code*, *Section 12.08.560 - Vibration*, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO, accessed May 2025.

Construction activities are anticipated to occur throughout the project site as well as off-site infrastructure improvements in Santa Anita Avenue and Lexington-Gallatin Road (temporary trenching activities). The nearest structure is a garage associated with the commercial/office use located approximately 20 feet to the west of the project site boundary. As indicated in **Table 4.11-18**, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.004 to 0.293 in/sec PPV at 20 feet from the source of activity. Therefore, ground-borne vibration generated from construction activities would not exceed the City and County structural damage criterion of 0.30 in/sec PPV. Although the commercial/office building is located approximately 20 feet to the west of the project site boundary, a garage occupies the area closest to the project site. Therefore, the office area of the commercial/office building would be the closest area of human occupation and is used in this analysis to determine human annoyance. The office area of the commercial/office use would be located approximately 105 feet to the west of the project site boundary. At this distance, ground-borne vibration generated from construction activities could reach a maximum of 75 VdB. Therefore, ground-borne vibration generated from construction activities would not exceed the human annoyance criteria of 80 VdB. Impacts would be less than significant and no mitigation is required.

Off-Site Construction Vibration

With respect to off-site infrastructure improvements, Project construction would involve trenchers and tractors in Santa Anita Avenue and Lexington-Gallatin Road. The nearest sensitive receptors from

Lexington-Gallatin Road are the residential receptors approximately 80 feet to the east. Infrastructure improvements are anticipated to include the use of trenchers and tractors. The FTA does not have a vibratory reference level for trenchers or tractors. However, it is conservatively assumed that the vibration from trenchers/tractors would be that of a small bulldozer, which creates a vibration level of 0.001 in/sec PPV at 80 feet or 79 VdB at 80 feet. Therefore, ground-borne vibration generated from off-site construction would not exceed the structural damage criterion (0.3 in/sec PPV) or human annoyance criteria (80 VdB). Impacts would be less than significant and no mitigation is required.

With respect to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. During excavation, soil would be stockpiled by trucks within designated areas of the project site prior to export. According to the FTA's Transit Noise and Vibration Impact Assessment, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when on a roadway. The factors influencing levels of ground-borne vibration include vehicle speed, vehicle suspension, and wheel condition and type. The frequency of vibration events is not listed as an influencing factor for vibration velocity by the FTA. As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Impacts would be less than significant and no mitigation is required.

Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees accessing the surface parking, and trucks accessing the warehouse, including truck loading and unloading. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks such as delivery trucks, refuse collection trucks, and occasional moving trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 in/sec PPV) when they are on roadways. It can be reasonably assumed that the same is true for trucks accessing the warehouse. Further, according to Caltrans' guidance (see **Table 4.11-3**), vibration from trucks accessing the warehouse would not be perceptible.

Truck movements at the warehouse would generally be low-speed (i.e., less than 15 miles per hour) and would occur over new, smooth surfaces. 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 earthborn vibrations of normal traffic." However, Caltrans further notes that the highest traffic-generated vibrations are along freeways and State routes. Further, the Caltrans study finds that "vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 in/sec, 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)." Since the truck movements associated with the Project would be at 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 rail or subways. The Project would not create or cause any vibration impacts due to operations. Impacts would be less than significant and no mitigation is required.

4.11.8 Cumulative Impacts

Noise is a localized phenomenon and drastically reduces as distance from the source increases. Cumulative noise impacts involve development of the proposed Project in combination with ambient growth and other cumulative development projects. As noise levels decrease as distance from the source increases, only projects in the nearby area could combine with the proposed Project to potentially result in cumulative noise impacts; refer to noise receptors shown in **Figure 4.11-2**.

Cumulative Construction Noise

As previously addressed, the Project's construction activities would not result in a substantial temporary increase in ambient noise levels and therefore, the Project's construction noise impacts would be less than significant. Construction noise would be periodic and would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. Construction activities at other planned and approved projects near the project site would also be required to comply with applicable City rules related to noise and any construction noise that could cause a registered noise disturbance at a residential use would take place during daytime hours on the days permitted by the applicable municipal code, and projects requiring discretionary City approvals would require the City to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the project site and immediate vicinity. Therefore, based on the foregoing, Project construction would not result in a cumulatively considerable contribution to any significant cumulative impacts. Cumulative impacts would be less than significant and no mitigation is required.

Cumulative Operational Noise

Cumulative noise impacts describe how much noise levels are projected to increase over existing conditions with the development of the proposed Project and other foreseeable projects. Cumulative noise impacts would occur primarily as a result of the Project-generated traffic on local roadways in combination with cumulative projects in the vicinity. However, noise from generators and other stationary sources could also generate cumulative noise levels.

Stationary Noise

Stationary noise sources of the proposed Project would result in an incremental increase in non-transportation noise sources in the area. However, as discussed above, operational noise caused by the proposed Project would be less than significant. Similar to the proposed Project, other planned and approved projects would be required to mitigate stationary noise impacts at nearby sensitive receptors, if necessary.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the project site and the immediate vicinity. Thus, stationary noise sources are generally localized and there is a limited potential for other projects to contribute to cumulative noise impacts. Furthermore, no known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City and County regulations that limit operational noise levels.

Therefore, based on the foregoing, the Project would not result in a cumulatively considerable contribution to any significant cumulative impact. Cumulative impacts would be less than significant and no mitigation is required.

Off-Site Traffic Noise

The cumulative off-site mobile noise analysis is conducted in a two-step process. First, the combined effects from both the Project and other projects are assessed. Second, for combined effects that are determined to be cumulatively significant, the Project's incremental effects are then analyzed. A project's contribution to a cumulative off-site traffic noise increase would be considered significant when the combined effect exceeds the perception level (i.e., auditory level increase) threshold. The combined effect compares the "Cumulative With Project" condition to "Existing" conditions. This comparison accounts for the traffic noise increase generated by the Project combined with the traffic noise increase generated by cumulative projects.

The following criteria is used to evaluate the combined effect of the cumulative noise increase.

- **Combined Effect.** The cumulative with Project noise level ("Cumulative With Project") would cause a significant cumulative impact if a 3.0 dB increase over "Existing" conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use; refer to **Section 4.11.6**, **Thresholds of Significance**.

Even if there would be a significant noise increase due to the Project in combination with identified cumulative projects (combined effects), it must also be demonstrated that the Project has an incremental effect. In other words, a significant portion of the noise increase must be due to the Project. The following criteria have been utilized to evaluate the incremental effect of the cumulative noise increase.

- **Incremental Effects.** The "Cumulative With Project" causes a 1.0 dBA increase in noise over the "Cumulative Without Project" noise level.

A significant cumulative impact would result only if both the combined and incremental effects criteria have been exceeded and if noise levels exceed acceptable noise levels. Noise by definition is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed Project and growth anticipated to occur in the immediate area would contribute to cumulative noise impacts. Increases in local volumes from related projects within a half-mile radius of the project site have been estimated and included in cumulative traffic conditions.

Table 4.11-19: Cumulative Plus Project Buildout Conditions Traffic Noise Levels identifies the traffic noise effects along roadway segments in the vicinity of the project site for "Existing," "Cumulative Without Project," and "Cumulative With Project," conditions, and net cumulative impacts. First, it must be determined whether the "Cumulative With Project" 3.0 dB increase above existing conditions (*Combined Effects*) is exceeded. Next, under the *Incremental Effects* criteria, cumulative noise impacts are defined by determining if the forecast ambient ("Cumulative Without Project") noise level is increased by 1.0 dB or more.

As shown in **Table 4.11-19**, although Combined Effects (3.0 dB) and Incremental Effects (1.0 dB) criteria would be exceeded along Lexington-Gallatin Road (east of Santa Anita Avenue), cumulative traffic noise levels remain within the County and City's "Clearly Compatible" noise standards for nearby receptors, including recreational and residential land uses. Cumulative impacts would be less than significant and no mitigation is required.

Table 4.11-19: Cumulative Plus Project Buildout Conditions Traffic Noise Levels

Roadway Segment	CNEL at 100 feet from Centerline			Land Use Compatibility Standards		Combined Effects	Incremental Effects	Cumulatively Significant Impact?[2]
	Existing	Cumulative Without Project	Cumulative With Project	Land Use[1]	Clearly Compatible (dBA CNEL)	dBA Difference: Existing and Cumulative With Project	dBA Difference: Cumulative Without and With Project	
Durfee Avenue between Rosemead Boulevard to Santa Anita Avenue	64.7	65.0	65.0	Park (County)	65	0.1	0.0	**No**
Durfee Avenue between Santa Anita Avenue to Peck Road	64.2	64.5	64.6	School (City)	55	0.1	0.1	**No**
Santa Anita Avenue between SR-60 to Lexington-Gallatin Road	61.1	60.6	61.2	Park (County)	65	0.7	0.6	**No**
Santa Anita Avenue between Lexington-Gallatin Road to Durfee Avenue	60.2	60.3	60.5	Park (County)	65	0.3	0.2	**No**
Lexington-Gallatin Road east of Santa Anita Avenue	48.7	48.9	52.3	Residential (City) Park (County)	65	3.5	3.4	**No[3]**

ADT = average daily trips; dBA = A-weighted decibels; CNEL = day-night noise level
Refer to **Appendix M** for traffic noise modeling assumptions and results.

1. The identified land use represents the lowest land use compatibility standard along the referenced roadway segment in the applicable jurisdiction.
2. Potential impacts occur when the combined effects exceed 3.0 dBA, incremental effects exceed 1.0 dBA, and the Cumulative with Project traffic noise level exceeds the land use compatibility standard (i.e., all must occur).
3. Although the increases in traffic noise would result in combined and incremental affects, Cumulative with Project traffic noise levels would remain within "Clearly Compatible" levels for recreational and residential receptors pursuant to the City General Plan and County General Plan.

Sources: City of South El Monte, General Plan, Public Safety Element, October 2001; and Los Angeles County, *Los Angeles County General Plan 2035*, *Noise Element*, adopted October 6, 2015.

4.11.9 Mitigation Program

Standard Conditions

SC NOI-1 Prior to issuance of a building permit, the applicant shall demonstrate, to the satisfaction of the City of South El Monte Building Official or Chief Engineer, that the construction contracts include the following:

- Noise Shielding and Muffling. The Project will include the installation of noise dampening material and muffling devices consistent with manufacturer's standards or the Best Available Control Technology. Noise dampening material will be installed in equipment hoods, shielding engine noise. Mufflers will be installed on equipment exhaust. All equipment will be properly maintained, and the construction contractor will be required to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.
- Enclosure of Outdoor Mechanical Equipment. All stationary outdoor mechanical equipment (e.g., generators, compressors) used during construction will be enclosed to reduce the level of noise between the equipment and off-site noise-sensitive uses.
- Location of Construction Staging Areas. Construction staging areas will be located as far from noise-sensitive uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints.

Mitigation Measures

MM NOI-1 Prior to issuance of a building permit, the applicant shall demonstrate, to the satisfaction of the City of South El Monte Building Official or Chief Engineer, that the construction contracts include the installation of a 10-foot-high temporary construction noise barrier along the portion of the southwest project site boundary line that is within approximately 20 feet of the office/commercial uses within Whittier Narrows Recreation area (as depicted in **Figure 4.11-2** of the EIR). The temporary construction noise barrier shall have a sound transmission class (STC) of 25 or greater in accordance with the American Society for Testing and Materials (ASTM) Test Method E90, or a density of at least two pounds per sf to ensure adequate transmission loss characteristics. To achieve this, the barrier may consist of steel tubular framing, welded joints, a layer of 18-ounce tarp, a two-inch thick fiberglass blanket, a half-inch thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding. An alternate design may be proposed by the applicant provided that the noise attenuation requirements above are met. The temporary construction noise barrier shall be free of degrading holes or gaps and shall be designed to prevent structural failure due to factors such as wind, shear, shallow soil failure, earthquakes, and erosion.

4.11.10 Level of Significance After Mitigation

Potential noise impacts would be mitigated to a less than significant level.

4.11.11 References

Kimley-Horn and Associates, Inc. 2025. *Acoustical Assessment*. Included as **Appendix M** to this EIR.

Los Angeles, County of. October 6, 2015. *Los Angeles County Code*, *Chapter 12.08 - Noise Control*, Retrieved from: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO. Accessed May 2025.

_____. *Los Angeles County General Plan 2035*, *Noise Element*.

South El Monte, City of. 2024. *City of South El Monte Code of Ordinances- Chapter 8 Health and Safety* Retrieved from: https://ecode360.com/44542738#44542738. Accessed November 2024.

_____. 2024. *City of South El Monte Code of Ordinances- Chapter 12 Streets, Sidewalks, and Public Places.* Retrieved from: https://ecode360.com/44544195?highlight=group,group%20use,use&searchId=1225869004773 4669. Accessed November 2024.

_____. 2000, as amended. *City of South El Monte General Plan Public Safety Element.*

4.12 POPULATION AND HOUSING

4.12.1 Introduction

This section of the EIR provides contextual background information on potential impacts on population growth and housing (either directly or indirectly) resulting from Project implementation in the City of South El Monte (City). To provide regional context, this section analyzes the estimated population, housing, and employment effects relative to the County of Los Angeles (County) and the City. Additionally, this section evaluates the potential for future development facilitated by the Project to induce substantial unplanned population growth in the area and its potential to displace people or housing.

4.12.2 Regulatory Setting

State Regulations

California Housing Element Law

The Housing Element is one of the General Plan elements that are mandated by the State of California (California Government Code §§65580 to 65589.8). California State law requires that the Housing Element provide, "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing" (Government Code §65580).

State law requires that each city and county identify and analyze existing and forecasted housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

Regional and Local Regulations

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Agency established under Sections 6502 et seq. of the California Government Code. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO) for the six-county region of Los Angeles, Riverside, Orange, Ventura, San Bernardino, and Imperial counties. The region encompasses a population exceeding 19 million persons in an area of more than 38,000 square miles. As the designated MPO, SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts for local governments. South El Monte is a member of the San Gabriel Valley COG (SGVCOG), one of the 14 subregional organizations in the SCAG region.

SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of anticipated growth in the region. In April 2024, SCAG adopted Connect SoCal 2024, its 2040–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS). Major themes in the 2024 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection

and economic opportunity; and incorporating the principles of social equity and environmental justice into the plan.

Growth forecasts contained in the 2024 RTP/SCS for Los Angeles County and the City are used as the basis of analysis for housing, population, and employment forecasts.

Regional Housing Needs Assessment (RHNA)

The Regional Housing Needs Assessment (RHNA) is an assessment process performed periodically as part of General Plan Housing Element updates at the local level. The RHNA process begins with the California Department of Housing and Community Development's (HCD) projection of future statewide housing growth need, and the apportionment of this need of regional councils of governments (COGs) throughout the State. SCAG is the COG responsible for developing "fair share" allocation methodology to allocate the region's assigned share of statewide need to cities and counties in the region. [1] California Government Code Section 65583 sets forth the specific content requirements of a jurisdiction's Housing Element. Included in these requirements are obligations on the part of local jurisdictions to provide their "fair share" of regional housing needs (its RHNA allocation) at all income levels. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that need to be added to compensate for anticipated demolitions and changes to achieve an ideal vacancy rate. SCAG defines a "household" as an occupied dwelling unit.

The RHNA 6th Cycle planning period is 2021-2029. The housing construction need is determined for four broad household income categories: very low (households making less than 50% of area median income), low (50 to 80% of area median income), moderate (80 to 120% of area median income), and above moderate (more than 120% of area median income). The intent of the future needs allocation by income groups is to relieve the undue concentrations of very low-income and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner.[1] For the 2021-2029 planning period, the City is required to meet with the RHNA number of 8,272 housing units. [2] The Housing Element is required to identify potential candidate housing sites by income category to meet the City's RHNA allocation. The City's 2021-2029 Housing Element was adopted by the City on October 12, 2021.

City of South El Monte General Plan

The *City of South El Monte General Plan* is the "Master Plan" for future growth and development in the City. It envisions a future that the City wishes to achieve that bears an improved general welfare for City residents, businesses, and property owners. The General Plan includes the City's 6th Cycle Housing Element (2021-2029) which provides goals and policies specifically associated with housing. The following housing goals are identified in the City's 6th Cycle Housing Element.

Goal 1 **The City will maintain an adequate supply of a variety of housing types to meet the existing and future needs of City residents.**

[1] Department of Housing and Community Development, Division of Housing Policy Development. 2019. *Southern California COG Final Regional Housing Need Assessment*. Retrieved from: https://www.hcd.ca.gov/community-development/housing-element/docs/Southern_California_Association_of_Governments_Regional_Housing_Need_Determination_for_the_Sixth_Housing_Element_Update_1.pdf. Accessed on October 29, 2024.

[2] Southern California Association of Governments. 2021. *6th Cycle Regional Housing Needs Assessment Allocation Plan.* Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196. Accessed October 29, 2024.

Goal 2 **The City will maintain high quality residential neighborhoods that are enhanced and well-maintained.**

Goal 3 **The City will maintain compatible uses that meet the needs of residents, employers, and employees.**

Goal 4 **The City will provide equal opportunities for all residents to reside in the housing of their choice.**

4.12.3 Existing Conditions

Existing Regional and Local Population

Table 4.12-1: County and City Population Projections identifies the increase of population growth in the County and City for 2019 (i.e., 2024 RTP/SCS base plan year), 2024, and 2050 (i.e., 2024 RTP/SCS horizon year). According to the Department of Finance (DOF) and SCAG's 2024 RTP/SCS, the County has a population of approximately 9,824,091 residents. The City has a population of approximately 19,441 residents.

Table 4.12-1: County and City Population Projections

Location	2019 Population[1]	2024 Population[2]	2050 Population[1]	Projected Population Increase (2019 to 2050)	% Change (2019 to 2050)
Los Angeles County	10,046,000	9,824,091	10,793,000	747,000	7%
City of South El Monte	19,700	19,441	20,682[3]	982	5%

Sources:
1. Southern California Association of Governments. *SCAG Connect SoCal RTP/SCS 2024: Demographics and Growth Forecast Technical Report.* Retrieved from: https://scag.ca.gov/connect-socal. Accessed October 29, 2024.
2. State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2020-2024*. Retrieved from: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed October 29, 2024.
3. City projected 2050 population estimate derived using the 2024 DOF City of South El Monte persons per household ratio (i.e., 3.83 persons per household) and applying it to the SCAG Connect SoCal City of South El Monte projected 2050 households (i.e., 5,400 units).

Existing Regional and Local Housing

Table 4.12-2: County and City Housing Data identifies the total housing units (Total/Occupied) plus vacancy rate and persons per household in the County and City for 2019 (i.e., 2024 RTP/SCS base plan year) and 2024 using DOF estimates. According to the DOF data, both the County and City have seen an increase in total and occupied housing units and a decrease in population household numbers and vacancy rates.

City of South El Monte

SCAG determines total housing needs for each community in Southern California based on three general factors: (1) the number of housing units needed to accommodate future population and employment growth; (2) the number of additional units needed to allow for housing vacancies; and (3) the number of very low, low, moderate, and above moderate-income units needed in the community. Additional factors used to determine the RHNA include tenure, the average rate of units needed to replace housing units demolished, and other factors. Based on DOF data (2024), the City has 5,058 housing units with an average of 3.83 persons per household. The vacancy rate is 2.7 percent (see **Table 4.12-2**). There is no residential development on the project site.

Table 4.12-2: County and City Housing Data

Location	Total Units		Occupied Units		Vacancy Rate		Persons/ Household	
	2019[1]	2024[2]	2019[1]	2024[2]	2019[1]	2024[2]	2019[1]	2024[2]
Los Angeles County	3,568,900	3,696,408	3,340,821	3,518,197	6.4%	4.8%	2.99	2.73
City of South El Monte	4,882	5,199	4,676	5,058	4.2%	2.7%	4.45	3.83

Sources:
1. State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark.* Retrieved from https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2020/. Accessed October 29, 2024.
2. State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2020-2024.* Retrieved from https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed October 29, 2024.

Existing Regional and Local Employment

Table 4.12-3: County and City Labor Force Data identifies the total labor force and employment and unemployment rates for the County and City for in the County and City for 2019 (i.e., 2024 RTP/SCS base plan year) and 2023 using DOF estimates. Because Covid-19 resulted in decreased employment for both the County and City, statistical information for 2020 was not used. Additionally, DOF 2024 annual average estimates are not available, therefore DOF 2023 annual average estimates are used in this analysis. According to the State of California Employment Development Department (EDD), between 2019 and 2023, the labor force and the number of employed persons decreased in both the County and City.

Table 4.12-3: County and City Labor Force Data

Location	Labor Force		Employment		Unemployment		Employment Change
	2019[1]	2023[2]	2019[1]	2023[2]	2019[1]	2023[2]	
Los Angeles County	5,148,600	5,015,600	4,917,700	4,763,600	230,900	252,000	-3.1%
City of South El Monte	9,100	8,900	8,800	8,500	300	400	-3.4%

Sources:
1. State of California, Employment Development Department. *Monthly Labor Force Data for Cities and Census Designated Places (CDP), Annual Average 2019 – Revised*. Retrieved from https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed September 17, 2024.
2. State of California, Employment Development Department. *Monthly Labor Force Data for Cities and Census Designated Places (CDP), Annual Average 2023 – Revised*. Retrieved from https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed September 17, 2024.

The City of South El Monte Housing Element outlines major employment statistics for specific economic sectors that provided employment to the City's residents in 2018 according to SCAG's Local Housing Data.[3] The Housing Element identified that the most prevalent industry in the City in 2018 was in Manufacturing with approximately 19 percent of the total jobs. The most prevalent occupational category in 2018 was in Production with approximately 28 percent of total employees.

[3] City of South El Monte, City of South El Monte 6th Cycle Housing Element (2021-2029), page 7. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2707/2021-2029-6th-Cycle-Housing-Element-PDF. Accessed Oct. 30, 2024.

Jobs to Housing Balance

The economic analysis conducted for SCAG's 2024 RTP/SCS shows the following regional employment growth:

- Job growth from building, operating, and maintaining the 2024 RTP infrastructure projects, averaging over 279,000 jobs per year; and
- Increases in economic competitiveness, efficiency, and amenities from the completion of the projects and operations, averaging over 465,000 jobs per year.

In terms of the jobs to housing balance, the SCAG City of South El Monte 2019 Local Profiles Report identified that 11.2 percent of residents work in the City, while 88.8 percent commute to places of employment outside the City.[4] The 2024 RTP/SCS aims to balance the region's future mobility and housing needs with economic, environmental and public health goals.

4.12.4 Methodology

The proposed Project is evaluated against the significance criteria below, as the basis for determining the impact's level of significance concerning population and housing. In addition, this analysis considers the existing regulatory framework (i.e., laws and standards) that avoid or reduce the potentially significant environmental impact.

4.12.5 Thresholds of Significance

State CEQA Guidelines, Appendix G Environmental Checklist Form, includes questions pertaining to population and housing. The issues presented in the Environmental Checklist have been used as significance criteria in this section. The Project would have a significant environmental impact if it would:

- 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).

As addressed in **Section 1.5, Summary of Effects With No Impact**, the City has determined that the proposed Project would not have a significant impact on the following threshold for the reasons stated below, and that no further analysis was required:

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The project site is vacant; there is no housing on the site. Therefore, Project implementation would not create an impact that would displace people or housing.

4.12.6 Project Impacts and Mitigation

Threshold 4.12-1:	**Would the Project 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)?** ***Level of Significance:*** Less than Significant Impact

[4] Southern California Association of Governments.2019. *Profile of the City of South El Monte*. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

The project site has a General Plan land use designation of Commercial (C) and is zoned Commercial (C), which allows for a maximum permitted floor area ratio (FAR) of 0.5. Project implementation would require a General Plan Amendment to change the General Plan designation from Commercial (C) to Commercial-Manufacturing (CM) and to rezone from Commercial (C) to Manufacturing (M), which allows a FAR of 0.75. The Project proposes the construction of an approximately 221,815-sf warehouse on approximately 10.5 acres. The remaining 10.7 acres of the project site would be developed by the City as a public park use, resulting in an actual FAR of 0.24 on the overall project site. Based on an employment generation factor of one employee per 749 sf of warehouse use, the warehouse component of the Project could employ approximately 297 employees.[5] Based on an employment generation factor of 5.71 employees per acre of local parks/recreational areas, the City park component of the Project could employ 61 employees.[6] The provision of additional employment opportunities meets Objective 1 (see **Section 3.0: Project Description**).

The 358 employees (297 employees from the warehouse component and the 61 employees from the City public park component) resulting from the Project would increase the City's existing employment by approximately 4.2 percent over the City's existing employment of 8,500 jobs; refer to **Table 4.12-3**. With Project implementation, the City's 2023 employment would increase to 8,858 jobs. Given the Project's scale and nature, it is assumed that employment associated with the proposed uses would not induce substantial direct population growth and it is reasonable to assume that many if not all of the new jobs would be filled by local residents who already reside in the City. Given the high percentage of City residents commuting outside the City for employment (approximately 89%[7]), the addition of new jobs as a result of Project implementation could be filled by the local labor market.

Additionally, as mentioned above, the existing Commercial Land Use Designation allows for an FAR of 0.5. The project site is located within USACE reservoir flowage easement lands associated with the Whittier For purposes of this EIR, development on the site consistent with the existing Commercial land use designation assumes the development of a commercial use on approximately 10.5 acres of the eastern portion of the site and the remaining approximately 10.7 acres on the northwestern portion of the site would be excavated to improve the existing storage capacity of the property. Therefore, using the existing General Plan designation, it is assumed that the project site could be developed with 228,690 sf of commercial uses. Using an employment generation factor of one employee per 511 sf of retail/commercial use, development of the site with commercial uses could generate approximately 448 employees.[8] Therefore, while the proposed Project would require a General Plan Amendment and zone change, the population growth associated with the employees generated by the proposed Project (358 employees) would not be unplanned as it is less than what can be assumed for commercial uses based on the General Plan land use designation. As a result, the increase in new jobs would not induce substantial population growth.

Additionally, Project construction would temporarily increase construction employment. While the size of the construction force would vary during the different phases of construction, workforce demand likely would be met with the existing and anticipated labor market in the City and surrounding region. As such,

[5] Natelson Company, Inc, 2001, *Employment Density Study Summary Report Prepared for SCAG, Table 4B.*

[6] Natelson Company, Inc, 2001, *Employment Density Study Summary Report Prepared for SCAG, Appendix B: Employment Densities By Anderson Code, using code 1820 for Local Parks and Recreation in the County of Los Angeles.*

[7] Southern California Association of Governments.2019. *Profile of the City of South El Monte*. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

[8] ibid.

Project construction would not require a substantial number of workers to relocate from outside the region, and the Project would not induce substantial unplanned population growth in connection with construction activities.

The Project proposes new access points to the project site from Santa Anita Avenue and Lexington-Gallatin Road for vehicle ingress/egress. However, these improvements would allow for access to the project site and would not provide an extension of roadway or infrastructure that would directly or indirectly induce unplanned population growth on or near the project site. Therefore, the Project would not induce substantial unplanned population.

Based on the foregoing, impacts related to unplanned population growth would be less than significant and mitigation is not required.

4.12.7 Cumulative Impacts

Potential cumulative population and housing impacts are assessed relative to the General Plan and regional plans, including SCAG's 2024 RTP/SCS population, housing, and employment projections. SCAG's regional growth projections reflect recent and past trends, key demographic and economic assumptions and include local and regional policies. Local jurisdictions participate in the growth forecast development process.

As explained above, the Project would result in a less than significant impact related to unplanned population growth. Cumulative impacts would occur if development on the project site, together with other cumulative projects would induce substantial unplanned population growth or displace substantial numbers of existing people or housing. As discussed above, while the proposed Project would require a General Plan Amendment and zone change, the population growth associated with the employees generated by the proposed Project would not be unplanned as it is less than what was assumed by the General Plan under the existing Commercial (C) land use designation and zoning. Therefore, the Project does not conflict with the City of South El Monte General Plan (2000) or with the City's 2021-2029 Housing Element goals. Further, the proposed Project would not result in significant direct, or indirect permanent or temporary impacts related to population or housing because off-site improvements that would be implemented as a part of the Project would not extend roadways or infrastructure that would directly or indirectly induce unplanned population growth on or near the project site. Therefore, the proposed Project would not result in incremental significant effects to population or housing that could be compounded or increased when considered together with similar effects from other cumulative present and reasonably foreseeable probable future projects. Therefore, the Project would not result in significant population and housing impacts (i.e., substantial unplanned population growth), and therefore, taken with past, present, and reasonably foreseeable future projects, Project impacts are not considered cumulatively considerable and any cumulative impact would be less than significant, and no mitigation is required.

4.12.8 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No mitigation is required.

4.12.9 Level of Significance After Mitigation

Impacts related to population and housing would be less than significant.

4.12.10 References

Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Table 4B.*

South El Monte, City of. 2024. *Revised 2021-2029 6th Cycle Housing Element.* Retrieved from: https://www.cityofsouthelmonte.org/595/Revised-2021-2029-6th-Cycle-Housing-Elem. Accessed October 22, 2024.

_____. South El Monte, City of. 2000, as amended. *City of South El Monte General Plan.* Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed October 22, 2024.

Southern California Association of Governments. 2021. *SCAG 6th Cycle Final RHNA Allocation Plan.* Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899. Accessed October 1, 2024.

_____. 2019. *Profile of the City of South El Monte*. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

_____. 2020. *SCAG RTP/SCS: Connect SoCal Plan – Demographics and Growth Forecast*. Retrieved from: https://scag.ca.gov/read-plan-adopted-final-plan. Accessed October 1, 2024.

4.13 PUBLIC SERVICES

4.13.1 Introduction

This section of the EIR describes existing public services for the project area and identifies and addresses potential Project impacts related to fire and police protection services provided to the City of South El Monte.

4.13.2 Regulatory Setting

Federal Regulations

Federal Emergency Management Act (FEMA)

In March 2003, FEMA became part of the U.S. Department of Homeland Security. FEMA's continuing mission is to lead the effort to prepare the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Federal Fire Safety Act (FFSA)

The 1992 FFSA is different from other laws affecting fire safety as the law applies to federal operations, and there is no requirement for local action unless a private building owner leases space to the federal government. The FFSA requires federal agencies to provide sprinkler protection in any building, whether owned or leased by the federal government, that has at least 25 federal employees during the course of their employment.

Occupational Safety and Health Administration (OSHA)

OSHA's mission is to "assure safe and healthy working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance." The agency is also charged with enforcing a variety of whistleblower statutes and regulations.

