Attachment No. 5

Addendum to the Adopted Initial Study/ Mitigated Negative Declaration (MND) and the MND – Technical Studies (Appendix A –E) can be found at: www.ArcadiaCA.gov/significantprojects

Addendum to the Artis Senior Living Project Initial Study/Mitigated Negative Declaration

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1.0 INTRODUCTION

On August 18, 2020, the City of Arcadia City Council adopted a Mitigated Negative Declaration (2020 MND) for the Artis Senior Living Project, which was proposed at the southeastern corner of the intersection of Colorado Boulevard and Michillinda Avenue at 1150 West Colorado Boulevard in the City of Arcadia (see **Figure 1**). The Artis Senior Living Project involved the demolition of an approximately 13,000-square-foot building (previously occupied by a Coco's Bakery and Restaurant) and the development of a new two-story, 44,192-square-foot senior/assisted living care facility with 80 senior housing units and on-site amenities, inclusive of a community center, a gallery, a café, a barber/beauty shop, and a small health center for the residents, and 58 parking spaces and one loading space (Approved Project).

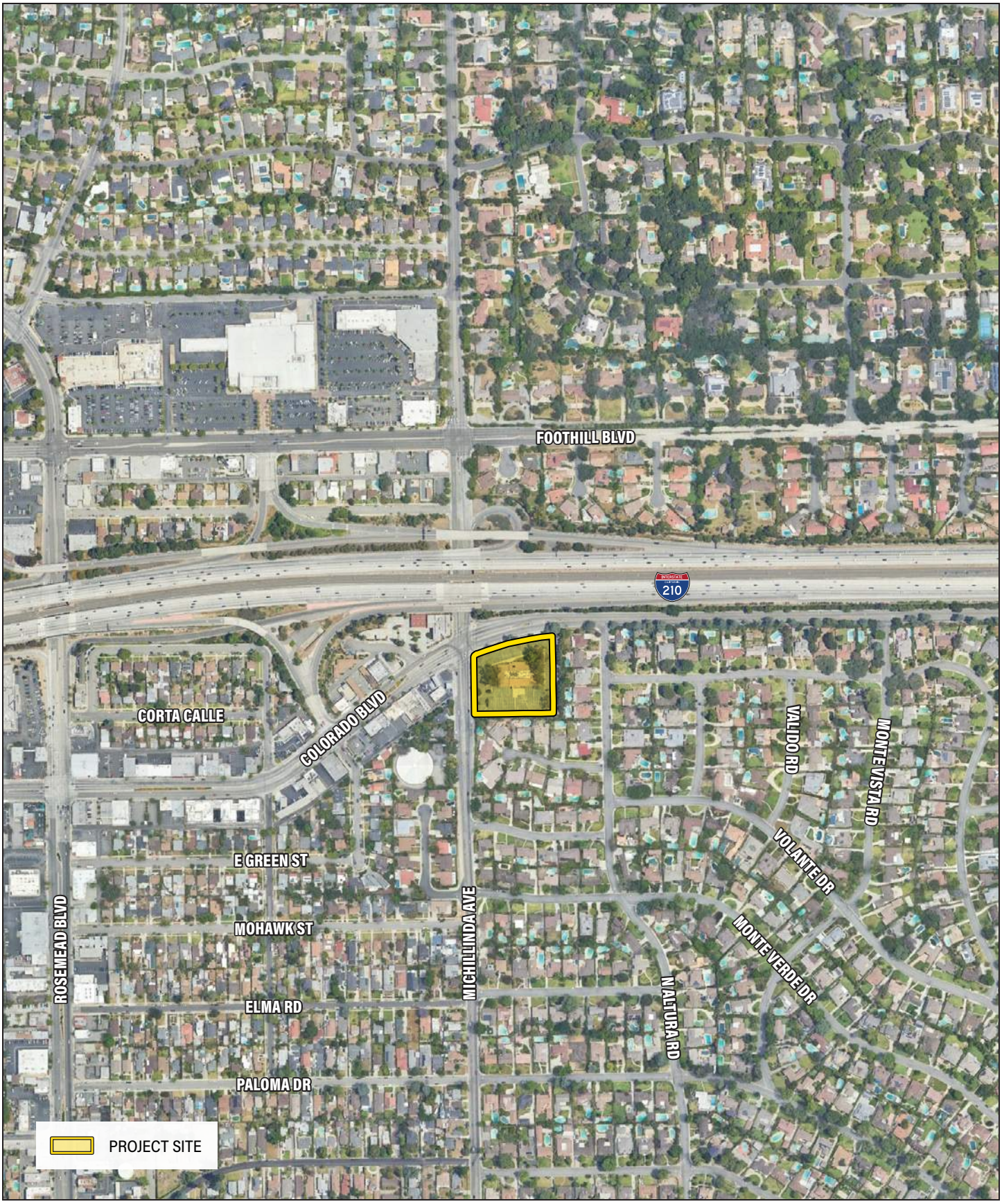
The Project Applicant, O&I Development, LLC, is now proposing to develop the Project Site with a new 107,706-square-foot, three-story building containing 100 units (with 114 beds), which constitutes the Revised Project, known as The Ivy Arcadia. In considering whether to approve the Revised Project, the City, as the lead agency pursuant to the California Environmental Quality Act (CEQA), is required to consider the environmental impacts of the Revised Project as compared to those of the Approved Project. Therefore, this addendum assesses the environmental impacts of the Revised Project as compared to those of the Approved Project in accordance with the requirements of CEQA and the CEQA Guidelines.

2.0 STATUTORY BACKGROUND

Under CEQA Guidelines Section 15162(c), once a project has been approved, the lead agency's role in project approval is completed unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If, after the project is approved, any of the conditions described in CEQA Guidelines Section 15162(a) occurs, a subsequent MND shall only be prepared by the public agency which grants the next discretionary approval for the project.

More specifically, CEQA Guidelines Section 15162 states the following:

> *(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*
>
> *(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*



Source: Google Earth Pro, December 2023

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Project Location Map

Figure 1

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In addition, CEQA Guidelines Section 15164 states the following:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

3.0 SUMMARY OF APPROVED PROJECT DESCRIPTION

Under the Approved Project, the existing, vacant building on-site, which was previously occupied by Coco's Bakery and Restaurant, would be demolished, and associated landscaping and surface parking lot would be removed. However, the majority of the trees along the perimeter of the Project Site were proposed to be retained and incorporated into the Approved Project's landscaping plan to continue to form a vegetative screen between the Project Site and the residential uses to the east and south. The Approved Project proposed to develop a W-shaped senior living facility, which was planned to support memory care and assisted living services. This facility was proposed to be entirely

dedicated to people afflicted with Alzheimer's disease and related memory disorders. The Approved Project proposed a new two-story (with a maximum height of 37.5 feet), 44,192-square-foot building with 80 senior housing units and on-site amenities, inclusive of a community center, a gallery, a café, a barber/beauty shop, and a small health center for the residents. The Approved Project also proposed to include decorative landscaping, private walking paths, and an outdoor plaza on the west and south sides of the Project Site, which were proposed to be enclosed with an 8-foot-high wooden fence that would connect to the northwestern and northeastern corners of the building and extend to the southern property line. The Approved Project required a Minor Administrative Modification to allow the fence to exceed the maximum permitted height of 6 feet.

Under the Approved Project, vehicle parking was proposed to include 55 regular parking stalls and 4 parking stalls that comply with the requirements of the Americans with Disabilities Act (ADA). Vehicular access to the new building was proposed to be from a single ingress/egress point on Colorado Boulevard, located at an existing ingress/egress point for the Project Site.

The Approved Project proposed to remove 18 of the 60 unprotected trees on-site, including 13 trees in the center of the Project Site around the existing building. Although no protected trees were proposed to be removed or irrevocably damaged during Project-related grading and construction, some minor damage to the protected tree root systems was anticipated. Accordingly, the Approved Project required a Tree Encroachment Permit and the implementation of **Mitigation Measure BIO-2** to prevent substantial damage to on- and off-site protected trees.

4.0 PROJECT DESCRIPTION

Existing Conditions

The Project Site consists of 2.82 acres of developed land in the northwestern portion of the City of Arcadia. The Project Site is located on the southeastern corner of the Colorado Boulevard and Michillinda Avenue intersection, immediately south of Interstate 210 (I-210/Foothill Freeway), as shown in **Figure 1**. The Project Site contains a vacant commercial building, previously occupied by Coco's Bakery and Restaurant. The existing building, which comprises 13,088 square feet in total floor area, is a rectangular, one-story building located in the center of the Project Site. The building is surrounded on all sides by a surface parking lot with two driveway locations, one at the northeastern corner of the Project Site along Colorado Boulevard and another at the southwestern corner of the Project Site along Michillinda Avenue. Mature eucalyptus trees flank the western and eastern sides of the existing building. Additionally, there are decorative shrubs and turf along the northern, eastern, and western façades of the building, with one mature fern pine near its northeastern corner. Currently, there is a mix of trees along the perimeter of the Project Site, serving as a landscape buffer between the Project Site and neighboring streets to the north and west and between the Project Site and the residential neighborhoods to the east and south.

The Colorado Boulevard and Michillinda Avenue frontages are both improved with a sidewalk, curb and gutter, two streetlights along each street, two traffic signal poles with safety lights, and one curb ramp at the southeastern corner. Each frontage is characterized by decorative ground cover; mature trees; a short, white-painted cinderblock wall; and decorative shrubs located between the sidewalk and the property line.

The Project Site is designated in the City's General Plan as Commercial (0.5 FAR) with a corresponding zoning of General Commercial (C-G).

Revised Project

Under the Revised Project, the Project Applicant is proposing a new 107,706-square-foot, three-story building (with a maximum height of 40 feet from the average grade of the building) containing 100 units of varying types, including studio, one-bedroom, and two-bedroom units for assisted living and private and shared studios for memory care, providing a total of 114 beds. As with the Approved Project, the Revised Project would support assisted living and memory care services, the latter of which would entirely be dedicated to people afflicted with Alzheimer's disease and related memory disorders.

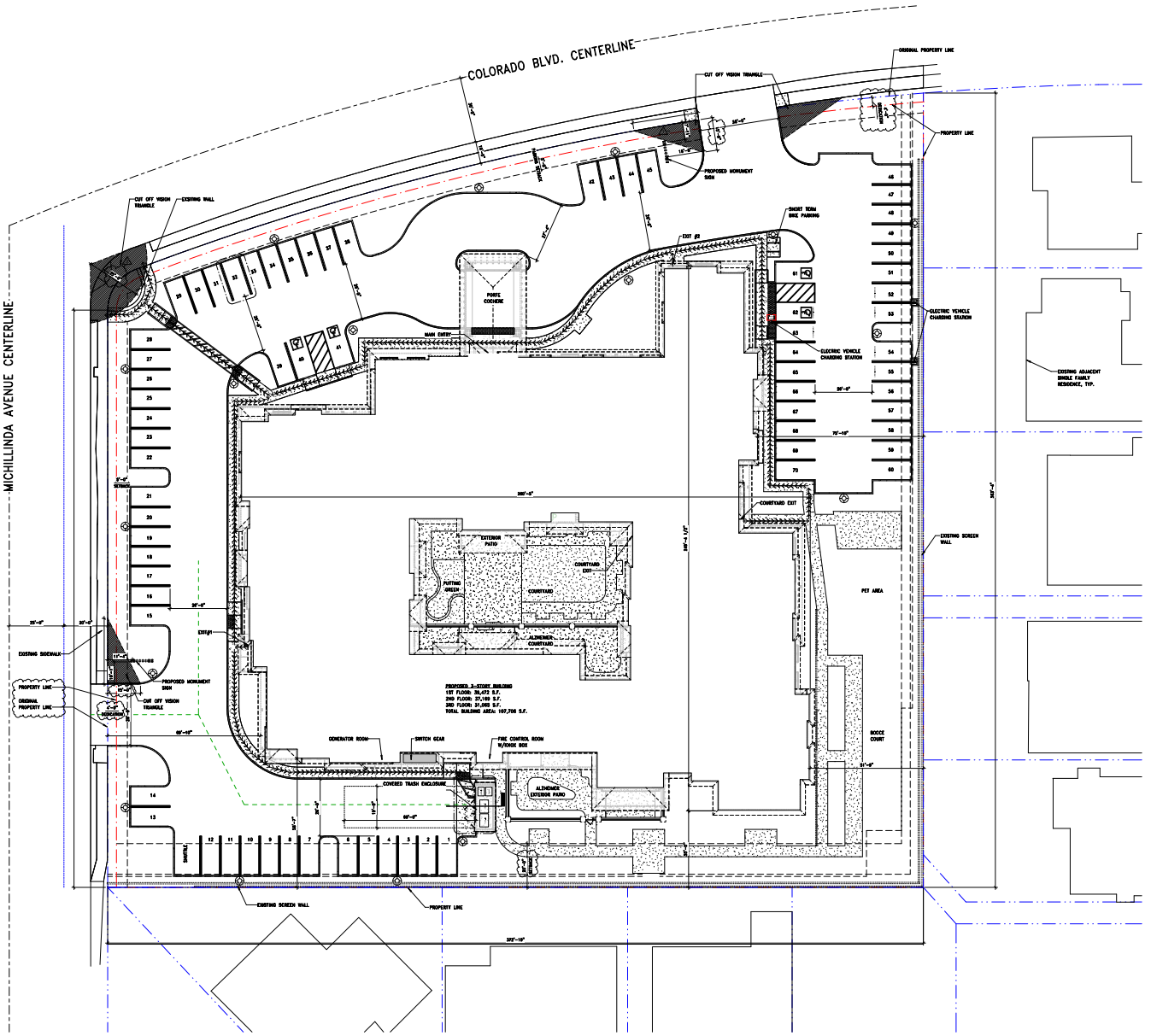
The first floor of the proposed building would comprise 14 units for assisted living and 30 units for memory care, front and rear lobbies, offices, a dining room and a café, a laundry room, a sensory wellness room, a reading room, and a sitting and music area, as well as separate open air courtyards for assisted living and memory care patients in the middle of the building, within 39,472 square feet of floor area. The second floor would comprise 36 units for assisted living, offices, a laundry room, and a staff lounge within 37,169 square feet of floor area. The third floor would comprise 20 units for assisted living, a dining room with an exhibition kitchen, a bar/lounge, an activity room, a media room, a fitness center with a physical therapy area, a beauty salon, and storage areas within 31,065 square feet of floor area.

In addition, an exterior patio for memory care patients and a workout seating area with outdoor workout equipment would be located along the southern boundary of the Project Site. A dog park and a bocce ball court would be located in the southeastern portion of the Project Site, as shown in **Figure 2**.

The proposed new building would feature a Cape Cod design with varied massing and materials with articulation on each of the building façades, similar in design to that of the Approved Project. Conceptual renderings are shown in **Figure 3**.

The Revised Project would include multiple new sources of light, including pole-mounted LED security lighting in parking areas and the passenger drop-off area; path lighting on internal walkways; and accent lighting over building doorways.

Vehicle parking would include 61 parking spaces, comprising 3 parking spaces that comply with the requirements of the Americans with Disabilities Act (ADA), 6 electric vehicle (EV) parking spaces, and 1 EV parking space that complies with ADA requirements. Parking would be located along the perimeter of the Project Site with one ADA-compliant and one ADA-compliant/EV parking spaces located near the northeastern corner of the proposed building, two ADA-compliant parking spaces near the northwestern corner by the main entrance, and six EV parking spaces in the parking lot along the eastern boundary. Vehicular access to the proposed building would be from the two existing driveways, one along Colorado Boulevard near the northeastern corner of the Project Site and another along Michillinda Avenue near the southwestern corner of the Project; these driveways would be reconstructed in the same general location to current City standards for ADA compliance. A porte cochere would be provided in front of the main entrance to the proposed building. A covered trash enclosure would be located along the southern boundary of the Project Site immediately adjacent to the Alzheimer exterior patio. An emergency generator would be located in the generator room on the first floor near the southwestern corner of the proposed building.



Source: B. Hills Architecture, March 2024

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Revised Project Site Plan

Figure 2

COLORADO BLVD. VIEW

MICHILLINDA AVE. VIEW

SOUTH VIEW FROM ADJACENT RESIDENCES

EAST VIEW FROM ADJACENT RESIDENCES

Source: B. Hills Architecture, January 2024

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Conceptual Renderings

Figure 3

In addition, a modular wetland, which is proposed in the southeastern corner of the Project Site, would be used to collect and treat surface water runoff from the Project Site prior to draining to the existing curb inlet and then to the existing storm drainage system to the east. With regard to wastewater, the Revised Project would connect to an existing 21-inch County of Los Angeles sewer main to the west along Michillinda Avenue via a new sewer lateral.