OSHA: *Em*ergency Action Plan*.* Developments are required under OSHA standards to prepare an emergency action plan that is kept in the workplace that provides procedures for reporting a fire or other emergency, emergency evacuation, including type of evacuation and exit route assignments, and to be followed by all employees. Employers are required to have and maintain an employee alarm system, provide training, and review the emergency action plan with each employee covered by the plan.

OSHA: Fire Prevention Plan. Developments are required under OSHA standards to prepare a fire prevention plan that, at minimum, must include procedures to control accumulations of flammable and combustible waste materials and for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials. Furthermore, the fire prevention plan must contain the names and/or job titles of employees responsible for maintaining equipment to prevent or control sources of ignition or fires, and for the control of fuel source hazards.

Disaster Mitigation Act of 2000

The Disaster Mitigation Act (DMA) of 2000 is a federal law that amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). The DMA was signed into law on October 30, 2000, after being introduced by Representative Tillie Fowler (R-FL-4) on February 11, 1999. The DMA's goals include reducing injuries, loss of life, and property damage; helping communities understand and reduce

their vulnerability to natural hazards; using a more proactive planning process; and developing more effective hazard mitigation plans.

State Regulations

California Building Code

The State of California provides a minimum standard for building design through the California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Industrial buildings are plan checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all industrial buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Section 1270 "Fire Prevention" and Section 6773 "Fire Protection and Fire Equipment" the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all fire-fighting and emergency medical equipment.

California Fire Code

The California Code of Regulations (CCR) Title 24, Part 9 (California Fire Code) contains regulations for the construction and maintenance of buildings, the use of premises, and the management of Wildland-Urban Interface areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023). The Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire safety requirements for new and existing buildings and the surrounding premises. The Project would be subject to applicable regulations of the California Fire Code.

Emergency Mutual Aid Agreements

The Emergency Mutual Aid Agreements (EMAA) system is a collaborative effort between city and county emergency managers in the Office of Emergency Services in the coastal, southern, and inland regions of the State. EMAA provides service in the emergency response and recovery efforts at the Southern Regional Emergency Operations Center, local Emergency Operations Centers, the Disaster Field Office, and community service centers. The purpose of EMAA is to support disaster operations in affected jurisdictions by providing professional emergency management personnel. In accordance with the EMAA, local and State emergency managers have responded in support of each other under a variety of plans

and procedures. Los Angeles County, including the City of South El Monte, is in Region I, which also includes San Luis Obispo, Santa Barbara, Ventura, and Orange counties.

Mitigation Fee Act (California Government Code (Sections 66000 through 66008))

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency, such as the City of South EL Monte, establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The local agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development project on which it is to be levied. The Mitigation Fee Act became enforceable on January 1, 1989.

Local Regulations

City of South El Monte General Plan

The *South El Monte General Plan* (General Plan) Health, Safety, and Environmental Justice Element identifies goals and policies related to public services. The following list includes General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project:

Goal 1	**Minimize risks, such as loss of life, injury, property damage, and natural resource destruction from natural hazards.**
Policy 1.4	Implement Programs and Standards to Mitigate Fire Risk and Secondary Impacts.
	Action 1.4a: Use the expertise of County of Los Angeles Fire Department personnel to review development proposals where fire hazards are of concern.
Goal 5	**Design emergency response to serve a range of community needs.**
Policy 5.1	Strengthen Emergency Services Preparedness and Response.

South El Monte Municipal Code

Title 15, Chapter 14.010: Los Angeles County Code, Title 32, Fire Code adopted. The City of South El Monte adopted by reference the Los Angeles County Fire Code, Title 32, as amended and in effect on or before January 1, 2023, adopting the 2022 California Fire Code, pursuant to the provisions of Sections 50022.1 through 50022.10 of the Government Code of the State of California, and made a part of the South El Monte Municipal Code.

4.13.3 Existing Conditions

Fire Protection

The City contracts with the Los Angeles County Fire Department (LACFD) for fire protection services. The nearest fire station to the project site is LACFD Fire Station 90 located at 10115 Rush Street, approximately 0.9 mile to the north. LACFD provides fire and paramedic services for approximately 4 million residents in 60 cities and all unincorporated communities of Los Angeles County, covering an approximately 2,300-square-mile service area. In total, there are 22 battalions, 175 fire stations, 228 engine companies, and 113 paramedic units in the LACFD.[1] LACFD provides response to fires, medical emergencies, marine safety,

[1] County of Los Angeles Fire Department. 2024. *2023 Statistical Summary*. *Retrieved from:* https:2023-Statistical-Summary_022024.pdf. Accessed August 2025.

hazardous materials incidents, natural and man-made disasters, and related emergencies to protect life, property, and the environment. In addition, the LACFD includes specialized functions in land development services, inspection of properties, and annual plan checks. South El Monte is within Division IX, which includes seven cities and is served by Battalions 3 and 10.[2] The City has adopted the Los Angeles County Fire Code under Chapter 15.14.010, and all projects must be compliant with this code.[3]

Fire Hazard Severity zones (FHSZs) are mapped by the California Department of Forestry and Fire Protection (CAL FIRE) as set forth in Public Resources Code (PRC) 4201-4204 and Government Code 51175-89. FHSZs are categorized as fire protection within a Federal Responsibility Area under the jurisdiction of a federal agency, a State Responsibility Area under the jurisdiction of CAL FIRE, or within a Local Responsibility Area under the jurisdiction of a local agency. CAL FIRE is responsible for fire protection within State Responsibility Areas, which are found in 56 counties in California, and provides a variety of emergency services in 36 counties.

CAL FIRE defines a State Responsibility Area as land that is not federally owned, not incorporated, does not exceed a housing density of three units per acre, contains wildland vegetation as opposed to agriculture or ornamentals, and has watershed value and/or has range/forage value (this effectively eliminates most desert lands). Where local fire protection agencies, such as the LACFD, are responsible for wildfire protection, the land is classified as a Local Responsibility Area. The project site and adjacent areas are classified as a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ).

Law Enforcement Protection

The City contracts with the Los Angeles County Sheriff's Department (LASD) for law enforcement services. LASD provides law enforcement services to more than 10 million residents living within 141 unincorporated communities and 42 contract cities. LASD also provides law enforcement services to 9 community colleges, Metropolitan Transit Authority (Metro), and 37 superior courts. The City is within the service area of the Sheriff's Temple Station, located at 8838 Las Tunas Drive, approximately 6 miles northwest from the project site.[4] LASD has five Divisions; the Temple Station is in the East Patrol Division. The LASD provides citywide services in preservation of public order, criminal investigation, emergency response, crime prevention, and ongoing community education on crime prevention.

The LASD participates in the California Law Enforcement Mutual Aid Plan administrated by the Governor's Office of Emergency Services. The law enforcement mutual aid system is an ongoing cooperative effort among law enforcement agencies to ensure an effective and organized response to a wide range of emergencies. Under the Law Enforcement Mutual Aid Plan, the City of South El Monte can both provide and request law enforcement resources to and from neighboring jurisdictions. There are seven mutual aid regions in the State and each region is comprised of multiple Operational Areas and has a Regional Law Enforcement Mutual Aid Coordinator. South El Monte is located in Mutual Aid Region I, which includes the counties of Los Angeles, San Louis Obispo, Santa Barbara, Ventura, and Orange.

[2] Ibid.

[3] City of South El Monte. ND. *Code of Ordinances.* Retrieved from: https://ecode360.com/44544790?highlight=code,county%20code,county%20fire%20code,fire%20code&searchId=3701915498419178. Accessed August 6, 2024.

[4] City of South El Monte. ND. *Los Angeles County Sheriff's Department.* Retrieved from: https://www.cityofsouthelmonte.org/179/Los-Angeles-County-Sheriffs-Department. Accessed August 6, 2024.

4.13.4 Methodology

This analysis considers the *State CEQA Guidelines, Appendix G* thresholds, as described below, in determining whether the proposed Project would result in impacts concerning public services. The methodology used to evaluate potential public service impacts includes an evaluation of existing fire and law enforcement services and personnel serving the project site, and a determination of service capabilities with the development of the Project in addition to existing population and building stock. An analysis would be conducted of whether the proposed Project's contribution to the future service population would cause fire or police station(s) to operate beyond service capacity. The determination of the significance of the proposed Project on fire protection and emergency medical and law enforcement protection services considers the level of services required by the proposed project and the ability of the LACFD and the LASD to provide this level of service and maintain the regular level of service provided throughout the county, which in turn could require the construction of new or expansion of existing facilities. Applicable regulatory requirements would also be considered for their potential to lessen Project impacts. Using these resources, impacts were analyzed according to the CEQA significance criteria described below.

4.13.5 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G*. Impacts to public services would be significant if the Project would:

- 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 fire protection.
- 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Potential impacts to park and recreational facilities are addressed in **Section 4.14: Recreation**.

As addressed in **Section 1.5: Summary of Effects with No Impact**, the City has determined that the proposed Project would not have a significant impact on the following threshold for the reasons stated below, and that no further analysis was required:

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

The project site is located within the Valle Lindo School District and the El Monte Union High School District. The Project proposes the construction of a warehouse and dedication of approximately 10.7 acres to the City for future development of a City park; the Project does not include any residential development. Given the Project's scale and nature, it is assumed that employment associated with the

proposed uses would not induce substantial direct population growth and it is reasonable to assume that many if not all of the new jobs would be filled by local residents who already reside in the City. Given the high percentage of City residents commuting outside the City for employment (approximately 89%[5]), the addition of new jobs as a result of Project implementation could be filled by the local labor market. Further, it is assumed that jobs generated by the Project would be filled by local residents who already reside in the City and would therefore not contribute to a significant population increase and associated student population influx to the Valle Lindo School District and the El Monte Union High School District. For this reason, no impact would occur.

Other Public Facilities generally refers to libraries and government buildings that serve the population within the jurisdiction. The South El Monte Library, at 1430 North Central Avenue, is located approximately one mile north of the project site. As noted above, there are no proposed habitable structures associated with the Project. Further, construction and operation of the Project would not result in a substantial permanent population growth (see **Section 4.12: Population and Housing**) that would result in increased use of public services, like libraries, such that a significant deterioration of the facility would occur, or such that new facilities would be required. Therefore, the Project would not result in a substantial adverse physical impact associated the construction of a new or physically altered school or other public facility, like libraries. No impact would occur.

4.13.6 Project Impacts and Mitigation

Threshold 4.13-1:	**Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?** ***Level of Significance:*** Less than Significant Impact

The City of South El Monte contracts with LACFD for fire protection services; the project site is located within the service area boundary. The LACFD has approximately 3,000 fire service personnel serving 112 unincorporated areas and 60 incorporated cities in the County.[6] Specifically, the LACFD East Region Division IX maintains 16 fire stations that serve the cities of Bell, Bell Gardens, Commerce, El Monte, Rosemead, South El Monte, and Temple City.[7] The fire station nearest the project site is Fire Station 90, located approximately 0.9-mile north of the site at 10115 Rush Street. Project implementation would develop a warehouse use and dedicate a portion of the project site to the City for future development of a City park. The proposed Project would incrementally increase the demand for fire protection and emergency medical services to the project site.

The Project would include three public fire hydrants located on the warehouse building frontage on Lexington-Gallatin Road. The fire hydrants would connect to the proposed water line extension in Lexington-Gallatin Road. All driveways have been designed to accommodate the required turning radius

[5] Southern California Association of Governments. ND. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

[6] Los Angeles County Fire Department. 2021. County of Los Angeles Annual Report. Retrieved from: https://fire.lacounty.gov/wp-content/uploads/2022/08/LACoFD-2020-Annual-Report_Final_081722.pdf. Accessed May 16, 2025.

[7] Los Angeles County Fire Department. 2020. Los Angeles County Fire Department Overview Booklet. Retrieved from: https://fire.lacounty.gov/wp-content/uploads/2020/02/Department-Overview-Booklet_Final_Sm.pdf. Accessed May 16, 2025

for fire engines and would not impair emergency fire service access. The Project would not require permanent road closures but would result in temporary partial lane closures during specific construction phases such as the connection and/or extension of utilities in Santa Anita Avenue and Lexington-Gallatin Road. The City has adopted the Los Angeles County Fire Code and 2022 California Fire Code under Municipal Code Chapter 15.14, which includes compliance with emergency access design standards. Therefore, through compliance with Municipal Code Chapter 15.14, temporary partial lane closure during construction would not result in a substantial impact to response times or other performance objectives.

Impacts related to fire protection services are assessed by the LACFD on a project-by-project basis. A project's land use, fire-protection-related needs, and a project site's recommended response distance and time and fire safety requirements, as well as project design features that would reduce the demand for fire protection services, are taken into consideration. Further, because the project site is currently served by fire protection services and is located in an urban setting where fire protection services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered fire protection facilities to maintain service objectives.

As part of the development review process, the LACFD Fire Prevention Division would review the proposed site plan and determine if access and water system requirements, which would enhance the proposed development's fire protection, are adequate. Further, the Project would be required to comply with standard LACFD conditions of approval. Specifically, the LACFD review addresses fire and life safety requirements for project construction at the fire plan check stage. This includes a review of the design details of the architectural, structural, mechanical, plumbing, and electrical systems. The proposed Project would conform with the then-current California Building Code and California Fire Code which would require fire suppression systems such as sprinklers and fire curtains. As discussed previously, the California Fire Code identifies standards for building and site design and fire protection and notification systems. It also contains regulations relating to construction, maintenance, and use of buildings including Fire Department access, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire safety requirements for new and existing buildings and the surrounding premises.

The Project would be required to comply with applicable City, County, and State code requirements for fire protection and be subject to pay any applicable fees. The City has adopted the California Fire Code as Title 15, Chapter 15.14 of the City of South El Monte Municipal Code, including appendices addressing fire-flow requirements for buildings. Implementation of all applicable California Fire Code requirements would further reduce potential impacts concerning fire protection services. Therefore, compliance with LACFD and the California Fire Code would ensure that the Project would result in less than significant impact with respect to performance objectives for fire protection services.

Construction and operation of the proposed Project would increase the number of structures and employees in the area; however, as addressed in **Section 4.12: Population and Housing**, the Project would not directly or indirectly induce substantial unplanned population growth in the City. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

Threshold 4.13-2:	**Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?**
	Level of Significance: Less than Significant Impact

The City contracts with the LASD for law enforcement services. The City is served by designated deputies of the Sheriff's Temple Station, located at 8838 Las Tunas Drive in the City of Temple City. The project site is approximately 6 miles from the Temple Station. Further, because the project site is currently served by law enforcement protection services and is located in an urban setting where services and equipment/infrastructure are already in place, the Project does not propose and would not require new or physically altered police protection facilities to maintain service objectives. Therefore, the Project would not result in adverse physical impacts associated with the construction of police protection facilities.

During construction, action by the LASD could be required in cases of trespassing, theft, or vandalism. Construction would not require road closures but may require temporary lane closures during specific construction phases such as connection to utilities in the roadways. Prior to commencement of construction activities, Project plans would be reviewed by the LASD to ensure the incorporation of defensible space concepts, as identified in Standard Condition (SC) PS-1. Defensible space refers to a set of design principles that aim to reduce crime, these include emergency access, site signage, lighting, perimeter control, and other crime safety preventative measures. SC PS-2 requires the Applicant to contract with a security service to provide security during construction and may include additional security measures, such as the installation of temporary fencing.

As discussed above, the Project would not substantially induce population growth in the City, such that a substantial increase in demand for law enforcement would occur. However, the Project would incrementally require operational police services such as routine police patrols, vandalism, break-ins, and other service calls typically associated with nonresidential buildings and public parks. The warehouse component of the Project would include installation of security cameras and nighttime security lighting which would be located around the perimeter of the building and in the warehouse parking areas. These measures would discourage criminal activity at the project site. Compliance with these measures would reduce demands on law enforcement services.

While the Project would incrementally increase demand for law enforcement services, the Project would not significantly impact the LASD's ability to continue to provide an adequate level of service to the community. Additionally, the Project would be required to comply with applicable City, County, and State code requirements for law enforcement protection and be subject to pay any applicable fees. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Impacts would be less than significant and mitigation is not required.

4.13.7 Cumulative Impacts

The cumulative study area related to public services is based on the service area for each of the fire and law enforcement departments serving the project site. The Project assumes the provision of fire protection and law enforcement services is based on a combination of existing services and the use of mutual aid agreements. Additionally, all present and reasonably foreseeable future projects would be required to pay impact fees collected by the City and/or County. Development impact fees are paid to ensure a proportionate fair share is contributed toward facilities, equipment, and personnel that would be needed over time to accommodate the additional demand caused by development. The payment of fees and compliance with applicable regulatory requirements pursuant to the Standard Conditions and Requirements below would result in a less than significant impact regarding the Project's cumulative contribution to fire protection and law enforcement impacts.

Population and potential employment growth would not be unplanned as the General Plan assumes development of the site with commercial uses. The forecast population growth and increased demand for services associated with the Project would not exceed General Plan population projections and anticipated public service needs. The proposed Project would not cause the need to construct any new or expand any existing facilities. Therefore, the project would not result in incremental effects to public services or facilities that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The Project would not result in cumulatively considerable impacts to public services or facilities and would have a less-than-significant cumulative impact.

4.13.8 Mitigation Program

Standard Conditions

SC PS-1 Prior to issuance of building permits, the Los Angeles County Sheriff's Department (LASD) shall review development plans for the incorporation of defensible space concepts. Public safety planning recommendations shall be incorporated into the Project plans. The Applicant shall prepare a list of project features and design components that demonstrate responsiveness to defensible space design concepts. The LASD shall review and approve all defensible space design features incorporated into the Project prior to initiating the building plan check process.

SC PS-2 Prior to the issuance of the first grading permit and/or action that would permit site disturbance, the Applicant shall provide evidence to the Los Angeles County Sheriff's Department (LASD) that a construction security service or equivalent service shall be established at the construction site along with other measures, as identified by the LASD, to be instituted during the grading and construction phase of the Project.

Mitigation Measures

No mitigation is required.

4.13.9 Level of Significance After Mitigation

Impacts related to public services would be less than significant.

4.13.10 References

Los Angeles, County of, Fire Department. 2023. *2023 Statistical Summary*. Retrieved from: https://fire.lacounty.gov/wp-content/uploads/2024/02/2023-Statistical-Summary_022024.pdf. Accessed October 30, 2024.

South El Monte, City of. 2024. *City of South El Monte Code of Ordinances*. Retrieved from: https://ecode360.com/SO5015. Accessed July 22, 2024.

_____. 2020, as amended. *City of South El Monte General Plan – Public Health, Safety, and Environmental Justice Element.* Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 22, 2024.

_____. ND. *Los Angeles County Sheriff's Department.* Retrieved from: https://www.cityofsouthelmonte.org/179/Los-Angeles-County-Sheriffs-Department. Accessed August 6, 2024.

4.14 RECREATION

4.14.1 Introduction

This section of the EIR assesses the potentially significant impacts related to recreation that could result from implementation of the proposed Project. This section analyzes whether the Project would cause an increase in the use of recreational facilities. In the event where a potentially significant environmental impact is identified, mitigation measures would be proposed in order to reduce the impacts to less than significant levels.

4.14.2 Regulatory Setting

State Regulations

Quimby Act

The Quimby Act (California Government Code §66477) states that "the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map." Requirements of the Quimby Act apply only to the acquisition of new parkland and do not apply to the physical development of new park facilities or associated operations and maintenance costs. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. The Quimby Act requires the provision of 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case a city may adopt a higher standard not to exceed 5 acres per 1,000 residents.

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act (Public Resource Code [PRC] §5400 – 5409). Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

Landscaping and Lighting Act

The Landscaping and Lighting Act (California Streets and Highways Code §22500 et seq.) enables cities, counties, and special districts to acquire land for parks, recreation, and open space. A local government may also use the assessments to pay for improvements and maintenance to these areas. In addition to local government agencies (i.e., counties and cities), park and recreation facilities may be provided by other public agencies, such as community service districts, park and recreation districts, etc. If so empowered, such an agency may acquire, develop, and operate recreational facilities for the public.

State of California Open Space Standards

State planning law provides a structure for the preservation of open space by requiring every city and county in the State to prepare, adopt, and submit to the Secretary of the Resources Agency a "local open-space plan for the comprehensive and long-range preservation and conservation of open-space land within its jurisdiction" (Government Code §65560). The following open space categories are identified for preservation:

- Open space for public health and safety, including, but not limited to, areas that require special management or regulation due to hazardous or special conditions.
- Open space for the preservation of natural resources, including, but not limited to, natural vegetation, fish and wildlife, and water resources.
- Open space for resource management and production, including, but not limited to, agricultural and mineral resources, forests, rangeland, and areas required for the recharge of groundwater basins.
- Open space for outdoor recreation, including, but not limited to, parks, and recreational facilities, areas that serve as links between major recreation and open space reservations (such as trails, easements, and scenic roadways), and areas of outstanding scenic and cultural value.
- Open space for the protection of Native American sites, including, but not limited to, places, features, and objects of historical, cultural, or sacred significance such as Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property (further defined in California Public Resources Code §§5097.9 and 5097.993).

Local Regulations

City of South El Monte General Plan

The *South El Monte General Plan* (General Plan) Resources Element establishes a framework to guide decision-making and investment in parks, groundwater management, air quality and landfill capacity that contribute to a high quality of life for local residents and an attractive climate for business. The following General Plan goals and policies have been adopted by the City for the purpose of avoiding or mitigating an environmental effect and are applicable to the proposed Project.

Goal 1	**Provide local public park space at a ratio of 2 acres of park land per 1,000 city residents.**
Policy 1.3	Continue to provide South El Monte residents with access to regional recreation resources.
Goal 2	**Provide a comprehensive recreation program, adequate facilities, and proper maintenance of parks and recreational facilities in the city.**

4.14.3 Existing Conditions

The City recognizes there are limited opportunities to increase local park resources within South El Monte, and therefore emphasizes enhancing existing parks, maintaining join-use agreements with local schools, and regional park resources. The City operates three parks, three community centers, and an aquatic center. **Table 4.14-1: South El Monte Park and Recreational Facilities** identifies existing park and recreational facilities in the City as well as a joint-use facility in the City of El Monte. The park nearest the project site is Shively Park, a joint-use facility located approximately 0.3 mile to the northeast, at 1402 Lerma Road.

Table 4.14-1: South El Monte Park and Recreational Facilities		
Park/Facility	**Acres**	**Amenities**
City Owned		
Community Center 1530 Central Ave, South El Monte	2.0	Recreation building, sports courts, playground, night lighting
Senior Citizens Center 1556 Central Ave, South El Monte	1.5	Recreation building and programs, educational classes, health services, nutrition programs
Mary Van Dyke Park 1819 Central Ave, South El Monte	1.6	Recreation building, sports courts, playground equipment, tot lot; rock climbing structure
Mini-Community Center 1824 Central Ave, South El Monte	2.5	Recreation building
Skate Park 1530 Central Ave, South El Monte	0.15	Skate ramps, rails, and stairs
South El Monte Aquatic Center 1500 Central Ave, South El Monte	1.3	Lap swim, recreation swim, swimming lessons, senior water aerobics
Joint Use		
New Temple Park 1450 Lidcombe Ave, South El Monte	13.4	Recreation building, picnic, field sports, playground equipment, tot lot, night lighting
Dean Shively Middle School and Park 1402 Lerma Road, South El Monte	11.0	Recreation building, picnic, field sports, playground equipment, tot lot, night lighting
Potrero School 2611 Potrero Ave, El Monte	4.2	Grass and field sports areas
Sources: South El Monte. 2000. *South El Monte General Plan – Resources Element*. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/155/Resources-Element-PDF. Accessed November 5, 2024. https://www.cityofsouthelmonte.org/231/Facilities. Accessed November 5, 2024.		

Regional Park Facilities

There are three regional recreation and park facilities near the City: Whittier Narrows Regional Park, Whittier Narrows Nature Center, and Santa Fe Dam Recreation Area, all which are managed and operated by the County of Los Angeles Department of Parks and Recreation. Whittier Narrows Regional Park and Nature Center are the closest facilities, bordering South El Monte's southern boundary. The Whittier Narrows Recreation Area is a 1,492-acre park located on both sides of SR-60 at Rosemead Boulevard and Santa Anita Avenue. It is to the west and south of the project site, on the west side of Santa Anita Avenue, and the south side of Lexington-Gallatin Road. It has a wide range of recreational amenities including lakes for boating and fishing; hiking, biking, and equestrian trails; the American Military Museum; sports courts and fields; playgrounds and tot lots; and picnic areas.

The 400-acre Whittier Narrows Natural Area and Nature Center borders the San Gabriel River. The riparian woodland area includes four lakes. Amenities include hiking trails, picnic areas, seasonal special events, and the Nature Center.

The Santa Fe Dam Recreational Area is an 836-acre facility in Baldwin Park with a 70-acre lake with year-round fishing and non-motorized watercraft usage. Amenities include a swim beach and water play area; hiking, biking, and equestrian trails; sports fields and courts, playgrounds; camping sites; and picnic areas. The Nature Center offers educational, interpretive and walking tours.

4.14.4 Methodology

This analysis considers the *State CEQA Guidelines, Appendix G* thresholds, as described above, in determining whether the proposed Project would result in a substantial temporary or permanent impact to the City's recreation amenities. The analysis evaluates increases in demand that would generate the need for new and expanded facilities and determines whether the potential environmental impacts would occur. The determination that the Project would or would not result in "substantial" temporary or permanent impacts to recreation considers the relevant policies and regulations established by local and regional agencies.

4.14.5 Thresholds of Significance

The City uses the thresholds of significance specified in *State CEQA Guidelines, Appendix G* concerning recreation. Impacts to recreation would be significant if the Project would:

- Increase the use of existing neighborhood, community and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.14.6 Project Impacts and Mitigation

Threshold 4.14-1:	**Would the Project increase the use of existing neighborhood, community and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? and**
Threshold 4.14-2:	**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?**
	Level of Significance: Less than Significant Impact

The Project includes both the construction of a warehouse building and the dedication of approximately 10.7 acres to the City for future development of a public City park, the latter on the northwest portion of the project site. As addressed in this EIR, the project site is located within USACE reservoir flowage easement lands associated with the spillway activation elevation of the Whittier Narrows Dam. The Project would be developed to maintain and improve existing flood storage capacity on the site by balancing the cut and fill up to the spillway activation elevation of the Whittier Narrows Dam. To maintain and improve the existing storage capacity on the site, the Project proposes to excavate within the future City park portion of the project site by approximately 10 feet and raise the finished grade of the warehouse portion to approximately 229 feet, above the spillway activation elevation using the excavated material. The proposed 6- to-12-foot-high retention basin would be surrounded by 2.5h:1v (horizontal to vertical) to 3h:1v earthen slopes. The warehouse finished floor elevation would be approximately 229 feet and retention basin elevation within the future City park area would have a minimum elevation of approximately 213 feet.

Although the Project Applicant for the warehouse does not propose to construct or operate the future City park, the 10.7-acre area would be excavated and graded by the Project Applicant to maintain reservoir capacity and the land would be dedicated to the City for future development of a City park facility. While

specific information regarding final City park design is not known at this time, the future park is evaluated in this EIR as a part of the Project based on a conceptual park design, which assumes two athletic fields, open lawn areas, restroom facilities, and parking for approximately 154 passenger vehicles. Lighting for the future City park area would include safety and security lighting for the parking lots, and has been conservatively assumed to include stadium lighting for the proposed athletic fields. It has been assumed for purposes of this EIR that access to the future City park would be provided via one new driveway with a double swing entry gate off Santa Anita Avenue.

Although the City park improvements may be constructed subsequent to the warehouse, the City park would occur in an area that would be physically disturbed as part of construction of the warehouse to maintain and improve flood storage capacity. The improvements assumed for the City park (see above) are evaluated for all topical areas in this EIR. Therefore, there would be no impacts to the environment specifically related to the future City park that have not already been addressed throughout this EIR including, but not limited to, biological and cultural resource impacts, and construction and operational impacts associated with traffic, air quality, greenhouse gas emissions, and noise. Further, future construction and operation of the City park would be reviewed during the City's development review process and would comply with applicable federal, State, and local regulations.

According to General Plan Resources Element Goal 1, the City's park standard is 2 acres for every 1,000 residents. The City's existing population based on California Department of Finance 2024 estimates is 19,441 residents.[1] Based on the current parkland standard of 2 acres per 1,000 residents, the City would need approximately 39 acres of parkland to serve the City population. The General Plan Public Health, Safety, and Environmental Justice Element (2021) states that the City has 0.7 acre of park per 1,000 residents, which is below the established service ratio.[2] However, the City also identifies regional park and recreational facilities, including Whittier Narrows Regional Park, Nature Center, and Santa Fe Dam Recreation Area, which is an additional 1,927 acres of park and recreational facilities. It is anticipated that the increase in use of the regional recreational facilities would be negligible as the Project would not generate substantial population growth (see **Section 4.12: Population and Housing**). Further, dedication of the 10.7 acres to the City for future public park use would provide the community with an additional park and recreational facility to serve the City's population and therefore would not result in accelerated deterioration of recreational facilities. Rather, the Project would improve the City's recreational facilities. Project impacts would be less than significant and no mitigation would be required.

4.14.7 Cumulative Impacts

The cumulative study area for Recreation is the City. As discussed above, impacts associated with the future City park component of the Project have been evaluated throughout this EIR (e.g., air quality, biological resources, etc.). Where cumulatively considerable impacts have been identified associated with Project implementation, mitigation measures have been identified to reduce impacts to the maximum feasible extent. Accordingly, cumulatively considerable impacts due to use of 10.7 acres by the City for a public park would be less than significant.

[1] State of California, Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2020-2024*. Accessed October 29, 2024

[2] South El Monte, City of. General Plan Public Health, Safety, and Environmental Justice Element. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 6, 2024.

Population and potential employment growth associated with the Project would not be unplanned as the General Plan assumes development of the site with commercial uses and as addressed in **Section 4.12: Population and Housing**, the employment growth associated with the Project would fall within that employment growth assumption. The forecast population growth and increased use of recreational facilities associated with the Project would not exceed General Plan projections and therefore, it is reasonable to assume that the Project would not result in accelerated deterioration of recreational facilities. The proposed Project does not cause the need to construct any new or expand any existing recreational facilities. Further, the Project would improve the City's recreational facilities through the provision of a future City park location. Therefore, the project would not result in incremental effects to recreational facilities that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The Project would not result in cumulatively considerable impacts to recreational facilities and would have a less-than-significant cumulative impact.

4.14.8 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No additional mitigation is required.

4.14.9 Level of Significance After Mitigation

Impacts related to recreational facilities would be less than significant.