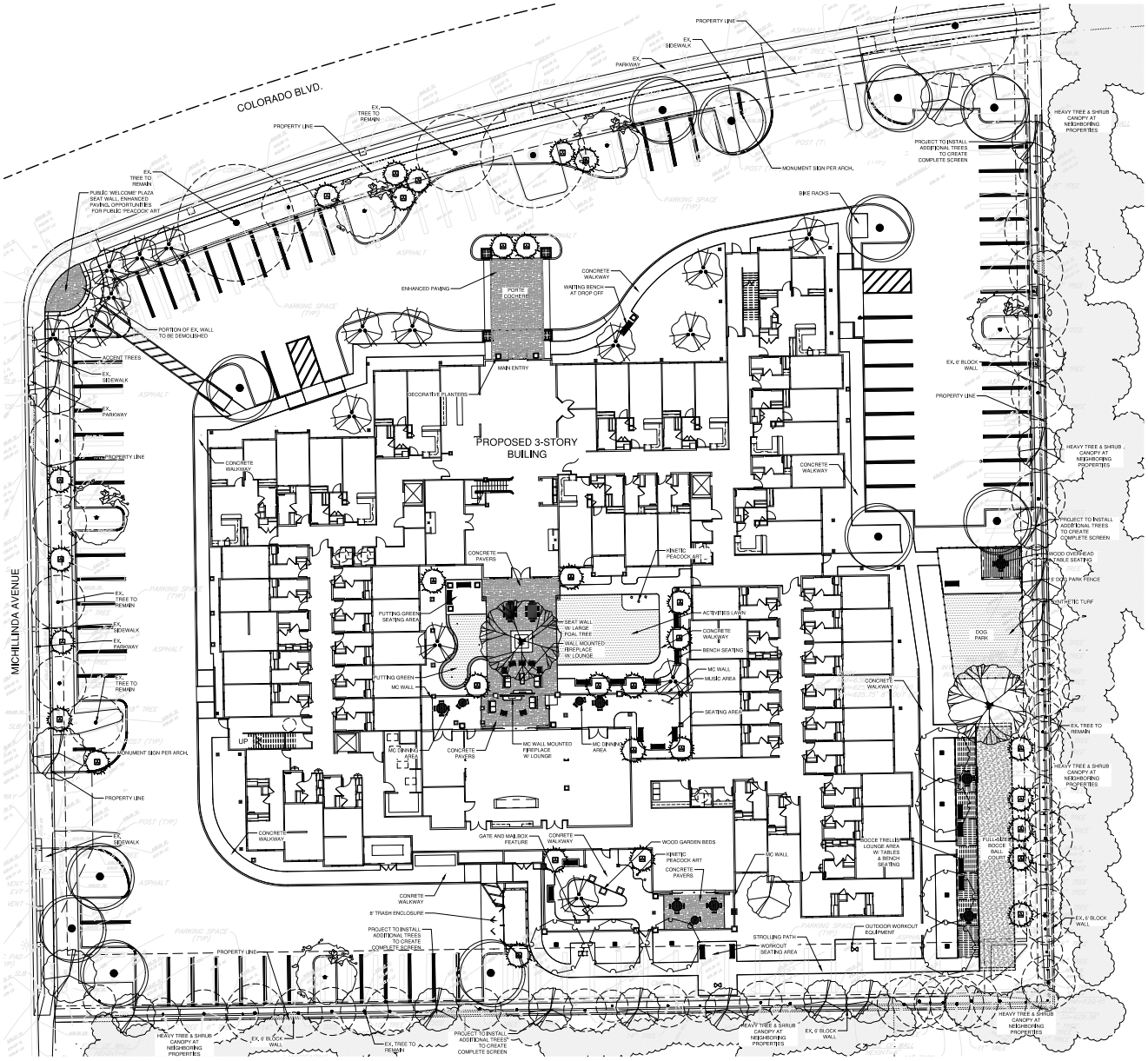
Regarding on-site trees, although the Revised Project would require the removal of 22 unprotected trees, the Revised Project would not only preserve the majority of trees along the perimeter of the Project Site, as proposed under the Approved Project, but would plant additional trees to completely screen the views of the proposed building from the residential uses to the east and south, as shown in **Figure 4**. The existing curb, gutter, and sidewalks along the Project Site's Colorado Boulevard and Michillinda Avenue frontages would be replaced. In addition, the Revised Project would be required to dedicate 4 feet of the Project Site along both Colorado Boulevard and Michillinda Avenue to accommodate the widening of these two public rights-of-way along the Project Site's frontages to 12 feet in width; however, the physical improvement would be implemented by the City and is not part of the Revised Project.

The Project Site's General Plan land use designation and zoning allow for the development of the Revised Project through a Conditional Use Permit (CUP) as the Revised Project proposes a floor area ratio (FAR) of 0.88, which exceeds the maximum permitted FAR of 0.5. Under the California Density Bonus Law, a project is entitled to receive a density bonus as a matter of right if it meets the requirements of California Government Code Section 65915. In addition, pursuant to Senate Bill (SB) 713, which was signed by Governor Newsom in October 2023, a local government cannot apply any development standard that precludes the construction of a development seeking a density bonus. Accordingly, pursuant to Government Code Section 65915(b)(1)(C) and SB 713, as the Revised Project is a senior citizen housing development, the Revised Project is entitled to receive a density bonus and deviate from the maximum permitted FAR, which would otherwise physically preclude the construction of the Revised Project based on the maximum allowable residential density under the General Plan land use and zoning designations. The Revised Project would comply with all other applicable development standards.

Construction of the Revised Project would occur over a 20-month period, commencing in the fall of 2024 and concluding in the summer of 2026.

The Revised Project would require the following City approvals:

- Adoption of the Addendum to the IS/MND
- Conditional Use Permit No. CUP 23-09
- Architectural Design Review No. ADR 23-13 with a Density Bonus
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to grading permit, excavation permit, dedications, and building permits



Source: O & I Development, January 2024

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Conceptual Landscape Plan

Figure 4

5.0 ENVIRONMENTAL ANALYSIS

This section assesses the environmental effects of the Revised Project and compares them to the environmental effects of the previously Approved Project as disclosed in the adopted 2020 MND to determine if any of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent MND have occurred. This section includes the environmental topics that were included in the 2020 MND.

5.1 AESTHETICS

Scenic Vistas and Scenic Resources

According to the 2020 MND, there are no scenic vistas or scenic highways in the Project vicinity. Views of the San Gabriel Mountains are only available from main arterial roadways in the City that are oriented north and south. As such, motorists traveling northbound on Michillinda Avenue (along the western boundary of the Project Site) and North Altura Road (one block east of the Project Site) have distant views of the San Gabriel Mountains, which are partially obstructed by existing mature trees and existing development along both of these streets, I-210, and the overpass over Michillinda Avenue, as well as utility poles, traffic signals, and business signs on either side of Michillinda Avenue. As a result of these existing impediments, views of the San Gabriel Mountains are only available straight north and are obstructed to the northeast and northwest and would not be significantly affected by the Approved Project. As related to scenic resources, the existing mature trees along the perimeter of the Project Site, the majority of which are considered protected by the City, could be considered scenic resources. These protected trees would be preserved by the Approved Project to continue to provide a visual barrier between the Project Site and surrounding uses and contribute to maintaining the existing visual character of the Project area. Accordingly, the 2020 MND determined that the Approved Project would have a less-than-significant impact on scenic vistas and scenic resources.

The Revised Project proposes the same land use type as the Approved Project within the boundaries of the Project Site. However, the Revised Project would involve a larger development and a slightly taller building than analyzed in the 2020 MND. Nonetheless, as with the Approved Project, views of the San Gabriel Mountains would not be significantly affected by the Revised Project given the existing intervening features that already obstruct such views and the remaining north-facing view corridors that would not be affected by the Revised Project. In addition, because the Revised Project would install additional trees along the eastern and southern boundaries of the Project Site to completely screen the views between the Project Site and the immediately adjacent residences, the increase in building height proposed under the Revised Project would not create an impact beyond those identified in the 2020 MND. Accordingly, as with the Approved Project, the Revised Project would have a less-than-significant impact on scenic vistas and scenic resources. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Conflict with Zoning Governing Scenic Quality

According to the 2020 MND, the Approved Project would be consistent with underlying City zoning upon approval of a CUP. Additionally, because the Arcadia Development Code does not contain any specific zoning regulations that govern scenic quality other than the City's Tree Preservation

Ordinance, the impacts discussed focused on the protected trees on the Project Site, which would be preserved in place to provide visual barriers between the Project Site and surrounding uses and would maintain the existing visual character of the Project vicinity. Therefore, the Approved Project would be consistent with applicable zoning and other regulations governing scenic quality, and impacts were determined to be less than significant.

As with the Approved Project, the Revised Project would preserve the protected trees on the Project Site and would install additional trees along the eastern and southern boundaries of the Project Site to completely screen the views between the Project Site and the immediately adjacent residences and maintain the existing visual character of the Project vicinity. Given the approval of the Zone Change that eliminated the Architectural Design Overlay Zone and the Automobile Parking Overlay Zone from the Project Site under the Approved Project, the Revised Project would not require any additional zone change and, therefore, would be consistent with applicable zoning regulations, including the height limit of 40 feet for the C-G zoning designation, other regulations governing scenic quality, and the density bonus law. Thus, impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Light and Glare

According to the 2020 MND, the Approved Project would contain multiple new sources of nighttime lighting, such as security lighting on internal walkways, lights in the parking areas and at building entrances, and accent lights along walking paths adjacent to landscaped areas. However, the Approved Project would be required to demonstrate compliance with Section 9103.01.120(D) of the Arcadia Development Code as part of the City's design review process, which limits potential light and glare impacts by requiring that lights be directed downward and shielded/recessed to avoid spillage to adjacent properties and prohibits flashing or roof-mounted lights that are directed outward. This Arcadia Development Code section also prohibits light fixtures that are inappropriate for the scale, intensity, and height of the use they are serving. Additionally, the Approved Project would not utilize glossy or reflective construction materials that would generate significant amounts of glare off-site. Accordingly, the 2020 MND determined that the Approved Project would not generate excessive light or glare and, by complying with lighting regulations in the Arcadia Development Code, would result in a less-than-significant impact on day or nighttime views in the Project area.

The Revised Project proposes the same land use type as the Approved Project and would not include land uses that would require more intense sources of light or building materials that would create glare beyond those identified for the Approved Project. As with the Approved Project, the Revised Project would be required to comply with the same regulations that would minimize impacts related to light and glare. Accordingly, as with the Approved Project, the Revised Project would not generate excessive light or glare and, by complying with lighting regulations in the Arcadia Development Code, would result in a less-than-significant impact on day or nighttime views in the Project area. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.2 AGRICULTURE AND FORESTRY RESOURCES

According to the 2020 MND, the Project Site and the surrounding area are not mapped as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance or subject to the Williamson Act contract. The Project Site is currently developed with an existing vacant building; thus, no agricultural uses, forestland, or timberland occur on the Project Site or the surrounding areas, and, as such, none of these uses would be converted to non-agricultural or non-forest uses as a result of the Approved Project. In addition, the Project Site is zoned as C-G and designated as Commercial in the City's General Plan. Accordingly, the Approved Project would not conflict with existing zoning for, or cause the rezoning of, farmland, forestland, or timberland. Therefore, the 2020 MND determined that development of the Approved Project would have no impact on agriculture or forestry resources.

As with the Approved Project, the Revised Project would have no impact on agriculture and forestry resources. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.3 AIR QUALITY

Consistency with Plans

According to the 2020 MND, the Approved Project would result in emissions below the regional and localized emissions thresholds established by the South Coast Air Quality Management District (SCAQMD) and, as such, would not have the potential to cause or affect a violation of the ambient air quality standards or delay the timely attainment of air quality standards or 2016 Air Quality Management Plan (AQMP) emissions reductions goals. In addition, because the Approved Project is consistent with the underlying zoning and General Plan land use designation for the Project Site, the population and employment growth associated with the Approved Project would have been anticipated and planned for in the City's General Plan, on which the Southern California Association of Governments (SCAG) bases its growth projections for the City. As the SCAQMD has incorporated these same projections into the 2016 AQMP, the 2020 MND concluded that the Approved Project would be consistent with the 2016 AQMP and have a less-than-significant impact related to consistency with the 2016 AQMP.

Since the adoption of the 2020 MND, the SCAQMD has adopted the 2022 AQMP, the air quality plan applicable to the Revised Project. The Revised Project would involve a slightly larger development than analyzed in the 2020 MND. In addition, because the restaurant occupying the existing building closed after the adoption of the 2020 MND, the trip credit from the restaurant use is no longer applied. Accordingly, the Revised Project would generate more trips and emissions compared to the Approved Project. However, as with the Approved Project, construction and operation of the Revised Project would result in emissions below the regional and localized emissions thresholds established by the SCAQMD, as shown in **Tables 1, 2,** and **3**, in the discussion of *Criteria Pollutants Emissions*, below. As such, the Revised Project would not have the potential to cause or affect a violation of the ambient air quality standards or delay the timely attainment of air quality standards or 2022 AQMP emissions reductions goals. In addition, because the Revised Project is also consistent with the underlying zoning and General Plan land use designation for the Project Site, the Revised Project would also be consistent with the 2022 AQMP and have a less-than-significant impact related to consistency with the 2022 AQMP. Therefore, there are no material changes in circumstances, and the Revised Project

would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Criteria Pollutant Emissions

According to the 2020 MND, construction of the Approved Project, which would take approximately 20 months to complete, would result in the generation of fugitive dust and pollutant emissions, resulting in substantial short-term increases in air pollutants. Similarly, operation of the Approved Project would result in long-term air quality impacts associated with mobile source emissions from traffic generated by the Approved Project and emissions from stationary area and energy sources. As mentioned previously, a trip credit was applied from the restaurant use for operational emissions. However, the 2020 MND determined that that construction and operation of the Approved Project would not exceed daily regional SCAQMD thresholds for any of the criteria pollutants analyzed and that impacts would be less than significant.

As with the Approved Project, construction and operation of the Revised Project would result in the short-term and long-term generation of criteria pollutants, respectively. As described in Section 4.0, Project Description, of this addendum, construction for the Revised Project would occur approximately over 20 months. Since the Revised Project would involve a larger development than analyzed in the 2020 MND and the trip credit from the restaurant use is no longer applied, the Revised Project would generate more trips and emissions compared to the Approved Project. However, as with the Approved Project, construction and operation of the Revised Project would result in emissions below the regional and localized emissions thresholds established by the SCAQMD, as shown in **Tables 1** and **2**. As such, the Revised Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under California Ambient Air Quality Standards (i.e., ozone [O_3], respirable particulate matter [PM_{10}], and fine particulate matter [$PM_{2.5}$]) and the National Ambient Air Quality Standards (i.e., O_3 and $PM_{2.5}$). Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Table 1
Revised Project Short-Term Construction Emissions

Emissions Source	Pollutant (pounds/day)[a,b]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Year 1 Construction Emissions[b]	5.65	53.3	54.2	0.08	6.08	3.71
Year 2 Construction Emissions[b]	3.27	29.5	37	0.06	5.59	2.83
Year 3 Construction Emissions[b]	35.4	11.4	19.9	0.03	1.63	0.66
Maximum Daily Emissions	***35.4***	***53.3***	***54.2***	***0.08***	***6.08***	***3.71***
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter

[a] Emissions were calculated using CalEEMod version 2022.1. Higher emissions between summer and winter are presented as a conservative analysis.

[b] Modeling assumptions include compliance with SCAQMD Rule 403, which requires properly maintaining mobile and other construction equipment, replacing ground cover in disturbed areas quickly, watering exposed surfaces twice daily, covering stockpiles with tarps, watering all haul roads twice daily, and limiting speeds on unpaved roads to 15 miles per hour.

Source: Refer to **Appendix A** for assumptions used in this analysis.

Table 2
Revised Project Long-Term Operational Emissions

Emissions Source	Pollutant (pounds/day)[a]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Mobile	0.95	0.67	7.72	0.02	1.66	0.43
Area	3.08	1.55	6.31	0.01	0.12	0.12
Energy	0.02	0.28	0.12	<0.01	0.02	0.02
Total Summer Emissions[b]	***4.05***	***2.50***	***14.10***	***0.03***	***1.80***	***0.57***
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Project Winter Emissions						
Mobile	0.94	0.74	7.15	0.02	1.66	0.43
Area	2.58	1.49	0.64	0.01	0.12	0.12
Energy	0.02	0.28	0.12	<0.01	0.02	0.02
Total Winter Emissions[b]	***3.53***	***2.51***	***7.90***	***0.03***	***1.80***	***0.57***
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter

[a] Emissions were calculated using CalEEMod version 2022.1.

[b] The numbers may be slightly off due to rounding.

Source: Refer to **Appendix A** for assumptions used in this analysis.

Exposure of Sensitive Receptors to Pollutants

According to the 2020 MND, sensitive receptors in the vicinity of the Project Site include residential uses adjacent to the east and south, which could be potentially affected by air pollutant emissions generated during on-site construction activities. However, the 2020 MND determined that construction emissions resulting from the Approved Project would not exceed the localized significance thresholds (LSTs) established by the SCAQMD for these existing residences. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project included stationary sources or attracted mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Approved Project does not include such uses. Therefore, the 2020 MND determined that impacts associated with localized emissions from the construction and operation of the Approved Project would be less than significant.

As with the Approved Project, sensitive receptors to the east and south of the Project Site may be potentially affected by air pollutant emissions generated during on-site construction activities of the Revised Project. Although the Revised Project would involve a slightly larger development than analyzed in the 2020 MND, construction of the Revised Project would not exceed the localized emissions thresholds for any criteria pollutants, as shown in **Table 3**. Additionally, the Revised Project proposes the same land use type as the Approved Project and would not include uses that may spend extended periods queuing and idling on the Project Site. Similar to the Approved Project, impacts associated with localized emissions from the construction and

operation of the Revised Project would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Table 3
Revised Project Construction Localized Emissions

Maximum Emissions	Pollutant (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Year 1[a]	24.90	21.70	3.60	2.11
Year 2[b]	16.30	17.90	3.48	2.00
Year 3[c]	9.85	13.00	0.38	0.35
Maximum Daily Emissions[d]	**24.90**	**21.70**	**3.60**	**2.11**
LST Screening Threshold[e]	89	623	5	3
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Note: NOx = nitrogen oxide; CO = carbon monoxide; PM10 = coarse particulate matter; PM2.5 = fine particulate matter

[a] Maximum on-site daily emissions occur during demolition phase for NO_X, and CO, and during grading phase for PM_{10}, and $PM_{2.5}$ in Year 1.

[b] Maximum on-site daily emissions occur during grading phase for NO_X, CO, PM_{10}, and $PM_{2.5}$ in Year 2.

[c] Maximum on-site daily emissions occur during building construction phase for NO_X, CO, PM_{10}, and $PM_{2.5}$ in Year 3.

[d] The maximum daily construction emissions includes fugitive dust control measures required by SCAQMD Rule 403, which includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

[e] The LST Screening Threshold was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Screening Threshold was based on the anticipated daily acreage disturbance for construction (one acre per day), the distance to sensitive receptors (adjacent to the Project Site, as such 25-meter threshold was used), and the source receptor area (SRA 9).

Source: Refer to **Appendix A** for detailed model data.

Odor and Other Emissions

According to the 2020 MND, the Approved Project would not include any uses identified by the SCAQMD as being associated with odors. However, construction activities associated with the Approved Project may generate other emissions and detectable odors from heavy-duty equipment exhaust and architectural coatings; these construction-related emissions and odors would be short term in nature and cease upon completion of construction. In addition, the Approved Project would be required to comply with existing regulations that reduce detectable odors from architectural coating application and heavy-duty equipment exhaust by limiting construction equipment idling time. Accordingly, the 2020 MND determined that the Approved Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

The Revised Project proposes the same land use type as the Approved Project and would not include land uses identified by the SCAQMD as being associated with odors. As with the Approved Project, construction activities associated with the Revised Project may generate other emissions and detectable odors from heavy-duty equipment exhaust and architectural coatings. However, as with the Approved Project, these construction-related emissions and odors would be

short term in nature and would cease upon completion of construction. In addition, the Revised Project would also be required to comply with existing regulations that reduce detectable odors from architectural coating application and heavy-duty equipment exhaust. As with the Approved Project, the Revised Project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.4 BIOLOGICAL RESOURCES

Sensitive Species

According to the 2020 MND, due to the disturbed nature of the Project Site and lack of native habitat to species known to occur in the City of Arcadia, it was determined that the Project Site would not support special-status species listed as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW). In addition, the Arcadia General Plan does not identify any sensitive or special-status species beyond the protected trees existing on-site as described below under *Local Biological Resources Policies/Ordinances*. Therefore, the 2020 MND determined that the Approved Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species and that impacts would be less than significant.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, where no sensitive or special-status species are known to occur. Accordingly, the Revised Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Riparian Habitat, Wetlands, and Conservation Plans

According to the 2020 MND, the Project Site does not support any riparian habitat, sensitive communities, or wetlands, and there are no adopted, approved, or proposed habitat conservation plans, natural community conservation plans, or other approved local, regional, or State conservation plans that cover habitats located in the City. Therefore, the 2020 MND determined that development of the Approved Project would have no impact on riparian habitat, sensitive communities, or wetlands or related to such conservation plans.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, where no riparian habitat, sensitive communities, or wetlands or applicable conservation plans have been identified. Accordingly, the Revised Project would have no impact on any riparian habitat, other sensitive natural communities, or wetlands or related to such conservation plans. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Migratory Wildlife

According to the 2020 MND, since the Project Site has been highly disturbed and is surrounded by developed, urban land uses, the Approved Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. However, 72 trees, comprising 12 protected and 60 unprotected trees, were identified on-site, which could provide habitat to animals capable of flight. According to the 2020 MND, the existing building, on-site trees, and ornamental landscaping could provide suitable roosting and nesting habitat for bird species. Of the suitable habitat identified, the Approved Project would remove 18 unprotected trees, the existing building, and other existing landscaping. As such, the 2020 MND determined that, while migratory bird species are considered highly mobile, the possible removal of suitable roosting and nesting habitat would result in the potential for minor impacts to bird species. To reduce this impact to a less-than-significant level, the 2020 MND identified the following mitigation measure:

BIO-1 Tree removal shall not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions may be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged. This measure shall be implemented to the satisfaction of the City of the Planning & Community Development Administrator or Designee.

Development of the Revised Project would require the removal of the existing building, 22 unprotected trees, and ornamental landscaping. Although the Revised Project would remove four additional trees when compared to the Approved Project, with implementation of **Mitigation Measure BIO-1** required for the Approved Project, development of the Revised Project would not result in impacts to migratory bird species beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts to migratory wildlife that would affect the determination of less-than-significant impact with mitigation in the 2020 MND.

Local Biological Resources Policies/Ordinances

According to the 2020 MND, there were 72 trees located on the Project Site, 12 of which were considered protected under the City's Tree Preservation Ordinance with all but two considered to be in good health. Four additional protected trees were identified off-site but with canopies that encroach onto the Project Site. The Approved Project would not remove any of these protected trees but would remove 18 unprotected trees to accommodate the proposed development. Of the 16 protected trees that are on or adjacent to the Project Site, the 12 on-site trees would experience some light grading within their immediate area. While the Protected Tree Report prepared for the Approved Project determined that the proposed development would not adversely affect the long-

term viability of the protected trees on or adjacent to the Project Site, some minor damage to the protected tree root systems was anticipated during construction. To prevent substantial damage to on- and off-site protected trees, meet the requirements of the Tree Preservation Ordinance, and ensure that impact to protected trees would be reduced to a less-than-significant level, the 2020 MND identified the following mitigation measure:

BIO-2 Prior to issuance of a building permit, the applicant shall demonstrate that the Project landscaping plan and planned construction are consistent with the City's Tree Protection Ordinance and the Protected Tree Study. The tree protection activities shall include the following:

1. Prior to demolition, the contractor and consulting arborist shall meet on-site to make sure tree protection zones are established around all protected trees to be preserved and to review the goals for the tree protection plan.
2. Tree protection zone fences shall be placed around each protected tree. Fences shall be at least 4 feet tall and constructed of chain-link fencing secured on metal posts. Where fences are not feasible (e.g., in haul routes or areas where workers will need frequent access), soil and root protection material can be installed.
3. The contractor shall maintain the fences and/or soil protection material throughout the completion of the Project. No staging of materials or equipment or washing out shall occur within the fenced protected zones.
4. Trees should be irrigated throughout the year. A deep watering that provides good soil moisture to a depth of 16 inches is optimal. The trees shall be deeply water once every 21 to 28 days during the summer and fall seasons when rain is unlikely.
5. For Tree No. 49, a protected deodar cedar located on the Project Site's Colorado Boulevard frontage, the deadwood shall be removed to prevent the dead branches from falling. However, no reduction pruning in the live crown of the tree is required. The tree shall be monitored for its health during the life of the Project, and irrigation shall occur at the same frequency of the other trees.
6. The arborist shall monitor a few critical phases of the Project, including pre-demolition, to direct the installation of protective fences and soil protection measures; grading and excavation; any utility or drainage trenching that is required within a tree protection zone; and a final evaluation during the landscape installation phase.
7. Additional construction best practices described in the Protected Tree Report shall be implemented.

The tree report that was prepared for the 2020 MND was updated in April 2024 to reflect the Revised Project. As with the previous tree report, the April 2024 tree report also identified 72 trees on the Project Site, 12 of which are considered protected under the City's Tree Preservation Ordinance with all but three (one more tree than previously identified) considered to be in good health. As with the previous tree report, four additional protected trees are identified off-site but with canopies that encroach onto the Project Site. Development of the Revised Project would require the removal of four additional trees, for a total of 22 unprotected trees, and light grading within the immediate area of the protected trees, which may result in minor damage to the root systems. However, as with the Approved Project, the Revised Project would comply with the Tree Preservation Ordinance and would implement the previously proposed mitigation measure to reduce impacts to

protected trees. With implementation of **Mitigation Measure BIO-2** required for the Approved Project, development of the Revised Project would not result in impacts to protected trees beyond those identified for the Approved Project.[1] Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact with mitigation in the 2020 MND.

5.5 CULTURAL RESOURCES

Historical Resources

According to the 2020 MND, no historical resources were identified on the Project Site as the existing building on-site does not meet the age requirement for eligibility listing in in the California Register of Historical Resources (CRHR). Similarly, there are no cultural resources listed or eligible for listing in the CRHR within the immediate vicinity of the Project Site. Therefore, the 2020 MND determined that, because physical alterations associated with development of the Approved Project would not extend beyond the Project Site, the Approved Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and no impact to historical resources would occur.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, where no historical resources or immediately adjacent resources have been identified. Accordingly, the Revised Project would have no impact on historical resources. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Archaeological Resources

According to the 2020 MND, no archaeological resources were identified on the Project Site or within a quarter mile of the Project Site; further, the site sensitivity for subsurface archaeological resources was considered low because the Project Site has been developed and redeveloped. However, the 2020 MND determined that the potential exists for unanticipated discovery of archaeological resources during ground-disturbing activities for the Approved Project. To reduce the impact of the Approved Project on archaeological resources to a less-than-significant level, the 2020 MND identified the following mitigation measure:

CUL-1 **Treatment of previously unidentified archaeological deposits.** If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits shall be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not eligible, no further protection of the find is necessary. If the deposits are eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of, but is not

[1] Arbor Care, Inc., *Protected Tree Report: Tree Survey, Encroachment, Protection and Mitigation for 1150 W. Colorado Boulevard, Arcadia, CA 91006*, April 2024.

necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.

As with the Approved Project, development of the Revised Project would result in ground-disturbing activities during construction and, as such, would result in potential impacts related to unanticipated discovery of archaeological resources. With implementation of **Mitigation Measure CUL-1** required for the Approved Project, development of the Revised Project would not result in impacts to archaeological resources beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact with mitigation in the 2020 MND.

Human Remains

According to the 2020 MND, the Approved Project would not likely disturb any human remains, including those interred outside of dedicated cemeteries given that the Cultural Resources Identification Memorandum prepared for the Approved Project found no indication of any past human burial activities on or near the Project Site. However, the 2020 MND determined that the potential exists to uncover buried human remains during construction-related earth-moving activities. Nonetheless, the Approved Project would be required to comply with the requirements of California Health and Safety Code Section 7050.5 related to the proper protocol to which the Approved Project must adhere in the event that buried human remains are discovered. Accordingly, the 2020 MND determined that, through compliance with California Health and Safety Code Section 7050.5, impacts of the Approved Project related to the disturbance of human remains would be less than significant.

As with the Approved Project, development of the Revised Project would include construction-related earth-moving activities and, as such, would result in potential impacts related to unanticipated uncovering of buried human remains. Through compliance with California Health and Safety Code Section 7050.5, development of the Revised Project would not result in impacts to human remains beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.6 ENERGY

Consumption of Energy Resources

According to the 2020 MND, the Approved Project's net energy consumption (i.e., minus the energy consumption of the Coco's Bakery and Restaurant that was in operation at the time) would constitute an approximate 0.0004-percent reduction from Los Angeles County's typical annual electricity consumption and an approximate 0.0007-percent reduction from Los Angeles County's typical annual natural gas consumption as a result of the Approved Project's compliance with Title 24 standards, which provide efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of Title 24 standards significantly reduces energy usage. In addition, the Approved Project would generate a net decrease of approximately 374 daily trips when compared to the previous use on-site (i.e., Coco's Restaurant). As a result, the Approved Project's operational

vehicle consumption would constitute an approximately 0.0002-percent reduction from Los Angeles County's fuel consumption. With regard to construction, the Approved Project's construction fuel consumption would increase Los Angeles County's consumption by 0.0069 percent. However, the 2020 MND determined that since the construction and operation of the Approved Project would not have any unusual characteristics that would result in excessive consumption of electricity, natural gas, and transportation fuel, the Approved Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources in comparison to other similar developments in the region, and impacts related to energy resources would be less than significant.

Since the adoption of the 2020 MND, the restaurant occupying the existing building has closed, and the building has remained vacant. As such, the trip credit from the restaurant use is no longer applicable to the Revised Project. In addition, the Revised Project would also involve a slightly larger development than analyzed in the 2020 MND. Accordingly, the Revised Project would result in higher energy consumption than the Approved Project. As shown in **Table 4**, the Revised Project's energy usage would constitute an approximate 0.0006-percent increase over Los Angeles County's typical annual electricity consumption, an approximate 0.0004 percent increase over Los Angeles County's typical annual natural gas consumption, and an approximate 0.4351-percent increase over Los Angeles County's fuel consumption. The Revised Project's construction off-road and construction on-road fuel consumption would increase the County's consumption by 0.1307 percent and 0.2683 percent, respectively. These increases would be considered nominal compared to the County's annual energy consumption.

Table 4
Revised Project and Countywide Energy Consumption

ENERGY TYPE	PROJECT ANNUAL ENERGY CONSUMPTION[a]	LOS ANGELES COUNTY ANNUAL ENERGY CONSUMPTION[b]	PERCENTAGE INCREASE COUNTYWIDE[b]
Electricity Consumption	386 MWh	68,484,956 MWh	0.0006
Natural Gas Consumption	11,107 Therms	2,820,285,935 Therms	0.0004
Fuel Consumption			
Construction Off-road Consumption[c]	41,852 Gallons	32,013,160 Gallons	0.1307
Construction On-road Consumption	29,661 Gallons	11,054,467 Gallons	0.2683
Operational Automotive Fuel Consumption[3]	45,837 Gallons	10,533,272 Gallons	0.4351

Notes: MWh = mega-watt hours

[a] As modeled in CalEEMod version 2022.1.

[b] The Revised Project's increases in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2022. The Revised Project's increase in construction and operational automotive fuel consumption is compared with the projected countywide heavy-duty vehicle/diesel fuel consumption and on-road automotive fuel consumption in 2024 (the year when construction starts). Los Angeles County electricity consumption data source: California Energy Commission, Electricity Consumption by County, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed December 27, 2023.

Los Angeles County natural gas consumption data source: California Energy Commission, Gas Consumption by County, http://www.ecdms.energy. ca.gov/gasbycounty.aspx, accessed December 27, 2023.

[c] Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.

Refer to **Appendix A** for assumptions used in this analysis.

As with the Approved Project, because the Revised Project would not have any unusual characteristics that would result in excessive operational energy consumption associated with electricity and natural gas usage and vehicular travel, the Revised Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources in comparison to other similar developments in the region, and impacts related to energy resources would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Consistency with Plans

According to the 2020 MND, the Approved Project's overall energy efficiency measures, such as the use of energy-efficient appliances, heaters, and heating, ventilation, and air conditioning (HVAC) systems; use of water-efficient landscaping (which would reduce the electricity used for water transport and treatment); and incorporation of building code-mandated energy-efficient design features, would generally support the energy reduction goals established in the City's 2019 Energy Action Plan. The Approved Project's energy consumption would be typical of senior living development projects in Southern California and would not result in an increased energy demand beyond the capacity of Southern California Edison (SCE) or Southern California Gas Company (SoCalGas). Accordingly, the 2020 MND determined that the Approved Project would not conflict with or obstruct any plans for renewable energy or energy efficiency, and no impact would occur.

The Revised Project would involve a slightly larger development than analyzed in the 2020 MND. However, as with the Approved Project, the Revised Project would use energy-efficient appliances, heaters, HVAC systems, and water-efficient landscaping (which would reduce the electricity used for water transport and treatment) and incorporate building code-mandated energy efficient design features that would generally support the energy reduction goals established in the City's 2019 Energy Action Plan. As with the Approved Project, the Revised Project's energy consumption would be typical of senior living development projects in Southern California and would not have any unusual characteristics that would result in excessive energy consumption beyond the capacity of SCE or SoCalGas. Similarly, the Revised Project would not conflict with or obstruct any plans for renewable energy or energy efficiency, and no impact would occur. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.7 GEOLOGY AND SOILS

Fault Rupture, Seismic Ground Shaking, Liquefaction, Unstable Soils, and Expansive Soils

According to the 2020 MND, the Project Site is near the Sierra Madre and Raymond Fault zones; thus, it is in an area subject to strong ground shaking due to these and other regional faults. The Project Site is also located within a liquefaction zone due to the relatively shallow groundwater depth at the Project Site. However, the Project Site is located outside Alquist-Priolo Earthquake Fault and Hazard Management Zones. The Project Site is also located in an area with potential to contain expansive soils. The Approved Project would be required to adhere to building regulations and seismic and building design standards that dictate seismic safety, earthquake-resistant structural design, and structural integrity of structures to minimize the impacts resulting from ground shaking, liquefaction, unstable soils (which may result in lateral spreading,

subsidence, or ground collapse), and expansive soils. Accordingly, with the Approved Project's adherence to applicable building regulations and seismic and building design standards, the 2020 MND determined that the Approved Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, liquefaction, lateral spreading, subsidence, ground collapse, and expansive soils, and that impacts of the Approved Project related to these issues would be less than significant.

As with the Approved Project, development of the Revised Project would be required to adhere to the same building regulations and seismic and building design standards that would minimize the impacts resulting from ground shaking, liquefaction, unstable soils, and expansive soils. With adherence to such regulations and standards, the Revised Project would not result in impacts related to these issues beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Landslides

According to the 2020 MND and the City's General Plan Safety Element, the Project Site is not located within an earthquake-induced landslide hazard area. Therefore, the 2020 MND determined that the Approved Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact related to landslides would occur.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, where no earthquake-induced landslide hazard area has been identified. Accordingly, development of the Revised Project would have no impact related to landslides. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Soil Erosion/Loss of Topsoil

According to the 2020 MND, because of the extensive ground alterations that have occurred on-site from the development of the existing building (previously occupied by a Coco's Bakery and Restaurant) and the prior uses consisting of the Eaton's Santa Anita Hotel and Restaurant, it is unlikely that any native topsoil remains in the near surface, and, thus, no impact involving the loss of topsoil would occur. However, during construction of the Approved Project, the uncovered soils may become exposed to wind or rainstorms and thus be subject to erosion. Nonetheless, to prevent stormwater-related erosion, the Approved Project would be required to comply with existing regulations, including, but not limited to, SCAQMD Rule 403 to reduce wind erosion the County of Los Angeles' National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements to reduce stormwater erosion. The Approved Project would also prepare a Stormwater Pollution Prevention Plan (SWPPP) to establish erosion and sedimentation controls as required by the City. Accordingly, with the Approved Project's compliance with existing regulations, the 2020 MND determined that the potential for soil erosion during construction activity would be reduced to a less-than-significant level.