4.14.10 References

South El Monte, City of. 2024. *City of South El Monte Code of Ordinances.* Retrieved from: https://ecode360.com/SO5015. Accessed July 22, 2024.

_____. 2021. General Plan Public Health, Safety, and Environmental Justice Element. Retrieved from: https://www.cityofsouthelmonte.org/DocumentCenter/View/2706/Public-Health-Safety-and-Environmental-Justice-Element-PDF. Accessed November 6, 2024.

_____. 2000, as amended. *City of South El Monte General Plan – Resources Element.* Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 22, 2024.

4.15 TRANSPORTATION

4.15.1 Introduction

The purpose of this section of the EIR is to describe the potential transportation impacts that may result from construction and operation of the Project, inclusive of the proposed warehouse and proposed future City park. The following discussion addresses the existing transportation conditions in the traffic study area, identifies applicable regulations, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes potential environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project. This EIR section summarizes the findings of the *South El Monte Athletic Fields and Business Park Project – CEQA VMT Analysis* prepared by Kimley-Horn and Associates, Inc. (Kimley-Horn, 2025). This study has been prepared in accordance with CEQA requirements to evaluate potential transportation impacts based on vehicle miles traveled (VMT). The report is included as **Appendix N** of this EIR.

4.15.2 Regulatory Setting

Federal Regulations

Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) is a federally mandated four-year program of all surface transportation projects that will receive federal funding or are subject to a federally required action. The FTIP is a comprehensive listing of such transportation projects proposed over a six-year period. As the metropolitan planning organization (MPO) for the region, the Southern California Association of Governments (SCAG) is responsible for developing the FTIP for submittal to the California Department of Transportation (Caltrans) and the federal funding agencies.

The FTIP identifies specific funding sources and fund amounts for each project. It is prioritized to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while supporting efforts to attain federal and State air quality standards for the region by reducing transportation related air pollution. Projects in the FTIP include highway improvements, transit, rail and bus facilities, high occupancy vehicle (HOV) lanes, high occupancy toll (HOT) lanes, signal synchronization, intersection improvements, freeway ramps, and non-motorized projects - bicycle and pedestrian.

The FTIP must include all federally funded transportation projects in the region, as well as all regionally significant transportation projects for which approval from federal funding agencies is required, regardless of funding source. Projects in the FTIP are consistent with SCAG's approved Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Manual on Uniform Traffic Control Devices

The Federal Highway Administration's (FHWA) Manual on Uniform Traffic Control Devices (MUTCD) is contained in the Code of Federal Regulations (CFR, Title 23, Part 655, Subpart F). The FHWA requires that the most recent MUTCD be adopted by individual states as their legal state standard for traffic-control devices within two years of the update. The MUTCD identifies the standards that should be used to install and maintain traffic-control devices on all public streets, highways, bikeways, and private roads that are open to public traffic.

State Regulations

Senate Bill 375: Sustainable Communities and Climate Protection Act

Senate Bill (SB) 375 (2008) provides for a planning process to coordinate land use planning and Regional Transportation Plans (RTP)s and funding priorities in order to help California meet the greenhouse gas (GHG) reduction goals established in Assembly Bill (AB) 32. SB 375 requires that RTPs developed by metropolitan planning organizations (e.g., SCAG) incorporate a "sustainable communities' strategy" in their RTPs that will achieve GHG emission reduction targets set by the California Air Resources Board (CARB). SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as Transit-Oriented Developments (TODs).

Senate Bill 743: Update to the CEQA Guidelines for Transportation Impacts

Senate Bill (SB) 743 was enacted in 2013 is to shift from level of service (LOS) to vehicle miles traveled (VMT) for assessing transportation impacts under CEQA. As a result, the Governor's Office of Planning and Research (OPR) amended the State CEQA Guidelines in December 2018 to clarify that a reduction in the level of service can no longer be considered an environmental impact under CEQA. LOS was replaced with VMT as the metric for transportation impact evaluations to encourage GHG emission reductions, support the development of multi-modal transportation networks, and promote a diversity of land uses.

Metrics to evaluate transportation impacts may include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. According to SB 743, projects should aim to reduce VMT and mitigate potential VMT impacts through the implementation of transportation demand management (TDM) strategies. By July 1, 2020, all CEQA lead agencies were required to analyze a project's transportation impacts using VMT.

Regional and Local Regulations

Regional Transportation Plan/Sustainable Communities Strategies

The Southern California Association of Governments (SCAG) is responsible for most regional planning in Southern California. SCAG represents a six-county region that includes Orange, Imperial, Los Angeles, Riverside, San Bernardino, and Ventura counties and 189 cities. The City is part of the San Gabriel Valley Council of Governments (SGVCOG), which is a sub-region of the SCAG planning area.

On April 4, 2024, SCAG's Regional Council adopted the *2024-2050 Regional Transportation Plan/ Sustainable Communities Strategies* (RTP/SCS) or Connect SoCal Plan. Connect SoCal Plan is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. It includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards. This long-range plan, required by the State of California and the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change. The RTP/SCS is a living, evolving blueprint for the region's future.

Of the goals presented in Connect SoCal, the following are applicable to transportation:

- Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water

- Improve access to jobs and educational resources
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

San Gabriel Valley Regional Bicycle Master Plan

The San Gabriel Valley Regional Bicycle Master Plan (SGV Regional Bicycle Master Plan) provides a broad vision, as well as strategies and actions, to improve conditions for bicycling throughout the region and in the cities of Baldwin Park, El Monte, Monterey Park, San Gabriel, and South El Monte for the next 20 years. Finalized in 2014, the SGV Regional Bicycle Master Plan provides direction for expanding the existing bikeway network and connecting local bicycle facilities to adjacent cities and unincorporated communities.

Los Angeles Congestion Management Plan

The Los Angeles County Metropolitan Transportation Authority (MTA) is the agency responsible for planning and operating regional transit facilities and services in Los Angeles County. The MTA is responsible for preparing the Congestion Management Plan (CMP) mandated by State law. The Los Angeles County Congestion Management Plan identifies the transportation network, establishes services levels for network routes, and identifies strategies to reduce congestion. Individual cities within Los Angeles County are responsible for implementing the CMP. The CMP includes the following roads and freeways through the City: State Route (SR- 60) and Rosemead Boulevard.

City of South El Monte General Plan

The *South El Monte General Plan* (General Plan) Circulation Element identifies issues, goals, and policies associated with all modes of transit in South El Monte. The Circulation Element focuses on providing safe, efficient, and adequate circulation throughout the City, and reducing regional traffic congestion. The following General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating a transportation impact and are applicable to the proposed Project.

Goal 4	**Accommodate alternative modes of transit in land use and circulation system planning.**
Policy 4.1	Provide for a Citywide Class II (on-street) bicycle path system consistent with Figure C-4. Note: no bikeways are identified adjacent to the project site.
Goal 5	**Provide adequate parking for existing and future vehicle demand.**
Policy 5.1	Ensure that parking regulations for industrial businesses are adequate to meet parking demands.
Goal 6	**Protect residential neighborhoods from through traffic associated with non-residential uses.**

City of South El Monte Municipal Code

Title 10, Chapter 10.08 - Truck Routes and Oversize Vehicles. Article 1 of this Chapter establishes specific streets as truck routes within the City. These are identified as street or portions of streets where commercial vehicles exceeding a maximum gross weight limit of six thousand pounds are allowed. Below are the established truck routes within the City:

A. Garvey Avenue between the western City boundary and Potrero Avenue

B. Rush Street between Rosemead Boulevard and Durfee Avenue
C. All of Peck Road
D. All of Santa Anita Avenue
E. All of Tyler Avenue
F. Durfee Avenue from Peck Road to the westerly City limits and from Slack Road to the northern City limits

4.15.3 Existing Conditions

Existing Transportation System

Site Access

Regional access to the project site is provided from SR-60, located approximately 170 feet north of the project site. Local access is provided from Santa Anita Avenue and Lexington-Gallatin Road.

Existing Roadway Characteristics

State Route 60. SR-60 is an east-west highway with five lanes in each direction within the study area. The highway begins at the East Los Angeles Interchange in the community of Boyle Heights, which connects to Interstate 5 (I-5), I-10, and US-101, then heads east and ends at the I-10 interchange in the City of Beaumont. The posted speed limit on SR-60 is 65 miles per hour (mph).

Santa Anita Avenue. Santa Anita Avenue is a roadway that travels in the north-south direction west of the project site and in the east-west direction north of the project site. The roadway begins at Durfee Avenue to the south and travels north through the cities of El Monte, Arcadia, and Sierra Madre where the roadway transitions into Chantry Flat Road. Santa Anita Avenue has two lanes in each direction with a posted speed limit of 35 mph near the project site. The roadway provides access to the Whittier Narrows Recreation Area south of SR-60 and to a mix of land uses north of SR-60. The roadway also provides access to the eastbound SR-60 on-ramp and off-ramp.

Lexington-Gallatin Road. Lexington-Gallatin Road is a local roadway that runs northeast and southwest with one lane in each direction. Lexington-Gallatin Road begins at Santa Anita Avenue to the west and terminates at the cul-de-sac just east of Andrews Street. The roadway provides access to residential uses on the northeast end of the roadway and serves as an unofficial drop-off point for South El Monte High School students. The posted speed limit within the project area is 25 mph.

Durfee Avenue. Durfee Avenue is an east-west roadway with two to four lanes within the traffic study area. The roadway transitions into San Gabriel Boulevard at Rosemead Boulevard to the west and terminates at Peck Road to the east. Within the study area, the roadway serves recreational, industrial, and residential uses and also provides access to the South El Monte High School. The posted speed limit within the study area is 40 mph. There are no existing sidewalks on either side of Durfee Avenue near the study area.

Merced Avenue/Fawcett Avenue. Merced Avenue/Fawcett Avenue is a north-south roadway that runs northwest and southeast near the project area. This roadway is located north of SR-60. Fawcett Avenue is one lane in each direction just south of Santa Anita Avenue and transitions into Merced Avenue with two lanes in each direction with a two-way left-turn lane. Fawcett Avenue provides access to the

westbound SR-60 on-ramp and off-ramp. The roadway serves residential, commercial, and light industrial uses. The posted speed limit on Merced Avenue is 35 mph and on Fawcett Avenue is 25 mph.

Transit Services

Foothill Transit, Metro, and Norwalk Transit provide transit services within South El Monte. Public transit service near the project site is provided by Foothill Transit and Norwalk Transit.

Foothill Transit provides fixed-route bus services to the San Gabriel Valley in the greater Los Angeles metropolitan area. Foothill Transit Line 269 is a north-south fixed-route bus service that operates from the El Monte Station to The Shops at Montebello. On weekdays, Line 269 currently operates between 5:55 a.m. and 10:19 p.m. with 30-60-minute headways.[1] On weekends, Line 269 currently operates between 6:30 a.m. and 8:27 p.m. with 60-minute headways. The nearest bus stop is at the intersection of Lexington-Gallatin Road and Santa Anita Avenue, which is located approximately 600 feet southwest of the project site.

Norwalk Transit provides local bus services through the City of Norwalk and several adjacent cities, including South El Monte. Norwalk Transit Route 7 is a north-south fixed-route bus services that operates between the El Monte Station to the Norwalk Green Line Station. On weekdays, Route 7 currently operates between 3:55 a.m. and 9:55 p.m. on 15-60-minute headways. On weekends, the route currently runs between 5:35 a.m. to 7:50 p.m. on approximately 60-minute headways. The nearest bus stop is at the intersection of Durfee Avenue and Peck Road, which is approximately 0.7-mile east from the project site.

Bicycle Facilities

The City's General Plan Circulation Element identifies Class I bikeways as paths exclusive for cyclists. The nearest bicycle facility is the San Gabriel River Class I Bike Path located approximately 0.5 mile south of the project site. Access from the project site to this trail is provided along Durfee Avenue.

Pedestrian Facilities

Existing pedestrian facilities in the vicinity of the project site include continuous sidewalks along the south side of Lexington-Gallatin Road between Santa Anita Road and Andrews Street, continuous sidewalks along the west side of Santa Anita Avenue between Durfee Avenue and the eastbound SR-60 ramps, and discontinuous sidewalks along the east side of Santa Anita Avenue between Durfee Avenue and Merced Avenue. These sidewalks provide access to nearby transit stops and commercial uses. There are currently no sidewalks along the project site frontage on the north side of Lexington-Gallatin Road. There are also gaps in the pedestrian facility along the east side of Santa Anita Road, adjacent to the project site. There are no existing pedestrian crosswalks at the intersection of Santa Anita Avenue and Lexington-Gallatin Road nor are any provided at the north or south end of the Whittier Narrows parking lot along Santa Anita Avenue.

4.15.1 Methodology

The analysis of impacts on transportation examines the Project's temporary (i.e., construction) and permanent (i.e., operational) effects. The impact conclusions consider the potential for changes in

[1] Headway refers to the amount of time between transit vehicles arriving at a stop.

environmental conditions, as well as compliance with the regulatory framework enacted to protect the environment.

A VMT analysis was conducted for the proposed Project and is included as **Appendix N** to this EIR. Project-generated VMT is the assessment based on trips and trip distances of project-specific trip purposes. The Project effect on VMT is an estimate of how VMT within the County will change once a project is built and new and existing traffic is redistributed.

Total Regional VMT

The proposed Project includes a warehouse land use which typically generates regional truck trips along with commute trips, which can be categorized as regional-serving. Considering the land use, the net increase in total VMT is used to evaluate project-generated VMT impacts for this Project. The study area for the net increase was determined to be Los Angeles County.

The Project's regional VMT net change was assessed based on the SCAG Travel Demand Model consistent with City guidelines. VMT calculations considered both passenger vehicle and truck trips for all traffic analyses. The SCAG model is a trip-based model and considers interaction between different land uses based on socioeconomic data such as population, households and employment. Adjustments in socioeconomic data (households, population and employment) were made to the appropriate traffic analysis zone (TAZ) within the SCAG model to reflect the Project's proposed land use.

Project Effect on VMT – Boundary Analysis

Consistent with City guidelines, Project cumulative VMT impacts were evaluated using the boundary method. This method is the total VMT within a specific area calculated by multiplying the area's daily vehicle traffic volume on all roadway segments by the length of the roadway segments. This approach includes all trips, including ones that do not begin or end in the designated boundary. This method also captures the effect of cut-through and/or displaced traffic within the specific study area.

VMT impact is determined by normalizing Project boundary VMT by the service population and comparing results between the with and without Project conditions. The Project effect on VMT using the boundary method was evaluated for a specific study area comprising a 16-mile radius from the project site's TAZ (TAZ #22197100).

4.15.2 Thresholds of Significance

The City uses the thresholds of significance specified in the *State CEQA Guidelines, Appendix G* Environmental Checklist Form. The Project could potentially have a significant transportation-related impact if it would:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

VMT Thresholds

Per the City's VMT Guidelines, VMT impacts are evaluated based on "project-generated VMT" and the "project's effect on VMT". The "project-generated VMT" is compared to the SGVCOG baseline metric. As noted above the net change in Countywide VMT was used to determine the Project's proposed warehouse VMT impact or "project-generated VMT." "Project's effect on VMT" is compared between the with and without project conditions. The following thresholds of significant apply to the VMT analysis:

- A project would result in a significant impact if the baseline project generated VMT per capita exceeds 15 percent below the SGVCOG baseline VMT per service population.
- A project would result in a significant impact if the cumulative project generated VMT per capita exceeds 15 percent below the SGVCOG baseline VMT per service population.

4.15.3 Project Impacts and Mitigation

Threshold 4.15-1	**Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?** ***Level of Significance:*** Less than Significant Impact

Please refer to **Section 4.7: Greenhouse Gas Emissions** and **Section 4.10: Land Use and Planning**, which includes an evaluation of the Project's consistency with SCAG's 2024 Connect SoCal RTP/SCS and the City's General Plan, respectively. The project site is within the SCAG region. The Connect SoCal 2024-2050 RTP/SCS forecasts the number of people, households and jobs (at the jurisdictional level) expected throughout SCAG's 191 cities and in unincorporated areas by 2050. This information is typically a component of the City's General Plan, and if available, the City's traffic analysis model.

Growth assumed in the City of South El Monte General Plan and its corresponding traffic modeling information and assumptions are supplied to SCAG. As discussed in **Section 4.12: Population and Housing**, while the proposed Project would require a General Plan Amendment and zone change, the population growth associated with the employees generated by the proposed Project (358 employees) would not be unplanned as it is less than what can be assumed for commercial uses based on the General Plan land use designation (448 employees). Therefore, the Project would not conflict with the growth forecasts set forth in the General Plan and zoning assumptions. Further, because the proposed Project was accounted for in the City's growth forecast, the Project would be consistent with the RTP/SCS. The analysis finds that the Project is consistent with the applicable goal and policies of the 2024 Connect SoCal and the General Plan. The Project's circulation plan would be consistent with the General Plan pertaining to transit, bicycle, and pedestrian facilities.

Roadways. There is currently no vehicular access directly into the project site. Vehicular access to the proposed warehouse would be provided via two 40-foot-wide driveways on Lexington-Gallatin Road for both truck loading/unloading and vehicle parking. It is assumed in this EIR that access to the future City park component would be provided via one 26-foot-wide driveway off Santa Anita Avenue. Vehicular circulation between the two Project components would not be provided. No changes to the existing roadway network would occur. All driveway improvements would be constructed pursuant to City requirements. Therefore, the proposed Project would not conflict with a plan, ordinance, or policy concerning roadway facilities.

Transit Facilities. The nearest transit stop (Foothill Transit Route 269) is located at the intersection of Santa Anita Avenue at Lexington-Gallatin Road. Neither the warehouse nor the future City park would impact surrounding roadways and thus would not impact transit facilities through roadway closures or impede public transit mobility. While the Project may incrementally increase the use of transit in the area, it would not result in the need to change existing bus routes or the transit network. Therefore, no transit-related deficiencies are anticipated due to the Project.

Bicycle Facilities. As noted above, there are no existing bicycle facilities located on or identified in the General Plan for Santa Anita Avenue or Lexington-Gallatin Road near the project site. The warehouse component of the project would provide on-site bike racks to be located near the ancillary office locations and an outdoor employee break area near the northeast corner of the warehouse site. The future City park component is also anticipated to provide on-site bike racks.

Pedestrian Facilities. As noted above, there are existing sidewalks on the south side of Lexington-Gallatin Road. The Project is proposing to construct sidewalks on the north side of Lexington-Gallatin Road along the project site frontage. Curb and gutter improvements would be provided along the project site frontage on Santa Anita Avenue.

Construction activities are expected to be primarily contained within the project site boundaries and would not require the complete closure of any public or private streets or roadways during construction. Any lane closures during construction would be temporary and project construction would be required to comply with Municipal Code Section 12.08.050: Improvements – New Construction, which requires the City's traffic engineer to review and approve proposed public improvements for compliance with accepted traffic management standards, inclusive of a construction management plan and haul route plan. Compliance with local regulations would ensure construction activities would not impact the circulation system. The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant and no mitigation is required.

Threshold 4.15-2	**Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?** ***Level of Significance:*** Less than Significant Impact

VMT Screening

The City's VMT Guidelines provide details on appropriate screening thresholds than can be used when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed level analysis. According to the City's VMT Guidelines, if a project meets the transit priority area (TPA), low VMT generation area, or project type screening thresholds, the project is presumed to result in a less than significant VMT impact. The Project is not within a transit priority area (TPA) or a low VMT generation area, and therefore does not meet those screening thresholds (**Appendix N**).

The Project Type screening considers a project to have a less than significant transportation impact if it meets the following:

- Local-serving retail uses less than 50,000 square ft
- Other local-serving uses as approved by the City Staff

- Projects generating less than 110 daily vehicle trips

While the warehouse component of the Project is anticipated to generate more than 110 daily vehicle trips, the future City park component of the Project is a local-serving use and therefore can be screened out based on the Project Type screening. The future City park component is therefore presumed to result in a non-significant VMT impact under CEQA pursuant to SB 743. The following VMT Analysis focuses on the warehouse component of the Project because it does not meet any of the VMT screening thresholds and therefore additional VMT analysis was required.

VMT Analysis

Project Generated VMT

As mentioned earlier, the net change in Countywide VMT is used to determine the project-generated VMT for the proposed warehouse land use. Project-generated VMT is the assessment based on trips and trip distances of project-specific trip purposes. The Project effect on VMT is an estimate of how VMT within the County will change once a project is built and new and existing traffic is redistributed.

Table 4.15-1: Project Generated VMT identifies the total VMT in Los Angeles County for the with and without Project conditions for the Existing Year (2024) and the Cumulative Year (2040). As shown in the table, the proposed Project would result in a net reduction of total VMT in the County under both the existing and cumulative conditions.

Table 4.15-1: Project Generated VMT

Region	With Project	Without Project	Net Change in VMT	Net Percent Change in VMT
Existing Year Conditions (2024)				
Los Angeles County (2024)	438,615,903	450,979,123	-12,363,220	-2.7%
Cumulative Year Conditions (2040)				
Los Angeles County (2050)	519,134,142	519,223,681	-89,538	-0.02%
Notes: Existing Year VMT was calculated based on the Base Year 2012 SCAG model runs. Cumulative Year VMT was calculated based on the Future Year 2040 SCAG model runs.				
Source: Kimley-Horn. 2025. *South El Monte Athletic Fields and Business Park Project – CEQA VMT Analysis.* **Appendix N**.				

As noted above under **Section 4.15.2: Methodology**, the Project would result in a significant VMT impact if the Project results in a net VMT increase above 15 percent below SGVCOG's baseline and/or cumulative baseline VMT per service population. Therefore, because the Project's Existing (2024) and Future Year (2040) are below the 15 percent increase and result in a net reduction of Countywide VMT, the Project would result in a less than significant impact concerning project-generated VMT.

Project Effect on VMT

As noted above, consistent with the City's Guidelines, the Project's effect on VMT was also evaluated using the boundary method for the cumulative conditions. The boundary method is the total daily VMT within a specific area calculated by multiplying the daily vehicle traffic volume on all the roadway segment by the length of each of the roadway segments within that specific study area. It was determined that the 16-mile radius from the Project TAZ would be the appropriate area for the boundary method to capture most of the trips coming from and to the project site.

The VMT impact is determined by normalizing the boundary VMT by the service population (residents + employees) and comparing the results between the With Project and the Without Project cumulative

conditions. **Table 4.15-2: Cumulative (2040) Project Effect on VMT - Boundary Method** identifies the Project's effect on VMT using the boundary method for VMT.

Table 4.15-2: Cumulative (2040) Project Effect on VMT - Boundary Method

VMT Metric	Cumulative (2040) with Project	Cumulative (2040) without Project
16-Mile Boundary VMT	138,137,562	138,136,036
16-Mile Service Population	9,046,420	9,046,185
16-Mile Boundary VMT/Service Population	15.27	15.27

Source: Kimley-Horn. 2025. *South El Monte Athletic Fields and Business Park Project – CEQA VMT Analysis.* **Appendix N**.

As shown in **Table 4.15-2**, the boundary VMT per service population (15.27) remains the same for the with and without Project conditions for the 2040 cumulative year. Therefore, because the Project's Boundary VMT per service-population does not increase under the With Project conditions, according to the City's VMT Guidelines, the proposed Project would have a less than significant impact concerning the Project's effect on VMT.

Because Project implementation would not significantly increase VMT, a less than significant impact would occur, and the Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT-related impacts would be less than significant and no mitigation is required.

Threshold 4.15-3	**Would the Project increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?**
Threshold 4.15-4	**Would the Project result in inadequate emergency access?**
	Level of Significance: Less than Significant Impact

The Project does not propose any changes to the existing roadway network. There is currently no vehicular access to the project site. The Project proposes two full-movement unsignalized driveways on Lexington Gallatin Road for the warehouse and one full-movement unsignalized driveway on Santa Anita Avenue for the future City park. The driveways on Lexington-Gallatin Road can be accessed by both passenger vehicles and trucks, which the driveway on Stanta Anita Avenue can only be accessed by passenger vehicles. Truck Routes near the project site include Santa Anita Avenue and Durfee Avenue from Peck Road to the western City limits and from Slack Road to the northern City limits.

The warehouse component of the Project would be designed to allow for truck turning movements and all drive aisles would accommodate standard fire lane turning radiuses and hammerhead turnaround maneuvers to allow access for emergency vehicles. Warehouse circulation would allow inbound trucks to be able to back into the loading docks without encroaching into the parking spaces or curbs. When exiting the driveway, trucks would cross over the center line, as permitted, and into the eastbound lane for a short segment. Lexington-Gallatin Road to the east has few eastbound trips because it only provides access to the small residential neighborhood and leads to a cul-de-sac in that neighborhood. Additionally, this truck turning movement would not conflict with passenger vehicles entering the neighborhood due to the distance from the project site driveways to the neighborhood. Therefore, due to the few number of trips on Lexington-Gallatin Road and the distance to the residential neighborhood, trucks crossing over

the center line when exiting the project site would not be a significant hazardous geometric design feature. Overall, site access and circulation would not require sharp curves or dangerous conditions such that Project implementation would result in increased hazards.

The driveways leading to and from the project site would be designed to avoid any disruption of the line of sight for drivers. The line of sight – a straight line between the driver's eye and oncoming vehicles on the adjacent roadway – defines the "limited use area." The limited use area for each driveway would be kept clear of visual obstructions, including signage, structures, and obstructive landscaping, in order to maintain adequate sight distance. The Project would be designed to ensure the proposed location of the driveways would provide sufficient sight distance for vehicles traveling along Lexington-Gallatin Road to see vehicles exiting the driveway and that vehicles exiting the project driveways would have adequate sight distance to see any conflicting traffic along Lexington-Gallatin Road. To ensure vehicles exiting the proposed driveways would be able to observe oncoming traffic, the line of sight from the driveways would be clear of any potential sight obstructions greater than 3.5 feet high. Municipal Code Section 12.08.050: Improvements – New Construction requires the City's traffic engineer to review and approve proposed public improvements for compliance with accepted traffic management standards, which includes line of sight provisions. The Project would be constructed in compliance with all applicable State building codes and would meet City standards for design, including sight distance at intersections. The Project does not include the use of incompatible vehicles (e.g., farm equipment) on the project site.

The City has adopted the Los Angeles County Fire Code and 2022 California Fire Code under Municipal Code Chapter 15.14, which includes compliance with emergency access design standards. Project traffic would not result in delays or congestion that would affect the circulation of emergency vehicles in the study area. While temporary lane closures during construction (for off-site infrastructure improvements in the street right-of-way) may be required, construction would not result in the closure of any roadways that would impact the mobility of first responders or increase traffic. Construction activities are expected to be primarily contained within the project site boundaries and would not require the complete closure of any public or private streets or roadways during construction. Any lane closures during construction would be temporary and project construction would be required to comply with Municipal Code Section 12.08.050: Improvements – New Construction, which requires the City's traffic engineer to review and approve proposed public improvements for compliance with accepted traffic management standards, inclusive of a construction management plan and haul route plan. Compliance with local regulations would ensure construction activities would not impact emergency access. The Project would be required to incorporate all applicable design and safety requirements as set forth by the City during construction and operation. Therefore, the Project would not result in inadequate emergency access to the City.

Based on the foregoing, the Project would not substantially increase hazards due to geometric design features or incompatible uses or result in inadequate emergency access. Compliance with applicable regulations and roadway design standards would not introduce design features incompatible with current circulation patterns. Therefore, impacts would be less than significant and no mitigation is required.

4.15.4 Cumulative Impacts

Circulation System. The City applies a growth factor to address potential increased traffic volumes on local roadways associated with cumulative development. It is noted that the project site is generally bordered by County recreational facilities, a freeway, a residential uses within a urbanized developed city. Cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews

that would address consistency with plans, programs, policies, and ordinances addressing circulation. As discussed above, the Project would result in a less than significant circulation system impact. The proposed Project would connect to the existing circulation system and implement the City's traffic engineering design standards. In addition, the proposed Project would provide new facilities, such as sidewalks adjacent to the project site, and would not conflict with a plan, ordinance, or policy addressing circulation. In addition, Therefore, the proposed Project would not combine with other cumulative projects to result in significant cumulative impacts. Accordingly, the Project would not result in cumulatively considerable circulation impact and would have a less than significant cumulative impact.

Vehicle Miles Traveled. The geographic context for the analysis of cumulative traffic impacts includes traffic volumes resulting from buildout of the City of South El Monte. In addition, cumulative impacts are based on the future traffic volumes estimated by SCAG, which includes population and socioeconomic projections. As discussed above, the Project would result in a less than significant VMT impact under cumulative (2040) conditions. For cumulative conditions, a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. Based on VMT thresholds of significance, the Project's contribution would not be cumulatively considerable. Accordingly, the Project would not result in cumulatively considerable VMT impact and would have a less than significant cumulative impact.

Hazards Due to Design and Incompatible Use and Emergency Access Adequacy. As discussed above, the evaluation of the proposed Project concluded that it would not result in impacts related to incompatible uses, hazards due to roadway design, or inadequate emergency access. The proposed circulation layout would be required to be installed in conformance with City design standards that would be ensured through the City's development permitting process to provide that no potentially hazardous design features or inadequate emergency access would be introduced by the Project; there are no known potential circulation hazards associated with nearby uses. In addition, cumulative development in the City and surrounding jurisdictions would also be subject to site-specific reviews, including reviews by building and fire authorities that would require compliance with existing building and fire code standards that limit the potential of other projects to create design hazards or interference with emergency access. Therefore, the Project would not result in a cumulatively considerable impact related to circulation design features, incompatible uses, and emergency access and would have a less than significant cumulative impact.

4.15.5 Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No mitigation is required.

4.15.6 Level of Significance After Mitigation

Impacts would be less than significant.

4.15.7 References

Kimley-Horn and Associates, Inc. 2025. *South El Monte Athletic Fields and Business Park Project – CEQA VMT Analysis.* Included as **Appendix N** to this EIR.

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_____. 2000, as amended. *City of South El Monte General Plan – Circulation Element*. Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 22, 2024.

Southern California Association of Governments (SCAG). 2024. *Connect SoCal 2024*. Retrieved from: https://scag.ca.gov/connect-socal. Accessed August 1, 2024.

4.16 TRIBAL CULTURAL RESOURCES

4.16.1 Introduction

This section of the EIR provides contextual background information on tribal cultural resources on or near the project site. The extent to which implementation of the proposed Project could impact existing tribal cultural resources is evaluated. This section also provides the results of Assembly Bill 52 (AB 52) tribal consultation.