As with the Approved Project, development of the Revised Project would be required to comply with the same regulations that would minimize the potential for soil erosion. Through compliance with existing regulations, development of the Revised Project would not result in substantial soil erosion beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Paleontological Resources

According to the 2020 MND, no paleontological resources were identified on the Project Site. However, the 2020 MND determined that the potential exists for encountering vertebrate paleontological resources during grading activities for the Approved Project. To avoid the potential destruction of paleontological resources and ensure proper identification and treatment of such resources that may be discovered during grading, the 2020 MND identified the following mitigation measure to reduce the potential impact of the Approved Project to paleontological resources to a less-than-significant level:

GEO-1 Paleontological Resource Monitor. If paleontological resources (fossils) are discovered during Project grading, work shall be halted in that area until a qualified paleontologist can be retained to assess the significance of the find. The Project paleontologist shall monitor remaining earth-moving activities at the Project Site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the CEQA Guidelines and offered for curation at an accredited facility approved by the City of Arcadia. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued.

As with the Approved Project, development of the Revised Project would include ground-disturbing activities during construction and, as such, would result in potential impacts related to the unanticipated discovery of paleontological resources. With implementation of **Mitigation Measure GEO-1** required for the Approved Project, development of the Revised Project would not result in impacts to paleontological resources beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact with mitigation in the 2020 MND.

5.8 GREENHOUSE GAS (GHG) EMISSIONS

According to the 2020 MND, the Approved Project would result in a net decrease in daily trips, thereby causing a net decrease in GHG emissions over existing conditions. Accordingly, the 2020 MND determined that the Approved Project would generate levels of GHG emissions that would have a less-than-significant impact on the environment. In addition, according to the 2020 MND, the Approved Project would be consistent with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2017 CARB Scoping Plan and SCAG 2016-2040 RTP/SCS. Therefore, the Approved Project would not conflict with any applicable plan, policy, or regulation

of an agency adopted for the purpose of reducing emissions of GHGs, and impacts would be less than significant.

The Revised Project would involve a slightly larger development than analyzed in the 2020 MND. In addition, because the restaurant occupying the existing building closed and has remained vacant since the adoption of the 2020 MND, the trip credit from the restaurant use is no longer applied. As a result, the Revised Project would emit a total of 598.30 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year, which would be 801.95 $MTCO_2e$ per year higher than the Approved Project, as shown in **Table 5**.

Table 5
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4	N_2O	Refrigerants	CO_2e
	Metric Tons/year[a,b]				
Approved Project Emissions					
Total Approved Project-Related Emissions[c]	-202.95 $MTCO_2e$/year				
Revised Project Emissions					
Direct Emissions					
Construction (amortized over 30 years)[d]	27.27	<0.01	<0.01	0.01	27.27
Area Source	23.20	0.01	<0.01	0.00	23.20
Mobile Source	294.00	0.02	0.01	0.44	299.00
Refrigerants	0.00	0.00	0.00	0.22	0.22
Total Direct Emissions	*344.47*	*0.03*	*0.01*	*0.67*	*349.70*
Indirect Emissions					
Energy	152.00	0.01	<0.01	0.00	153.00
Solid Waste	24.10	2.41	0.00	0.00	84.40
Water Demand	7.31	0.12	<0.01	0.00	11.20
Total Indirect Emissions	*183.41*	*2.54*	*<0.01*	*0.00*	*248.60*
Total Revised Project-Related Emissions	***598.30 $MTCO_2e$/year***				
Difference between Approved Project and Revised Project Emissions[e]	***801.95 $MTCO_2e$/year***				

Notes:

[a] Emissions calculated using California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model.

[b] Totals may be slightly off due to rounding.

[c] Total Approved Project GHG emissions are from the 2020 MND. In the 2020 MND, the Project resulted in a GHG emissions reduction of approximately 202.95 MT CO_2e per year when compared to the existing Coco's Restaurant. This overall reduction in GHG emissions was attributed to the decrease in total daily vehicle trips associated with the development as compared with existing conditions at the time.

[d] Total Revised Project construction GHG emissions equate to 818.00 $MTCO_2e$. Value shown is amortized over the lifetime of the Revised Project (assumed to be 30 years).

[e] Overall resultant emissions were derived by subtracting the Approved Project's emissions from the Revised Project's Emissions.

Refer to **Appendix A** for detailed model input/output data.

Since there is no applicable adopted numerical threshold of significance for GHG emissions, the methodology for evaluating the Revised Project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or

mitigating GHG emissions. Since the adoption of the 2020 MND, the California Air Resources Board (CARB) has adopted the 2022 Scoping Plan, and SCAG has adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Accordingly, the evaluation of consistency with such plans is the sole basis for determining the significance of the Revised Project's GHG-related impacts on the environment. The 2022 Scoping Plan describes the approach the State will take to achieve carbon neutrality by 2045, and the 2020-2045 RTP/SCS includes strategies that will assist the region to reach the regional target of reducing GHG from transportation sector.

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each Assembly Bill (AB) 32 inventory sector. An evaluation of applicable reduction actions/strategies by emissions source category to determine how the Revised Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan is provided in **Table 6**.

Table 6
Consistency with the 2022 Scoping Plan

Actions and Strategies	Project Consistency Analysis
Smart Growth/Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent**. The Revised Project would provide a dining room, a café, a laundry room, a sensory wellness room, a reading room, a sitting and music area, a beauty salon, a fitness center with a physical therapy area, a bar/lounge, an activity room, a media room, and separate open-air courtyards and outdoor spaces. Providing these amenities on-site would reduce VMT as the residents do not need to drive off-site for services. In addition, the residents are anticipated to have limited mobility and, as such, are expected to generate a very small number of vehicle trips. Furthermore, the Revised Project would provide bicycle parking, which would promote an alternative mode of transportation for visitors and employees. As such, the Revised Project would be consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent.** The City of Arcadia has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if such an ordinance is adopted, the Revised Project would be required to comply with the applicable goals or policies limiting the use of natural gas equipment in the future. Furthermore, the Revised Project would install high efficiency lighting and appliances. As such, the Revised Project would be consistent with this action.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045	**Consistent.** The City of Arcadia has not adopted an ordinance or program requiring electric-powered construction equipment. However, if such an ordinance is adopted, the Revised Project would be required to comply with the applicable goals or policies requiring the use of electric construction equipment in the future. As such, the Revised Project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent**. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The Revised Project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383. As such, the Revised Project would be consistent with this action.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG emissions reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the California Air Resources Board targets adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional vehicle miles traveled (VMT) and GHG reduction goals, as required by the State.

Table 7 presents the Revised Project's consistency with these five strategies. As shown therein, the Revised Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 7
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening	**Consistent.** The Project Site is located within an area that is near residential uses. The Revised Project would be required to incorporate pedestrian-oriented features, bicycle parking, EV charging stations, and vanpool/carpool parking spaces to promote other forms of transportation. Existing bus stops are located less than 1 mile south of the Project Site. Therefore, the Revised Project would focus growth near destinations and mobility options.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply	PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening	**Consistent.** The Revised Project would involve development of an assisted living facility within a mile of a transit station, which increases housing supply and supports reduction of GHG emissions. Therefore, the Revised Project would be consistent with this reduction strategy.

Table 7
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
• Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions		
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	HQTA, TPAs, NMA, Livable Corridors	**Consistent.** The Revised Project would provide seven EV parking spaces, including one that is ADA-compliant. Therefore, the Revised Project would promote low emission technology innovations and help the City, County, and State meet their GHG reduction goals. The Revised Project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	Center Focused Placemaking, PGA, Job Centers, HQTAs, TPA, NMAs, Livable Corridors, SOIs, Green Region, Urban Greening.	**Consistent.** The Revised Project would be located close to bus stops and provide bicycle parking spaces, which would promote alternative modes of transportation. Furthermore, the Revised Project would be required to comply with 2022 Title 24 standards and install high efficiency features, such as energy-efficient appliances, low-flow fixtures, and water-efficiency irrigation. Thus, the Revised Project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project	Green Region, Urban	**Consistent.** The Revised Project involves development of an assisted

Table 7
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	Greening, Greenbelts and Community Separators	living facility on developed land and, therefore, would not interfere with regional wildlife connectivity or agricultural land. As discussed above, the Revised Project would be required to comply with the 2022 Title 24 standards, which would help reduce energy consumption and reduce GHG emissions. Thus, the Revised Project would support efficient development that reduces energy consumption and GHG emissions. The Revised Project would be consistent with this reduction strategy.

Source: Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.

In summary, the Revised Project's characteristics render it consistent with statewide, regional, and local climate change mandates, plans, policies, and recommendations. More specifically, the GHG plan consistency analysis demonstrates that the Revised Project would comply with the regulations and GHG reduction goals, policies, actions, and strategies outlined in the 2022 Scoping Plan and 2020-2045 RTP/SCS. Consistency with these plans would reduce the impact of the Revised Project's incremental contribution of GHG emissions. Accordingly, the Revised Project would not conflict with any applicable plan, policy, regulation, or recommendation adopted for the purpose of reducing GHG emissions. Impacts in this regard would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact in the 2020 MND.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Routine Transport, Use, Disposal, or Accidental Release of Hazardous Materials

According to the 2020 MND, given the age of the existing restaurant building on-site (constructed in the 1970s), there is potential for the building to contain asbestos-containing materials (ACM) and/or lead-based paint (LBP). However, the Approved Project would be required to comply with existing regulations to properly identify, remove, handle, and dispose of ACMs and LBP. Compliance with these regulations would ensure that existing hazardous materials would be effectively disposed of during the demolition phase and would, therefore, have no effect on the health and safety of construction workers and area residents. In addition, the transport, use, and disposal of hazardous materials, as well as the potential release of these materials to the environment, are closely regulated through State and federal laws. Furthermore, the use of hazardous materials during operation of the Approved Project would likely involve minor quantities of typical household hazardous materials, such as cleaning products, solvents, adhesives,

refrigerants, paints, other chemical materials used in building maintenance, small amounts of oil and fuels from internal combustion engines, pesticides and herbicides, sharp or used needles, and electronic waste. This level of hazardous materials use would be typical for institutional uses and, thus, is not identified as a significant threat to the environment. Accordingly, the 2020 MND determined that based on the type of land use proposed, the relatively minor anticipated level of use, storage, and disposal of hazardous materials and compliance with various State and federal laws regulating hazardous materials, the Approved Project would result in a less-than-significant impact involving the routine transport, use, or disposal of hazardous materials or the accidental release of hazardous materials into the environment.

The Revised Project proposes the same land use type as the Approved Project and would not include land uses that may generate hazardous materials or hazardous waste beyond those identified for the Approved Project. As with the Approved Project, the Revised Project would be required to comply with the same regulations that would minimize the impacts to the public and the environment as related to the routine transport, use, or disposal of hazardous materials or the accidental release of hazardous materials into the environment, including the removal of ACM and LBP if found on-site. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Impacts Related to Hazardous Emissions, Cortese List Site, Airports, and Wildland Fires

According to the 2020 MND, there are no schools within a quarter mile of the Project Site, and, as such, the Approved Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school. In addition, the Project Site is not included on the Cortese List, which is the list of hazardous waste sites or facilities compiled by the California Department of Toxic Substances Control under Government Code Section 65962.5. As such, the Approved Project would not create a significant hazard to the public or the environment. Furthermore, the nearest airport to the Project Site is the San Gabriel Airport, which is approximately 4.5 miles to the southeast, and, as such, the Approved Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Finally, the Project Site is not located within a Very High Fire Hazard Severity Zone, as identified by the California Department of Forestry and Fire Protection, or surrounded by wildland areas. As such, the Approved Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fire. Accordingly, the 2020 MND determined that the Approved Project would have no impact related to these issues.

The Revised Project would be developed within the boundaries of the Project Site and proposes the same land use type as the Approved Project. Accordingly, as with the Approved Project, the Revised Project would have no impact related to hazardous emissions near schools, creating a hazard as a hazardous waste site, airport safety hazards, or wildland fires. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Emergency Evacuation Plan

Access to the Project Site is currently available on Michillinda Avenue and Colorado Boulevard. According to the 2020 MND, the Approved Project would have access to major thoroughfares that

have been identified as a Principal Travel Corridor by the City's General Plan, such as Michillinda Avenue, I-210, and Foothill Boulevard, during an emergency evacuation. In addition, the Approved Project would reduce the number of daily trips and peak hour trips generated by the Coco's Bakery and Restaurant, which was in operation at the time, thereby reducing traffic on adjacent and nearby thoroughfares. Therefore, the 2020 MND determined that development of the Approved Project would not impair implementation of an adopted emergency response plan or evacuation plan.

The Revised Project proposes the same land use type as the Approved Project and would not include land uses that may interfere with or obstruct emergency evacuation of the Project Site and the Project vicinity. As with the Approved Project, the Revised Project would have access to major thoroughfares during an emergency evacuation. The Revised Project would generate no more than 30 vehicle trips in the peak hours, as presented in **Appendix B** of this Initial Study. This minimal increase in peak hour trips would have a negligible impact on the area intersections. Accordingly, as with the Approved Project, development of the Revised Project would not impair implementation of an adopted emergency response plan or evacuation plan. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.10 HYDROLOGY AND WATER QUALITY

Water Quality

According to the 2020 MND, the Approved Project could have both short- and long-term impacts on water quality. Short-term impacts would occur during the construction phase, when the pollutants of greatest concern are sediment and hydrocarbon or fossil fuel remnants, which could run off the Project Site without any best management practices (BMPs) in place. Long-term impacts would result from stormwater runoff from the Project Site during operation of the Approved Project. However, construction runoff is regulated by the NPDES Construction General Permit, which requires identification of a variety of water quality control BMPs to be specified on construction plans and implemented throughout construction. Similarly, the Approved Project would be required to comply with the City's Low Impact Development (LID) Ordinance, which requires the preparation of a LID Plan that addresses on-site stormwater runoff retention and treatment and implementation of post-construction BMPs, such as cleaning the parking areas and the sidewalks along the Project Site's frontages. Accordingly, the 2020 MND determined that through compliance with existing regulations and the preparation of a LID Plan, potential water quality impacts during construction and operation of the Approved Project would be avoided or reduced to less-than-significant levels, and the Approved Project would not result in violations of any water quality standards or waste discharge requirements.

As with the Approved Project, the Revised Project would be required to comply with the same regulations that would minimize the impacts on water quality, including the preparation of a LID Plan, and, as such, would not substantially degrade surface or groundwater quality and result in impacts beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Groundwater

According to the 2020 MND, there are no groundwater wells on the Project Site, and none were proposed by the Approved Project. The Approved Project would reduce, but not substantially change, the amount of impervious surface area on-site and, as such, would not have an effect on groundwater levels beneath the Project Site; if any, the effect would be minimal and likely beneficial given the Approved Project's reduction in overall impervious surfaces as compared to existing conditions. As such, operation of the Approved Project would not interfere with groundwater recharge. Accordingly, the Approved Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Approved Project may impede sustainable groundwater management of the basin. Therefore, impacts to groundwater would be less than significant.

As with the Approved Project, development of the Revised Project would not substantially change the amount of impervious surface area on-site and would not have an effect on groundwater levels beneath the Project Site. Similar to the Approved Project, the Revised Project would likely have a beneficial effect given the reduction in overall impervious surfaces as compared to existing conditions. Accordingly, the Revised Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Revised Project may impede sustainable groundwater management of the basin, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Drainage

According to the 2020 MND, there are no natural drainage courses on the Project Site, and, because the Project Site is currently fully developed with impervious surfaces, the Approved Project would not result in a substantial alteration of the existing drainage pattern of the Project Site. The Approved Project would be required to comply with existing regulations to (1) minimize erosion that may lead to siltation on- or off-site during construction; (2) ensure proper drainage to avoid or redirect flooding on- or off-site; and (3) prevent discharge of sediment and polluted stormwater runoff, and retain, control, and treat stormwater runoff on the Project Site. Accordingly, the 2020 MND determined that the Approved Project would not alter the existing drainage pattern of the Project Site in a manner that would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, create or contribute runoff water that would exceed the capacity of the existing stormwater drainage system or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts related to drainage would be less than significant.

As with the Approved Project, development of the Revised Project would not substantially change the amount of impervious surface area on-site as compared to existing conditions. In addition, the Revised Project would be required to comply with same existing regulations as the Approved Project. Furthermore, similar to the Approved Project, the Revised Project would likely have a beneficial effect given the reduction in overall impervious surfaces as compared to existing conditions. A modular wetland is proposed in the southeastern corner of the Project Site to collect and treat surface water runoff from the Project Site prior to draining to the existing curb inlet and then to the existing storm drainage system to the east. Accordingly, the Revised Project would

not alter the existing drainage pattern of the Project Site that would result in flooding on- or off-site, create or contribute runoff water that would exceed the capacity of the existing stormwater drainage system or provide substantial additional sources of polluted runoff, or impede or redirect flood flows; as such, impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Flooding

According to the 2020 MND, the Project Site is not located near any reservoir, other bodies of water, or the Pacific Ocean to be potentially inundated by seiches or tsunamis. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the area, the Project Site is located within Zone X, which represents an area of minimal flood hazard. However, according to the City's General Plan Safety Element, the Project Site is located within a designated inundation area for the Morris S. Jones Reservoir. Nonetheless, dams are regulated and monitored for structural safety by the California Department of Water Resources in accordance with the California Water Code to reduce the potential for catastrophic failure and inundation of downstream areas, such as the Project Site. In addition, the Approved Project would be required to implement a LID plan, which would incorporate water quality control features on-site, such as maintenance of landscape areas and proper storage of any hazardous materials, which would prevent the release of pollutants in the unlikely event that the Project Site is inundated by catastrophic dam failure. Therefore, the 2020 MND determined that the Approved Project would not risk release of pollutants due to inundation, and no impact would occur.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, which has been identified as not being subject to inundation by seiches or tsunamis. Given that the Revised Project is located within a designated inundation area for the Morris S. Jones Reservoir, the Revised Project would be required to implement water quality control features on-site to prevent the release of pollutants when inundated. Accordingly, the Revised Project would not risk release of pollutants due to inundation, and no impact would occur. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Consistency with Water Quality Control Plan or Sustainable Groundwater Management Plan

According to the 2020 MND, because the Approved Project would not result in a substantial increase in potable water demand and because it would not involve the use, disposal, or storage of hazardous chemicals that could impact water quality, the Approved Project would not interfere with the Main Basin Watermaster's 2019 Supply Plan, and impacts would be less than significant.