Tribal cultural resources are defined in Public Resources Code (PRC) Section 21074 as a site, feature, place, cultural landscape, sacred place or object which is of cultural value to a California Native American tribe and is either [1] on or eligible for the California Historic Register or a local historic register; or [2] the lead agency at its discretion, chooses to treat the resource as a tribal cultural resource.

The analysis in this section was conducted in compliance with PRC Section 5024.1 and Section 21074 to identify tribal, archaeological and historic resources in the project area and evaluate potential impacts that could result from implementation of the Project. Baseline conditions and impact analyses are based on the Cultural Resources Assessment which is included in **Appendix F** of this EIR. The analysis also includes information obtained during consultations with Native American tribal representatives. Native American tribal resources correspondence is provided in **Appendix O**. Historic and prehistoric archaeological resources are addressed in **Section 4.4: Cultural Resources**. Potential impacts to paleontological resources are addressed in **Section 4.6: Geology and Soils**.

4.16.2 Regulatory Setting

Federal Regulations

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979 (ARPA) is to ensure preservation and protection of archaeological resources on public and Native American lands. ARPA places primary emphasis on a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act. Under this regulation, the term “archaeological resources” includes but is not limited to:

> *“pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archaeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.”*

ARPA mandates consultation procedures before initiation of archaeological research on Native American lands or involving Native American archaeological resources. ARPA Section 4(c) requires Native American tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The federal land manager must notify affected tribes before issuing the permit for archaeological work. ARPA Section (g)(2) specifies that permits to excavate or remove archaeological

resources from Indian lands require consent of the Native American or Native American tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans.

Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Native American lands must be subject to the consent of the Native American or Native American tribe that owns or has jurisdiction over such lands.

American Indian Religious Freedom Act, Title 42, United States Code, Section 1996

The American Indian Religious Freedom Act protects Native American religious practices, ethnic heritage sites, and land uses. It requires each executive branch agency with statutory or administrative responsibility for the management of federal lands, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoid adversely affecting the physical integrity of such sacred sites.

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act of 1990 describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. This statute aims to provide greater protection for Native American burial sites and more careful control over the removal of Native American remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. It requires that Indian tribes or Native Hawaiian organizations be consulted whenever archaeological investigations encounter or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the ARPA.

State Regulations

California Public Resources Code

California Public Resources Code (PRC) Sections 5097–5097.6 identify that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands, and it provides for criminal sanctions.

This section was amended in 1987 to require consultation with the Native American Heritage Commission (NAHC) whenever Native American graves are found. Violations for taking or possessing remains or artifacts are felonies. PRC Section 5097.5 states that “no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historic feature situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.”

Pursuant to PRC Section 21084.2, a "project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."

PRC Section 21074(a) defines "tribal cultural resources" as either:

"(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe."

PRC Section 21074(b) states that a "cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

A unique archaeological resource (PRC §21083.2(g)) or a nonunique archaeological resource (PRC §21083.2(h)) may also be a tribal cultural resource if it conforms with the criteria of PRC Section 21074(a).

California Native American Graves Protection and Repatriation Act (2001)

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, requires all State agencies and museums that receive State funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

California Public Records Act

Sections 6254(r) and 6254.10 of the California Public Records Act (Government Code §6250 et seq.) were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects…maintained by…the Native American Heritage Commission…." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the [NAHC], another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency."

Senate Bill 18

Senate Bill (SB) 18 (California Government Code §65352.3) requires local governments to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The consultation and notice requirements apply to the adoption and amendment of general plans and specific plans. The intent of SB 18 is to establish meaningful consultation between tribal governments and local governments at the earliest possible point in the planning process, to avoid potential conflicts, and to allow tribes to manage and act as caretakers of Native American cultural places. A Native American cultural place is defined in PRC Section 5097.9 as "any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine," or as "a Native American historic, cultural or sacred site, which is listed or may be eligible for listing in the CRHC…including any historic or prehistoric ruins, any burial ground, or any archaeological or historic site." The consultation process requires (1) that local governments send the State Native American Heritage Commission (NAHC) information on a proposed project and request contact information for local Native American tribes; (2) that local governments then send information on the project to the tribes that the NAHC has identified and notify them of the opportunity to consult; (3) that the tribes have 90 days to respond on whether they want to consult or not, and (4) that consultation begins if requested by a tribe and there is no statutory limit on the duration of the consultation. If issues arise and consensus on mitigation cannot be reached, SB 18 allows a finding to be made that the suggested mitigation is infeasible.

Assembly Bill 52

On July 1, 2015, California AB 52 of 2014 was enacted and expanded CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC §21084.2).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before an EIR can be released. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the Lead Agency, in writing, to be informed by the Lead Agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation." In addition, under AB 52, public agencies must evaluate a project's potential impact on a "tribal cultural resource". A tribal cultural resource is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a tribe. Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the Lead Agency. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of a project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe.

Health and Safety Code Sections 7050.5 and 7052

California Health and Safety Code (HSC) Section 7050.5, declares that, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance must cease, and the county coroner must be notified. HSC Section 7052 establishes a felony penalty for mutilating, disinterring, or

otherwise disturbing human remains, except by relatives. If human remains are encountered on the project site, HSC Section 7050.5 states:

a) "Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in PRC Section 5097.99. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to PRC Section 5097.94(l) or to any person authorized to implement PRC Section 5097.98.

b) In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Government Code Section 27491 or any other related provisions of law concerning investigation of 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 shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative notifies the coroner of the discovery or recognition of the human remains.

c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC)."

Local Regulations

City of South El Monte General Plan

The *City of South El Monte General Plan* (General Plan) Resources Element includes goals and policies to protect and enhance open space, natural habitat, and biological and cultural resources. The General Plan notes that "no historic or archaeologically significant sites have been located in City."[1] No goals or policies are identified.

4.16.3 Existing Conditions

Ethnography

The project site is located within the ancestral territory of the Gabrieleño/Tongva. Gabrieleño is a Spanish word associated with the San Gabriel Mission. It is generally understood that their ancestral territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles Rivers, portions of the Santa

[1] City of South El Monte (2000). *City of South El Monte General Plan – Resources Element.* https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 2024.

Monica and Santa Ana Mountains, the Los Angeles Basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina Islands.

The Gabrieleño/Tongva have a rich and diverse material culture, traditionally including shell set in asphaltum, carvings, painting, baskets, an extensive steatite industry, and a wide range of stone, shell, and bone materials. At the time of European colonization, they inhabited numerous permanent villages in fertile lowlands along waterways in sheltered areas along the coast, each of which held a population in the low hundreds. Smaller villages were also located at varying distances from these permanent villages, all of which were highly connected via economic, religious, and social ties. Villages contained circular and domed homes made of tule mats, fern, or carrizo, as well as small, circular earth-covered sweathouses. Their hunting and gathering subsistence strategy included land and offshore efforts that resulted in the intake of both small and large land animals, sea mammals, river and ocean fish, and a variety of plant resources. The population sometimes migrated between villages on a temporary basis throughout the year, returning to their permanent villages for ceremony or when resources needed to be replenished.

Records show that the long history of European colonization and harmful displacement of Native Americans initially began in 1542 as a result of Juan Rodríguez Cabrillo visiting the area during exploration. According to mission records, many Gabrieleño/Tongva were forced into the system because of the nearby missions in their ancestral lands. Due in part to the introduction of new diseases, as well as the harsh conditions of mission life, the indigenous population quickly decreased and cultural practices were lost. Following the secularization of the missions, most surviving Gabrieleño/Tongva became wage laborers on the ranchos of Mexican California and were later nearly completely wiped out as a result of a smallpox outbreak in the 1860s. The combination of removal, murder, disease, forced labor, and poor diet contributed to the harmful diaspora of the Gabrieleño/Tongva from established villages to scattered areas of the Los Angeles Basin for survival. This history of displacement within their own ancestral lands has led to difficulty in attaining federal recognition. However, the 20th century found a revitalization of the Gabrieleño/Tongva people and culture, and though the communities remain unrecognized by the federal government, they remain a very active people in the Los Angeles area.

Historic Setting

Please refer to **Section 4.4: Cultural Resources** of this EIR.

4.16.4 Methodology

NAHC Sacred Lands File Search

A Sacred Lands File (SLF) search was requested from the California Native American Heritage Commission (NAHC) on February 26, 2024, to determine if there was any information relating to the potential presence of Native American cultural resources on the project site. A response was received on March 11, 2024.

SB 18 Tribal Consultation

Pursuant to Government Code Section 65352.3, the City of South El Monte sent formal notification on June 3, 2024, to tribal representatives who may have interest in projects within the geographic area traditionally and culturally affiliated with the tribe(s) and have requested notifications of applicable development projects from the City. Formal notification letters were sent to representatives of California Native American tribes based on the list of tribal contacts provided by the NAHC.

AB 52 Tribal Consultation

In compliance with PRC Section 21080.3.1(b), the City of South El Monte sent formal notification on June 3, 2024, to tribal representatives who may have interest in projects within the geographic area traditionally and culturally affiliated with the tribe(s) and have requested notifications of applicable development projects from the City. Formal notification letters were sent to representatives of California Native American tribes based on the list of tribal contacts provided by the NAHC.

Records Search and Site Survey

The evaluation was based on record searches conducted using available data from the South Central Coastal Information Center (SCCIC). Additional resources referenced to determine baseline conditions and impact analyses include historical maps, aerial photographs, local planning documents, and a pedestrian survey. The intensive-level pedestrian survey was conducted by Kimley-Horn archaeologist's Jessica Mauck, MA, RPA and Jamie Nord, MA RPA, on April 23, 2024, by walking parallel transects spaced approximately 15 meters apart oriented in a north-south direction. The determination that any components of the Project components may result in "substantial" adverse effects on tribal cultural resources considers the existing site's cultural resource value and the severity of the Project implementation on resources that may be considered significant tribal cultural resources.

4.16.5 Thresholds of Significance

The City uses the thresholds of significance that are specified in its *State CEQA Guidelines, Appendix G*. Impacts to tribal cultural resources would be significant if the Project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:
    - listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
    - 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.16.6 Project Impacts and Mitigation

Threshold 4.16-1:	**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** **ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?** ***Level of Significance:*** Less than Significant with incorporation of MM CUL-1, MM TCR-1, and MM TCR-2.

As discussed in **Section 4.4: Cultural Resources** of the EIR, results from the SCCIC records search indicated the presence of three previously recorded cultural resources identified in the study area, P-19-004828, P-19-191157, and P-19-192581. Specifically, P-19-004828 consists structural remnants of radio tower footings, P-19-191157 consists of structural foundations of a transmitter building, and P-19-192581 is a SCE transmission line. The KRLA radio-related resources would have no cultural value to a California Native American tribe. As addressed in **Section 4.4: Cultural Resources**, none of the resources identified were determined to be eligible for listing under the NRHP or CRHR and therefore would not be considered a "Historical Resources" under CEQA. During the pedestrian survey conducted on April 23, 2024, no new historical, archaeological, or Native American tribal resources were observed.

As previously noted, a Sacred Lands File (SLF) search was requested by the NAHC. The NAHC response was positive and suggested contacting the Gabrieleno Band of Mission Indians – Kizh Nation for more information. A list of 11 Native American tribal contacts who may have interest in the project area regarding known and recorded cultural resource sites was also provided with the NAHC response. In compliance with AB 52 and SB 18 and the NAHC's response, the City provided formal notification letters on June 3, 2024, to the Native American tribal contacts identified by the NAHC. Native American groups may have knowledge about cultural resources in the area and may have concerns about the adverse effects of development on tribal cultural resources. A summary of the AB 52 and SB 18 formal notification letters sent by the City is provided in **Table 4.16-1: AB 52 and SB 18 Native American Consultation Summary**.

Table 4.16-1: AB 52 and SB 18 Native American Consultation Summary

Tribe Name	Contact	AB52 Letter Date	SB18 Letter Date	Comments
Gabrieleno Band of Mission Indians - Kizh Nation	Christina Swindall Martinez, Secretary	June 3, 2024	June 3, 2024	No response, to date.
Gabrieleno Band of Mission Indians - Kizh Nation	Andrew Salas, Chairperson	June 3, 2024	June 3, 2024	Responded July 31, 2024, identifying the project site within the Tribe's Ancestral Tribal Territory and requested formal consultation.
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales, Chairperson	June 3, 2024	June 3, 2024	No response, to date.
Gabrielino / Tongva Nation	Sandonne Goad, Chairperson	June 3, 2024	June 3, 2024	No response, to date.
Gabrielino Tongva Indians of California Tribal Council	Robert Dorame, Chairperson	June 3, 2024	June 3, 2024	No response, to date.
Gabrielino Tongva Indians of California Tribal Council	Christina Conley, Cultural Resource Administrator	June 3, 2024	June 3, 2024	Responded July 12, 2024, identifying the project site within a sensitive cultural site for the tribe. Requested formal consultation and to review the cultural resources report.
Gabrielino-Tongva Tribe	Sam Dunlap, Cultural Resource Director	June 3, 2024	June 3, 2024	No response, to date.
Gabrielino-Tongva Tribe	Charles Alvarez, Chairperson	June 3, 2024	June 3, 2024	No response, to date.
Santa Rosa Band of Cahuilla Indians	Lovina Redner, Tribal Chair	June 3, 2024	June 3, 2024	No response, to date.
Soboba Band of Luiseno Indians	Joseph Ontiveros, Tribal Historic Preservation Officer	June 3, 2024	June 3, 2024	No response, to date.
Soboba Band of Luiseno Indians	Jessica Valdez, Cultural Resource Specialist	June 3, 2024	June 3, 2024	The letter was returned to the sender after using the documented mailing address; email of formal notification letter was sent July 24, 2024. No response, to date.

As noted above in the table the Gabrielino Tongva Indians of California and the Gabrieleno Band of Mission Indians - Kizh Nation requested formal consultation with the City.

The City responded to the Gabrielino Tongva Indians request via email on August 15, 2024, asking for their availability schedule a meeting. The City responded to the request and consultation was held with the Gabrielino Tongva Indians on February 13, 2025. As a result of consultation, the tribe provided suggested

mitigation measures which outlined their request to monitor and protocol/treatment of a tribal cultural resources in the event one was discovered. The City acknowledged the tribe's request; mitigation in this EIR reflects this collaboration. Consultation between the tribe and City concluded on March 31, 2025.

As noted above, the Gabrieleno Band of Mission Indians - Kizh Nation also requested formal consultation with the City on July 31, 2024. The City responded to the request and consultation was held with the tribe via email. As a result of the consultation, two mitigation measures were added to ensure a Native American Monitor approved by the Gabrieleño Band of Mission Indians – Kizh Nation would be retained to monitor ground disturbing actives and that in the event of discovery of a tribal cultural resource construction activity would cease within 50 feet, and the Gabrieleño Band of Mission Indians – Kizh Nation would be notified to assesses/evaluate/recover the resource. The City acknowledged the tribe's request; mitigation in this EIR reflects this collaboration. Consultation between the tribe and the City concluded on November 12, 2024.

As addressed above and in **Section 4.4: Cultural Resources**, a portion of the project site was previously developed and associated excavation and grading has occurred resulting in prior ground disturbance. It is unlikely that tribal cultural resources are present on the project site given the prior ground disturbance, pedestrian survey results, record search results, Native American consultation, review of archival and environmental data, and existing additional site disturbance. While low, there is the potential for tribal cultural resources to be inadvertently unearthed during excavation and grading activities. Therefore, Project construction activities could result in potential impacts to previously unidentified tribal cultural resources. To ensure potential impacts to unknown tribal cultural resources would be avoided, the Project would implement MM CUL-1, MM TCR-1, and MM TCR-2. Compliance with MM TCR-1 would require the project applicant/City of South El Monte to retain a Native American Monitor prior to any ground-disturbing activities. MM CUL-1 would require work to cease within 60 feet of an inadvertently unearthed cultural resource and an archaeologist, the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes, would be contacted regarding the significance of the resources and its potential to be a tribal cultural resource. In the event the discovery is a tribal cultural resource, the Project would be subject to compliance with MM TCR-2, which would ensure the Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California, and any other consulting tribes be notified to evaluate and assess the discovery and determine appropriate treatment. Therefore, compliance with MM CUL-1, MM TCR-1, and MM TCR-2 would reduce potential impacts associated with the unanticipated and inadvertent discovery of a tribal cultural resources to a less than significant level.

4.16.7 Cumulative Impacts

For purposes of cumulative impact analysis to tribal resources, the cumulative study area would include the areas historically used by the Gabrielino Tongva Indians and the Gabrielino Band of Mission Indians - Kizh Nation. However, the discussion is focused on the Project's potential for resulting in site-specific impact that could contribute to a cumulative loss. The cumulative analysis for tribal cultural resources considers whether the Project, in combination with the past, present, and reasonably foreseeable projects, could cumulatively affect any common cultural resources.

As addressed in this EIR section, the project site does not contain any known tribal cultural resources. However, the potential exists for unknown tribal cultural resources to be discovered during ground disturbance activities. Although the Project—in conjunction with the effects of past projects, other current

projects, and probable future projects—could result in the disturbance of tribal cultural resources throughout the cumulative study area, standard conditions of approval and mitigation measures would be required for each project. Despite the site-specific nature of the resources, mitigation required for the identification and protection of unknown or undocumented resources would reduce the potential for cumulative impacts.

In addition, future cumulative development projects have the potential to encounter/adversely affect tribal cultural resources. Potential tribal cultural resource impacts associated with other project development would be site-specific and would undergo environmental and development review in order to evaluate potential impacts. Projects resulting in ground disturbance would be required to comply with all applicable State, federal, and local regulations concerning preservation, salvage, or handling of cultural and tribal cultural resources, including compliance with required mitigation. This also includes project-by-project consultation with the appropriate tribal representatives to discuss mitigation measures that would be included to mitigate impacts to tribal cultural resources. On a cumulative level, data recovered from a site, combined with data from other sites in the region, would allow for the examination and evaluation of the diversity of human activities in the region. As a result, development of the proposed Project would not contribute to a significant cumulative impact on tribal cultural resources; impacts would therefore be less than cumulatively considerable with implementation of mitigation measures.

4.16.8 Mitigation Program

Standard Conditions

Standard Conditions (SC) CUL-1 is applicable. See **Section 4.4: Cultural Resources**.

Mitigation Measures

Mitigation Measure (MM) CUL-1 is applicable. See **Section 4.4: Cultural Resources**.

MM TCR-1 **Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.** The project applicant/City of South El Monte shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the Project inclusive of the warehouse and future City park at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

A copy of the executed monitoring agreement shall be submitted to the City of South El Monte (lead agency) prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

The 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 TCRs, including but not limited to, Native

American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/lead agency upon written request to the Tribe.

On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes from a designated point of contact for the project applicant/City of South El Monte that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the consulting tribes to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.

MM TCR-2 **Discovery of Tribal Cultural Resources.** Upon discovery of any tribal cultural resources (TCRs), all construction activities in the immediate vicinity (i.e., not less than the surrounding 50 feet) of the discovery shall cease. The Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes shall be immediately informed of the discovery, and the Native American Monitor shall promptly evaluate the TCR. The City of South El Monte shall consult with the Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrielino Tongva Indians of California, and any other consulting tribes to determine the appropriate treatment and/or final disposition for the TCR, which may include one of the following options: preservation in place/avoidance, on-site reburial/relocation, data recovery/excavation, curation, or transfer to the consulting tribes. No project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until its assessment/ evaluation/ recovery has been completed.

4.16.9 Level of Significance After Mitigation

With implementation of the Mitigation Program set forth in this EIR, potential impacts to tribal cultural resources would be reduced to a less than significant level.

4.16.10 References

Kimley-Horn and Associates, Inc. 2025. *Cultural Resources Assessment Report.* Included as **Appendix F**.

South El Monte, City of. 2024. *City of South El Monte Code of Ordinances – 17.03.40 Development Application – Streamlined Ministerial Approval*. Retrieved from: *https://ecode360.com/45035400?highlight=tribal&searchId=1991220972016322#45035400*. Accessed July 2024.

_____. 2000, as amended. *City of South El Monte General Plan*. Retrieved from: https://www.cityofsouthelmonte.org/186/General-Plan. Accessed July 2024.

4.17 UTILITIES AND SERVICE SYSTEMS

4.17.1 Introduction

This section of the EIR examines the utilities and service systems that would be used by the proposed Project and describes the potential impacts on those systems due to the implementation of the Project. Specifically, this section addresses water, wastewater, dry utilities, and solid waste. Storm drain facilities are addressed in **Section 4.8: Hydrology and Water Quality**.

4.17.2 Water

Regulatory Setting

Federal Regulations

Clean Water Act

The Clean Water Act (33 United States Code §§1251 et seq.) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutants discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters so that they can support "the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water."

Section 401 of the Clean Water Act requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, obtain State certification. Section 303 of the Clean Water Act requires states to identify surface waters that have been impaired. Under Section 303(d), states, territories, and authorized tribes are required to develop a list of water quality segments that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology.

Safe Drinking Water Act

The Safe Drinking Water Act (Health and Safety Code, §§116350–116405) is intended to protect public health by regulating the nation's public drinking water supply. The federal Safe Drinking Water Act authorizes the U.S. Environmental Protection Agency (U.S. EPA) to set national standards for drinking water to protect against both naturally occurring and man-made contaminants.

State Regulations

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is the California agency focused on providing and ensuring clean sustainable water for all State residents. The SWRCB works alongside federal programs like the Clean Water Act to regulate water sources and uses. The agency regulates water consumption for irrigation and drinking, as well as water discharges from construction, municipal uses, stormwater, and other sources.

California Safe Drinking Water Act

California enacted its own Safe Drinking Water Act, with the California Department of Health Services (DHS) granted primary enforcement responsibility. Title 22 of the California Code of Regulations (CCR) (Division 4, Chapter 15, "Domestic Water Quality and Monitoring Regulations") established DHS authority

and provides drinking water quality and monitoring requirements, which are equal to or more stringent than federal standards.

Urban Water Management Plan Act

In 1983, the Urban Water Management Planning Act (UWMP Act) was established by Assembly Bill (AB) 797, and passage of this law recognized that water is a limited resource and that efficient water use and conservation would be actively pursued throughout the State of California. The UWMP Act requires that water suppliers providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually (AFY), prepare and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources every five years.

California Water Conservation Act of 2009

The Water Conservation Act of 2009 (often referred to as "SB X7-7" or the "20 by 2020 law") established the goal of achieving a 20 percent reduction in statewide urban per capita water use by December 31, 2020, and the interim goal of achieving a 15 percent reduction by 2015. In an effort to achieve those goals, SB X7-7 required urban retail water suppliers to develop technical information (e.g., baseline daily per capita water use, water use targets, and interim water use targets) and to report that information in their Urban Water Management Plans (UWMPs). UWMPs draw on local, regional, and statewide inputs present data and analyses as required by the California Department of Natural Resources and the California Water Code.

California Code of Regulations Title 24 (California Building Standards Code)

Title 24, also known as the California Building Standards Code, includes regulations for how buildings are designed and constructed, and are intended to ensure the maximum structural integrity and safety of private and public buildings. Components of Title 24 relevant to water are identified below.

Title 24 Part 5 (California Plumbing Code). The California Plumbing Code (CPC) contains plumbing design and construction standards. The CPC also promotes water conservation.

Title 24 Part 11 (California Green Building Standards [CALGreen Code]). The CALGreen Code contains standards applicable to residential and non-residential buildings throughout California, including schools and community colleges. The CALGreen Code is intended to improve public health, safety, and public welfare through sustainable construction practices. The sustainable practices are applied to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides a waste reduction requirement of 65 percent of nonhazardous construction and demolition waste.

Senate Bill 610 and Senate Bill 221

Senate Bill (SB) 610 (§21151.9 of the Public Resources Code [PRC] and §10910 et seq. of the Water Code) requires the preparation of "water supply assessments" for large developments.[1] These are defined as:

- A proposed residential development of more than 500 dwelling units
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet (sf) of floor space.

[1] California Department of Water Resources (CDWR). 2003. *Guidebook for Implementation of Senate Bill 1610 and Senate Bill 221 of 2001.* Page iii. Accessed August 2024.

- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space.
- A proposed hotel or motel, or both, having more than 500 rooms.
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area.
- A mixed-use project that includes one or more of the projects specified above.
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

These water supply assessments, prepared by public water systems responsible for service, address whether adequate existing or projected water supplies are available to serve proposed projects, in addition to urban and agricultural demands and other anticipated development in the service area in which the project is located. The proposed Project does not require the preparation of a water supply assessment.

Additionally, SB 610 requires new information to be included as part of an UWMP if groundwater is identified as a source of water available to the supplier. Information must include a description of all water supply projects and programs that may be undertaken to meet total projected water use. SB 610 prohibits eligibility for funds from specified bond acts until the plan is submitted to the State. SB 221 requires written verification that there is sufficient water supply available for applicable new residential subdivisions. The verification must be provided before commencement of construction.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 became law on January 1, 2015, and applies to all of the State's groundwater basins (Water Code §10720.3). By enacting this Act, the State legislature intended to provide local agencies with the authority and the technical and financial assistance necessary to sustainably manage groundwater within their jurisdiction (Water Code § 10720.1).

Water Conservation in Landscaping Act of 2006 (AB 1881)

The Water Conservation in Landscaping Act (AB 1881) required the California Department of Water Resources (CDWR) to update the State of California's Model Water Efficient Landscape Ordinance (MWELO). Under AB 1881, cities and counties are required to adopt the State's MWELO or to adopt a different ordinance that is at least as effective in conserving water as the State's MWELO. The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and to build resiliency for future droughts. The 2015 revisions to the MWELO increased water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture and by limiting the portion of landscapes that can be covered in turf. Each city and county are required to submit annual reports to CDWR that document how the agency is achieving compliance with the State MWELO and how many projects were subject to the ordinance during the annual reporting period.

California Recycled Water Regulations

The regulation of recycled water is vested by State law to the State Water Resources Control Board (SWRCB) and the California Department of Public Health Services (DPH). DPH is responsible for the

regulations concerning the use of recycled water. Title 17 (California Water Code, §§13500–13556) regulates the protection of the potable water supply through the control of cross-connections with potential contaminants, including recycled water. The established water quality standards and treatment reliability criteria for recycled water are codified in Title 22 of the California Water Code. The requirements of Title 22, as revised in 1978, 1990 and 2001, establish the quality and/or treatment processes required for a recycled effluent to be used for a non-potable application. In addition to recycled water uses and treatment requirements, Title 22 addresses sampling and analysis requirements at the treatment plant, preparation of an engineering report prior to production or use of recycled water, general treatment design requirements, reliability requirements, and alternative methods of treatment.

Assembly Bill 1668 and Senate Bill 606

Assembly Bill 1668 and SB 606 establish guidelines for efficient water use and a framework for implementation and oversight of the new standards, which were required to be in place by 2022. The two bills strengthen the State's water resiliency in the face of future droughts with provisions that include:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers, and indoor residential water use, outdoor residential water use, commercial, industrial and institutional irrigation with dedicated meters, water loss, and other unique local uses.
- Providing incentives for water suppliers to recycle water.
- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and provide recommendations for drought planning. Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

California Code, Government Code Section 66013

Pursuant to Government Code, water and sewer connections for new development to existing infrastructure may be associated with fees from the corresponding local agency. These fees or charges shall not exceed the estimated reasonable cost of providing the service for which the fee is charged or imposed unless taken to a vote regarding if the amount imposed is in excess of the estimated reasonable cost of providing the service.

Local and Regional

San Gabriel Valley Water Company 2020 Urban Water Management Plan and Water Shortage Contingency

The City of South El Monte is a part of the San Gabriel Valley Water Company (SGVWC) service area. Pursuant to the UWMP Act, the SGVWC prepares and adopts an Urban Water Management Plan (UWMP) every five years. SGVWC's most recent update was the San Gabriel Valley Water Company's 2020 UWMP and Water Shortage Contingency, which was adopted on July 1, 2021.

City of South El Monte General Plan

The *South El Monte General Plan Resources Element* provides measures for the conservation of parks, water, groundwater, air quality, and landfill capacity. The following list includes General Plan goals and policies that have been adopted by the City for the purpose of avoiding or mitigating an environmental effect on the supply of water and are applicable to the proposed Project:

Goal 3 **Ensure that City residents and businesses are provided with a reliable, safe domestic water source.**

Policy 3.2	Support Federal government efforts to reduce contamination within the San Gabriel groundwater basin.
Goal 4	**Achieve broad-based participation in water conservation programs.**
Policy 4.1	Provide residents and businesses with information about landscaping and irrigation systems that reduce water use.
Policy 4.2	Establish regulations that require new developments to incorporate water-saving plumbing fixtures.

South El Monte Municipal Code

Title 8 Chapter 8.46: Water Conservation. Chapter 8.46 of the City of South El Monte Municipal Code (Municipal Code) establishes water conservation measures to reduce water consumption in the City through conservation, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water in the City to avoid and minimize the effects of drought. Chapter 8.46 establishes the procedure for declaring a water supply shortage and four conservation measures intended to alter behavior related to water use efficiency.

Title 16, Chapter 12.050: Public Utilities and utility easements. Section 16.12.050 of the South El Monte Municipal Code provides requirements for public utility connections including water distribution systems, electricity, gas, water, water, sewer, storm drain, and telecommunications services.

Title 16, Chapter 12.075: Water Supply. Section 16.12.075 of the Municipal Code requires each parcel in the City to be served by the City's water system.

Title 17, Chapter 11.160: Water Efficient Landscaping. The purpose of Section 17.11.160 of the Municipal Code is to establish standards of design, installation, and maintenance of water efficient landscaping.

Existing Conditions: Water

San Gabriel Valley Water Company (SGVWC) is a retail water supplier that serves all or portions of the cities of Arcadia, Baldwin Park, El Monte, Industry, Irwindale, La Puente, Montebello, Monterey Park, Pico Rivera, Rosemead, San Gabriel, Santa Fe Springs, South El Monte, West Covina, Whittier, and unincorporated areas of Los Angeles County.[2] The SGVWC has a service area of approximately 45 square miles and provides water utility service to a populations of approximately 273,024 people. SGVWC provides water service to the project area. There is an existing water main in Durfee Avenue, approximately 0.3 mile south of the project site.

SGVWC's water supply sources include groundwater pumped from the Main San Gabriel Basin (Main Basin) and Central Basin; treated, imported surface water purchased from Metropolitan Water District of Southern California (MWD) through Central Basin Municipal Water District; and recycled water. SGVWC uses local groundwater from 28 wells located in the Main Basin and from 2 wells located in the Central Groundwater Basin (Central Basin).[3] SGVWC purchases treated, imported surface water supplies from MWD through the Central District, which can supply up to 6,735 gallons per minute (gpm) from MWD's middle feeder. However, SGVWC only uses the treated, imported water as an emergency water supply

[2] San Gabriel Valley Water Company. 2021. *Final 2020 Urban Water Management Plan and Water Shortage Contingency*. Retrieved from: https://www.sgvwater.com/. Accessed November 6, 2024.

[3] San Gabriel Valley Water Company (SGVWC) (ND). *Water Sources, Potable Water.* Retrieved from: Regulatory | SGV Water Company Accessed August 2025.

sources and has not purchased water from MWD in the last five years. SGVWC recycled water supply is produced by Los Angeles County Sanitation Districts' San Jose Creek Water Reclamation Plant, which has a treatment capacity of approximately 15 million gallons per day (mgd) and Whittier Narrows Water Reclamation Plant, which has a treatment capacity of approximately 100 mgd.

In accordance with the requirements of the UWMP Act, SGVWC prepared and adopted an UWMP in July 2021. The UWMP provided historical water supplies from 2011 to 2020 as well as projected supplies for consecutive five-year periods between 2025 and 2045. **Table 4.17-1: SGVWC Historical System Water Supply Sources (AF)** and **Table 4.17-2: SGVWC Future System Water Supply Sources (AF)** identify these volumes from each of the respective sources.

Table 4.17-1: SGVWC Historical System Water Supply Sources (AF)

	System Water Supply Sources (AF)					
	Potable Water					
	Groundwater		MWD Imported Water	Subtotal	Recycled Water	Total
Calendar Year	Main Basin Groundwater	Central Basin Groundwater				
2011	33,679	997	0	34,676	1,949	36,625
2012	35,258	36	0	35,294	2,390	37,684
2013	39,646	22	0	39,668	2,482	42,150
2014	38,552	19	0	38,571	2,547	41,118
2015	29,567	1,644	0	31,211	1,635	32,846
2016	29,207	1,624	0	30,831	1,831	32,663
2017	30,666	1,730	0	32,396	1,647	34,043
2018	30,428	1,758	0	32,186	1,677	33,863
2019	29,120	1,268	0	30,389	1,360	31,749
2020	32,081	49	0	32,130	1,502	33,632

Source: San Gabriel Valley Water Company, 2020, *Final 2020 Urban Water Management Plan and Water Shortage Contingency, page 6-4.* Retrieved from: https://www.sgvwater.com/. Accessed November 6, 2024.

Table 4.17-2: SGVWC Future System Water Supply Sources (AF)

	System Water Supply Sources (AF)					
	Potable Water					
	Groundwater		MWD Imported Water	Subtotal	Recycled Water	Total
Calendar Year	Main Basin Groundwater	Central Basin Groundwater				
2025	33,385	1,750	0	35,135	1,800	36,935
2030	33,371	1,950	0	35,321	2,100	37,421
2035	33,361	2,150	0	35,511	2,400	27,911
2040	33,254	2,350	0	35,604	2,700	38,304
2045	33,200	2,500	0	35,700	3,000	38,700

Source: San Gabriel Valley Water Company, 2020, *Final 2020 Urban Water Management Plan and Water Shortage Contingency, page 6-60.* Retrieved from: https://www.sgvwater.com/. Accessed November 6, 2024.

Additionally, SGVWC also provides anticipated water supplies for a normal year, single dry year, multiple dry years. The UWMP for the SGVWC performed these calculations, which are shown in **Table 4.17-3: SGVWC Normal Dry Years Supply and Demand Comparison**, **Table 4.17-4: SGVWC Single Dry Year Supply and Demand Comparison**, and **Table 4.17-5: SGVWC Multiple Dry Years Supply and Demand Comparison**. These tables indicate that SGVWC can meet water demands during normal years, single dry years, and a five consecutive year drought periods over the next 25 years.

Table 4.17-3: SGVWC Normal Dry Years Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (acre-feet; AF)	36,935	37,421	37,911	38,304	38,700
Demand Totals (AF)	36,935	37,421	37,911	38,304	38,700
Difference (AF)	0	0	0	0	0

Source: San Gabriel Valley Water Company, 2020, *Final 2020 Urban Water Management Plan and Water Shortage Contingency, Table 7-2, page 7-11.* Retrieved from: https://www.sgvwater.com/. Accessed November 6, 2024.

Table 4.17-4: SGVWC Single Dry Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (AF)	35,578	36,046	36,518	36,897	37,278
Demand Totals (AF)	35,578	36,046	36,518	36,897	37,278
Difference (AF)	0	0	0	0	0

Source: San Gabriel Valley Water Company, Final 2020 Urban Water Management Plan and Water Shortage Contingency, Table 7-3. https://www.sgvwater.com/. Accessed November 6, 2024.

Table 4.17-5: SGVWC Multiple Dry Years Supply and Demand Comparison

Year	Totals	2025	2030	2035	2040	2045
First Year	Supply Totals (AF)	40,222	40,751	41,285	41,713	42,144
	Demand Totals (AF)	40,222	40,751	41,285	41,713	42,144
	Surplus (AF)	0	0	0	0	0
Second Year	Supply Totals (AF)	41,835	41,930	42,479	42,919	43,363
	Demand Totals (AF)	41,835	41,930	42,479	42,919	43,363
	Surplus (AF)	0	0	0	0	0
Third Year	Supply Totals (AF)	46,289	46,899	47,513	48,005	48,501
	Demand Totals (AF)	46,289	46,899	47,513	48,005	48,501
	Surplus	0	0	0	0	0
Fourth Year	Supply Totals (AF)	45,157	45,751	46,350	46,831	47,315
	Demand Totals (AF)	45,157	45,751	46,350	46,831	47,315
	Surplus (AF)	0	0	0	0	0
Fifth Year	Supply Totals (AF)	35,072	36,547	37,025	37,509	37,796
	Demand Totals (AF)	35,072	36,547	37,025	37,509	37,796
	Surplus (AF)	0	0	0	0	0

Source: San Gabriel Valley Water Company, Final 2020 Urban Water Management Plan and Water Shortage Contingency, Table 7-4. https://www.sgvwater.com/. Accessed November 6, 2024.

Methodology: Water Supply

The Project is evaluated against the significance criteria/thresholds and information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the proposed Project.

Water Facilities: This analysis addresses the Project's potential impacts on water infrastructure.

Water Supply: The analysis of water supply is based on the change of water levels due to the Project's projected water demand. This information used for this analysis includes data provided in the SGVWC 2020 UWMP.

Thresholds of Significance: Water Supply

The following significance criteria for water systems is from the Environmental Checklist in *State CEQA Guidelines, Appendix G*. An impact would be considered significant and would require mitigation if it would meet one of the following criteria:

- Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Project Impacts and Mitigation: Water Supply

Threshold 4.17-1:	**Would the Project require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects?** ***Level of Significance:*** No additional impacts beyond that evaluated in Section 4.1 through Section 4.17 of the EIR.

The Project would require the extension of water infrastructure to the project site (warehouse and future City park) from existing off-site infrastructure. Water service to the warehouse component of the Project would be provided from the existing 16-inch water main in Durfee Avenue, approximately 0.3 mile south of the project site. Project implementation would require a 16-inch main line extension from Durfee Avenue where it intersects with Santa Anita Avenue, in Santa Anita Avenue to Lexington-Gallatin Road to provide potable water service and fire flow water to the project site. The total length of the main line extension from Durfee Avenue to Lexington-Gallatin Road is approximately 2,600 linear feet. The Project would connect to the proposed water main extension in Lexington-Gallatin Road via one approximately 2-inch pipe for potable water supply and two approximately 8- to 12-inch pipes for fire flow water to the warehouse, and one approximately 1- to 2-inch pipe for irrigation. No construction or upsizing of the existing water main in Durfee Avenue would be required. Off-site improvements associated with the connection and extension of the existing main line would occur with the public rights-of-way of Santa Anita Avenue and Lexington-Gallatin Road. The County of Los Angeles Fire Department has approved the access plan and fire flow/fire hydrant locations for the warehouse (July 8, 2024). The proposed water system improvements would be designed and constructed in accordance with City and SGVWC requirements and final design would require City and SGVWC approval.

Water service to the future City park component of the Project would be provided via by either connecting to an approximately 550-foot main line extension in Santa Anita Avenue north of the intersection with Lexington-Gallatin Road or running an approximately 2-inch domestic water line through the warehouse component of the Project through a private easement.

The extension of water infrastructure to the project site and the construction of infrastructure on the site has been evaluated as a part of the overall impact analysis in **Section 4.1** through Section **4.17**. Therefore, no additional impacts would occur beyond those evaluated for implementation of the overall proposed Project.

Threshold 4.17-2:	**Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?** ***Level of Significance:*** Less than Significant Impact

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. During construction, the contractor would bring their own portable bathroom and wash stations which would have their own self-contained water source and wastewater storage. These facilities would not connect to the adjacent sewer or water infrastructure for those uses. The temporary water use is less than the operational demand.

The Project's total estimated water demand would be approximately 77,087 gallons per day (gpd) or 86.35 acre-feet per year (AFY); see **Table 4.17-6: Estimated Project Water Demand.** Water demand for the warehouse component would total approximately 42,174 gpd or 47.24 AFY while the estimated water demand for the City park component would total approximately 34,913 (gallons per day) gpd or 39.11 AFY; see **Table 4.17-6**. The Project would comply with Title 24 water saving features as Chapter 8.46 and Section 17.11.160 of the Municipal Code.

Table 4.17-6: Estimated Project Water Demand

Land Use	Total Employees/Acreage	Demand Factor (gdp/unit)[3]	Water Demand	
			Gpd	AFY
Warehouse Component[1]	297 employees	142	42,174	47.24
Park Component[2]	61 employees	142	8,662	9.71
Park/Landscaping	10.5 acres	Maximum Allowed Water Allowance [4]	26,251	29.40
		Total	77,087	86.35

gpd = gallons per day; AFY = acre-feet per year

1. Total employees based on 749 sf per employee for warehouse use; see Section 4.12: Population and Housing.
2. Total employees based on 5.71 employees per acre of local park/recreational area; see Section 4.12: Population and Housing.
3. Water Demand Estimates are based on the SGVWC UWMP calculated water use target of 142 gallons per capita per day (gpcd).
4. Maximum Allowed Water Allowance = (Eto) x (0.62) x [(ETAF x LA)]+[(1-ETAF) x (SLA)] where 0.62 is a conversion factor that converts acre-inches per acre per year to gallons per square foot per year, LA is the total landscape area in square feet, SLA is the total special landscape area in square feet, and ETAF is 0.45 for non-residential areas.

Source: San Gabriel Valley Water Company, Final 2020 Urban Water Management Plan and Water Shortage Contingency. https://www.sgvwater.com/. Accessed November 21, 2024.

UWMP water demand forecasts are based on adopted general plans. The General Plan land use designation for the project site is "Commercial" with an FAR of 0.5. This EIR assumes an estimated

maximum development capacity of approximately 228,690 sf of commercial uses; see **Section 4.12: Population and Housing**. Therefore, the UWMP assumed commercial uses for the project site and a greater amount of building square footage. Because the Project proposes a General Plan Amendment to change the project site's land use designation from Commercial to Commercial-Manufacturing, the Project's estimated water demand associated with a warehouse and public City park was not assumed in the 2020 UWMP. However, as mentioned in **Section 4.12**, development of the site with commercial uses could generate 448 employees (90 more employees than the proposed Project). Therefore, while the proposed Project would require a General Plan Amendment and zone change, employees generated by the proposed Project would be less than what was originally planned for in the 2020 UWMP and therefore, water demand would be lower than originally assumed.

Additionally, the SGVWC anticipates an increase in water use for commercial and landscaping uses through 2045. Water demand for commercial uses is anticipated to increase from 6,443 AF in 2020 to 7,159 AF by 2045. Water demand for landscaping uses is anticipated to increase from 504 AF in 2020 to 560 AF by 2045. According to the SGVWC 2020 UWMP, the available water supply would meet projected demand during normal, dry, and multiple dry years through 2045; see **Table 4.17-3**, **Table 4.17-4**, and **Table 4.17-5**. The increase in water demand associated with the proposed project would represent 11.2 percent of SGVWC's projected water demand increase for commercial and landscape uses. Therefore, the increase in water demand generated by project implementation can be accommodated by the SGVWC. No significant water supply impact would occur and no mitigation is required.

Cumulative Impacts: Water

As explained above, the Project would result in a less than significant water supply impact. For purposes of cumulative impacts for water facilities and water supply, the City of South El Monte and San Gabriel Valley Water District service area is considered. There would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years as forecasted by the General Plan and the UWMP. Also, the Project would require relocation/construction of new water facilities (see above), but these would not cause significant environmental effects. Related projects could result in water supply impacts and incrementally increase the long-term demand for water supply. Further, all cumulative projects would be required to assess whether adequate water infrastructure and supply exist to serve their demand, and whether additional or expanded water infrastructure would be required. All projects would be required to construct water infrastructure improvements in order to adequately serve the projects, if necessary. Individual assessments of water services would be prepared, and mitigation would be provided if necessary to reduce a potentially significant impact. Each applicant also must fund the cost of the water-related infrastructure needed to serve a particular site. Consequently, the Project combined with other cumulative development would not result in significant cumulative environmental impacts concerning water supply or infrastructure. Therefore, based on the foregoing, the Project would not contribute considerably to a cumulative water supply impact, would not cause a cumulatively considerable impact concerning water supply and facilities, and the cumulative impact would be less than significant.

Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No additional mitigation beyond that required for the overall Project as included in **Section 4.1** through **Section 4.17** of the EIR

Level of Significance After Mitigation

No significant impact would occur.

4.17.3 Wastewater

Regulatory Setting

Federal Regulations

Clean Water Act

See Subsection 4.17.2: Water.

State Regulations

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California's water resources and ensures proper allocation and efficient use for the benefit of present and future generations. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal Clean Water Act and California's Porter-Cologne Water Quality Control Act, the SWRCB regulates wastewater discharges to surface waters through the National Pollution Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may still apply. Under California law, the SWRCB requires waste discharge requirements for some discharges, in addition to those subject to NPDES permits. Permits contain specific requirements that limit the pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB routinely inspects treatment facilities and strictly enforces permit requirements.

Sanitary Sewer Management Plan

The SWRCB adopted Wastewater Discharge Requirements Order 2006-0003-DWQ on May 2, 2006. This order mandates all federal and State agencies, municipalities, counties, districts, and other public entities ("enrollees") that own or operate sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated sewer to a publicly owned treatment works facility in California to comply with the terms of the order. Order 2006-0003-DWQ also requires each enrollee to develop and implement a system-specific sewer management plan to facilitate proper funding and management of sanitary sewer systems. Sewer system management plans must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost/benefit analysis. Additionally, a sewer system management plan must contain a spill response plan that establishes standard procedures for immediate response to a sewer system overflow in a manner designed to minimize water quality impacts and potential nuisance conditions.

Wastewater Discharge Requirements Order 2006-0003-DWQ

On May 2, 2006, the SWRCB adopted Wastewater Discharge Requirements Order 2006-0003-DWQ. This order mandated all federal and State agencies, municipalities, counties, districts, and other public entities ("enrollees") that own or operate sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated sewer to a publicly owned treatment works facility in California to comply with the terms of the order. Order 2006-0003-DWQ also stated that, to facilitate proper funding and management of sanitary sewer systems, each enrollee must develop and implement a system-specific sewer management plan. To be effective, sewer system management plans must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost/benefit analysis. Additionally, a sewer system management plan must contain a spill response plan that establishes standard procedures for immediate response to a sewer system overflow in a manner designed to minimize water quality impacts and potential nuisance conditions.

Sewer System Management Plan

The State Water Resources Control Board requires wastewater collection providers to report sanitary sewer overflows and to prepare and implement Sewer System Management Plans (SSMP). The SSMP policy requires dischargers to provide adequate capacity in the sewer collection system, take feasible steps to stop sewer overflows, identify and prioritize system deficiencies, and develop a plan for disposal of grease, among other requirements. In addition, wastewater providers must report sanitary sewer overflows to the Los Angeles Regional Water Quality Control Board (RWQCB), keep internal records of these overflows, and produce an annual report on overflows. The City of South El Monte prepared a SSMP in May 2015, in compliance with the State Water Resources Control Board.

California Code of Regulations Title 24 (California Building Standards Code) **Part 5 (California Plumbing Code).**

The California Plumbing Code (CPC) contains plumbing design and construction standards. The CPC also promotes water conservation.

Local Regulations

City of South El Monte General Plan

The *City of South El Monte General Plan* does not identify any goals or policies that are related to wastewater.

South El Monte Municipal Code

Title 13 Chapter 04.010: Adoption of County Sanitary Sewer and Industrial Waste Ordinance. Section 13.04.010 of the Municipal Code adopts Title 10, Utilities, Division 2, Sanitary Sewers and Industrial Waste, of the Los Angeles County Code, as amended and in effect on July 27, 1989, except as amended in this chapter, is adopted by reference as the sanitary sewers and industrial waste ordinance of the City.

Title 16 Chapter 12.050: Public Utilities and Utility Easements. Section 16.12.050 of the Municipal Code provides requirements for public utility connections including electricity, gas, water, sewer, storm drain, and telecommunications services.

Title 16 Chapter 12.055: Sewage Disposal. Section 16.12.055 of the Municipal Code requires that subdivider shall provide a connection from each parcel to the Los Angeles County Sanitation Districts' sewage collection, treatment, and disposal system, in compliance with the districts' improvement standards and specifications.

Existing Conditions: Wastewater

The Los Angeles County Public Works Consolidated Sewer Maintenance District provides operation and maintenance services for the City's sewer facilities. There are approximately 38 miles of sewer pipes, most ranging from 6 to 12 inches in diameter, in South El Monte. Wastewater generated in the City is collected in the City's local sewer collection system that connects with the Los Angeles County Sanitation Districts (Sanitation Districts) regional trunk sewers. Wastewater is then treated at the Whittier Narrows Water Reclamation Plant, which is located at 301 Rosemead Boulevard in the City of El Monte. The Whittier Narrows Water Reclamation Plant has a design capacity of 15 mgd and currently processes an average of 8.9 mgd and serves a population of 150,000 people. The Los Coyotes Water Reclamation Plant has a capacity of 37.5 mgd and currently processes an average flow of 18.8 mgd and serves a population of 370,000 people. The project site located in the jurisdictional boundary of Sanitation Districts No. 15.

The Los Angeles County Public Works Consolidated Sewer Maintenance District provides operation and maintenance services for the City's sewer facilities. There is an existing 8-inch local sanitary sewer mainline located approximately 400 feet north on Lexington Gallatin Road at the intersection with Andrews Street that is not maintained by the Sanitation District. The City of South El Monte maintains the existing sewer mainline.

Methodology: Wastewater

The Project is evaluated against the significance criteria/thresholds and information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the proposed Project.

The wastewater analysis identifies the types of wastewater that is anticipated to be generated by Project implementation and wastewater treatment requirements related to wastewater. Impacts would be considered significant if the proposed Project would require or result in the relocation or construction of new or expanded wastewater treatment facilities or would not comply or would conflict with existing applicable wastewater regulations resulting in a significant environmental impact.

Thresholds of Significance: Wastewater

The following significance criteria for utilities and service systems were derived from the Environmental Checklist in *State CEQA Guidelines, Appendix G*. An impact would be considered significant and would require mitigation if it would meet one of the following criteria:

- Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

Project Impacts and Mitigation: Wastewater

Threshold 4.17-3:	**Would the Project require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction of which could cause significant environmental effects?** ***Level of Significance*:** No additional impacts beyond that evaluated in Section 4.1 through Section 4.17 of the EIR.

To provide sewer service to the warehouse component of the Project, the existing local sewer line would be extended south toward the northern boundary of the project site on Lexington-Gallatin Road. A new 6-inch on-site sewer lateral would connect to the extension in the road and continue west for conveyance to the Sanitation District's 33-inch Join Outfall H Unit 5D Trunk Sewer, which is located in Fawcett Avenue at Santa Anita Avenue.[4] The proposed wastewater system improvements would be designed and constructed in accordance with City and Los Angeles County Public Works Consolidated Sewer Maintenance District requirements.

Wastewater collection from the future City park component of the Project would be provided from a domestic sewer line through the warehouse component of the Project pursuant to a public easement on private property.

The proposed Project would increase wastewater generation on the project site. The expected average wastewater from the Project would be approximately 9,205 gpd and is shown in **Table 4.17-7: Estimated Project Wastewater Generation**.

Table 4.17-7: Estimated Project Wastewater Generation

Land Use	Unit of Measure	Proposed Project	Demand Factor (gpd)	Generated Wastewater (gpd)
Warehouse	1,000 sf	201,815 sf	25	5,045
Warehouse Office	1,000 sf	20,000 sf	200	4,000
Park Restrooms	1,000 sf	1,600 sf	100	160
			Total	9,205

gpd = gallons per day

Source: Los Angeles County Sanitation Districts. *Will Serve Program, Table 1: Loadings for Each Class of Land Use.* Retrieved from: Microsoft Word - wilsrv_loadings_tbl1.doc. Accessed November 7, 2024.

The 33-inch trunk sewer in Fawcett Avenue at Santa Anita Avenue has a capacity of 12.8 mgd and a conveyed peak flow of 7.6 million gpd when last measured in 2021. As such, sufficient capacity exists in the Sanitation Districts 33-inch trunk sewer to serve the Project's wastewater generation in addition to the provider's existing commitments. Wastewater generated at the project site would be treated at the Whittier Narrows Water Reclamation Plant, which has a design capacity of 15 mgd and a currently processes an average flow of 8.9 mgd or at the Los Coyotes Water Reclamation Plant, which has a design capacity of 37.5 mgd and currently processes and average flow of 18.8 mgd. As such, sufficient capacity exists at the existing Whittier Narrows Water Reclamation Plant and the Los Coyotes Water Reclamation

[4] Los Angeles County Sanitation Districts. 2024. Patricia Horsely, Personal Communication, Second Response to South El Monte Athletic Fields and Business Park and Will Serve Letter for 825 Lexington-Gallatin Road; Appendix A: Notice of Preparation and Correspondence.

Plant to serve the Project's wastewater treatment demand in addition to the provider's existing commitments. Sewer lines would not need to be upsized to accommodate the Project. The Project would be subject to compliance with all pertinent local, regional, and State-level regulations concerning new connections, laterals, or trenching.

The Sanitation Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System.

The extension of wastewater infrastructure to the project site and the construction of infrastructure on the site has been evaluated as a part of the Project and therefore, as part of the overall impact analysis in **Section 4.1** through **Section 4.17**. Therefore, no additional impacts would occur beyond those identified for implementation of the overall proposed Project.

Threshold 4.17-4:	**Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?**
	***Level of Significance*:** Less than Significant Impact

As discussed under Threshold 4.17-3, the Project's estimated wastewater generation would be approximately 9,205 gpd; see **Table 4.17-7**. Wastewater from the Project would be conveyed to and treated at the Whittier Narrows Water Reclamation Plant or the Los Coyotes Water Reclamation Plant located in the City of Cerritos. The Whittier Narrows Water Reclamation Plant has a design capacity of 15 million gallons per day (mgd) and the Los Coyotes Water Reclamation Plant has a capacity of 37.5 mgd. The Los Angeles County Sanitation Districts has provided a will serve letter.

The Project's estimated wastewater demand comprises less than one percent of the daily treatment volume at each of the treatment facilities. This increase is nominal compared to the combined residual capacity of the two treatment plants. As such, sufficient capacity exists at the treatment plants and no expansion or modifications would be required to accommodate the Project. Therefore, existing wastewater treatment facilities would accommodate the project-generated wastewater and continue to maintain a substantial amount of remaining capacity for future wastewater treatment. No significant impacts are anticipated and no mitigation is required.

Cumulative

The Project's projected demand of 9,205 gpd is less than 0.04 percent of the capacity of the Whittier Narrows Water Reclamation Plant and less than 0.04 percent of the capacity of the Los Coyotes Water Reclamation Plant. Regarding potential cumulative impacts, given the existing available capacity at the Whittier Narrows Water Reclamation Plant and Los Coyotes Water Reclamation Plant, the wastewater treatment needs of the Project, when combined with past, present, and reasonably foreseeable future projects within the service area for the Los Angeles County Sanitation District, would not result in the need for new or expanded wastewater treatment facilities that could result in significant environmental impacts or exceed the capacity of the wastewater treatment facilities. The Sanitation Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or

indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. All projects within the Los Angeles County Sanitation Districts wastewater service area would be required to comply with applicable federal, State, and local regulations that would minimize environmental impact and prevent a cumulatively considerable significant impact from occurring. Based on the foregoing, no significant cumulative impact is anticipated with respect to wastewater capacity, and the Project's contribution would not cumulatively considerable. Therefore, the cumulative impact relating to wastewater capacity and treatment would be less than significant.

Mitigation Program: Wastewater

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No additional mitigation beyond that required for the overall Project as included in **Section 4.1** through **Section 4.17** of the EIR.

Level of Significance After Mitigation

No significant impact would occur.

4.17.4 Dry Utilities: Electricity, Natural Gas, Telecommunications

Regulatory Setting: Dry Utilities

Federal and State Regulations

Please refer to **Section 4.5: Energy** regarding federal and State energy regulations.

Local Regulations

City of South El Monte General Plan

The *City of South El Monte General Plan* does not identify any goals or policies that are related to wastewater.

South El Monte Municipal Code

Title 15 Chapter 26.010: Underground Requirements. Section 15.26.010 for the City of South El Monte Municipal Code requires that all electrical distribution lines of sixteen thousand volts or less, telephone, cable television and similar wires or cables, which provide direct service to any building shall be installed underground. No building permits will be issued until security satisfactory to the city attorney has been posted to ensure compliance with the requirements of this chapter.

Title 16 Chapter 12.050: Public Utilities and Utility Easements. Section 16.12.050 of the South El Monte Municipal Code provides requirements for public utility connections including electricity, gas, water, sewer, storm drain, and telecommunications services. Section 16.12.050(A)(1) requires all utility distribution facilities including electric, telecommunications, cable television lines, and equipment appurtenant to utilities (transformers, terminal boxes, meter cabinets and concealed ducts) designed to serve a subdivision to be installed underground. Underground utility lines may be installed within street

rights-of-way or on a lot line. The city engineer may determine the location and method of installation of lines installed within street rights-of-way.

Existing Conditions: Dry Utilities

Electricity

Southern California Edison Company (SCE) is the primary distribution provider for electricity in the City.[5] SCE services approximately 15 million people in a 50,000-square-mile service territory. [6] SCE is a regulated electrical utility and maintains electrical facilities and infrastructure within the City and surrounding areas. SCE facilities and infrastructure are used to provide service to the City under the applicable rules and tariffs approved by the California Public Utilities Commission (CPUC), which is responsible for ensuring that California utilities' customers have safe and reliable utility service. SCE provides service in accordance with Tariff Rule 2 as authorized by the CPUC. In addition to the specific rule requirements, each service request is individually designed taking into consideration factors that include but are not limited to: the customer's projected electrical load, location of the customer's metering point, requested service voltage, reliability needs, proximity and delivery capacity of SCE's near-by facilities, potential for load expansions and future development of the SCE system.[7] There are existing overhead SCE electric lines along Lexington-Gallatin Road.

Natural Gas

The City is served by Southern California Gas Company (SoCalGas).[8] SoCalGas serves approximately 21.1 million people in a 24,000-square mile service territory.[9] According to the California Energy Commission (CEC), natural gas demand in the SoCalGas service area was 5,026 million therms in 2022 (most recent data).[10]

SoCalGas projects that total demand for natural gas will decline at an annual average rate of 2.0 percent per year through 2040.[11] The decline in demand is due to modest economic growth, California Public Utilities Commission mandated energy efficiency standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure.

Telecommunications

Telecommunications are provided by multiple telecommunications companies that operate and maintain transmission and distribution infrastructure which currently serves the City. There are existing telecommunication lines in the vicinity of the project site that are serving the existing surrounding developments.

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5 City of South El Monte. ND. *Services, Utilities, Electricity*. Retrieved from: https://www.cityofsouthelmonte.org/356/Electricity. Accessed November 7, 2024.

6 Southern California Edison. 2025. *Southern California Edison's Service Area*. Retrieved from: Southern California Edison's Service Area. Accessed October 8, 2024, August 2025.

7 Southern California Edison. ND. *Expansion and New Facilities*. Retrieved from: Building Expansions & New Facilities Energy Consulting | SCE Accessed November 8, 2024.

8 City of South El Monte. ND. *Utilities, Gas*. Retrieved from: https://www.cityofsouthelmonte.org/359/Gas. Accessed November 8, 2024.

9 SoCalGas. ND. *Company Profile*. Retrieved from: https://www.socalgas.com/about-us/company-profile. Accessed November 8, 2024.

10 California Energy Commission. 2022. *Gas Consumption by Southern California Gas*. Retrieved from: Natural Gas Consumption. Accessed May 7, 2025, August 2025.

11 California Gas and Electric Utilities.2024. *California Gas Report 2024.* Page 5. Retrieved from: https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf. Accessed November 8, 2024.

Methodology

The Project is evaluated against the aforementioned significance criteria/thresholds and information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the Project. This analysis addresses the Project's potential impacts on dry utility infrastructure, including electrical, natural gas, and telecommunications facilities. Energy consumption that would occur during both construction and operation of the Project and specific analysis methodologies was assessed in **Section 4.5: Energy**.

Energy System Capacity: This analysis addresses the Project's potential energy usage, including electricity, natural gas, and transportation fuel. Energy consumption that would occur during both construction and operation of the proposed Project and specific analysis methodologies was assessed in **Section 4.5: Energy**. Energy calculations are provided in **Appendix G: Energy Calculations** and are based on the same assumptions used in **Section 4.2: Air Quality**, and **Section 4.7: Greenhouse Gas Emissions** of this EIR.

Thresholds of Significance: Dry Utilities

The City uses the thresholds of significance specified in *State CEQA Guidelines, Appendix G.* Impacts would be significant if Project implementation would:

- Require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Project Impacts and Mitigation: Dry Utilities

Threshold 4.17-5:	**Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?** ***Level of Significance*:** No additional impacts beyond those evaluated in Section 4.1 through Section 4.17 of the EIR.

The Southern California Gas Company and SCE provide natural gas and electric power services to the area. These service providers install and maintain mainline systems throughout the City. Several companies provide telecommunications. Project construction would use approximately 2,412 kilowatt-hours (kWh) of electricity, 13,351 gallons of gasoline, and 55,204 gallons of diesel. Project operations would annually use approximately 1.86 GWh of electricity,, 327,146 gallons of gasoline, and 507,731 gallons of diesel with implementation of MM GHG-2 and MM GHG-5; see **Section 4.5: Energy** and **Section 4.7: Greenhouse Gas Emissions**.