Although the Revised Project would consume and generate more water and wastewater, respectively, than the Approved Project, the Revised Project would also not result in a substantial increase in potable water demand. As discussed in Section 5.19, Utilities/Service Systems, of this addendum, because the Revised Project is consistent with the underlying zoning and General Plan designation for the Project Site, the population and employment growth associated with the Revised Project would have been incorporated into the SCAG 2020-2045 RTP/SCS growth projections, on which the City's 2020 Urban Water Management Plan (UWMP) was based.

According to the 2020 UWMP, the City can meet water demands during normal years, single dry years, and five consecutive year drought periods through 2045.[2] In addition, as with the Approved Project, because the Revised Project would not involve the use, disposal, or storage of hazardous chemicals that could impact water quality, the Revised Project would not interfere with the Main Basin Watermaster's 2019 Supply Plan, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.11 LAND USE AND PLANNING

Physical Division of an Established Community

According to the 2020 MND, the Approved Project would not result in physical alterations to any land use beyond the Project Site boundaries or significant changes to the public rights-of-way beyond the widening of Colorado Boulevard and Michillinda Avenue along the Project Site's frontages to be implemented by the City following the Approved Project's 4-foot dedication from the Project Site. Therefore, the 2020 MND determined that the Approved Project would not physically divide an established community, and no impact would occur.

As with the Approved Project, development of the Revised Project would occur on the Project Site and, as such, would not result in physical alterations to any land use beyond the Project Site boundaries. Similar to the Approved Project, the Revised Project would dedicate 4 feet from the Project Site to allow the City to improve and widen Colorado Boulevard and Michillinda Avenue along the Project Sites frontages. In addition, the Revised Project would connect to an existing 21-inch sewer main to the west along Michillinda Avenue via a new sewer lateral. However, as with the Approved Project, the Revised Project would not physically divide an established community, and no impact would occur. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

Conflict with Plans, Policies, or Regulations

According to the 2020 MND, the Approved Project would be consistent with the development standards and regulation of the underlying C-G zone upon approval of a CUP. In addition, the Arcadia General Plan Parks, Recreation, and Community Resources Element and the Safety Element do not identify any land use restrictions for the Project Site that, respectively, (1) would require conservation of the Project Site for purposes of protecting wildlife habitat or other natural resources or (2) pertain to avoidance of environmental hazards on or near the Project Site. The Project Site is not within an area where special land use policies or zoning standards have been created for the purpose of avoiding or mitigating environmental effects. Accordingly, the 2020 MND determined that the Approved Project would not conflict with an applicable land use plan, policy, or regulation established for the purpose of avoiding or mitigating an environmental effect, and impacts related to land use and planning would be less than significant.

As with the Approved Project, development of the Revised Project would occur on the Project Site and not within an area where special land use policies or zoning standards have been created

[2] City of Arcadia, *Final 2020 Urban Water Management Plan*, June 2021.

for the purpose of avoiding or mitigating environmental effects. Additionally, the Revised Project would be consistent with the existing General Plan Land Use designation of Commercial and zone of G-C. As discussed in Section 4.0, Project Description, of this addendum, the Revised Project is entitled to receive a density bonus and deviate from the maximum permitted FAR for the Project Site through a CUP; the Revised Project would comply with all other applicable development standards. Accordingly, as with the Approved Project, the Revised Project would not conflict with an applicable land use plan, policy, or regulation established for the purpose of avoiding or mitigating an environmental effect, and impacts related to land use and planning would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.12 MINERAL RESOURCES

According to the 2020 MND, since the Project Site is currently developed with a building previously occupied by Coco's Bakery and Restaurant and surface parking, development of the Approved Project on the Project Site would not result in the loss of availability of (1) a known mineral resource that would be of regional or Statewide value or (2) a locally-important mineral resource recovery site. Accordingly, the 2020 MND determined that the Approved Project would have no impact to mineral resources.

As with the Approved Project, development of the Revised Project would occur within the Project Site boundaries and, as such, would not result in the loss of a known mineral resource or a locally-important mineral resource recovery site. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.13 NOISE

Temporary or Permanent Increase in Ambient Noise Levels

According to the 2020 MND, although construction noise is allowed during the City's allowable construction hours and is not considered to be a significant impact during those hours, construction of the Approved Project could expose adjoining residential uses to temporary high noise levels. To reduce the short-term construction impacts on adjacent sensitive receptors to less-than-significant levels, the 2020 MND identified the following mitigation measure:

NOI-1 Prior to issuance of a Grading Permit, the Project applicant shall demonstrate, to the satisfaction of the City of Arcadia Planning Division, that the Project complies with the following:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.
- The contractor shall provide evidence that a construction staff member will be designated as a noise disturbance coordinator and will be present on-site during construction activities. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. When a

complaint is received, the noise disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early or bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Planning & Community Development Administrator (or designee). All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. All necessary signage and notices shall be posted on or sent to residential units immediately surrounding the construction site no less than two weeks prior to the start of noise-generating construction activities on the Project Site.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- Prior to issuance of any Grading or Building Permit, the Project applicant shall demonstrate to the satisfaction of the Community Development Director (or designee) that construction noise reduction methods shall be used where feasible. These reduction methods may include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and utilizing electric air compressors and similar power tools.
- Construction haul routes shall be designed to avoid noise-sensitive uses (e.g., residences and convalescent homes) to the extent feasible.

In addition, according to the 2020 MND, the Approved Project would generate fewer trips when compared to the existing use on the Project Site at the time (i.e., Coco's Bakery and Restaurant). As such, the 2020 MND determined that, because the Approved Project's trip generation would reduce existing traffic volumes along local roadways, traffic noise levels also would be reduced and would be less than significant. Additionally, the 2020 MND determined that the Approved Project's operational stationary noise associated with mechanical equipment, slow-moving trucks, and parking areas would not exceed the City's noise standards or introduce new sources of noise in the Project vicinity compared to existing conditions. Therefore, operation of the Approved Project was determined to result in less-than-significant noise impacts in the 2020 MND.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, with sensitive receptors located immediately adjacent to the east and south. Although the Revised Project would involve a slightly larger development and, thus, longer construction duration than analyzed in the 2020 MND, there would be no change in the construction equipment anticipated to be used or the distance between the closest receptors and the proposed construction activities. As with the Approved Project, although construction noise is allowed during the City's allowable construction hours and is not considered to be a significant impact during those hours, the Revised Project could expose adjoining residential uses to temporary high noise levels and would, therefore, be required to comply with **Mitigation Measure NOI-1** to reduce short-term construction noise impacts to less-than-significant levels. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any

new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact with mitigation in the 2020 MND.

As discussed in Section 5.17, Transportation/Traffic, of this addendum, the Revised Project would generate more trips compared to the Approved Project. However, the Revised Project would only add 17 or fewer trips to the two driveways when compared to the Approved Project; this increase in traffic would be equivalent to an average of no more than 1 trip every 3.5 minutes and, as such, would have a negligible impact on the area intersections. In addition, according to the City of Arcadia Traffic Volume Map, existing daily traffic volumes along Colorado Street and Michillinda Avenue are 20,842 and 18,522 trips per day, respectively.[3] As determined by the California Department of Transportation, a doubling in roadway traffic volumes is required to generate any noticeable increase in roadway noise levels.[4] Accordingly, the Revised Project's minimal trip generation of approximately 296 trips per day (compared to the 208 trips per day generated by the Approved Project) would not double existing traffic volumes along Colorado Boulevard and Michillinda Avenue or result in a perceptible increase in traffic noise. In addition, the Revised Project proposes the same land use type as the Approved Project and would not include stationary sources, such as mechanical equipment, slow-moving trucks, and parking areas, beyond those identified for the Approved Project. Therefore, the Revised Project's operational stationary noise levels would not exceed the City's noise standards or introduce new sources of noise in the Project vicinity compared to existing conditions and would be considered less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Groundborne Vibration

According to the 2020 MND, construction of the Approved Project would not generate groundborne vibration exceeding the building damage or human annoyance thresholds established by the Federal Transit Administration. Similarly, operation of the Approved Project would not include uses that would generate excessive groundborne vibration. Accordingly, the 2020 MND determined that the Approved Project would not result in excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, with sensitive receptors located immediately adjacent to the east and south. Although the Revised Project would involve a larger development and longer construction duration than analyzed in the 2020 MND, there would be no change in the construction equipment anticipated to be used or the distance between the closest receptors and the proposed construction activities. Accordingly, construction and operation of the Revised Project would not generate groundborne vibration exceeding the building damage or human annoyance thresholds or include uses that would generate excessive groundborne vibration beyond those identified for the Approved Project. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

[3] City of Arcadia, Traffic Volume Map, February 2019.
[4] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

Airport-Related Noise

As discussed in Section 5.9, Hazards and Hazardous Materials, of this addendum, the nearest airport to the Project Site is the San Gabriel Airport, which is approximately 4.5 miles to the southeast, and, as such, the Approved Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Accordingly, the 2020 MND determined that the Approved Project would have no impact related to excessive noise levels associated with aircraft operation.

The Revised Project would be developed within the boundaries of the Project Site and proposes the same land use type as the Approved Project. Accordingly, as with the Approved Project, the Revised Project would have no impact related to excessive noise levels associated with aircraft operation. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.14 POPULATION AND HOUSING

According to the 2020 MND, the Approved Project, which was estimated to generate 80 residents and 40 employees,[5] would account for approximately 0.9 percent of the forecasted population growth and 0.7 percent of the forecasted employment growth between 2012 and 2040 as projected in the SCAG 2016-2020 RTP/SCS.[6] The 2020 MND determined that the Approved Project would not result in substantial unplanned growth in the area, and impacts would be less than significant.

The Revised Project would have 114 beds, resulting in the generation of 114 residents. Using the same assumption (based on SCAG's Employment Density Report) as that for the Approved Project, the Revised Project is also estimated to generate 40 employees. The SCAG 2020-2045 RTP/SCS, the update to the 2016-2040 RTP/SCS, estimates that the City's population would increase by 4,900 residents and 2,800 employees between 2016 and 2045. Accordingly, the Revised Project's residents and employees would account for approximately 2.3 percent of the forecasted population growth and 1.4 percent of the forecasted employment growth between 2016 and 2045. Although the Revised Project would increase the number of residents and employees and the corresponding percentages in forecasted growth, the Revised Project would remain consistent with the zoning and General Plan land use designation for the Project Site pursuant to the California Density Bonus Law, as discussed in Section 4.0, Project Description, of this addendum. As with the Approved Project, the Revised Project would not result in substantial unplanned growth in the area, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

With regard to displacement of people or housing, the Project Site contains an existing building, which was previously occupied by Coco's Bakery and Restaurant and is now vacant, and surface

[5] According to the 2020 MND, the number of employees was calculated using SCAG's Employment Density Report (*Employment Density Study Summary Report*, Table B-1, 2001), which provided an average employee density of 14.24 employees per acre for Special Care Facilities in Los Angeles County. As the Project Site is 2.79 acres in size, the estimated number of employees serving the Approved Project would be 40.

[6] The 2016-2040 RTP/SCS estimated that the population in Arcadia would increase from 56,700 to 65,900 and employment from 28,900 to 34,400 between 2012 and 2040.

parking. Accordingly, because there are no current residents or housing units on the Project Site, the Approved Project would not displace people or housing, necessitating the construction of replacement housing elsewhere. As such, no impact related to displacement would occur. As with the Approved Project, the Revised Project would occur within the Project Site boundaries and, thus, would not displace people or housing. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.15 PUBLIC SERVICES

Fire and Police Protection

According to the 2020 MND, the Approved Project would incrementally increase the demand for fire and police protection services. However, the Approved Project would be required to comply with the California Fire Code and Arcadia Fire Department regulations governing hydrant placement, fire flows, and building construction, and with the Arcadia Fire Department's review and approval of the Project Site's access and circulation plans. With regard to police protection, the Approved Project would include on-site security resources, such as security guards and orderlies, to patrol the grounds, monitor locked entry and exit points to the property, and protect residents. In addition, the Approved Project would be required to comply with Policy S-5.11 of the Arcadia General Plan and pay its fair share of costs associated with any necessary increases in public safety equipment, facilities, and staffing to provide life safety protection. Accordingly, through compliance with existing regulations and incorporation of safety and security features in the design of the proposed development, the Approved Project would have a less-than-significant impact on fire and police protection services.

As with the Approved Project, the Revised Project would incrementally increase the demand for fire protection and emergency medical services. Although the Revised Project would generate 34 additional residents than the Approved Project, the Revised Project would not present unique or more difficult circumstances than the Approved Project that would warrant new or expanded fire or police protection services or facilities. As with the Approved Project, the Revised Project would be required to comply with existing regulations and incorporate safety and security features in the design of the proposed development resulting in a less-than-significant impact on fire and police protection services. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Schools, Parks, and Other Public Facilities

According to the 2020 MND, because the Approved Project would be inhabited by seniors affected by memory loss, there would be no school-aged children living on the Project Site that would incrementally increase the demand for schools. In addition, the residents of the Approved Project were anticipated to have limited mobility and, thus, not expected to substantially increase the demand on parks, libraries, and other public facilities. Furthermore, the Approved Project would include activity rooms, enclosed landscaped outdoor area with gardens, walking paths, and a gazebo for use by the Project's residents. Accordingly, the 2020 MND determined that the Approved Project would have no impact on schools, City park facilities, libraries, and other public facilities.

As with the Approved Project, the Revised Project would be inhabited by seniors affected by memory loss, and, as such, no school-aged children would be living on the Project Site. Similarly, the residents of the Revised Project are anticipated to have limited mobility and are not expected to substantially increase the demand on parks, libraries, and other public facilities. As with the Approved Project, the Revised Project would provide indoor recreational amenities, such as a reading room, sitting and music areas, sensory wellness room, a bar/lounge, an activity room, a media room, and a fitness center with a physical therapy area, and outdoor recreational amenities, such as open air courtyards, a seating area with outdoor workout equipment, a dog park, and a bocce ball court, for use by the Project's residents. Accordingly, as with the Approved Project, the Revised Project would have no impact on schools, City park facilities, libraries, and other public facilities. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.16 RECREATION

As discussed in Section 5.16, Public Services (Parks), residents of the Approved Project were expected to have limited mobility and, thus, not expected to increase the demand on parks or other recreational facilities. In addition, the Approved Project would include activities rooms, enclosed landscaped outdoor area with gardens, walking paths, and a gazebo for use by the Project's residents. Accordingly, the 2020 MND determined that the Approved Project would have no impact on parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

As with the Approved Project, the residents of the Revised Project are anticipated to have limited mobility and are not expected to substantially increase the demand on parks or other recreational facilities. As with the Approved Project, the Revised Project would provide indoor recreational amenities, such as a reading room, sitting and music areas, sensory wellness room, a bar/lounge, an activity room, a media room, and a fitness center with a physical therapy area, and outdoor recreational amenities, such as open air courtyards, a seating area with outdoor workout equipment, a dog park, and a bocce ball court, for use by the Project's residents. Accordingly, as with the Approved Project, the Revised Project would have no impact on parks or other recreational facilities. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.17 TRANSPORTATION/TRAFFIC

Conflict with Plans, Policies, or Regulations

According to the 2020 MND, while the Approved Project's construction traffic would temporarily affect traffic flow on the surrounding street network, particularly along the truck haul routes, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following the demolition and grading phases. Accordingly, the 2020 MND determined that, because the construction traffic impacts associated with the Approved Project would be temporary, they would not significantly affect the performance of the circulation system with respect to level of service standards or other metrics related to congestion and travel delay. During operation, the Approved Project would generate fewer trips when compared to the existing use on the Project Site at the

time (i.e., Coco's Bakery and Restaurant), resulting in a less-than-significant impact related to trip generation, trip distribution, and intersection performance. In addition, the residents of the Approved Project were anticipated to have limited mobility and, as such, would have little to no impact on surrounding bus, pedestrian, or bicycle facilities. Project employees were anticipated to have a small impact on bus, pedestrian, or bicycle systems as the number of employees and visitors that would utilize transit or bicycle infrastructure to access the senior living and memory care facility under the Approved Project as compared to those of the existing use of the Project Site at the time was deemed negligible. Accordingly, the 2020 MND determined that the Approved Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities; as such, impacts related to transportation would be less than significant.

The Revised Project proposes the same land use type as the Approved Project and would temporarily affect traffic flow on the surrounding street network during construction. As with the Approved Project, the short-term nature of the construction traffic impacts would not significantly affect the performance of the circulation system with respect to level of service standards or other metrics related to congestion and travel delay. During operation, because the Revised Project would involve a larger development than analyzed in the 2020 MND and the trip credit from the restaurant use is no longer applied due to its closing, the Revised Project would generate more trips compared to the Approved Project (see **Appendix B**). However, the Revised Project would only add 17 or fewer trips to the two driveways when compared to the Approved Project; this increase in traffic would be equivalent to an average of no more than 1 trip every 3.5 minutes and, as such, would have a negligible impact on the area intersections. As with the Approved Project, the residents of the Revised Project are anticipated to have limited mobility and, as such, would have little to no impact on surrounding bus, pedestrian, or bicycle facilities. In addition, because the number of employees under the Revised Project would be the same as that under the Approved Project employees, as discussed in Section 5.14, Population and Housing, of this addendum, the Revised Project would not result in impacts on bus, pedestrian, or bicycle systems beyond those identified for the Approved Project. Accordingly, as with the Approved Project, the Revised Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities; as such, impacts related to transportation would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

VMT Analysis

According to the 2020 MND, the Approved Project would result in a substantial reduction in daily trips compared to the existing use at the time. Accordingly, the 2020 MND determined that the Approved Project's impact on citywide and regional VMT would be less than significant.

With regard to the Revised Project, the City of Arcadia *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* identifies Assisted Living Facilities as one of the types of land uses under the VMT Project Type Screening criteria. Land uses of this type are presumed to result in a less-than-significant transportation impact under CEQA and do not require a detailed quantitative VMT assessment. Accordingly, the Revised Project would not conflict with CEQA Guidelines Section 15064.3(b), and impacts would be considered less than significant. Therefore, there are no material changes in circumstances, and the Revised Project

would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Hazards Due to a Geometric Design Feature

According to the 2020 MND, the Approved Project would not create uses that could generate an incompatible use of area roadways, which could impair circulation or safety on area roads. In addition, no internal street network was proposed as part of the Approved Project, and, therefore, no potential hazards associated with a geometric design feature, such as a sharp curve, would occur within the Project Site. The Approved Project proposed a single entrance and exit driveway onto Colorado Boulevard, which would be designed to meet the mandatory design standards of the City of Arcadia as it relates to width, intersection control, and sight distance. Accordingly, the 2020 MND determined that through compliance with applicable City requirements related to roadway safety, the Approved Project would not increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

The Revised Project proposes the same land use type as the Approved Project and, as such, would not create any uses that could impair circulation or safety on area roads. As with the Approved Project, no internal street network is proposed as part of the Revised Project, and, therefore, no potential hazards associated with a geometric design feature, such as a sharp curve, would occur within the Project Site. The Revised Project would retain the two existing driveways, which would be reconstructed in the same general location, to provide site access along Colorado Boulevard and Michillinda Avenue; the design of these driveways would be reviewed to confirm that the reconstruction meets the mandatory design standards of the City of Arcadia as they relate to width, intersection control, and sight distance. Accordingly, as with the Approved Project, through compliance with applicable City requirements related to roadway safety, the Revised Project would not increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Emergency Access

According to the 2020 MND, the Approved Project's building plans and structures would be reviewed by the Arcadia Fire Department for compliance with applicable safety and emergency access standards, including the adequacy of fire flow, access, and fire hydrant placement. In addition, because the Project Site is located in an urban setting, where the surrounding street network allows for access to the Project Site from multiple directions and because the Approved Project would be designed to accommodate emergency response vehicles, the 2020 MND determined that the Approved Project's impacts related to emergency access would be less than significant.

As with the Approved Project, the Revised Project's building plans and structures would be reviewed by the Arcadia Fire Department for compliance with applicable safety and emergency access standards, including the adequacy of fire flow, access, and fire hydrant placement. Similarly, because it is confined to the same Project Site, the Revised Project's impacts related to emergency access would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially

more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.18 TRIBAL CULTURAL RESOURCES

According to the 2020 MND, no documented historic or prehistoric cultural resources were identified on the Project Site or within a quarter-mile radius of the Project Site. As such, the 2020 MND determined that the Approved Project would not cause an adverse change in the significance of a tribal cultural resource, defined in Public Resources Code (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 or in a local register of historical resources, and no impact would occur.

With regard to the impact related to the significance of a resource to a California Native American tribe, the City formally consulted with the Gabrieleño Band of Mission Indians–Kizh Nation. However, the information obtained during consultation did not demonstrate that existing tribal cultural resources are present within the Project Site. Accordingly, the 2020 MND determined that, due to the lack of substantial evidence as to why the Project area should be considered sensitive for tribal cultural resources, impacts related to tribal cultural resources would be less-than-significant. However, the 2020 MND included the following voluntary mitigation measures imposed by the City to address the inadvertent discovery of tribal cultural resources:

TCR-1 **Retail a Native American Monitor/Consultant.** The Project Applicant shall be required to retain and compensate for the services of a tribal monitor/consultant, who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The tribal Monitor/consultant shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural resources.

TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources.** Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place or

recovery for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources. For unique archaeological resources, preservation in place is the preferred manner of treatment in accordance with PRC Section 21083.2(b). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the tribe or a local school or historical society in the area for educational purposes.

TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.

Upon discovery of human remains, the tribal and/or archaeological monitor/ consultant/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) shall then notify the tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by State law, who will then appoint a Most Likely Descendent (MLD). If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the tribe, the term "human remains" encompasses more than human bones. In ancient, as well as, historic times, tribal traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have

been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery are approved by the tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the tribe and the NAHC. The tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

TCR-4 **Professional Standards.** Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior's Standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The qualified archaeologist shall ensure that all other personnel are appropriately trained and qualified.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, where no tribal cultural resources have been identified. Thus, development of the Revised Project would result in a less-than-significant impact on tribal cultural resources. However, as with the Approved Project, the Revised Project would include **Mitigation Measures TCR-1** through **TCR-4**, which are voluntary mitigation measures that the City would impose as an added protection to address the inadvertent discovery of tribal cultural resources.

Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.19 UTILITIES/SERVICE SYSTEMS

Water Conveyance/Supply and Wastewater Treatment/Conveyance

According to the 2020 MND, the Approved Project would result in the daily consumption of approximately 10,000 gallons of water and daily generation of the same amount of wastewater. These would represent a daily net reduction of 3,088 gallons in water consumption and wastewater generation due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the 2020 MND determined that the Approved Project would not require or result in the relocation or construction of new or expanded water or wastewater treatment facility, the construction or relocation of which could cause significant environmental effects, and impacts related to water consumption/water supply and wastewater generation would be less than significant.

The Revised Project proposes the same land use type as the Approved Project. However, the Revised Project would involve a larger development than analyzed in the 2020 MND. In addition, because the restaurant occupying the existing building closed since the adoption of the 2020 MND, the amount of water consumed and wastewater generated by the restaurant use are no longer applied. As a result, the Revised Project would consume approximately 14,250 gallons per day of water and would generate the same amount of wastewater.[7]

Nonetheless, according to the City's 2020 Urban Water Management Plan (UWMP), the City can meet water demands during normal years, single dry years, and five consecutive year drought periods through 2045.[8] Because the Revised Project is consistent with the underlying zoning and General Plan land use designation for the Project Site, the population and employment growth associated with the Revised Project would have been incorporated into the SCAG 2020-2045 RTP/SCS growth projections, on which the City's 2020 UWMP was based.

Furthermore, as related to wastewater, the City's 2020 UWMP identified the three water reclamation plants owned by the Los Angeles County Sanitation Districts of Los Angeles and serving the City as having a combined treatment capacity of 415 million gallons per day of wastewater. As such, the approximately 14,250 gallons per day of wastewater generated by the Revised Project would represent 0.003 percent of the treatment capacity, which is considered a negligible increase. The Revised Project would connect to an existing 21-inch sewer main to the west along Michillinda Avenue via a new sewer lateral.

Accordingly, as with the Approved Project, the Revised Project would not require or result in the relocation or construction of new or expanded water or wastewater treatment facility, the construction or relocation of which could cause significant environmental effects, and impacts related to water consumption/water supply and wastewater generation would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project

[7] Based on the water consumption and wastewater generation rate of 125 gallons per day per bed used in the 2020 MND.

[8] City of Arcadia, *Final 2020 Urban Water Management Plan*, June 2021.

would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Storm Drains

As discussed in Section 5.10, Hydrology and Water Quality, of this addendum, the 2020 MND determined that the Approved Project would slightly reduce the amount of impervious surfaces on the Project Site due to the increase in the amount of pervious landscape areas proposed by the Approved Project as compared to existing conditions. In addition, only stormwater overflow from the Project Site would drain to the existing private storm drain at the southeastern corner of the Project Site. Therefore, the Approved Project would not contribute to additional runoff as compared to existing conditions and would not result in the relocation or construction of new or expanded storm drain facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to drainage were determined to be less than significant.

As with the Approved Project, development of the Revised Project would not substantially change the amount of impervious surface area on-site as compared to existing conditions. In addition, the Revised Project would be required to comply with the same existing regulations as the Approved Project. Furthermore, similar to the Approved Project, the Revised Project would likely have a beneficial effect given the reduction in overall impervious surfaces as compared to existing conditions. As such, the Revised Project would not alter the existing drainage pattern of the Project Site that would create or contribute runoff water that would exceed the capacity of the existing stormwater drainage system. Accordingly, as with the Approved Project, the Revised Project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects, and impacts related to storm drains would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Electricity, Natural Gas, and Telecommunications

According to the 2020 MND, the Approved Project would result in a net reduction in electricity and natural gas consumption due to the change in land use from a high turnover restaurant to an assisted living facility; further, the Approved Project could be served by existing telecommunication facilities that are available in the Project area. Accordingly, the Approved Project would not require or result in the relocation or construction of new or expanded power lines, natural gas lines, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to electricity, natural gas, and telecommunication facilities would be less than significant.

The Revised Project proposes the same land use type as the Approved Project. However, the Revised Project would involve a larger development than analyzed in the 2020 MND. In addition, because the restaurant occupying the existing building closed since the adoption of the 2020 MND, the amount of electricity and natural gas consumed by the restaurant use is no longer applied. As a result, the Revised Project would result in higher consumption of electricity and natural gas than the Approved Project. Nonetheless, as discussed in Section 5.6, Energy, of this addendum, the Revised Project's electricity and natural gas usage would constitute a nominal increase compared to the County's annual electricity and natural gas consumption. As with the

Approved Project, the Revised Project could be served by existing telecommunication facilities that are available in the Project area. Accordingly, as with the Project, the Revised Project would not require or result in the relocation or construction of new or expanded power lines, natural gas lines, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. As such, impacts related to electricity, natural gas, and telecommunication facilities would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

Solid Waste

According to the 2020 MND, the Approved Project would result in the daily generation of approximately 400 pounds of solid waste, a daily net reduction of 9 pounds due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the 2020 MND determined that the Approved Project would not 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 and that impacts would be less than significant.

The Revised Project proposes the same land use type as the Approved Project. However, the Revised Project would involve a larger development than analyzed in the 2020 MND. In addition, because the restaurant occupying the existing building closed since the adoption of the 2020 MND, the amount of solid waste generated by the restaurant use is no longer applied. As a result, the Revised Project would generate approximately 570 pounds per day of solid waste.[9] This would represent a daily net increase of 170 pounds of solid waste when compared to the Approved Project. However, according to the 2020 MND, the City's General Plan Update Program Environmental Impact Report determined that there would be no significant adverse impact on landfill capacity and that continuation of existing City and County programs and implementation of pertinent goals, policies, and implementation actions in the General Plan Update would provide for future developments' compliance with solid waste regulations.[10] Accordingly, as with the Approved Project, the Revised Project would not 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, and impacts would be less than significant. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the less-than-significant impact determination in the 2020 MND.

5.20 WILDFIRE

According to the 2020 MND, the Project Site is not located within or adjacent to a state responsibility area or a Very High Fire Hazard Severity Zone (VHFHSZ), as designated by the California Department of Forestry and Fire Protection. Accordingly, the 2020 MND determined that the Approved Project would not (1) substantially impair an adopted emergency response plan or emergency evacuation plan, (2) exacerbate wildfire risks and expose the residents of the Approved Project to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, (3) 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

[9] Based on the solid waste generation rate of 5 pounds per day per person used in the 2020 MND.
[10] City of Arcadia, *General Plan Update Draft Program EIR*, September 2010, p. 4.16-33.

or that may result in temporary or ongoing impacts to the environment, or (4) expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact related to wildfire would occur.

As with the Approved Project, development of the Revised Project would occur within the boundaries of the Project Site, which is not located within or adjacent to a state responsibility area or a VHFHSZ. Accordingly, as with the Approved Project, development of the Revised Project would have no impact related to wildfire. Therefore, there are no material changes in circumstances, and the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the no-impact determination in the 2020 MND.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

The 2020 MND determined that, with implementation of the identified mitigation measures related to biological resources, archaeological resources, paleontological resources, noise, and tribal cultural resources, the Approved Project would not degrade the quality of the environment. Specifically, the Approved Project would not have substantial impacts to special-status species, stream habitat, and wildlife dispersal. **Mitigation Measure BIO-1** would ensure that tree removal would not pose a significant impact to migratory wildlife species. Furthermore, the Approved Project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, with implementation of **Mitigation Measures CUL-1, GEO-1, and TCR-1** through **TCR-4**, the Approved Project would not have substantial impacts to historical, archaeological, paleontological, or tribal cultural resources and, thus, would not eliminate any important examples of California history or prehistory. Therefore, the Approved Project would not result in a Mandatory Finding of Significance due to impacts to biological, cultural, paleontological, or tribal cultural resources.

In addition, the 2020 MND determined that the Approved Project would not have the potential to cause impacts that are cumulatively considerable as the Approved Project would not result in any significant and unavoidable impacts in any environmental categories. In all cases, the impacts associated with the Approved Project would be limited to the Project Site and were of such a negligible degree that they would not result in a significant contribution to any cumulative impacts. In some cases, the Approved Project would result in a net reduction when compared to existing conditions (i.e., related to emissions, transportation, water consumption, and wastewater and solid waste generation). Therefore, the Approved Project would not result in a Mandatory Finding of Significance due to cumulative impacts.

Furthermore, the Approved Project would not have the potential to result in direct or indirect substantial adverse effects on human beings. Although construction noise is allowed during the City's allowable construction hours and is not considered to be a significant impact during those hours, the Approved Project could expose adjoining residential uses to temporary high noise levels during construction activities. Accordingly, **Mitigation Measure NOI-1** was recommended to reduce short-term construction noise impacts through noise reduction methods to a less-than-significant level. In all other environmental issue areas, the Approved Project would not approach or exceed any significance thresholds typically associated with direct or indirect effects on people, such as air, water, or land pollution, natural environmental hazards, transportation-related hazards, or adverse effects to emergency service response. Therefore, the Approved Project

would not result in a Mandatory Finding of Significance due to direct or indirect effects on human beings.

As with the Approved Project, the Revised Project would be required to comply with all mitigation measures identified in the 2020 MND. Furthermore, there are no design features included within the Revised Project that would suggest that these mitigation measures would not be sufficient to address any potentially significant impact that would arise from implementation of the Revised Project. As such, there are no material changes in circumstances, and implementation of the Revised Project would not result in any new significant or substantially more severe environmental impacts that would affect the determination of less-than-significant impact and less-than-significant impact with mitigation in the 2020 MND.

6.0 CONCLUSION

CEQA Guidelines Section 15164(b) states that the Lead Agency shall prepare an addendum to a previously certified negative declaration if only minor technical changes or additions are necessary or none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent negative declaration have occurred. The Revised Project described above does not result in significant modifications or have any occurrences within the conditions described in CEQA Guidelines Section 15162. In addition, the impact comparison provided above demonstrates that no new potentially significant impacts would occur and that no substantial increase in the severity of impacts would occur upon implementation of the Revised Project.

On the basis of the evaluation contained in this document, there are no changes in the Approved Project or the circumstances under which the Revised Project is being undertaken or any new information of substantial importance that was not known to the Lead Agency at the time the 2020 MND was adopted that trigger any of the conditions identified in CEQA Guidelines Section 15162, which would require a subsequent CEQA document. Therefore, pursuant to CEQA Guidelines Sections 15162 and 15164, this addendum has been prepared to document the changes to the adopted 2020 MND for the Revised Project to explain the Lead Agency's decision not to prepare a subsequent CEQA document or a new MND.