SCE currently provides electrical power in the City through electricity distribution lines both aboveground and underground lines. The Project would connect to existing overhead SCE lines along Lexington-Gallatin Road which would enable services to the site. Although some new utility infrastructure may be required on the site, extension of services is not anticipated to require the construct of any new off-site electric power facilities to serve the Project. Further, the environmental effects associated with the extension of infrastructure from the street to serve the Project are evaluated as part of the overall environmental analyses in **Section 4.1** through **Section 4.17**.

The SoCalGas Company provides gas services to most of Southern California. Similar to electrical services, natural gas lines already exist in the area to enable service to surrounding uses including natural gas lines in Lexington-Gallatin Road. However, MM GHG-5 would prohibit the use of natural gas and therefore infrastructure would not be extended to the project site.

The proposed Project would require telecommunication services. Existing telecommunication lines are located within existing rights-of-way. Service to the project site would require tying into these lines. The construction of substantial new telecommunication infrastructures would not be required. Further, the environmental effects associated with the extension of telecommunication infrastructure from the street to serve the Project are evaluated as part of the overall environmental analyses in **Sections 4.1** through **4.17**.

Cumulative Impacts: Dry Utilities

As explained above, the Project would result in a less than significant impact related to dry utilities. Regarding cumulative impacts, the electric power, natural gas, or telecommunication needs of the Project, when combined with past, present, and reasonably foreseeable future projects within the vicinity of the project site, would not result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities that could result in significant environmental impacts or exceed the capacity of the electricity, natural gas, and telecommunication providers. All projects within the vicinity of the Project would be required to comply with applicable federal, State, and local regulations that would minimize environmental impacts and prevent a cumulatively considerable significant impact from occurring. Based on the foregoing, no significant cumulative impact is anticipated with respect to dry utilities, and the Project's contribution is not cumulatively considerable. Therefore, the cumulative impact relating to electric power, natural gas, and telecommunication facilities would be less than significant.

Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No additional mitigation beyond that required for the overall Project as included in Section 4.1 through Section 4.17 of the EIR.

Level of Significance After Mitigation

No significant impact would occur.

4.17.5 Solid Waste

Regulatory Setting

State

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate.[12] SB 1016 builds on

[12] CalRecycle. ND. *Per Capita Disposal and Measurement*. Retrieved from: Per Capita Disposal and Goal Measurement (2007 and Later) - CalRecycle Home Page. Accessed November 13, 2024.

AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal, as reported by disposal facilities. Each year, Cal Recycle calculates each jurisdiction's per capita (per resident or per employee) disposal rates. If business is the dominant source of a jurisdiction's waste generation, CalRecycle may use the per employee disposal rate. Each year's disposal rate will be compared to that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because, as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress or other changes over time.

Assembly Bill 341

AB 341, approved in October 2011, is intended to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in the state. It is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. This law requires California commercial businesses and public entities, that generate four or more cubic yards of commercial solid waste per week or is a multi-family residential dwelling with five or more units, to arrange for recycling services.

Each local jurisdiction is required to inform businesses about the recycling requirement and to keep track of the level of recycling within the business community. In addition, each jurisdiction is required to report to CalRecycle, the State agency that oversees recycling and solid waste, on progress in the business community.[13]

Assembly Bill 939

Assembly Bill 939, the California Integrated Waste Management Act of 1989, requires each city or county to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state waste diversion goal of 50 percent by and after the year 2000. SB 2022 expanded on the municipal solid waste diversion requirements under AB 939, clarifying that local governments must continue to divert fifty percent of all solid waste on and after January 1, 2000.

California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act require areas in development projects to be set aside for collecting and loading recyclable materials. The Act required CalRecycle (formerly the California Integrated Waste Management Board) to develop a model ordinance for adoption by any local agency relating to adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model, or an ordinance of their own, providing for adequate areas in development projects for the collection and loading of recyclable materials.

[13] CLI. 2011. *Assembly Bill No. 341*. Retrieved from: Bill Text - AB-341 Solid waste: diversion. Accessed November 13, 2024.

Assembly Bill 1826

Assembly Bill 1826, also known as Mandatory Commercial Organics Recycling (MORe) law, requires most businesses and multi-family complexes to recycle their organic waste dependent on weekly waste generation. Local jurisdictions across the state are required to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units.[14]

Senate Bill 1383

SB 1383 establishes targets for reductions in organic waste disposal in landfills and rescue of currently wasted surplus food. The goal was to reduce emissions of short-lived climate pollutants in various sectors of California's economy and find a sustainable alternative to disposing of organics in landfills. All businesses must comply with the law and enroll in an organic recycling program and utilize an organics cart for residential and commercial customers.[15]

CalGreen Code Section 5.408

The California Green Building Standards Code mandates that construction waste management must be recycled or salvaged for reuse at a minimum of 65 percent for nonhazardous construction and demolition waste and comply with local construction standards for demolition waste management when applicable. Exceptions to this include excavated soil and land-clearing debris, if recycle facilities capable of compliance with this item do not exist or not located reasonably close the jobsite, or if the enforcing agency makes exceptions when project sites are in areas beyond the haul boundaries of the diversion facility.[16]

Local and Regional

City of South El Monte General Plan

The *South El Monte General Plan Resources Element* provides measures for the conservation of parks, groundwater, air quality, and landfill capacity. The following General Plan goal has been adopted by the City for the purpose of avoiding or mitigating an environmental effect related to solid waste and is applicable to the proposed Project:

Goal 6.0 Control and reduce the amount of waste generated in the City.

South El Monte Municipal Code

Title 13 Chapter 12: Solid Waste Handling and Recycling Services. Chapter 13.12 of the Municipal Code addresses solid waste disposal, including requirements for Construction and Demolition (C&D) projects.

Title 13 Chapter 12.730: Recycling Plan. Section 13.12.730 of the Municipal Code requires C&D projects to develop and submit a plan to recycle and salvage the projected construction and demolition debris to the greatest extent feasible prior to issuance of C&D permits form the City. The recycling plan may include source-separated recycling, salvaging, and disposal on nonrecyclables and non-salvageable debris.

[14] CalRecycle. ND. *Mandatory Commercial Organics Recycling.* Retrieved from: https://calrecycle.ca.gov/recycle/commercial/organics. Accessed November 13, 2024.

[15] Republic Services. 2022. *What is SB 1383?.* Retrieved from: https://oclandfills.com/sites/ocwr/files/2022-06/Repub%20Services%201383%20Organics.pdf. Accessed Nov 13, 2024.

[16] CalRecycle. ND. *Construction Waste Management.* Retrieved from: Construction and Landscaping - CalRecycle Home Page. Accessed August 2025.

Existing Conditions: Solid Waste

The City's Environmental Services Division addresses all matters related to solid waste collection, hazardous waste, and recycling programs provided to the residents and businesses of the City. The City contracts with Athens Services for residential trash collection.[17] Athens Services is responsible for collection, material recovery facility (MRF) processing, recycling, and disposal of non-recyclable solid waste. The Athens Services Materials Recovery Facility (MRF) is located at 14048 Valley Boulevard in the City of Industry.[18] Waste separation and sorting occurs at the Athens Services MRF, and solid waste not diverted for recycling is disposed of at one of five landfills located within San Bernardino County Waste Disposal System. **Table 4.17-8: County of San Bernardino Landfill Capacities** provides capacity details for each of the county landfills.

Table 4.17-8: County of San Bernardino Landfill Capacities

Landfill	Location	Maximum Daily Permitted Tonnage (tons per day)	Maximum Permitted Capacity (Cubic Yards)	Remaining Capacity (Cubic Yards)
Barstow	32553 Barstow Road, Barstow	1,500	80,354,500	71,481,660
Landers	59200 Winters Road, Landers	1,200	13,983,500	11,148,100
Mid-Valley	2390 Alder Avenue, Rialto	7,500	101,300,000	67,520,000
San Timoteo	31 Refuse Road, Redlands	2,000	20,400,000	11,402,000
Victorville	19600 Stoddard Wells Road, Victorville	3,000	83,200,000	81,510,000

Source: CalRecycle. Solid Waste Information System (SWIS). 2024.

Methodology: Solid Waste

The Project is evaluated against the significance criteria/thresholds and information concerning current service levels and the ability of the service providers to accommodate the increased demand created by the proposed Project.

Landfill Capacity: The analysis of the proposed Project's impact on landfill facilities is based on the anticipated generation of solid waste that would occur during construction and operation of the Project. The analysis identifies the projected amount of non-hazardous construction debris and operational solid waste that would be generated from implementation of the Project and the amount that would be disposed of in landfills after compliance with recycling/diversion requirements. The proposed Project impact's regarding solid waste would be significant if the Project's anticipated solid waste generation would substantially affect landfill capacity, such that additional or expanded landfill facilities would be required to accommodate the Project.

Solid Waste Regulations: The analysis of the proposed Project consists of the Project's conformance of applicable solid waste regulations related to the generation or disposal of solid waste. Impacts would be considered significant if the proposed Project would not comply with all applicable federal, state, or local statutes or regulations related to solid waste.

[17] City of South El Monte, *Residential Trash Collection.* Retrieved from: Residential Trash Collection | South El Monte, CA. Accessed November 8, 2024.

[18] City of South El Monte, *Athens Services Agreement.* Retrieved from: Athens-Services-Agreement-PDF-. Accessed November 8, 2024.

Thresholds of Significance: Solid Waste

The following significance criteria for utilities and service systems were derived from the Environmental Checklist in *State CEQA Guidelines, Appendix G*. An impact of the Project would be considered significant and would require mitigation if it would meet one of the following criteria:

- 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.
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Project Impacts and Mitigation: Solid Waste

Threshold 4.17-6:	**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.**
Threshold 4.17-7:	**Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.**
	***Level of Significance*:** Less than Significant Impact

Solid waste generation from the Project during construction and operations would be collected and handled by Athens Services and taken to a materials recovery facility (MRF) where recyclable materials are diverted from waste taken to one of the five landfills located within San Bernardino County Waste Disposal System. As shown in **Table 4.17-8**, the Barstow Landfill has a remaining capacity of 71,481,660 cubic yards (cy); the Landers Landfill has a remaining capacity of 11,148,100 cy; the Mid-Valley Landfill has a remaining capacity of 67,520,000 cy; the San Timoteo Landfill has a remaining capacity of 11,402,000; and, the Victorville Landfill has a remaining capacity of 81,510,000 cy. **Table 4.17-9: Estimated Project Solid Waste Generation** shows the proposed Project's approximate solid waste generation, using CalRecycle's estimated solid waste generation per land use. The proposed Project would generate approximately 2,280,885 pounds per year, or 1,140 tons per year (**Table 4.17-9**).

Table 4.17-9: Estimated Project Solid Waste Generation

Land Use	Generation Rate	Project Information	Solid Waste Generation (lbs/year)
Warehouse	1.42 lbs/100 sf/day	201,815 sf	1,046,090
Warehouse Office	6 lbs/ksf/day	20,000 sf	43,800
Future Park[1]	0.007 lbs/sf/day	466,092 sf	1,190,995
		Total	**2,280,885**

ksf = thousand square feet, lbs = pounds, sf = square feet
1. Future Park uses the generation rate for Public/Institutional land use types

Source: CalRecycle. 2019

The Project would generate approximately 3.1 tons per day, which accounts for less than one percent of the maximum daily capacity of the Barstow Landfill, Lander Landfill, Mid-Valley Landfill, San Timoteo Landfill, and the Victorville Landfill, respectively; see **Table 4.17-8**. The existing landfills would have

sufficient capacity to serve the proposed Project and solid waste generated during construction and operations would represent a nominal increase compared to the daily permitted tonnage at the landfills. Compliance with all applicable regulations and laws regarding solid waste would further reduce impacts. Therefore, impacts are less than significant and no mitigation is required.

The Project would comply with applicable local, State and federal regulations regarding solid waste, including those of the City of South El Monte. Regulations specifically applicable to the proposed Project include the California Integrated Waste Management Act of 1989 (AB 939), AB 1826, SB 2022, SB 1383, SB 1019, CalGreen Code Section 4.408, AB 341, and the City's Municipal Code Chapter 13.12: Solid Waste Handling and Recycling Services. The regulatory framework is described above in the regulatory setting and details what requirements the Project must follow to be compliant. The City's Municipal Code Chapter 13.12 addresses solid waste disposal, including requirements for Construction and Demolition (C&D) projects within the City. Compliance with the above-mentioned policies and programs would ensure that the Project would not conflict with federal, State and local statutes and regulations related to solid waste. Further, the General Plan contains a goals and policies related to solid waste. Following adherence to these federal, State and local statutes and regulations related to solid waste, impacts would be less than significant.

Cumulative Impacts: Solid Waste

As explained above, the Project would result in a less than significant solid waste-related impact. Regarding cumulative impacts, potential future projects in Los Angeles County would increase solid waste generation and decrease available capacity at the Barstow Landfill, Lander Landfill, Mid-Valley Landfill, San Timoteo Landfill, and the Victorville Landfill. However, as with the proposed Project, these projects would be required to comply with federal, State and local regulations to minimize solid waste impacts. Additionally, the Barstow Landfill, Lander Landfill, Mid-Valley Landfill, San Timoteo Landfill, and the Victorville Landfill are projected to have sufficient capacity to serve current and future needs until their scheduled closures.[19] The Project would not result in a significant impact and combined with other projects within the vicinity would not result in cumulatively considerable significant impacts to solid waste standards, infrastructure, or reduction goals. Further, the Project would comply, and it is expected that other developments would comply with federal, State, and local management and reduction statues and regulations related to solid waste. Based on the foregoing, no significant cumulative impact is anticipated with respect to solid waste and the Project's contribution is not cumulatively considerable. Therefore, the cumulative impact related to solid waste would be less than significant.

Mitigation Program

Standard Conditions

No standard conditions are identified.

Mitigation Measures

No mitigation measures are required.

[19] The scheduled closure dates for the San Bernardino County Landfills are as follows: Barstow Landfill, May 1, 2071; Lander Landfill, January 1, 2072; Mid-Valley Landfill, April 1, 2024; San Timoteo Landfill, December 1, 2039; and the Victorville Landfill, October 1, 2047. Per CalRecycle. Solid Waste Information System (SWIS). 2024.

Level of Significance After Mitigation

No significant impact would occur.

4.17.6 References

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5.0 LONG-TERM IMPLICATIONS OF THE PROPOSED PROJECT

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. The environmental effects of the proposed Project are addressed in Sections 4.1 through 4.17 of this EIR. Implementation of the proposed Project would result in potentially significant impacts for the following topical issues:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas (GHG) Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Tribal Cultural Resources

As provided in Sections 4.1 through 4.17 of this EIR, all feasible standard conditions (SCs) and mitigation measures (MMs) would reduce potential impacts to the above topic areas to less than significant, with the exception of greenhouse gas emission (GHG) impact related to Project operations, which would remain significant and unavoidable as discussed below.

Greenhouse Gas Emissions. As discussed in **Section 4.7: Greenhouse Gas Emissions**, the Project is located within South Coast Air Quality Management District's (SCAQMD's) jurisdiction. While SCAQMD has not adopted its proposed 3,000 metric tons of CO_2e ($MTCO_2e$) threshold, this EIR's analysis conservatively uses the proposed 3,000 $MTCO_2e$ screening threshold. Project construction and operation would generate approximately 7,977 $MTCO_2e$ per year, and therefore exceed the 3,000 $MTCO_2e$ per year threshold despite implementing MM GHG-1 through MM GHG-9. The Project would also be required to comply with Laws, Ordinances, and Regulations (LOR) GHG-1 through LOR GHG-7 which would be required by local, State, or federal regulations or laws, i.e., California Code of Regulations and California Green Building Standards Code. It should be noted that the majority of the unmitigated GHG emissions (89%) are associated with non-construction related mobile sources. Additional mitigation to reduce the Project's mobile emissions is not feasible due to the limited ability of the City to address emissions resulting from mobile sources and/or emissions generated by cars and trucks outside of the City's limits. As such, the Project would generate GHG emissions, either directly or indirectly, that would exceed SCAQMD thresholds despite all feasible mitigation measures, resulting in a significant and unavoidable impact.

5.2 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project should it be implemented. Generally, the section notes that a project would result in significant irreversible environmental changes if the following occurs:

- The project would involve large amounts of nonrenewable resources during initial and continued phases in a way that would make their nonuse or removal unlikely;
- The primary and secondary impacts from the Project would generally commit future generations to similar uses;

- The project would involve uses in which irreversible damage could result from a potential environmental accident; and
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

As described in **Section 4.2: Air Quality**, **Section 4.5: Energy**, **Section 4.7: Greenhouse Gas Emissions**, and **Section 4.17: Utilities and Service Systems**, Project implementation would require long-term commitment of natural resources and land. Project development would result in committing land resources associated with warehouse uses and the future City park use. The Project includes infrastructure to support the proposed land use. Project construction and long-term operation would require committing and reducing available nonrenewable and slowly renewable resources (i.e., resources that take a long time to replenish, often on a scale of decades or even centuries), including petroleum fuels and natural gas (for vehicle use, construction, lighting, heating, and cooling of structures) and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation; examples include air quality, through the combustion of fossil fuels and production of greenhouse gases and water supply, through the increased potable water demands for drinking, cleaning, landscaping, and general maintenance needs. However, the Project would not involve large amounts of nonrenewable resources in a way that would result in significant irreversible environmental changes, nor does it commit future generations to similar uses. Additionally, the Project does not involve uses in which irreversible damage could result from a potential environmental accident, Finally, the proposed Project's consumption of resources is justified as the Project does not involve the wasteful or inefficient use of natural resources. Therefore, the proposed Project would not result in significant irreversible environmental changes and impacts would be less than significant in this regard.

5.3 GROWTH INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(e) requires that EIRs include a discussion of ways in which a project could induce growth. The State CEQA Guidelines identify a project as "growth-inducing" if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment. New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. The project would therefore have a growth-inducing impact if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing;
- Remove obstacles to population growth;
- Require the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

A project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, the potential for growth inducement is not considered necessarily detrimental nor necessarily beneficial,

and neither is it automatically considered to be of little significance to the environment. The following analyzes the Project's potential growth-inducing impacts for the criteria outlined above, in accordance with State CEQA Guidelines Section 15126.2(e). Potential growth-inducing effects are examined through analysis of the following questions:

Would the Project directly or Indirectly foster economic or population growth, or the construction of additional housing?

As discussed in **Section 4.12: Population and Housing**, based on an employment generation factor of one employee per 749 sf of warehouse use, the warehouse component of the Project would have approximately 297 employees.[1] Based on an employment generation factor of 5.71 employees per acre of local parks/recreational areas, the public City park component of the project could have 61 employees.[2]

The potential 358 employees (297 employees from the warehouse component and the 61 employees from the City park component) resulting from the Project would increase the City's existing employment by approximately 4.2 percent over the City's existing employment of 8,500 jobs. Given the Project's scale and nature, it is assumed that employment associated with the proposed uses would not induce substantial direct population growth and that new jobs would be filled by local residents who already reside in the City. Given the high percentage of City residents commuting outside the City for employment (approximately 88%), the addition of new jobs as a result of Project implementation could be filled by the local labor market.

Further, compared to the City of South El Monte General Plan (2000) assumptions and assuming development on 10.5 acres of the site in order to be compliant with the USACE reservoir flowage easement requirements, the project site could be developed at a 0.5 FAR with 228,690 sf of commercial uses. Using an employment generation factor of one employee per 511 sf of retail/commercial use, development of the site with commercial uses could generate approximately 448 employees. The proposed Project would not generate a greater number of employees than what was already assumed in the General Plan. Therefore, Project implementation would not directly foster unplanned population growth or necessitate the construction of additional housing. Therefore, given the City has already accounted for the Project's general economic and population effects, the Project would not directly affect housing availability within the City.

Additionally, Project construction would temporarily increase construction employment. While the size of the construction force would vary during the different phases of construction, workforce demand likely would be met with the existing and anticipated labor market in the City and surrounding region[3] as addressed in **Section 4.12: Population and Housing**. As such, Project construction would not require a substantial number of workers to relocate from outside the region, and Project construction would not indirectly foster population growth, or the construction of additional housing.

[1] Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Table 4B.*

[2] Natelson Company, Inc. 2001. *Employment Density Study Summary Report Prepared for SCAG, Appendix B: Employment Densities By Anderson Code, using code 1820 for Local Parks and Recreation in the County of Los Angeles.*

[3] Southern California Association of Governments. 2019. *Profile of the City of South El Monte*. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

Would the Project remove obstacles to population growth or require the construction of new or expanded facilities that could cause significant environmental effects?

The Project would not remove obstacles to growth through the construction or extension of major infrastructure facilities. Although the project site is undeveloped, it is bordered by existing uses and is planned for development in the City's General Plan.

Existing utilities and service systems (i.e., water, wastewater, solid waste, and electricity) are available to serve the Project. While upgrades to the existing utilities may be necessary, major infrastructure is already present in the area. Project improvements include distribution lines that would serve the project site via existing infrastructure such as the existing water main in Durfee Avenue, and sewer main located approximately 400 feet north of the project site in Lexington-Gallatin Road at the intersection with Andrews Street. Project implementation would require extension of the water main up Santa Anita Avenue and along Lexington-Gallatin Road to the Project site. Utility improvements would be contained within previously disturbed and developed City/County right-of-way, therefore not causing a significant environmental effect. Additionally, the existing recreational office use adjacent to the southwest of the project site boundary and the residential neighborhood to the northeast of the Project site have existing water and sewer facilities/connections. The Project does not propose new facilities that would extend services to areas that currently are not already served or provide additional capacity in these infrastructure improvements, thereby facilitating new off-site development. Therefore, the Project is not considered growth inducing with respect to removal of obstacles to growth or through the provision of infrastructure.

Would the Project encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively?

The Project is not anticipated to encourage or facilitate other activities that would significantly affect the environment, either individually or cumulatively. The potential impacts associated with the Project have been analyzed in this EIR in Sections 4.1 through 4.17. Project mitigation measures and standard conditions would reduce identified potential significant environmental effects to less than significant except for GHG emissions. As previously addressed, while the Project would generate temporary construction-related employment and long-term operational jobs, these effects are typical of warehouse uses and do not represent substantial growth inducement.

As described above, the Project would not result in significant growth-inducing impacts. It would not directly or indirectly induce substantial population growth, remove barriers to development, or extend infrastructure in a manner that would facilitate off-site growth. Any economic stimulation or employment generation would be consistent with the City's adopted land use plans and would not, in itself, result in significant environmental effects.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 CEQA REQUIREMENTS FOR ALTERNATIVES IDENTIFICATION AND ANALYSIS

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in State CEQA Guidelines Section 15126.6(a):

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.*

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to a proposed project, "…even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The State CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.[2]

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.*

Beyond these factors, the State CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for a project, if feasible. Based on the alternatives analysis, the City of South El Monte (City) must identify an environmentally superior alternative. If the environmentally superior alternative is the no project alternative, then the EIR must identify an environmentally superior alternative among the other alternatives.[3] In addition, State CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

6.2 PROJECT SUMMARY

The approximately 21.17-acre (rounded to 21 acres) project site is located at 825 Lexington-Gallatin Road (Assessor's Parcel Number [APN] 8119-005-032), just within the southwestern boundary of the City of South El Monte in Los Angeles County, California. The site is generally bordered by Santa Anita Avenue to the north and west, Lexington-Gallatin Road to the south/southeast, and vacant land to the east. Surrounding land uses and infrastructure include State Route (SR) 60 and vacant property to the north;

[1] State CEQA Guidelines Section 15126.6(b).

[2] State CEQA Guidelines Section 15126.6(f).

[3] State CEQA Guidelines Section 15126.6(e)(2).

Whittier Narrows Recreation Area to the southeast and west; and limited office uses to the south at the intersection of Santa Anita Avenue and Lexington-Gallatin Road; and residential uses to the northeast.

The approximately 21-acre project site is mostly vacant and undeveloped. Remains of previous uses of the site include remnant building foundations and radio tower footings are present on the site along Lexington-Gallatin Road. The topography of the site generally slopes downward from the east to the west at a gradient of less than one percent with elevations ranging from approximately 219 to 226 above mean sea level.

The Project includes the development a 221,815-square-foot (sf) warehouse building on approximately 10.5 acres of the eastern portion of the project site and the dedication of the remaining approximately 10.7 acres on the northwestern portion of the site to the City for the future development of a City park and a digital billboard, the latter which would be constructed and operated by the Project Applicant. The project site is located within the U.S. Army Corps of Engineers (USACE) reservoir flowage easement lands associated with the spillway activation elevation of the Whittier Narrows Dam. The proposed Project is not allowed to reduce the Whittier Narrows reservoir's storage space. Therefore, to avoid an adverse effect to flood storage capacity of the reservoir, the Project must balance the cut and fill up to the spillway activation elevation of the Whittier Narrows Dam. To maintain the reservoir capacity, the Project proposes to excavate within the City park portion of the project site and to raise the finished grade of the warehouse portion above the spillway activation elevation using the excavated material. The proposed 6- to 12-foot-high retention basin would be surrounded by 2.5h:1v (horizontal to vertical) to 3h:1v earthen slopes. The warehouse finished floor elevation would be approximately 229 feet and retention basin elevation within the future City park area would have a minimum elevation of approximately 213 feet.

The 221,815-sf warehouse building includes 10,000 sf of ancillary office space on the first floor and 10,000 sf of ancillary office use on the mezzanine level, with 27 trailer truck dock doors. The proposed structure would be a concrete tilt up warehouse building and would have a roof line of approximately 45 feet in height. Vehicular access to the warehouse component of the proposed Project would be from two new driveways on Lexington-Gallatin Road that would provide both truck and passenger ingress/egress to the site. The warehouse would include a total of 277 standard vehicle parking spaces, 92 of which would be located within the secured lot on the southern side of the building. The secured lot would also be used as a truck maneuvering area with access to the proposed dock doors and would be shielded by a 14-foot-tall concrete screen wall.

As conceptually proposed, the future City park would include two athletic fields with stadium lights, open lawn areas, restroom facilities, and parking. Access to the future City park would be provided from one new driveway with a double swing entry gate off Santa Anita Avenue. Vehicular circulation between the two Project components would not be provided.

The Project would require a General Plan Amendment to change the existing General Plan land use designation from Commercial (C) to Commercial-Manufacturing (CM) and a zone change from Commercial (C) to Manufacturing (M).

6.3 CRITERIA FOR SELECTING ALTERNATIVES

The range of feasible alternatives must be selected and discussed in a manner to foster meaningful public participation and informed decision making. Several criteria were used to select alternatives to the Proposed Project. These criteria are described below.

6.3.1 Ability to Achieve Project Objectives

Section 15126.6(f) of the State CEQA Guidelines (14 CCR) states:

> *The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.*

The State CEQA Guidelines do not require an EIR to consider every plausible alternative to a project, but rather must examine in detail only the ones which the lead agency determines could feasibly attain most of the basic project objectives. For purposes of the alternative analysis, each alternative assessed in this EIR was evaluated to determine the extent to which it could attain the following objectives identified for the proposed Project:

Objective 1: Provide public benefits to the City by increasing employment opportunities during construction of the Project and occupancy of the warehouse building and increasing property sales and tax revenues that the City will receive as part of the warehouse building improvements.

Objective 2: Provide additional public benefits to the City under the Development Agreement for the Project by creating opportunities for City development of a public park to meet the recreational needs of the City and providing digital billboard advertising revenue sharing.

Objective 3: Develop the warehouse component of the Project consistent with the guidelines and policies of the City of South El Monte General Plan land use designation (Commercial-Manufacturing (CM)) and Zoning designation (Manufacturing (M)) proposed as part of the Project and applicable Municipal Code provisions.

Objective 4: Develop a single pad Class A[4] warehouse of sufficient size and with sufficient trailer truck doors and parking to be competitive within the industrial warehouse marketplace in the vicinity.

Objective 5: Develop a warehouse use proximate to the State Route 60 transportation corridor.

Objective 6: Improve the Property's flood storage capacity via Storage Basin Improvements in the USACE Easement area.

6.3.2 Elimination/Reduction of Significant Impacts

Section 15126.6(b) of the State CEQA Guidelines (14 CCR) states that "[b]ecause an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC §21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly".

[4] Class A buildings command the market's highest rents and attract credit-worthy tenants" and consist of "[i]nvestment-grade buildings that offer an excellent location and first-rate design, building systems, amenities, and management." *See* Richard B. Peiser with Anne B. Frej, *Professional Real Estate Development: The ULI Guide of the Business* (Second Edition).

Therefore, the alternatives evaluated in this Program EIR have been selected because they are anticipated to reduce and/or eliminate one or more significant impacts associated with the proposed Project. Potentially significant environmental impacts that would result from the Project are evaluated in Sections 4.1 through 4.17 of this EIR. With implementation of the respective Mitigation Program which would include existing requirements based on local, State, or federal regulations or laws and Mitigation Measures (MMs) identified for each topical issue, all significant impacts resulting from the Project would be reduced to a level considered less than significant except for greenhouse gas (GHG) impacts.

Significant and Unavoidable Impacts-Greenhouse Gas Emissions

As discussed in **Section 4.7: Greenhouse Gas Emissions**, the project site is located within South Coast Air Quality Management District's (SCAQMD) jurisdiction. While SCAQMD has not adopted its proposed 3,000 metric tons of CO2e (MTCO2e) threshold, this EIR's analysis conservatively uses the proposed 3,000 MTCO2e screening threshold. Project construction and operation would generate approximately 7,977 MTCO2e per year, and therefore exceed the 3,000 MTCO2e per year threshold despite implementing MM GHG-1 through MM GHG-9. The Project would also be required to comply with Laws, Ordinances, and Regulations (LOR) GHG-1 through LOR GHG-7 which would be required by local, State, or federal regulations or laws (i.e., California Code of Regulations and California Green Building Standards Code). It should be noted that the majority of the unmitigated GHG emissions (89%) are associated with non-construction related mobile sources. Additional mitigation to reduce the Project's mobile emissions is not feasible due to the limited ability of the City to address emissions resulting from mobile sources and/or emissions generated by cars and trucks outside of the City's limits. As such, the Project would generate GHG emissions, either directly or indirectly, that would exceed SCAQMD thresholds despite all feasible mitigation measures, resulting in a significant and unavoidable impact.