ATTACHMENT A

Air Quality/GHG Assumptions and Model Outputs

Artis Senior Living Project ISMND Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Artis Senior Living Project ISMND
Construction Start Date	10/1/2024
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	24.4
Location	1150 Colorado St, Arcadia, CA 91007, USA
County	Los Angeles-South Coast
City	Arcadia
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4971
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Congregate Care (Assisted Living)	100	Dwelling Unit	6.25	107,706	0.00	—	296	—
Parking Lot	56.0	Space	0.50	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	35.4	11.4	19.9	0.03	0.44	1.22	1.63	0.40	0.29	0.66	—	4,035	4,035	0.17	0.11	4.86	4,076
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.73	5.65	53.3	54.2	0.08	2.31	4.41	6.08	2.13	1.74	3.71	—	10,100	10,100	0.43	0.38	0.23	10,214
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.23	2.34	8.05	12.7	0.02	0.31	0.73	1.05	0.29	0.18	0.46	—	2,648	2,648	0.11	0.07	1.42	2,674
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.22	0.43	1.47	2.31	< 0.005	0.06	0.13	0.19	0.05	0.03	0.08	—	438	438	0.02	0.01	0.23	443

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.72	1.45	11.1	18.2	0.03	0.44	1.03	1.47	0.40	0.25	0.65	—	3,732	3,732	0.15	0.10	4.57	3,771
2026	1.81	35.4	11.4	19.9	0.03	0.41	1.22	1.63	0.37	0.29	0.66	—	4,035	4,035	0.17	0.11	4.86	4,076
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	6.73	5.65	53.3	54.2	0.08	2.31	3.77	6.08	2.13	1.59	3.71	—	10,100	10,100	0.43	0.34	0.16	10,214
2025	3.98	3.27	29.5	37.0	0.06	1.18	4.41	5.59	1.08	1.74	2.83	—	8,412	8,412	0.37	0.38	0.23	8,535
2026	1.60	1.34	10.6	17.1	0.03	0.38	1.03	1.42	0.35	0.25	0.60	—	3,655	3,655	0.15	0.10	0.11	3,690
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.57	0.48	4.60	4.68	0.01	0.20	0.43	0.63	0.18	0.18	0.37	—	920	920	0.04	0.04	0.28	933
2025	1.23	1.03	8.05	12.7	0.02	0.31	0.73	1.05	0.29	0.18	0.46	—	2,648	2,648	0.11	0.07	1.42	2,674
2026	0.58	2.34	3.82	6.27	0.01	0.14	0.37	0.51	0.13	0.09	0.21	—	1,324	1,324	0.06	0.04	0.66	1,337
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.10	0.09	0.84	0.85	< 0.005	0.04	0.08	0.11	0.03	0.03	0.07	—	152	152	0.01	0.01	0.05	154
2025	0.22	0.19	1.47	2.31	< 0.005	0.06	0.13	0.19	0.05	0.03	0.08	—	438	438	0.02	0.01	0.23	443
2026	0.11	0.43	0.70	1.14	< 0.005	0.03	0.07	0.09	0.02	0.02	0.04	—	219	219	0.01	0.01	0.11	221

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.78	4.05	2.50	14.1	0.03	0.16	1.65	1.80	0.16	0.42	0.57	153	4,700	4,852	15.5	0.10	7.54	5,277

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.24	3.53	2.51	7.90	0.03	0.15	1.65	1.80	0.15	0.42	0.57	153	4,608	4,761	15.5	0.10	1.53	5,181
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.43	3.79	1.17	11.4	0.02	0.04	1.62	1.67	0.04	0.41	0.46	153	2,874	3,027	15.5	0.10	4.03	3,447
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.26	0.69	0.21	2.08	< 0.005	0.01	0.30	0.30	0.01	0.08	0.08	25.3	476	501	2.56	0.02	0.67	571

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.04	0.95	0.67	7.72	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,834	1,834	0.09	0.07	6.17	1,865
Area	0.71	3.08	1.55	6.31	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,910	1,910	0.04	< 0.005	—	1,912
Energy	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	918	918	0.07	< 0.005	—	921
Water	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Waste	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Total	1.78	4.05	2.50	14.1	0.03	0.16	1.65	1.80	0.16	0.42	0.57	153	4,700	4,852	15.5	0.10	7.54	5,277
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.03	0.94	0.74	7.15	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,758	1,758	0.10	0.08	0.16	1,784
Area	0.17	2.58	1.49	0.64	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,895	1,895	0.04	< 0.005	—	1,897

Energy	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	918	918	0.07	< 0.005	—	921
Water	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Waste	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Total	1.24	3.53	2.51	7.90	0.03	0.15	1.65	1.80	0.15	0.42	0.57	153	4,608	4,761	15.5	0.10	1.53	5,181
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.02	0.93	0.74	7.33	0.02	0.01	1.62	1.63	0.01	0.41	0.42	—	1,778	1,778	0.09	0.08	2.66	1,807
Area	0.38	2.84	0.14	3.93	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	140	140	< 0.005	< 0.005	—	140
Energy	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	918	918	0.07	< 0.005	—	921
Water	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Waste	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Total	1.43	3.79	1.17	11.4	0.02	0.04	1.62	1.67	0.04	0.41	0.46	153	2,874	3,027	15.5	0.10	4.03	3,447
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.19	0.17	0.14	1.34	< 0.005	< 0.005	0.30	0.30	< 0.005	0.08	0.08	—	294	294	0.02	0.01	0.44	299
Area	0.07	0.52	0.03	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	23.2	23.2	< 0.005	< 0.005	—	23.2
Energy	0.01	< 0.005	0.05	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	152	152	0.01	< 0.005	—	153
Water	—	—	—	—	—	—	—	—	—	—	—	1.18	6.12	7.31	0.12	< 0.005	—	11.2
Waste	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.23	0.23
Total	0.26	0.69	0.21	2.08	< 0.005	0.01	0.30	0.30	0.01	0.08	0.08	25.3	476	501	2.56	0.02	0.67	571

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.12	2.62	24.9	21.7	0.03	1.06	—	1.06	0.98	—	0.98	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	0.17	1.64	1.43	< 0.005	0.07	—	0.07	0.06	—	0.06	—	225	225	0.01	< 0.005	—	226
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.30	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.3	37.3	< 0.005	< 0.005	—	37.4
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.08	0.96	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	201	201	0.01	0.01	0.02	203
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.4	13.4	< 0.005	< 0.005	0.02	13.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.22	2.22	< 0.005	< 0.005	< 0.005	2.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969

Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.18	2.25	< 0.005	0.10	—	0.10	0.09	—	0.09	—	353	353	0.01	< 0.005	—	354
Dust From Material Movement	—	—	—	—	—	—	0.33	0.33	—	0.16	0.16	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	58.5	58.5	< 0.005	< 0.005	—	58.7
Dust From Material Movement	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.08	0.96	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	201	201	0.01	0.01	0.02	203
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.12	0.03	2.08	0.77	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,603	1,603	0.09	0.26	0.10	1,682

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	24.3	24.3	< 0.005	< 0.005	0.04	24.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.25	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	191	191	0.01	0.03	0.19	201
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.03	4.03	< 0.005	< 0.005	0.01	4.08
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.7	31.7	< 0.005	0.01	0.03	33.3

3.5. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.79	5.79	< 0.005	< 0.005	—	5.81

Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.96	0.96	< 0.005	< 0.005	—	0.96
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.12	0.02	2.01	0.76	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,575	1,575	0.09	0.25	0.09	1,651
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.39	0.39	< 0.005	< 0.005	< 0.005	0.40
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.08	3.08	< 0.005	< 0.005	< 0.005	3.23
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.06	0.06	< 0.005	< 0.005	< 0.005	0.07
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.51	0.51	< 0.005	< 0.005	< 0.005	0.54

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.96	0.80	7.46	9.31	0.02	0.31	—	0.31	0.28	—	0.28	—	1,713	1,713	0.07	0.01	—	1,719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.36	1.70	< 0.005	0.06	—	0.06	0.05	—	0.05	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34	0.31	0.31	5.01	0.00	0.00	0.94	0.94	0.00	0.22	0.22	—	996	996	0.04	0.03	3.64	1,010
Vendor	0.02	0.01	0.39	0.19	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	339	339	0.01	0.05	0.93	355
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34	0.31	0.35	4.25	0.00	0.00	0.94	0.94	0.00	0.22	0.22	—	944	944	0.04	0.04	0.09	955
Vendor	0.02	0.01	0.40	0.19	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	339	339	0.01	0.05	0.02	354
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.27	3.19	0.00	0.00	0.66	0.66	0.00	0.15	0.15	—	684	684	0.03	0.02	1.12	693
Vendor	0.02	0.01	0.29	0.13	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	242	242	0.01	0.03	0.29	253
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.05	0.58	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	113	113	0.01	< 0.005	0.19	115
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	40.1	40.1	< 0.005	0.01	0.05	41.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.46	0.38	3.51	4.62	0.01	0.13	—	0.13	0.12	—	0.12	—	854	854	0.03	0.01	—	857
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.64	0.84	< 0.005	0.02	—	0.02	0.02	—	0.02	—	141	141	0.01	< 0.005	—	142
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.27	0.28	4.65	0.00	0.00	0.94	0.94	0.00	0.22	0.22	—	976	976	0.04	0.03	3.30	990
Vendor	0.02	0.01	0.37	0.18	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	333	333	0.01	0.05	0.90	349
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.26	0.31	3.97	0.00	0.00	0.94	0.94	0.00	0.22	0.22	—	925	925	0.04	0.03	0.09	936

Vendor	0.02	0.01	0.38	0.18	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	333	333	0.01	0.05	0.02	348
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.09	0.12	1.48	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	334	334	0.01	0.01	0.51	339
Vendor	0.01	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	119	119	< 0.005	0.02	0.14	124
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	55.3	55.3	< 0.005	< 0.005	0.08	56.1
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.7	19.7	< 0.005	< 0.005	0.02	20.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.07	0.06	0.51	0.66	< 0.005	0.03	—	0.03	0.02	—	0.02	—	99.4	99.4	< 0.005	< 0.005	—	99.7
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.5	16.5	< 0.005	< 0.005	—	16.5
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.08	0.96	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	201	201	0.01	0.01	0.02	203
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.4	13.4	< 0.005	< 0.005	0.02	13.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.22	2.22	< 0.005	< 0.005	< 0.005	2.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	33.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	—	1.86	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	—	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.93	0.00	0.00	0.19	0.19	0.00	0.04	0.04	—	195	195	0.01	0.01	0.66	198
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.3	10.3	< 0.005	< 0.005	0.02	10.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.70	1.70	< 0.005	< 0.005	< 0.005	1.73
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	1.04	0.95	0.67	7.72	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,834	1,834	0.09	0.07	6.17	1,865
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.04	0.95	0.67	7.72	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,834	1,834	0.09	0.07	6.17	1,865
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	1.03	0.94	0.74	7.15	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,758	1,758	0.10	0.08	0.16	1,784
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.03	0.94	0.74	7.15	0.02	0.01	1.65	1.66	0.01	0.42	0.43	—	1,758	1,758	0.10	0.08	0.16	1,784
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.19	0.17	0.14	1.34	< 0.005	< 0.005	0.30	0.30	< 0.005	0.08	0.08	—	294	294	0.02	0.01	0.44	299
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.19	0.17	0.14	1.34	< 0.005	< 0.005	0.30	0.30	< 0.005	0.08	0.08	—	294	294	0.02	0.01	0.44	299

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	534	534	0.03	< 0.005	—	536
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	28.0	28.0	< 0.005	< 0.005	—	28.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	562	562	0.03	< 0.005	—	564
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	534	534	0.03	< 0.005	—	536
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	28.0	28.0	< 0.005	< 0.005	—	28.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	562	562	0.03	< 0.005	—	564
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	88.5	88.5	0.01	< 0.005	—	88.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.64	4.64	< 0.005	< 0.005	—	4.66

Total	—	—	—	—	—	—	—	—	—	—	—	—	93.1	93.1	0.01	< 0.005	—	93.5

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	356	356	0.03	< 0.005	—	357
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	356	356	0.03	< 0.005	—	357
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	356	356	0.03	< 0.005	—	357
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	356	356	0.03	< 0.005	—	357
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	0.01	< 0.005	0.05	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	58.9	58.9	0.01	< 0.005	—	59.1

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.05	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	58.9	58.9	0.01	< 0.005	—	59.1

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.17	0.09	1.49	0.64	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,895	1,895	0.04	< 0.005	—	1,897
Consumer Products	—	2.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.53	0.50	0.05	5.67	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.2	15.2	< 0.005	< 0.005	—	15.2
Total	0.71	3.08	1.55	6.31	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,910	1,910	0.04	< 0.005	—	1,912
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.17	0.09	1.49	0.64	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,895	1,895	0.04	< 0.005	—	1,897
Consumer Products	—	2.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.17	2.58	1.49	0.64	0.01	0.12	—	0.12	0.12	—	0.12	0.00	1,895	1,895	0.04	< 0.005	—	1,897
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	21.5	21.5	< 0.005	< 0.005	—	21.5
Consumer Products	—	0.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	0.06	0.01	0.71	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.72	1.72	< 0.005	< 0.005	—	1.73
Total	0.07	0.52	0.03	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	23.2	23.2	< 0.005	< 0.005	—	23.2

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	7.14	37.0	44.1	0.73	0.02	—	67.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	1.18	6.12	7.31	0.12	< 0.005	—	11.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.18	6.12	7.31	0.12	< 0.005	—	11.2

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	146	0.00	146	14.6	0.00	—	510
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	24.1	0.00	24.1	2.41	0.00	—	84.4

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.37	1.37
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.23	0.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.23	0.23

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description

Demolition	Demolition	10/1/2024	11/1/2024	5.00	24.0	—
Grading	Grading	11/1/2024	1/1/2025	5.00	44.0	—
Building Construction	Building Construction	1/1/2025	7/1/2026	5.00	391	—
Paving	Paving	10/1/2024	11/1/2024	5.00	24.0	—
Architectural Coating	Architectural Coating	7/1/2026	7/28/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38

Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	22.7	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	72.0	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	10.7	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—

Architectural Coating	Worker	14.4	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	218,105	72,702	0.00	0.00	1,317

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Grading	—	8,000	44.0	0.00	—
Paving	0.00	0.00	0.00	0.00	0.50

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Congregate Care (Assisted Living)	—	0%
Parking Lot	0.50	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	532	0.03	< 0.005
2025	0.00	532	0.03	< 0.005
2026	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Congregate Care (Assisted Living)	296	296	296	108,040	2,323	2,323	2,323	847,872
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Congregate Care (Assisted Living)	—

Wood Fireplaces	0
Gas Fireplaces	90
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	10

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
218104.65	72,702	0.00	0.00	1,317

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Congregate Care (Assisted Living)	366,583	532	0.0330	0.0040	1,110,684
Parking Lot	19,232	532	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Congregate Care (Assisted Living)	3,727,380	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Congregate Care (Assisted Living)	270	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Congregate Care (Assisted Living)	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Congregate Care (Assisted Living)	Household refrigerators and/or freezers	R-134a	1,430	0.22	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	20.8	annual days of extreme heat
Extreme Precipitation	7.85	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	6.20	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A

Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	84.6
AQ-PM	67.7
AQ-DPM	64.9
Drinking Water	73.7
Lead Risk Housing	82.5
Pesticides	0.00
Toxic Releases	69.0
Traffic	92.3
Effect Indicators	—
CleanUp Sites	27.8
Groundwater	30.9
Haz Waste Facilities/Generators	41.8
Impaired Water Bodies	0.00
Solid Waste	52.9
Sensitive Population	—
Asthma	7.85
Cardio-vascular	11.0
Low Birth Weights	23.9
Socioeconomic Factor Indicators	—
Education	13.7
Housing	39.2
Linguistic	71.7
Poverty	37.0
Unemployment	15.8

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	81.39355832
Employed	67.22699859
Median HI	79.26344155
Education	—
Bachelor's or higher	85.4484794
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	34.2871808
Active commuting	31.10483767
Social	—
2-parent households	89.32375209
Voting	33.50442705
Neighborhood	—
Alcohol availability	52.31618119
Park access	81.35506224
Retail density	93.53265751
Supermarket access	46.91389709
Tree canopy	71.61555242
Housing	—
Homeownership	56.70473502
Housing habitability	58.14192224
Low-inc homeowner severe housing cost burden	83.07455409

Low-inc renter severe housing cost burden	28.21763121
Uncrowded housing	92.9038881
Health Outcomes	—
Insured adults	94.73886822
Arthritis	0.0
Asthma ER Admissions	94.4
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	95.9
Cognitively Disabled	43.0
Physically Disabled	65.4
Heart Attack ER Admissions	85.9
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	68.0
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—

Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	77.6
Elderly	23.5
English Speaking	37.4
Foreign-born	74.6
Outdoor Workers	93.5
Climate Change Adaptive Capacity	—
Impervious Surface Cover	71.9
Traffic Density	89.7
Traffic Access	23.0
Other Indices	—
Hardship	15.3
Other Decision Support	—
2016 Voting	40.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	31.0
Healthy Places Index Score for Project Location (b)	81.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Per Project Description
Construction: Construction Phases	Per AQ Questionnaire, Architectural Coating days keeps at default
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Per traffic study
Operations: Hearths	No wood stove
Operations: Architectural Coatings	SCAQMD Rule 1113

Artis Senior Living Project
Energy Calculations

Land Use	Natural Gas Use		Electricity Use	
	(kBTU/yr)	**(Therms)**	**(kWh/yr)**	**(MWh/yr)**
Congregate Care (Assisted Living)	1,110,684	11,107	366,583	367
Parking Lot	0	0	19,232	19
Totals	**1,110,684**	**11,107**	**385,815**	**386**

1 kBTU = 0.01 therms

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption (2022)	Percentage Increase Countywide
Electricity (MWh)	386	68,484,956	0.0006%
Natural Gas (Therms)	11,107	2,820,285,935	0.0004%

Artis Senior Living Project
Energy Calculations

Vehicle Type	Percent of Vehicle Trips[1]	Daily Trips[2]	Annual Vehicle Miles Traveled	Average Fuel Economy (miles per gallon)[3]	Total Annual Fuel Consumption (gallons)[4]
Passenger Cars	0.50	148	423,364	22	19,244
Light/Medium Trucks	0.48	141	403,630	17.3	23,331
Heavy Trucks/Other	0.02	7	20,879	6.4	3,262
TOTAL [6]	***1.00***	**296**	***847,872***	**--**	***45,837***

Notes:

1. Percent of Vehicle Trip distribution based on trip characteristics within the CalEEMod model.
2. Daily Trips taken from ITE manual.
3. Average fuel economy derived from the Department of Transportation.
4. Total Daily Fuel Consumption calculated by dividing the daily VMT by the average fuel economy (i.e., VMT/Average Fuel Economy).
5. Values may be slightly off due to rounding.

Source: Refer to CalEEMod outputs for assumptions used in this analysis.