6.3.3 Feasibility

Section 15126.6(f)(1) of the State CEQA Guidelines (14 CCR) states:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).*

Each alternative was evaluated for its feasibility, its ability to attain the proposed Project's objectives, and its ability to reduce and/or eliminate significant impacts associated with the Project.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) notes that the EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Reasons underlying the lead agency's determination may include factors such as failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. The City of South El Monte did not identify additional alternatives for consideration in this EIR and none were identified during the public scoping process beyond what is addressed in the EIR.

6.4.1 Alternative Project Location

Pursuant to CEQA Guidelines Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened. An alternative location was considered and rejected because there are no site-specific significant and unavoidable impacts that would be lessened if a different site were selected. It is required under CEQA that alternative site(s) be evaluated if any feasible sites exist where significant impacts can be lessened. The Project would result in a significant and unavoidable greenhouse gas emissions (GHG) impact. The majority of the Project's GHG emissions are associated with mobile sources (i.e., vehicle and truck trips), therefore, GHG emissions would not be reduced by relocating the proposed Project to an alternate location. Additionally, due to the cumulative nature of GHG emissions, the environmental impacts of development on any other site in the City are expected to be similar to those of the proposed Project. In addition, other sites, depending on their known on-site resources may have similar or greater impacts than the Project. Given the nature of the proposed Project, an alternative location would not alleviate the impacts because a relocation of the proposed Project would not lessen the significant and unavoidable GHG impact. Therefore, an alternative location may meet most of the basic Project objectives but would not substantially lessen impacts and meet the CEQA definition of an alternative. Therefore, this alternative was not further considered.

6.5 ALTERNATIVES FOR ANALYSIS

State CEQA Guidelines Section 15126.6 (d) requires an EIR to provide sufficient information about each alternative to allow for meaningful evaluation, analysis, and comparison with the Project. Pursuant to State CEQA Guidelines Section 15126.6, an analysis of alternatives is presented in this EIR to provide decision-makers with alternatives to be considered. The State CEQA Guidelines specify that an EIR shall describe a reasonable range of alternatives that would avoid or substantially lessen the Project's significant effects but need not consider every conceivable alternative.

The analysis provides a comparison of the alternatives' varying environmental effects and their merits and/or disadvantages in relation to the proposed Project and to each other; their feasibility and ability to achieve Project objectives are also discussed. The environmentally superior alternative is identified as required by CEQA.

Three alternatives to the proposed Project have been identified.

- Alternative A: No Project/No Development
- Alternative B: Existing Land Use and Zoning Designations – Commercial Development
- Alternative C: Reduced Warehouse

These alternatives present a reasonable range of alternatives to the proposed Project. The analysis in this section focuses on significant and unavoidable impacts attributable to each alternative and the ability of each alternative to meet basic Project objectives. The evaluation of each alternative uses the same thresholds of significance identified in Sections 4.1 through 4.17 of this EIR.

Where applicable, relevant regulatory requirements, applicable project design features, and project-specific mitigation measures identified for the proposed Project would also be implemented with the alternative scenarios to reduce or avoid potential significant impacts similar to the proposed Project.

6.5.1 Alternative A: No Project/No Development Alternative

Description of the Alternative

Alternative A is the "No Project" alternative required by the State CEQA Guidelines Section 15126.6(e) which allows the decision-makers to compare the potential impacts of the proposed Project with the potential impacts of not developing a site.

Section 15126.6(e)(2) of the State CEQA Guidelines specifies the following:

> *The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation [NOP] is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*

The No Project/No Development Alternative assumes that the proposed Project would not be developed, which means there would be no warehouse facilities, future City park, digital billboard, landscape or infrastructure improvements, or surface lot improvements developed on the project site. In its existing condition, the site would remain vacant apart from the scattered remnants of previous uses (including building pad foundations and radio tower footings/pile caps). The project site is primarily populated by non-native grasses with sparse patches of ornamental vegetation. There are no on-site operations.

Section 15126.6(e)(3)(B) of the State CEQA Guidelines indicates that when the project is not a land use or regulatory plan, the "no project" alternative:

> *…is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others … this "no project" consequence should be discussed.*

Therefore, although this alternative assumes "No Development" (as required by CEQA), this is considered a speculative assumption as the land is assumed to remain in private ownership (as there are no offers to purchase the land for public use). Under this alternative scenario, none of the Project's requested entitlements (i.e., General Plan Amendment, Zone Change, and Site Permit approval) would be granted. Importantly a portion of the project site would not be dedicated to the City for future development of a public City park because the warehouse would not be developed and no public benefit would be provided to the City.

Impact Comparison to the Proposed Project

Aesthetics

Under the Alternative A scenario, no development would occur. There would be no buildings, recreational uses, digital billboard, or related on-site or off-site improvements. The proposed Project would introduce sources of lighting to illuminate the outside of the warehouse building, building entrance areas, signage, internal pedestrian paths, parking areas, as well as stadium lighting in the City park, and a freeway adjacent digital billboard on the northern portion of the project site within the future City park area. With respect to the City park, Mitigation Measure (MM) AES-1 is required to address potentially significant lighting impacts associated with lighting of the athletic fields in the future City park. The Project also proposes a freeway-adjacent digital billboard on the northern portion of the project site within the future

City park area that would require implementation of MM AES-2 to avoid potentially significant light and glare impacts. Because Alternative A would not involve development of the project site, there would be no new sources of lighting. Consistent with the findings for the proposed Project, no significant views would be obstructed.

Alternative A would result in less impact than the proposed Project regarding aesthetics. Alternative A would have no aesthetic impacts because no development would occur, while the proposed Project would result in less than significant impacts with mitigation incorporated related to aesthetics (see **Section 4.1: Aesthetics**).

Air Quality

Under the Alternative A scenario, because there would be no development, no air quality emissions would be generated. The Project would generate emissions during construction and operational activities; based on the thresholds of significance, these impacts would be less than significant.

Alternative A would result in less impact than the proposed Project regarding air quality. Alternative A would result in no air quality impacts because no development would occur, while the proposed Project would result in less than significant air quality impacts (see **Section 4.2: Air Quality**).

Biological Resources

Alternative A would have no impacts to biological resources, including potential impacts to burrowing owl, special status bird species, and pallid bats associated with site development. Trees and other vegetation on the project site that currently could be used for nesting by migratory birds protected under the Migratory Bird Treaty Act (MBTA) would remain because no existing vegetation would be removed associated with development of the project site.

Although Alternative A would result in no impact to biological resources, all potentially significant impacts associated with the Project would be mitigated to a less than significant level (see **Section 4.3: Biological Resources**).

Cultural Resources

Under Alternative A, potential impacts to cultural resources would be avoided because the project site would remain in its current condition and no construction or grading activities would occur. Therefore, the potential to discover and impact previously undisturbed cultural resources, including archaeological resources, would not occur.

Alternative A would result in less impact than the proposed Project regarding cultural resources. Alternative A would result in no impacts to cultural resources, while the proposed Project would result in less than significant impacts with mitigation incorporated (see **Section 4.4: Cultural Resources)**.

Energy

The energy usage during construction associated with water for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would not occur under the Alternative A scenario because no construction or development would occur. However, it is also noted that implementation of the proposed Project would not result in significant impacts concerning energy usage.

Alternative A would result in less impact than the proposed Project regarding energy usage. Alternative A would have no impact on energy, while the proposed Project would result in a less than significant impact (see **Section 4.5: Energy**).

Geology and Soils

Under the Alternative A scenario, no development would occur on the project site. Therefore, the potential to expose additional people or structures to adverse effects of seismic ground shaking, ground failure, expansive soils, or other unstable geologic hazards would not occur. No soil erosion or loss of topsoil would occur since the project site would remain in its existing condition. Additionally, the potential to unearth unknown paleontological resources during Project implementation would not occur.

Alternative A would result in less impact than the proposed Project regarding geology, soils, and paleontological resources. Alternative A would have no impact on soils and geology or paleontological resources, while impacts associated with the Project would be mitigated to a less than significant level (see **Section 4.6: Geology and Soils**).

Greenhouse Gas Emissions

Under Alternative A, there would be no construction or operation activities. Therefore, there would be no short-term GHG emissions from construction activities or long-term GHG emissions from mobile sources, area sources, or the consumption of electricity, natural gas, and water associated with operations of the land uses assumed as a part of the Project.

Alternative A would result in less impact than the proposed Project regarding GHG emissions. Alternative A would not generate GHG emissions and would have no impact, while the proposed Project's GHG emissions would be significant and unavoidable despite implementation of all feasible mitigation (see **Section 4.7: Greenhouse Gas Emissions**).

Hazards and Hazardous Materials

The proposed Project would include the demolition of the remnants of previous uses (including building pad foundations and radio tower footings/pile caps). The Phase I Environmental Site Assessment (ESA) prepared for the proposed Project determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) NPL Whittier Narrows OU listing is considered to represent a Recognized Environmental Condition (REC). However, because the project site is not a source and is not located on a source site, ongoing remedial actions, identification of responsible parties, and regulatory oversight by the U.S. EPA, no further action related to current and future use of the project site is anticipated and vapor migration is not expected to represent a significant environmental concern at this time. Further, with implementation of MM GEO-1 and MM HYD-1, the Project would not create a significant hazard to the public or the environment and mitigation would ensure that the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Mitigation would ensure that proposed Project demolition activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction and would not result in the accidental release of hazardous materials. The proposed Project would not create a safety hazard as it pertains to an Airport Land Use Compatibility Plan because the project site is not located within two miles of a public airport or public use airport.

Alternative A would result in less impact than the proposed Project regarding hazards and hazardous materials. Alternative A would have no impact regarding hazards and hazardous materials, the scattered

remnants of previous uses would remain on the site but do not represent a health hazard. The proposed Project's impacts would be less than significant with mitigation (see **Section 4.8: Hazards and Hazardous Materials**).

Hydrology and Water Quality

The proposed Project would not decrease groundwater supplies or interfere substantially with groundwater supplies or recharge. However, in the event that groundwater or perched groundwater is encountered during construction and groundwater dewatering is necessary, it would be completed in compliance with the Groundwater Discharge Permit, as specified in Standard Condition (SC) HYD-1. Project activities would not extract groundwater during operations. Under the Alternative A scenario there would be no effects to groundwater supplies or interference with groundwater recharge. The proposed Project would result in an increase in impervious surfaces, therefore potentially altering drainage patterns and increasing stormwater runoff. However, the Project would include installation of a drainage network, consisting of two stormwater biofiltration systems (or approved equal) and one detention basin, to detain and treat stormwater runoff, in accordance with allowable discharges per the Los Angeles County Flood Control District (LACFCD). As a result, the proposed Project would not generate runoff concerning drainage, erosion, siltation, flooding, or pollutant release due to inundation. Under the Alternative A scenario, the existing on-site drainage pattern and runoff quantities would remain. The proposed Project would be required to comply with water quality control measures within the NPDES General Construction Permit that requires implementation of a SWPPP and BMPs that help reduce impacts of pollutants on water quality.

Alternative A would result in less impact than the proposed Project regarding hydrology and water quality. Alternative A would have no impact on hydrology and water quality, whereas the proposed Project's impacts would be less than significant with mitigation incorporated (see **Section 4.9: Hydrology and Water Quality**).

Land Use and Planning

Under Alternative A, the project site would remain undeveloped. Neither Alternative A nor the Project would physically divide an established community through the introduction of physical or community barriers or cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. The proposed Project would require a General Plan Amendment and zone change and would be consistent with applicable land use goals and policies of Connect SoCal, the South El Monte General Plan, and South El Monte Municipal Code.

Alternative A would result in less impact than the proposed Project regarding land use and planning. Alternative A would have no impact on land use and planning because no development would occur, while the proposed Project would result in a less than significant impact (see **Section 4.10: Land Use and Planning**).

Noise

Under Alternative A, there would be no construction activities or associated construction equipment operations or development. Therefore, there would be no construction noise impacts. Further, Alternative A would not result in operational noise associated with the warehouse building or future City public park development. Implementation of the proposed Project would create new sources of noise including mechanical equipment, truck and loading dock noise, activities at loading areas, parking lot noise, recreational activities at the City park, and off-site traffic noise.

Alternative A would result in less impact than the proposed Project regarding noise. Alternative A would avoid construction and operational noise impacts, while the proposed Project's noise impacts would be mitigated to a less than significant level (see **Section 4.11: Noise**).

Population and Housing

Alternative A would not create any new jobs; involve the development of additional housing; or cause increases in the residential population of the City. Therefore, there would be no impact associated with inducing substantial population growth. This alternative would maintain the site in its existing condition. The proposed Project would not induce substantial unplanned population or displace any existing housing, and impacts would be less than significant.

Alternative A would result in less impact than the proposed Project regarding population and housing. Alternative A would result in no impacts regarding population and housing, whereas the proposed Project would result in less than significant impacts (see **Section 4.12: Population and Housing**).

Public Services

Alternative A would not involve new development and therefore, no impacts to public services would occur. Development of the proposed Project would incrementally increase the demand for fire and police protection services. However, the proposed Project is not expected to substantially increase service demand such that new or physically altered fire and police facilities would need to be constructed, which would cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for fire and police protection.

Alternative A would result in less impact than the proposed Project regarding public services. Alternative A would have no impact on public services, while the proposed Project would result in less than significant impacts (see **Section 4.13: Public Services**).

Recreation

Alternative A would not involve new development, and therefore, no warehouse building or City park would be developed on the project site. Although the Project Applicant for the warehouse does not propose to construct or operate the City park, the 10.7-acre area would be excavated and graded by the Project Applicant to improve reservoir capacity and would be dedicated to the City for future development of a City park facility. Dedication of the 10.7 acres to the City for future City park use would provide the community with an additional City park and recreational facility to serve the City's population and therefore would not result in potential accelerated deterioration of recreational facilities. Rather, the Project would improve the City's recreational facilities.

Alternative A would have no impact on recreational facilities, while the proposed Project would result in a beneficial impact (see **Section 4.14: Recreation**).

Transportation

Under Alternative A, the project site would remain undeveloped and would not generate any vehicle trips when compared to the proposed Project. Based on traffic generation rates, the proposed Project would have 1,997 total daily vehicle trips, of which the City park component would generate approximately 810 passenger vehicles, and the warehouse component of the Project would generate approximately 1,187 passenger vehicles and 320 truck vehicles. Alternative A would have no impact concerning vehicle miles traveled (VMT) while the proposed Project would have a less than significant impact concerning VMT.

Alternative A would result in less impact than the proposed Project regarding transportation. Alternative A would have no transportation impacts, while the proposed Project would have less than significant transportation impacts based on the City's significance criteria (see **Section 4.15: Transportation**).

Tribal Cultural Resources

Alternative A would not involve any construction or excavation activities. Tribal cultural resource impacts are primarily dependent upon the construction and operations footprint of each development, as well as depth of excavation.

Alternative A would result in less impact than the proposed Project regarding tribal cultural resources. Alternative A would have no impact on tribal cultural resources, whereas potential impacts associated with the proposed Project would be mitigated to a less than significant level (see **Section 4.16: Tribal Cultural Resources**).

Utilities and Service Systems

Alternative A would not involve the development of industrial land uses or a future City park and would not generate any new employees; therefore, no impacts to utilities and service systems would occur. Since Alternative A would not provide new facilities or infrastructure, there would be no physical impacts associated with construction or operation of facilities or accelerated physical deterioration associated with increased usage of existing facilities. In addition, since there would be no development or new employees under Alternative A, there would be no need to extend water and wastewater infrastructure to the site. There would also be no increased demand for solid waste disposal. The proposed Project would generate new employees, resulting in an incremental increase in water demand and wastewater and solid waste generation.

Alternative A would result in less impact than the proposed Project regarding utilities and service systems. Alternative A would result in no impacts to utilities and service systems, while the proposed Project would result in a less than significant impact (see **Section 4.17: Utilities and Service Systems**).

Feasibility and Ability to Meet Project Objectives

Alternative A fails to meet any of the Project's basic objectives because there would be no project and no development would occur on the project site. This alternative would not provide public benefits to the City by increasing employment opportunities during construction of the Project and occupancy of the warehouse building or increasing property sales and tax revenues that the City would receive as part of the warehouse building improvements. Therefore, Alternative A would not meet Project Objective 1. Alternative A would not provide additional public benefits to the City by creating opportunities for development of a public City park and providing digital billboard advertising revenue sharing because there would be no project or associated public benefits. Therefore, Alternative A would not meet Project Objective 2. There would be no development on the project site under Alternative A, meaning that Project Objectives 3, 4, and 5, which are related to developing a warehouse building on the property, would also not be met. This alternative would continue to meet the flood storage capacity of the Whittier Narrows Dam USACE reservoir flowage easement but would not improve flood storage capacity via Storage Basin Improvements and therefore, would not meet Project Objective 6.

Conclusion

Alternative A would have no significant impacts when compared to the proposed Project because no development would occur. Significant unavoidable GHG impacts associated with the proposed Project

would not occur. No mitigation would be required to reduce potential significant impacts to a less than significant level. All impact areas which were anticipated to cause a less than significant impact, less than significant with mitigation measures, or a significant and unavoidable impact due to implementation of the proposed Project would be eliminated under the No Project Alternative. However, none of the Project objectives would be met and this alternative would not serve the recreational needs of the City by creating the opportunity for development of a future City park on the project site.

6.5.2 Alternative B: Existing Land Use and Zoning Designations – Commercial Development

Description of the Alternative

Consistent with State CEQA Guidelines Section 15126.6, the Existing Land Use and Zoning Designations – Commercial Development Alternative (Alternative B) assumes development of the project site pursuant to existing General Plan and zoning designations. Alternative B assumes development of the project site consistent with the City of South El Monte General Plan (2000, as amended) and the City Municipal Code. The project site's existing General Plan land use designation is Commercial (C), which permits a broad range of retail, professional office, and service-oriented business activities and allows for a maximum permitted floor area ratio (FAR) of 0.5. The project site is currently zoned Commercial (C) which is intended to provide areas throughout the City for a wide range of commercial uses.

Therefore, Alternative B assumes the development of commercial uses (a retail shopping center) on approximately 10.5 acres of the eastern portion of the site. Under this scenario, the remaining approximately 10.7 acres on the northwestern portion of the site would be excavated by approximately 10 feet to improve the existing storage capacity of the property pursuant to the Storage Basin Improvements. The project site is located within USACE reservoir flowage easement lands associated with the Whittier Narrows Dam. Per USACE requirements, projects on the site would be required to include Storage Basin Improvements.

The proposed Project would require a General Plan amendment and zone change to allow for the proposed warehouse component. Discretionary actions associated with the proposed Project include a Development Agreement by and between the Project Applicant and the City, pursuant to which public benefits would be provided, including but not limited to the dedication of land for a future City park and revenue sharing associated with digital billboard advertising. According to the Project Applicant, no Development Agreement would be proposed under Alternative B, in part because the retail shopping center would be permitted under existing law. For that reason, no digital billboard or City park would be proposed under Alternative B. Therefore, the remaining 10.7 acres would remain vacant and in private ownership.

Alternative B assumes 228,690 sf of commercial uses, in the form of a retail shopping center, based on the maximum FAR of 0.5 as established in the General Plan over 10.5 acres. Under this alternative scenario, the retail use would provide 763 passenger vehicle parking spaces, based on 1 space for every 300 sf of retail gross floor area. **Table 6-1: Alternative B and Proposed Project Comparison**, identifies an increase of 6,875 sf of building area compared to the proposed Project.

Table 6-1: Alternative B and Proposed Project Comparison			
Development Standard	**Proposed Project**	**Alternative B**	**Difference**
Building Area (sf)	**221,815**	**228,690**	**+6,875**
Employee Parking	**277**	**763**	**+486**
Source: City of South El Monte Municipal Section 17.16.020: Parking Requirements. Accessed February 20, 2025.			

Impact Comparison to the Proposed Project

Aesthetics

Similar to the Project, Alternative B would be required to be consistent with the development standards of Municipal Code Title 17. Neither the proposed Project nor Alternative B would significant scenic quality or visual character impacts based on the significance thresholds set forth in the EIR. Both the proposed Project and Alternative B would be implemented in compliance with the City's Municipal Code development standards to avoid impacts to visual character or scenic quality. Alternative B would include an increase in night lit surface parking when compared to the proposed Project because additional surface parking and associated lighting would be required for the retail shopping center (see **Table 6-1**). A digital billboard would not be proposed under Alternative B. Therefore, MM AES-1 would not be required. Furthermore, because a City park would not be proposed under Alternative B, stadium lighting would not be introduced to the project site to allow for nighttime use of athletic fields.

Alternative B would result in less impact than the proposed Project regarding aesthetics. As addressed in the description of this alternative, digital billboard and City park with stadium lighting would not be developed. However, both Alternative B and the Project would result in less than significant impacts with mitigation incorporated.

Air Quality

Alternative B would construct approximately 6,875 sf more development than the proposed square footage associated with the proposed warehouse. A similar construction schedule, similar site preparation, and grading phase of construction is assumed. However, the use of more construction materials and equipment may be required because the retail shopping center would be larger and would require more internal improvements than a warehouse facility. Again, the entire site would be graded under Alternative B. Accordingly, maximum daily construction emissions would likely be greater under Alternative B as compared to the proposed Project.

Alternative B would result in more passenger vehicle and truck traffic. The proposed Project would generate approximately 1,997 daily trips, including 320 truck trips. A retail shopping center on the project site would generate approximately 8,645 daily trips, including 3,458 truck trips.[5] Therefore, Alternative B would result in a substantial increase in average daily trips and a proportional increase in mobile source emissions when compared to the Project. Additionally, Alternative B would not reduce stationary emission sources from mechanical equipment (e.g., HVAC units) and landscaping equipment for project site maintenance because of the increased use of energy resources associated with retail development compared to a warehouse building. Therefore, air quality emissions would be proportionally greater under Alternative B as compared to the proposed Project due to the increased operational uses and increased average daily passenger vehicle and truck trips associated with Alternative B.

[5] Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. ITE Code 820: Shopping Center.

Alternative B would result in greater impacts than the proposed Project regarding air quality. While the proposed Project would result in less than significant impacts, it is expected that air quality emissions associated with Alternative B would be significant and mitigation would be required.

Biological Resources

Like the Project, Alternative B assumes that the entire project site would be graded to allow for Storage Basin Improvements. Therefore, for environmental issues where site disturbance would be the same for the Project and Alternative B, there would be no change in the significance of potential impacts.

As explained in **Section 4.3: Biological Resources**, impacts on the burrowing owl could occur if the burrowing owl is present in nearby habitat and light from the future City park stadium lighting for the athletic fields is directed into or near that habitat. However, no City park would be proposed under Alternative B and therefore, no related potential impacts would occur. Because MM AES-1 is only applicable to stadium lighting for the future City park, this mitigation measure would not be required for Alternative B.

Therefore, Alternative B would result in less impacts than the proposed Project regarding biological resources because stadium lighting would not occur under this alternative. However, as with the proposed Project, impacts to biological resources associated with Alternative B would also be less than significant with mitigation.

Cultural Resources

Like the Project, Alternative B assumes that the entire project site would be graded to allow for Storage Basin Improvements. Therefore, for environmental issues where site disturbance would be the same for the proposed Project and Alternative B, there would be no change in the significance of potential impacts.

Alternative B would result in similar impacts as the proposed Project regarding cultural resources because the entire project site would be graded under both scenarios. However, as with the Project, potential impacts to cultural resources associated with Alternative B would also be less than significant with mitigation.

Energy

Alternative B would construct approximately 6,875 sf more development than the proposed square footage associated with the proposed warehouse. A similar construction schedule, similar site preparation, and grading phase of construction is assumed. However, the use of more construction materials and equipment may be required because the retail shopping center would be larger and would require more internal improvements than a warehouse facility. Therefore, energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would likely be greater under Alternative B as compared to the proposed Project. Additionally, Alternative B would result in an increase in operational energy usage based on the commercial land uses assumed under Alternative B. However, Alternative B would also be required to comply with State and local energy efficiency standards would ensure that the alternative meets all applicable energy conservation policies and regulations. Therefore, potential energy impacts would remain less than significant.

Alternative B would result in greater impacts than the proposed Project regarding energy because of likely greater energy usage during construction and greater operational energy usage. However, both

Alternative B and the proposed Project would result in less than significant impacts with mitigation incorporated.

Geology and Soils

Potential geological, soil, and paleontological resource impacts for Alternative B would be similar to the Project because the entire site would be graded under the same geologic unit and soil conditions. The potential for seismic ground shaking, fault rupture, liquefaction, or collapse would be the same as with the proposed Project. Development under Alternative B would also be required to submit a site-specific geotechnical investigation, comply with California Building Code standards, and applicable construction and operational BMPs to reduce impacts related to geologic hazards. Additionally, the potential to unearth unknown paleontological resources during Project implementation would still occur under the Alternative B scenario.

Alternative B would result in similar impacts as the proposed Project regarding geology, soils and paleontological resources because the entire project site would be graded under both scenarios. Impacts associated with both Alternative B and the Project would be less than significant with the incorporation of mitigation.

Greenhouse Gas Emissions

Alternative B would construct approximately 6,875 sf more development than the proposed square footage associated with the proposed warehouse. A similar construction schedule, similar site preparation, and grading phase of construction is assumed. However, the use of more construction materials and equipment may be required because the retail shopping center would be larger and would require more internal improvements than a warehouse facility. Therefore, direct emissions of GHGs from construction activities would likely be greater under Alternative B as compared to the proposed Project.

Additionally, as explained above, Alternative B would result in a substantial increase in average daily trips when compared to the proposed Project. As such, Alternative B would result in greater GHG emissions compared to the Project during operations. Both the Project and Alternative B would implement MM GHG-1 through MM GHG-9 to reduce operational emissions. However, GHG emissions under Alternative B would be proportionally greater than the proposed Project due to the increased average daily trips associated with commercial uses.

Alternative B would result in greater impacts than the proposed Project regarding greenhouse gas emissions due to the likely direct emissions of GHGs from construction activities and increased average daily trips associated with commercial uses. Despite implementation of required MM GHG-1 through MM GHG-9, both Alternative B and the proposed Project would result in significant and unavoidable impacts regarding GHG emissions.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials for Alternative B would be similar to the proposed Project because the entire site would be graded under both development scenarios. Alternative B would still include the demolition of the remnants of previous uses (including building pad foundations and radio tower footings/pile caps). The Phase I ESA prepared for the proposed Project determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) NPL Whittier Narrows OU listing is considered to represent a REC. However, because the project site is not a source and is not located on a source site, ongoing remedial actions, identification of responsible parties, and regulatory oversight by the U.S. EPA, no further action related to current and future use of the project site

is anticipated and vapor migration is not expected to represent a significant environmental concern at this time. Like the Project, Alternative B would not be exposed to airport hazards, affect aircraft operations, or create an airport safety hazard for employees. Alternative B would consist of the operation of a commercial development and would not result in the release of hazardous materials. Alternative B would also be required to comply with the established regulatory framework and implement MM GEO-1 and MM HYD-1 to mitigate impacts to a less than significant level.

Alternative B would result in similar impacts as the proposed Project regarding hazardous waste and materials because the entire project site would be graded under both scenarios. Impacts associated with Alternative B and the proposed Project would be less than significant with mitigation incorporated.

Hydrology and Water Quality

Like the proposed Project, Alternative B assumes that the entire project site would be graded. Furthermore, under both development scenarios, the amount of pervious surface would decrease associated with new development and associated parking. As explained above, the amount of paved surface parking required Under Alternative B would be greater as compared to the proposed Project. This alternative and the Project would require installation of a drainage network to detain and treat stormwater runoff, in accordance with allowable discharges per the LACFCD. As a result, the proposed Project and Alternative B would not generate runoff that would create a significant impact concerning drainage, erosion, siltation, flooding, or pollutant release due to inundation. Under Alternative Band the proposed Project, there would be no effects to groundwater supplies or interference with groundwater recharge. However, in the event that groundwater or perched groundwater is encountered during construction of either the Project or Alternative B, and groundwater dewatering is necessary, it would be completed in compliance with the Groundwater Discharge Permit, as specified in MM HYD-1. Alternative B would also be required to obtain a General Permit for Stormwater Discharge Associated with Construction Activity and prepare a SWQMP.

Alternative B would result in similar impacts as the proposed Project regarding hydrology and water quality because the entire project site would be graded under both scenarios and new impervious surfaces would be introduced. It is likely that Alternative B would result in a net increase of impervious surfaces as compared to the proposed Project due to the larger building square footage and larger surface parking lot (even factoring in the exclusion of the parking lot for the City park). With respect to hydrology and water quality, impacts associated with Alternative B and the proposed Project would be less than significant with mitigation incorporated.

Land Use and Planning

The proposed Project requires a General Plan Amendment to change the designation from Commercial (C) to Commercial-Manufacturing (CM) and a zone change from Commercial (C) to Manufacturing (M) to allow warehouse uses. Alternative B would comply with the existing land use designations requirements applicable to the site. Neither the proposed Project nor the Alternative B development scenario would physically divide an established community through the introduction of either physical or community barriers and would not cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Additionally, neither scenario would introduce any roadways or infrastructure that would bisect or transect surrounding land uses. Therefore, both Alternative B and the Project would have a less than significant impact associated with land use and planning.

Alternative B would result in less impact than the proposed Project regarding land use and planning because it does not require a General Plan Amendment or zone change. However, impacts to land use and planning would be less than significant under both scenarios.

Noise

Alternative B would construct approximately 6,875 sf more development than the proposed square footage associated with the proposed warehouse. A similar construction schedule, similar site preparation, and grading phase of construction is assumed. However, the use of more construction materials and equipment may be required because the retail shopping center would be larger and would require more internal improvements than a warehouse facility. Therefore, when compared to the proposed Project, Alternative B would likely have incrementally greater construction noise impacts. However, like the proposed Project, the construction of Alternative B would require implementation of MM NOI-1 which requires the installation of a 10-foot-tall temporary construction noise barrier to mitigate construction noise impacts.

Alternative B would have more truck and passenger vehicle traffic when compared to the proposed Project. Therefore, Alternative B would result in an increase in average daily trips and an increase in vehicle traffic volumes on nearby roadways. Therefore, when compared to the proposed Project, Alternative B would have incrementally greater operational noise impacts.

Alternative B would result in greater impacts than the proposed Project regarding noise. However, construction and operational noise impacts associated with Alternative B and the proposed Project would both be less than significant with the implementation of mitigation.

Population and Housing

Both the Project and Alternative B would generate new construction-related and permanent employment opportunities. The Project proposes a warehouse building and future City park and would employ approximately 358 employees (297 employees from the warehouse component and the 61 employees from the City public park component). Alternative B would involve the development of a retail shopping center, which would have greater employment opportunities. Using an employment generation factor of one employee per 511 sf of retail/commercial use, development of the site with commercial uses under Alternative B would generate approximately 448 employees. Similar to the Project, future employees would be anticipated to travel to and from the site from within the City and surrounding area. Approximately 89 percent[6] City residents commute outside the City for employment. Therefore, the addition of new jobs as a result of Project implementation could be filled by the local labor market.

Neither Alternative B nor the Project would be expected to require the construction of additional residential units to the extent that substantial unplanned population growth would be induced that was not analyzed in the City's General Plan, as addressed in **Section 4.12: Population and Housing**. Therefore, while Alternative B would increase the number of employees required for operations when compared to the proposed Project, it would not induce substantial unplanned population growth.

Alternative B would result in greater impacts than the proposed Project regarding population and housing. However, under both development scenarios, impacts to population and housing would be less than significant.

[6] Southern California Association of Governments. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/southelmonte_localprofile.pdf?1606011165. Accessed October 29, 2024.

Public Services

Development of both Alternative B and the Project would incrementally increase the demand for police and fire protection services. An increase of 6,875 sf for commercial uses and the exclusion of a City park would not be expected to substantially affect the demand on public services when compared to the proposed Project. Neither scenario is expected to substantially increase service demand such that a new or physically altered facility would need to be constructed, which would cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police and fire protection. Further, development impact fees are paid on a project-by-project basis to ensure a proportionate fair share is contributed toward facilities, equipment, and personnel that would be needed over time to accommodate the additional demand from the Project.

Alternative B would result in greater impacts than the proposed Project regarding public services. However, under both development scenarios, impacts would be less than significant.

Recreation

The proposed Project would dedicate 10.7 acres of the project site to the City for future City park use, which would provide the community with an additional park and recreational facility to serve the City's population and therefore would not result in accelerated deterioration of recreational facilities. Under Alternative B, the 10.7-acre area would be excavated and graded by the Project Applicant to provide Storage Basin Improvements. However, the 10.7-acre area would not be dedicated to the City for future development of a public City park and would be left undeveloped as private property under the ownership of the Project Applicant. Therefore, the proposed Project would expand the City's recreational facilities while Alternative B would result in no dedication of land for recreational facilities. Alternative B could incrementally increase the use of regional recreational facilities due to increased public and employee use of the commercial development; however, it would not be to the extent that could result in accelerated or substantial physical deterioration.

Alternative B would not provide recreational facilities, which is a beneficial impact associated with the proposed Project. However, under both development scenarios, environmental impacts to parks and recreational facilities would be less than significant.

Transportation

The proposed Project would generate approximately 1,997 daily trips, including 320 truck trips and would have a less than significant impact concerning VMT. A retail shopping center on the project site would generate approximately 8,645 daily trips, including 5,187 passenger vehicle trips and 3,458 truck trips. [7] Alternative B would generate substantially more daily trips than the proposed Project and would require a VMT impacts analysis based on the size of the project. Alternative B could result in significant VMT impacts and it is unknown whether any such significant VMT impacts could be mitigated to a less than significant level.

Alternative B would result in greater impacts than the proposed Project regarding transportation and VMT impacts. Alternative B could result in significant impacts regarding VMT when compared to the proposed Project.

[7] Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. ITE Code 820: Shopping Center.

Tribal Cultural Resources

Like the proposed Project, Alternative B assumes that the entire project site would be graded. Therefore, for environmental issues where site disturbance would be the same for the proposed Project and Alternative B, there would be no change in the significance of potential impacts.

Alternative B would result in similar impacts as the proposed Project regarding tribal cultural resources because the entire project site would be graded under both scenarios. Therefore, as with the Project, potential impacts to unknown tribal cultural resources associated with Alternative B would also be less than significant with mitigation incorporated.

Utilities and Service Systems

When compared to the proposed Project, Alternative B would result in an increase in demand on utilities because of the nature of commercial uses when compared to a warehouse. It is assumed that Alternative B would require increased water and wastewater demand compared to the Project during construction and operations. The commercial uses under Alternative B would also result in an increased demand for electrical power and natural gas as compared to the proposed Project; the proposed Project would not use natural gas. While Alternative B would likely result in greater solid waste generation than the Project, no significant impact is assumed because of the available capacity of the landfill serving the City. Alternative B would increase the demand on utilities and service systems when compared to the proposed Project.

Alternative B would result in greater impacts than the proposed Project regarding utilities and service systems. However, under both development scenarios, impacts would be less than significant.

Feasibility and Ability to Meet Project Objectives

As explained above, no Development Agreement would be proposed under Alternative B. For that reason, no digital billboard or City park would be proposed under Alternative B.

Alternative B fails to meet most of the Project's basic objectives. Development under this alternative scenario would not provide additional public benefits to the City through the dedication of land for a future City park. Therefore, Alternative B would not meet that component of Project Objective 2. Alternative B would not include public benefits to the City through digital billboard advertising revenue sharing. Therefore, Alternative B would not meet that component of Project Objective 2. There would be no warehouse building under Alternative B, meaning that Project Objectives 3, 4, and 5, which are related to developing a warehouse building on the property, would not be met.

Like the proposed Project, Alternative B would improve the flood storage capacity of the Whittier Narrows Dam USACE reservoir flowage easement by providing Storage Basin Improvements; therefore, Objective 6 would be met. This Alternative would also increase employment opportunities during construction and occupancy of the retail development and increase property sales and tax revenues that the City would receive as part of the building improvements, therefore Objective 1 would be met.

Conclusion

Alternative B would result in similar impacts as compared to the proposed Project for the following EIR topic areas, which would be less than significant with the implementation of mitigation measures (where required) under both development scenarios: Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Tribal Cultural Resources.

Alternative B would result in less impact as compared to the proposed Project for the following topic areas, but impacts would be less than significant with the implementation of mitigation measures (where required) under both development scenarios: Aesthetics, Biological Resources, and Land Use and Planning.

Alternative B would result in greater impacts as compared to the proposed Project for the following topic areas, but impacts would nonetheless be less than significant with the implementation of mitigation measures (where required) under both development scenarios: Energy, Noise, Population and Housing, Utilities and Service Systems, Recreation, and Air Quality.

Alternative B could result in significant VMT impacts and it is not clear whether any such significant VMT impacts could be mitigated to a less than significant level.

Alternative B also fails to meet most of the Project's basic objectives.

6.5.3 Alternative C: Reduced Warehouse

The proposed Project would result in significant unavoidable GHG emissions. To reduce GHG impacts to a less than significant level, the square footage of the proposed warehouse would need to be substantially reduced by approximately 63 percent, which is equivalent to an 82,072-sf warehouse with 10 truck trailer dock doors. This alternative scenario assumes 100 passenger vehicle parking spaces based on 1 space/1,000 sf for warehouse uses and 1 space/300 sf of office uses per Municipal Code Section 17.16.020. **Table 6-2: Alternative C and Proposed Project Comparison***,* identifies a reduction of 139,744 sf of building area when compared to the proposed Project.

As with the proposed Project, Alternative C would require a General Plan amendment and zone change to allow for the proposed warehouse component. The Project proposes a related Development Agreement by and between the Project Applicant and the City, pursuant to which public benefits would be provided, including but not limited to the dedication of land for a future City park and digital billboard advertising revenue sharing. According to the Project Applicant, no Development Agreement would be proposed under Alternative C, in part because the currently proposed public benefits would not be justified by the reduced-size warehouse under Alternative C. For that reason, no digital billboard or City park would be proposed under Alternative C. Therefore, the remaining 10.7 acres would remain vacant and in private ownership.

Like the proposed Project, Alternative C assumes that 10.7 acres on the northwestern portion of the site would be excavated by approximately 10 feet to improve the existing storage capacity of the property pursuant to the Storage Basin Improvements. The project site is located within USACE reservoir flowage easement lands associated with the Whittier Narrows Dam. Per USACE requirements, projects on the site would be required to include Storage Basin Improvements. Under Alternative C, the remaining 10.5 acres would be developed with the reduced 82,072-sf warehouse.

Table 6-2: Alternative C and Proposed Project Comparison

Development Standard	Proposed Project	Alternative C	Difference
Building Area (sf)	221,815	82,072	-139,744
Employee Parking	277	100	-177

Impact Comparison to the Proposed Project

Aesthetics

Similar to the proposed Project, Alternative C would be required to be consistent with the development standards of Municipal Code Title 17. Neither the proposed Project nor Alternative C would have aesthetic impacts based on the significance thresholds set forth in the EIR. Both the proposed Project and Alternative C would be implemented in compliance with the City's Municipal Code development standards to avoid impacts to visual character or scenic quality. Alternative C would include surface parking and landscaping, similar to the Project. Alternative C does not include the freeway adjacent digital billboard; therefore, MM AES-1 would not be required. Because this alternative does not include a City park, stadium lighting would not be introduced to the project site to allow for nighttime use of athletic fields.

Alternative C would result in less impact than the proposed Project regarding aesthetics because the public City park with stadium lighting and the freeway adjacent digital billboard would not be developed. Alternative C would result in a less than significant impact regarding aesthetics, while the Project would result in less than significant impacts with mitigation incorporated.

Air Quality

Alternative C would result in the construction of a warehouse that is reduced by approximately 63 percent, which is equivalent to an 82,072-sf warehouse with 10 dock doors and 100 passenger vehicle parking spaces. Therefore, a shorter construction schedule, a similar site preparation and grading phase of construction, and the use of less construction materials and equipment is anticipated. Accordingly, maximum daily emissions during construction would be lower than the proposed Project because of the reduced size of the warehouse and the exclusion of a City park. Therefore, Alternative C would result in lower construction emissions than the proposed Project.

Alternative C would also result in a decrease in average daily trips, which would result in lower mobile source emissions than the proposed Project. Based on the reduction is square footage, Alternative C would be expected to generate approximately 439 daily trips, including 118 truck trips and 320 passenger vehicle trips compared to the 1,997 daily trips, including 320 truck trips and 1,677 passenger vehicle trips for the proposed Project. Alternative C would have an incremental decrease in stationary emission sources from mechanical equipment (e.g., HVAC units) and landscaping equipment for project site maintenance because of the exclusion of the City park. Air quality emissions would be proportionally lower than the proposed Project due to the decreased development square footage and average daily trips associated with Alternative C.

Alternative C would result in less impact than the proposed Project regarding air quality due to lower construction and operational emissions. However, potential impacts to air quality for Alternative C and the proposed Project would remain less than significant.

Biological Resources

Like the Project, Alternative C assumes that the entire project site would be graded to allow for Storage Basin Improvements. Therefore, for environmental issues where site disturbance would be the same for the Project and Alternative C, there would be no change in the significance of potential impacts.

As addressed in **Section 4.3: Biological Resources**, impacts on the burrowing owl could occur if the burrowing owl is present in nearby habitat and light from the future City park stadium lighting for the athletic fields is directed into or near that habitat. However, no City park would be proposed under

Alternative C and therefore, no related potential impacts would occur. Because MM AES-1 is only applicable to stadium lighting for the future City park, this mitigation measure would not be required for Alternative C.

Therefore, Alternative C would result in less impacts than the proposed Project regarding biological resources because stadium lighting would not occur under this alternative. However, as with the proposed Project, impacts to biological resources associated with Alternative C would also be less than significant with mitigation incorporated.

Cultural Resources

Like the Project, Alternative C assumes that the entire project site would be graded to allow for Storage Basin Improvements. Therefore, for environmental issues where site disturbance would be the same for the proposed Project and Alternative C, there would be no change in the significance of potential impacts.

Alternative C would result in similar impacts as the proposed Project regarding cultural resources because the entire project site would be graded under both scenarios. Therefore, as with the Project, impacts to cultural resources associated with Alternative C would also be less than significant with mitigation.

Energy

Alternative C assumes the construction of a smaller warehouse than the proposed Project and no City park. The energy usage during construction associated with water usage for dust control, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips would be lower than the Project due to the shorter construction schedule, less intensive site preparation and grading phase of construction, and the use of less construction materials and equipment. Additionally, Alternative C would result in a decrease in operational energy usage given this alternative would result in a decrease of 139,744 sf in the size of the warehouse. Energy usage would be proportionally lower than the proposed Project due to the decreased development square footage associated with Alternative C.

Alternative C would result in less impacts than the proposed Project regarding energy. However, potential impacts to energy would remain less than significant under both development scenarios.

Geology and Soils

Like the Project, Alternative C assumes that the entire project site would be graded to allow for the Storage Basin Improvements. Therefore, potential geological, soil, and paleontological resource impacts would be similar to the Project because development would occur within the same geologic unit and soil conditions. The potential for seismic ground shaking, fault rupture, liquefaction, or collapse would be the same as with the proposed Project. Development under Alternative C would also be required to submit a site-specific geotechnical investigation, comply with California Building Code standards, and applicable construction and operational BMPs to reduce impacts related to geologic hazards.

Alternative C would result in similar impacts as the proposed Project regarding geology, soils and paleontological resources because the entire project site would be graded under both scenarios. Impacts associated with both Alternative C and the Project would be less than significant with mitigation incorporated.

Greenhouse Gas Emissions

Alternative C would result in the construction of a warehouse that is reduced by approximately 63 percent, which is equivalent to an 82,072-sf warehouse with 100 passenger vehicle spaces. Therefore, a shorter construction schedule, a less intensive site preparation and grading phase of construction, and the use of less construction materials and equipment is anticipated. Accordingly, direct emissions of GHGs from construction activities would be less than the proposed Project.

As previously addressed, the majority of the Project's GHG emissions are associated with mobile sources (i.e., vehicle and truck trips). Alternative C would result in a decrease in average daily trips compared to the Project. Based on the reduction in square footage, Alternative C would be expected to generate approximately 439 daily trips, including 118 truck trips and 320 passenger vehicle trips compared to the 1,997 daily trips, including 320 truck trips and 1,677 passenger vehicle trips for the proposed Project. The reduction in square footage of the warehouse and decrease in average daily trips could alone reduce operational GHG emissions to a less than significant level. If so, that would avoid the need for implementation of MM GHG-1 through MM GHG-9 to reduce operational emissions under Alternative C.

Alternative C would result in less than significant GHG emissions impacts (possibly with mitigation incorporated) while the proposed Project would result in significant and unavoidable impacts regarding GHG emissions with mitigation incorporated.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials for Alternative C would be similar to the Project. Under both development scenarios, the entire site would be graded although the development footprint associated with a smaller warehouse would be reduced. Alternative C would still include the demolition of the remnants of previous uses (including building pad foundations and radio tower footings/pile caps). The Phase I ESA prepared for the proposed Project determined that the project site's proximity to confirmed groundwater contamination in the San Gabriel Valley (Area 1) NPL Whittier Narrows OU listing is considered to represent a REC. However, because the project site is not a source and is not located on a source site, ongoing remedial actions, identification of responsible parties, and regulatory oversight by the U.S. EPA, no further action related to current and future use of the project site is anticipated and vapor migration is not expected to represent a significant environmental concern at this time. Similar to the Project, Alternative C would not be exposed to airport hazards, affect aircraft operations, or create an airport safety hazard for employees. Similar to the Project, Alternative C would consist of the operation of a warehouse and would not result in the release of hazardous materials. Alternative C would also be required to comply with the established regulatory framework and implement MM GEO-1 and MM HYD-1 to mitigate impacts to a less than significant level.

Alternative C would result in similar impacts as the proposed Project regarding hazardous waste and materials because the entire project site would be graded under both scenarios. Impacts associated with Alternative C and the proposed Project would be less than significant with mitigation incorporated.

Hydrology and Water Quality

Impacts related to hydrology and water quality for Alternative C would be similar to the Project. Under Alternative C and the proposed Project, the amount of pervious surface would decrease due to the construction of a new warehouse building and associated parking. However, the reduced development area under Alternative C would be expected to retain more pervious surfaces than the proposed Project because the City park and associated parking lot for the park is not a part of Alternative C and the parking

lot for the warehouse building would be smaller under Alternative C. This alternative and the Project would require installation of a drainage network to detain and treat stormwater runoff, in accordance with allowable discharges per the LACFCD. As a result, the proposed Project and Alternative C would not generate runoff that would create a significant impact concerning drainage, erosion, siltation, flooding, or pollutant release due to inundation. Under Alternative C and the proposed Project, there would be no effects to groundwater supplies or interference with groundwater recharge. However, in the event that groundwater or perched groundwater is encountered during construction of either the Project or Alternative C, and groundwater dewatering is necessary, it would be completed in compliance with the Groundwater Discharge Permit, as specified in MM HYD-1. Alternative C would also still be required to obtain a General Permit for Stormwater Discharge Associated with Construction Activity and prepare a SWQMP.

Alternative C would result in less impacts than the proposed Project regarding hydrology and water quality because although the entire project site would be graded under both scenarios, Alternative C would have more pervious surface due to the reduced size of the warehouse development and exclusion of the parking lot associated with the City park. With respect to hydrology and water quality, impacts associated with Alternative C and the proposed Project would be less than significant with mitigation incorporated.

Land Use and Planning

As with the Project, Alternative C would require a General Plan Amendment to change the existing General Plan land use designation from Commercial (C) to Commercial-Manufacturing (CM) and a Zone change from Commercial (C) to Manufacturing (M).

Like the proposed Project, Alternative C would not physically divide an established community through the introduction of either physical or community barriers and would not cause a significant environmental impact due to a conflict with any plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Like the proposed Project, following approval of the General Plan Amendment and zone change, Alternative C would comply with the land use designations of the site. Additionally, neither scenario would introduce any roadways or infrastructure that would bisect or transect surrounding land uses.

Alternative C would result in similar impacts as the proposed Project regarding land use and planning because a general plan amendment and zone change would be required for both development scenarios. Therefore, both Alternative C and the proposed Project would have a less than significant impact associated with land use and planning.

Noise

Alternative C would result in the construction of a warehouse that is reduced by approximately 63 percent. Therefore, Alternative C would result in less construction noise impacts than the proposed Project because of the shorter duration of construction. With respect to construction noise, impacts associated with Alternative C and the proposed Project would be less than significant with mitigation.

Alternative C would have lower average daily trips than those anticipated for the proposed Project. Based on the reduction in square footage, Alternative C would be expected to generate approximately 439 daily trips, including 118 truck trips and 320 passenger vehicle trips compared to the 1,997 daily trips, including 320 truck trips and 1,677 passenger vehicle trips for the proposed Project. Alternative C would result in less truck and passenger vehicle traffic volumes on nearby roadway segments compared to the proposed Project, resulting in lower roadway noise levels. The reduced building size of Alternative C would likely result in lower operational noise impacts when compared to the Project.

When compared to the proposed Project, Alternative C would have less noise impacts. However, operational and construction noise impacts associated with Alternative C and the proposed Project would both be less than significant with mitigation.

Population and Housing

Both the Project and Alternative C would generate new permanent employment opportunities. The proposed Project would employ approximately 358 employees (297 employees from the warehouse component and the 61 employees from the City public park component), based on an employment generation factor of 1 employee per 749 sf of warehouse use and an employment generation factor of 5.71 employees per acre of local parks/recreational areas.[8] Using this generation factor, Alternative C would have approximately 110 employees. Similar to the Project and Alternative B, it is assumed that employment associated with Alternative C's proposed uses would not induce substantial direct population growth and as explained above, it is reasonable to assume that many if not all of the new jobs would be filled by local residents who already reside in the City. Neither Alternative C nor the Project are expected to require the construction of additional residential units to the extent that substantial unplanned population growth would be induced that was not analyzed in the City's General Plan, as explained in **Section 4.12: Population and Housing**.

Alternative C would result in less impact than the proposed Project regarding population and housing because Alternative C would decrease the number of employees required for operations when compared to the proposed Project. Under both development scenarios, impacts to population and housing would be less than significant.

Public Services

Development of both Alternative C and the Project would incrementally increase the demand for police and fire protection services. However, Alternative C would decrease the number of employees required for operations, which would reduce the demand on public services when compared to the proposed Project. Neither scenario is expected to substantially increase service demand such that a new or physically altered facility would need to be constructed, which would cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police and fire protection. Further, development impact fees are paid on a project-by-project basis to ensure a proportionate fair share is contributed toward facilities, equipment, and personnel that would be needed overtime to accommodate the additional demand from the Project.

Alternative C would result in less impact than the proposed Project regarding public services because Alternative C would reduce the demand of public services when compared to the proposed Project. However, under both development scenarios, impacts would be less than significant.

Recreation

Alternative C would result in a smaller warehouse facility with no City park. The proposed Project would dedicate 10.7 acres to the City for future park use that would provide the community with an additional park and recreational facility to serve the City's population and therefore would not result in the potential accelerated deterioration of recreational facilities. Under Alternative C, the northwestern portion of the site would remain vacant and in private ownership rather than being dedicated to the City for future development of a park use. The Project would improve the City's recreational facilities while Alternative C

[8] Natelson Company, Inc, 2001, *Employment Density Study Summary Report Prepared for SCAG, Table 8A.*

would result in no dedication of land to recreational facilities. Similar to the proposed Project, Alternative C could incrementally increase the use of existing parks and recreational facilities due to employees of the warehouse; however, it would not be to the extent that could result in accelerated or substantial physical deterioration.

Alternative C would result in greater impact than the proposed Project regarding recreational facilities because the 10.7 acres of the project site would not be dedicated to the City for use as a future public park. However, under both development scenarios, impacts to parks and recreational facilities would be less than significant.

Transportation

Based on the reduction in square footage, Alternative C would be expected to generate approximately 439 daily trips, including 118 truck trips and 320 passenger vehicle trips compared to the 1,997 daily trips, including 320 truck trips and 1,677 passenger vehicle trips for the proposed Project. VMT impacts are measured based on the Citywide VMT per Service Population Threshold and the Countywide VMT per Employee Threshold.

Alternative C would result in less impact than the proposed Project regarding transportation and VMT due to the reduced square footage of the warehouse facility. However, similar to the proposed Project, the reduced warehouse under Alternative C would result in a less than significant impact as it relates to VMT.

Tribal Cultural Resources

Alternative C assumes that the entire project site would be graded to allow for Storage Basin Improvements. Therefore, for environmental issues where site disturbance would be the same for the Project and Alternative C, there would be no change in the significance of potential impacts.

Alternative C would result in similar impacts as the proposed Project regarding tribal cultural resources because the entire project site would be graded under both scenarios. However, as with the Project, impacts to tribal cultural resources associated with Alternative C would also be less than significant with mitigation.

Utilities and Service Systems

When compared to the Project, Alternative C would result in a decreased demand on utilities as compared to the proposed Project because the alternative would result in a decrease of 139,744 sf of building area. A decrease of 139,744 sf would result in lower water and wastewater demand compared to the Project during construction and operations. A smaller building would also result in a decreased demand for electrical power. Alternative C would also result in lower solid waste generation. Alternative C would reduce the demand on utilities and service systems when compared to the proposed Project.

Alternative C would result in less impact than the proposed Project regarding utilities and service systems because Alternative C would reduce the demand on utilities when compared to the proposed Project. However, under both development scenarios, impacts would be less than significant.

Feasibility and Ability to Meet Project Objectives

As previously noted, no Development Agreement would be proposed under Alternative C. For that reason, no digital billboard or City park would be proposed under Alternative C.

Alternative C would only partially meet the basic Project Objectives. Like the proposed Project, Alternative C requires both a General Plan Amendment and zone change to develop a warehouse on the project site proximate to SR-60.

Alternative C would not provide additional public benefits to the City through the dedication of land for a future City park. Therefore, Alternative C would not meet that component of Project Objective 2. Alternative C would not include public benefits to the City through digital billboard advertising revenue sharing. Therefore, Alternative B would not meet that component of Project Objective 2.

Alternative C would not meet Project Objective 4 because according to the Project Applicant, the construction of an 82,072-sf warehouse, which is more than 63 percent smaller than the proposed Project, would not qualify as a "Class A" warehouse of sufficient size and with sufficient trailer truck doors and parking to be competitive in the industrial marketplace of the region.[9] Alternative C would increase employment opportunities during construction and occupancy of the warehouse building but not to the same extent as a larger warehouse facility.

Alternative C would develop a warehouse component consistent with the proposed General Plan CM land use designation and M zoning but the warehouse would be much smaller than the proposed Project. Therefore, Alternative C would partially meet Project Objectives 1, 3, and 5 but not to the same extent as the Project, which proposes a much larger "Class A" warehouse facility and also includes a City public park and related employment opportunities.[10]

Alternative C would improve the flood storage capacity of the Whittier Narrows Dam USACE reservoir flowage easement through the provision of Storage Basin Improvements; Project Objective 6 would be met. However, it is unknown whether the Project Applicant would pursue development on the project site with the reduced-size warehouse building under Alternative C that would not be a marketable "Class A" warehouse.

Conclusion

Alternative C would result in similar impacts as compared to the proposed Project for the following EIR topic areas, which would be less than significant with the implementation of mitigation measures (where required) under both development scenarios: Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Land Use and Planning, and Tribal Cultural Resources.

Alternative C would result in less impact as compared to the proposed Project for the following topic areas, but impacts would be less than significant with the implementation of mitigation measures (where required) under both development scenarios: Aesthetics, Air Quality, Biological Resources, Energy, Hydrology and Water Quality, Noise; Population and Housing, Public Services, and Utilities and Service Systems.

Alternative C would result in greater impact than the proposed Project regarding recreational facilities because land would not be dedicated to the City for use as a future public park. However, under both development scenarios, impacts to parks and recreational facilities would be less than significant.

[9] "Class A buildings command the market's highest rents and attract credit-worthy tenants" and consist of "[i]nvestment-grade buildings that offer an excellent location and first-rate design, building systems, amenities, and management." *See* Richard B. Peiser with Anne B. Frej, *Professional Real Estate Development: The ULI Guide of the Business* (Second Edition).

[10] Based on an employment generation factor of 5.71 employees per acre of local parks/recreational areas, the City park component of the Project could have 61 employees, including net new City employment opportunities.

Alternative C would result in less than significant GHG emissions impacts (possibly with mitigation incorporated) while the proposed Project would result in significant and unavoidable impacts regarding GHG emissions with mitigation incorporated.

Alternative C would only partially meet the basic Project Objectives.

6.6 COMPARISON OF ALTERNATIVES

Table 6-3: Summary of Proposed Project and Alternative Impacts, compares the alternative's anticipated environmental impacts with the implementation of mitigation, as required. **Table 6-4: Project Objectives Consistency Analysis**, summarizes each alternative's ability to achieve the Project objectives.

Table 6-3: Summary of Proposed Project and Alternative Impacts

Topic	Proposed Project	Alternative A: No Project/ No Development	Alternative B: Existing Land Use and Zoning Designations	Alternative C: Reduced Warehouse
Aesthetics	LS/M	-	-	-
Air Quality	LS	-	+	-
Biological Resources	LS/M	-	-	-
Cultural Resources	LS/M	-	=	=
Energy	LS/M	-	+	-
Geology and Soils	LS/M	-	=	=
Greenhouse Gas Emissions	**SU**	*	+	*
Hazards and Hazardous Materials	LS/M	-	=	=
Hydrology and Water Quality	LS/M	-	=	-
Land Use and Planning	LS	-	-	=
Noise	LS/M	-	+	-
Population and Housing	LS	-	+	-
Public Services	LS	-	+	-
Recreation	LS	-	+	+
Transportation	LS	-	+	-
Tribal Cultural Resources	LS/M	-	=	=
Utilities and Services Systems	LS	-	+	-

LS = Less than Significant
LS/M = Less than Significant with Mitigation/Standard Conditions
S/U = Significant Unavoidable Impact
(–) The alternative would result in less of an impact than the proposed Project or no impact.
(+) The alternative would result in greater impacts than the proposed Project.
(=) The alternative would result in the same/similar impacts as the proposed Project.
(*) The alternative would reduce/eliminate a significant and unavoidable impact.

Table 6-4: Project Objectives Consistency Analysis

Project Objective	Alternative A: No Project/ No Development	Alternative B: Existing Land Use and Zoning Designations	Alternative C: Reduced Warehouse
	Consistent?		
Objective 1: Provide public benefits to the City by increasing employment opportunities during construction of the Project and occupancy of the warehouse building and increasing property sales and tax revenues that the City will receive as part of the warehouse building improvements.	No	Yes, but in the context of a retail shopping center	Yes, but to a lesser extent
Objective 2: Provide additional public benefits to the City under the Development Agreement for the Project by creating opportunities for City development of a public park to meet the recreational needs of the City and digital billboard advertising revenue sharing.	No	No	No
Objective 3: Develop the warehouse component of the Project consistent with the guidelines and policies of the City of South El Monte General Plan land use designation (Commercial-Manufacturing (CM)) and Zoning designation (Manufacturing (M)) proposed as part of the Project and applicable Municipal Code provisions.	No	No	Yes
Objective 4: Develop a single pad Class A[11] warehouse of sufficient size and with sufficient trailer truck doors and parking to be competitive within the industrial warehouse marketplace in the vicinity.	No	No	No
Objective 5: Develop a warehouse use proximate to the State Route 60 transportation corridor.	No	No	Yes
Objective 6: Improve the Property's flood storage capacity via Storage Basin Improvements in the USACE Easement area.	No	Yes	Yes

6.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines requires that an Environmentally Superior Alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the "No Project" Alternative is the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the Project's basic objectives be chosen as the environmentally superior alternative.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the Project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. As such, the No Project Alternative would be the environmentally superior

[11] "Class A buildings command the market's highest rents and attract credit-worthy tenants" and consist of "[i]nvestment-grade buildings that offer an excellent location and first-rate design, building systems, amenities, and management." *See* Richard B. Peiser with Anne B. Frej, *Professional Real Estate Development: The ULI Guide of the Business* (Second Edition).

alternative because it would eliminate all of the potentially significant impacts of the Project. However, while the No Project Alternative is the environmentally superior alternative, it is not capable of meeting any of the basic objectives for the Project.

The CEQA Guidelines state that should the No Project Alternative be the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining Alternatives. Aside from the No Project Alternative, the environmentally superior alternative to the Project is the one that would result in the fewest or least significant environmental impacts. Based on the evaluation undertaken herein, Alternative C: Reduced Warehouse is the environmentally superior alternative. This is an environmentally superior project alternative because, as explained above, Alternative C would reduce GHG emissions impacts to a less than significant level (potentially with implementation of mitigation measures), whereas the proposed Project would result in a significant and unavoidable GHG emissions impact with mitigation. Alternative C would also reduce impacts to aesthetics, air quality, biological resources, energy, hydrology and water quality, noise, population and housing, public services, and utilities and service systems as compared to the proposed Project. However, as explained above, those impacts would nonetheless be reduced to less than significant level with the implementation of mitigation measures (where required) under the proposed Project and Alternative C.

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