County On-Road
2026
10,533,727
0.4351%

Artis Senior Living Project
Energy Calculations

WORKER TRIPS

Phase	Phase Length (# days)	# Worker Trips	Worker Trip Length	Total VMT	Fuel Consumption Factor (Miles/Gallon/Day)	Total Fuel Consumption
Demolition	24	15	18.5	6,660		267.44
Grading	44	15	18.5	12,210		490.31
Building Construction	391	72	18.5	520,812	**24.90284233**	20,913.76
Paving	24	15	18.5	6,660		267.44
Architectural Coating	20	14	18.5	5,328		213.95
						22,152.89

VENDOR TRIPS

Phase	Phase Length (# days)	# Vendor Trips	Vendor Trip Length	Total VMT	Fuel Consumption Factor (Miles/Gallon/Day)	Total Fuel Consumption
Demolition	24	0	10.2	0		0.00
Grading	44	0	10.2	0		0.00
Building Construction	391	11	10.2	42,674	**8.343886151**	5,114.37
Paving	24	0	10.2	0		0.00
Architectural Coating	20	0	10.2	0		0.00
						5,114.37

HAULING TRIPS

Phase	Phase Length (# days)	# Hauling Trips	Hauling Trip Length	Total VMT	Fuel Consumption Factor (Miles/Gallon/Day)[1]	Total Fuel Consumption
Demolition	24	0	20	0		0.00
Grading	44	23	20	19,976		2,394.09
Building Construction	391	0	20	0	**8.343886151**	0.00
Paving	24	0	20	0		0.00
Architectural Coating	20	0	20	0		0.00
						2,394.09

TOTAL OFF-SITE MOBILE GALLONS CONSUMED DURING CONSTRUCTION	**29,661.35**
County On-road Gallons	11,054,467
2024	0.2683%

Artis Senior Living Project
Energy Calculations

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	Fuel Consumption Rate (gallons per hour)	Duration (total hours/day)	# days	Total Fuel Consumption (gallons)
Demolition	Rubber Tired Dozers	2	8	367	0.40	5.872	16	24	2254.85
Demolition	Excavators	3	8	36	0.38	0.5472	24	24	315.19
Demolition	Concrete/Industrial Saws	1	8	33	0.73	0.9636	8	24	185.01
Grading	Graders	1	8	148	0.41	2.4272	8	44	854.37
Grading	Excavators	1	8	36	0.38	0.5472	8	44	192.61
Grading	Tractors/Loaders/Backhoes	3	8	84	0.37	1.2432	24	44	1312.82
Grading	Rubber Tired Dozers	1	8	367	0.40	5.872	8	44	2066.94
Building Construction	Forklifts	3	8	82	0.20	0.656	24	391	6155.90
Building Construction	Generator Sets	1	8	14	0.74	0.4144	8	391	1296.24
Building Construction	Cranes	1	7	367	0.29	4.2572	7	391	11651.96
Building Construction	Welders	1	8	46	0.45	0.828	8	391	2589.98
Building Construction	Tractors/Loaders/Backhoes	3	8	84	0.37	1.2432	24	391	11666.19
Paving	Pavers	2	8	81	0.42	1.3608	16	24	522.55
Paving	Paving Equipment	2	8	89	0.36	1.2816	16	24	492.13
Paving	Rollers	2	8	36	0.38	0.5472	16	24	210.12
Architectural Coating	Air Compressors	1	6	37	0.48	0.7104	6	20	85.25
								Total:	**41,852.13**

Notes:

Fuel Consumption Rate = Horsepower x Load Factor x Fuel Consumption Factor

Where:

Fuel Consumption Factor for a diesel engine is 0.04 gallons per horsepower per hour (gal/hp/hr) and a gasoline engine is 0.06 gal/hp/hr.

Source: Refer to CalEEMod outputs for assumptions used in this analysis.

ATTACHMENT B
Trip Generation Analysis

TECHNICAL MEMORANDUM

To: Edwin Arreola, City of Arcadia

From: Carla Dietrich, Michael Baker International

CC: Madonna Marcelo, Michael Baker International

Date: March 21, 2024

Subject: Addendum to the Artis Senior Assisted Living Project Trip Generation Analysis

Project Background

On August 18, 2020, the City of Arcadia City Council adopted a Mitigated Negative Declaration for the Artis Senior Living Project, which was proposed at the southeastern corner of the intersection of Colorado Boulevard and Michillinda Avenue at 1150 West Colorado Boulevard in the City of Arcadia. The Artis Senior Living Project involved the demolition of an approximately 13,000-square-foot building (previously occupied by a Coco's Bakery and Restaurant) and the development of a new two-story, 44,192-square-foot senior/assisted living care facility with 80 rooms and on-site amenities (Approved Project). The Project Applicant, O&I Development, LLC, is now proposing to develop the Project site with a new 107,706-square-foot, three-story building which would have the same use as the Approved Project and constitute the Revised Project. In considering whether to approve the Revised Project, the City, as the lead agency pursuant to the California Environmental Quality Act (CEQA), is required to consider the environmental consequences of the Revised Project as compared to those of the Approved Project. Therefore, this addendum assesses the trip generation analysis of the Revised Project as compared to the Approved Project using the same analysis process of evaluating the Project trip generation using the Institute of Transportation Engineer's (ITE) *Trip Generation Manual*, 10th Edition.

Project Description

The Revised Project proposes the construction of a 107,706 square-foot building with 100 units of varying size including studio, one-bedroom, and two-bedroom units for assisted living and private and shared studios for memory care. The 100 units are proposed to accommodate 114 beds. As with the Approved Project, the Revised Project would support assisted living and memory care services, the latter of which would entirely be dedicated to people afflicted with Alzheimer's disease and related memory disorders. **Exhibit A-1** (attached) shows the proposed site plan.

Previous Approved Project Finding

The Approved Project trip generation analysis determined a minimal change in the number of site trips entering and exiting the site at the W. Colorado Boulevard driveway. It was anticipated that these minimal changes in site trips would have had a negligible impact on site driveway and nearby intersection operations. It should be noted that the Coco's Bakery and Restaurant was operational when the Approved Project trip generation analysis was initiated and thus an existing trip credit was applied as part of that analysis.

Revised Project Trip Generation

Applicable Trip Credits

Trip credits may be applied to account for certain conditions including current operational uses located at the proposed site. **Table 1** details the type of trip credits which were considered during this study.

Table 1: Trip Credit Summary

Item	Project Condition	Credit Applied?
Existing Active Land Use	While the site was occupied by an operational Coco's Bakery and Restaurant during the Approved Project analysis, the restaurant is no longer operational. A conservative approach was taken and a trip credit was not applied for the Revised Project trip generation analysis.	No
Internal Trip Reduction	Singular land use proposed which is not consistent with internal trip reductions.	No
Pass-by Trip Reduction	Land use not consistent with pass-by trips.	No

Project Trips

Trip generation analysis was conducted for the weekday daily, AM Peak Hour, and PM Peak Hour time periods. The ITE *Trip Generation Manual*, 10th Edition published in 2017, was the source of the project trip generation rates, as was the case for the Approved Project analysis. **Table 2** summarizes the trip generation rates for the Assisted Living use (Land Use Code 254). It should be noted that the planned Project includes amenities for residents including a beauty salon, a fitness facility, and a restaurant. These uses are ancillary to the care facility and will be available for use by the residents rather than for commercial purposes or outside users. Ancillary uses are accounted for in the Land Use Code 254 trip generation rates.

Table 2: Trip Generation Rates

Land Use	ITE Code	Daily Trips			AM Peak Hour Trips			PM Peak Hour Trips		
		Total	In	Out	Total	In	Out	Total	In	Out
Assisted Living	254	2.6 / bed	50%	50%	0.19 / bed	63%	37%	0.26 / bed	38%	62%

Source: Institute of Transportation Engineer's *Trip Generation Manual*, 10th Edition.

The project trips estimated for the proposed assisted living facility Revised Project are shown in **Table 3**. As shown, the estimated new trips for an assisted living facility with 114 beds is 296 daily trips, 22 AM peak hour trips and 30 PM peak hour trips.

Table 3: Estimated Number of Project Trips (Revised Project)

Land Use	ITE Code	Intensity	Daily Trips			AM Peak Hour Trips			PM Peak Hour Trips		
			Total	In	Out	Total	In	Out	Total	In	Out
Assisted Living	254	114 beds	296	148	148	22	14	8	30	11	19

Trip Distribution/Assignment

The Revised Project facility will have two access points (see **Exhibit 1**). One driveway will provide full access along W. Colorado Boulevard and the second driveway will provide right-in/right-out access along Michillinda Avenue. While the Approved Project only had one site driveway which was located on W. Colorado Boulevard, the driveway locations for the Revised Project are consistent with the two existing Coco's Bakery and Restaurant driveways. **Exhibit 2** graphically shows the anticipated distribution patterns for the proposed Assisted Living facility with two driveways and **Exhibit 3** shows the anticipated site trips for the Revised Project at each of the site driveways.

Exhibit 1: Revised Project Site Access

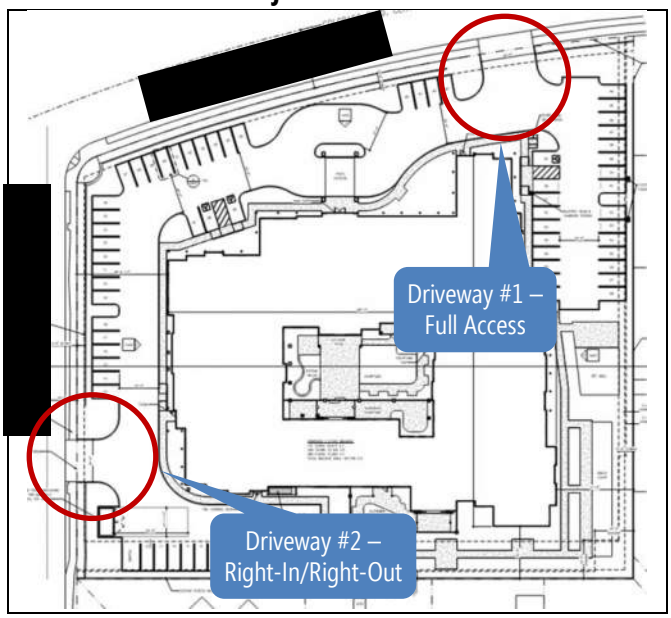


Exhibit 2: Revised Project Trip Distribution

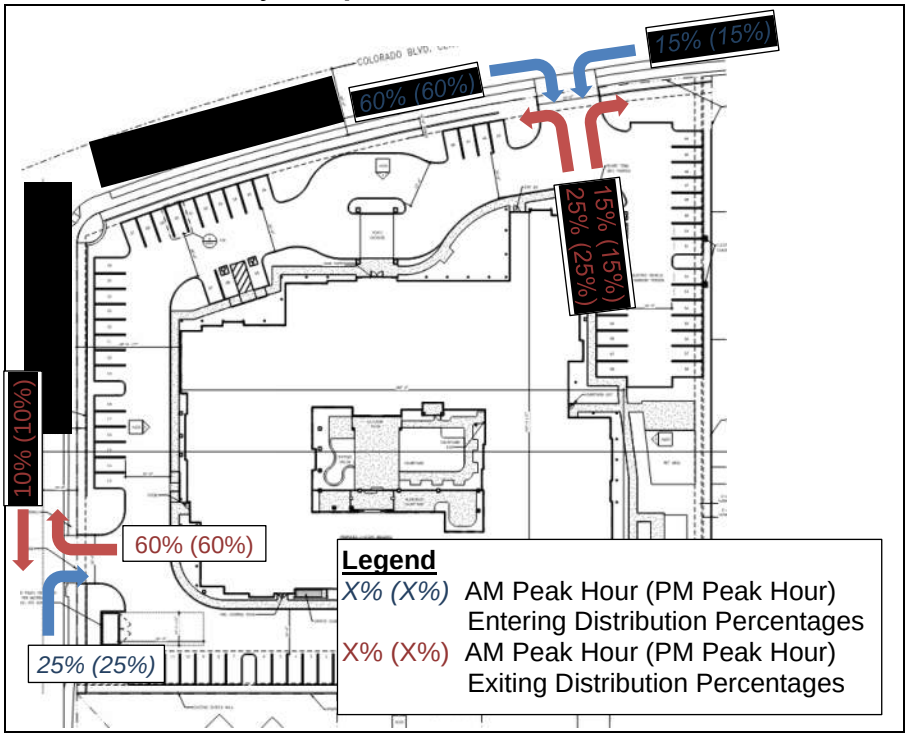


Exhibit 3: Revised Project Site Trip Assignment

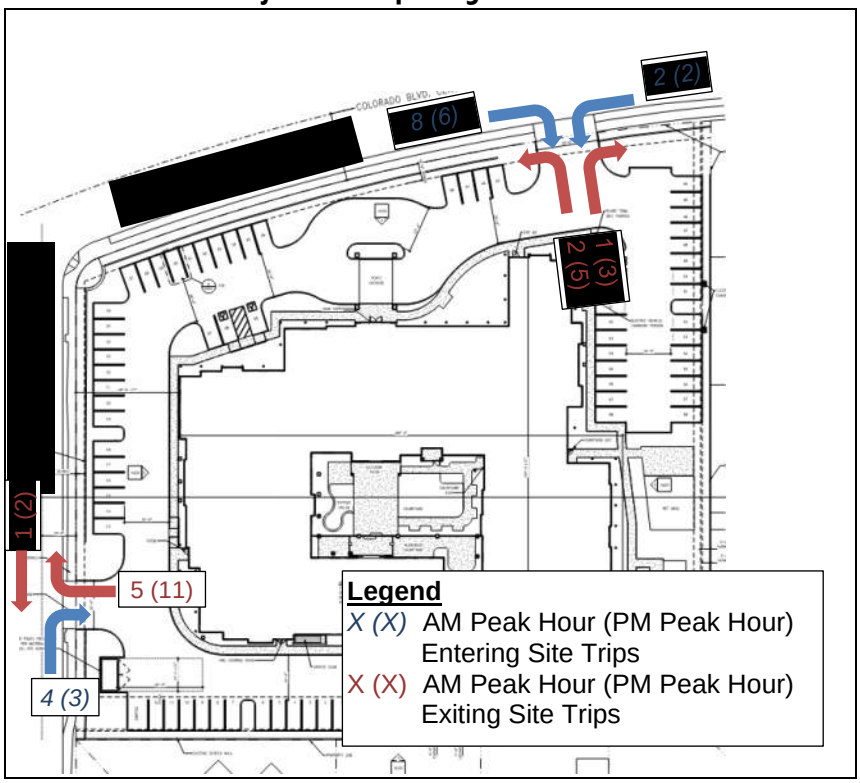


Table 3 summarizes the total site trips at each of the site driveways. Here are the key findings:

- **Revised Project** – It is anticipated that the Revised Project will add no more than 16 site trips to each of the two site driveways during each of the peak hours.
- **Comparison of the Revised Project to the Approved Project** – A comparison of site trips between the Revised Project to the Approved Project indicates that the Revised Project will add 17 or fewer site trips to each of the site driveways during each of the peak hours. It should be noted that the Approved Project site trips were adjusted by applying a trip credit for the Coco's Bakery and Restaurant trips. Since the restaurant closed between the time of the original evaluation of the Approved Project and this evaluation of the Revised Project, the Coco's Bakery and Restaurant trip credit was no longer applied to provide a conservative estimate. If the trip credit had been accounted for in this analysis of the Revised Project, the additional site trips added under the Revised Project would be even fewer.

Table 3: Estimated Number of Project Trips

Site Driveway Intersection	Total Site Trips					
	Revised Project		Approved Project[1]		Comparison	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Driveway #1 – W. Colorado Blvd	13	16	1	-1	+12	+17
Driveway #2 – Michillinda Ave	10	16	Did Not Exist		+10	+16
Total	**23**	**32**	**1**	**-1**	**+22**	**+33**

Note: 1) Approved Project site trips include trip credit from previous Coco's Bakery and Restaurant use (Exhibit 4 from Artis Senior Assisted Living Facility Trip Generation Analysis technical memorandum dated December 17, 2019).

Additional Trip Generation Analysis

As noted above, the analysis utilized trip rates from the ITE *Trip Generation Manual*, 10th Edition published in 2017. This was the source of the project trip generation rates for the Approved Project analysis. An updated *Trip Generation Manual* (11th Edition) was published after the Approved Project analysis was completed. While the use of the 10th Edition is appropriate for the comparison to the Approved Project since it was the previously approved method, an additional comparison was conducted using the 11th Edition. **Table 4** provides the trip rates and **Table 5** provides the estimated trips for both editions of the manual. As shown, the daily, AM Peak Hour, and PM Peak Hour rates included 11th Edition of the manual are the same or lower than the 10th Edition rates. Therefore, the difference in the estimated Project trips using both editions of the manual are negligible.

Table 4: Comparison of Trip Generation Manual Rates

Land Use		ITE Code	Daily Trips			AM Peak Hour Trips			PM Peak Hour Trips		
			Total	In	Out	Total	In	Out	Total	In	Out
10th Edition	Assisted Living	254	2.6 / bed	50%	50%	0.19 / bed	63%	37%	0.26 / bed	38%	62%
11th Edition	Assisted Living	254	2.6 / bed	50%	50%	0.18 / bed	60%	40%	0.24 / bed	39%	61%

Table 5: Comparison of Trip Generation Manual Estimated Trips

Land Use		ITE Code	Intensity	Daily Trips			AM Peak Hour Trips			PM Peak Hour Trips		
				Total	In	Out	Total	In	Out	Total	In	Out
10th Edition	Assisted Living	254	114 beds	296	148	148	22	14	8	30	11	19
11th Edition	Assisted Living	254	114 beds	296	148	148	21	12	9	27	11	16
Difference				**0**	**0**	**0**	**-1**	**-2**	**+1**	**-3**	**0**	**-3**

Findings

It is estimated that the Revised Project will add no more than 16 new peak hour site trips to each of the site driveways during each of the peak hours. A comparison between the Approved Project and the Revised Project again shows a minimal increase in traffic due to the Revised Project (no more than 17 peak hour trips at each of the site driveways). These additional trips are equivalent to an average of no more than 1 trip every 3½ minutes. It is anticipated that these minimal changes in site trips would have a negligible impact on the area intersections. Additionally, if the Coco's Bakery and Restaurant trip credit had been taken in this analysis of the Revised Project, the additional site trips added under the Revised Project would be even fewer.

The trip comparison utilized the 10th Edition of the ITE *Trip Generation Manual* to be consistent with the Approved Project. An additional comparison was conducted using the 11th Edition of the *Trip Generation Manual* which was published after the Approved Project analysis was conducted. The daily, AM Peak Hour, and PM Peak Hour rates included

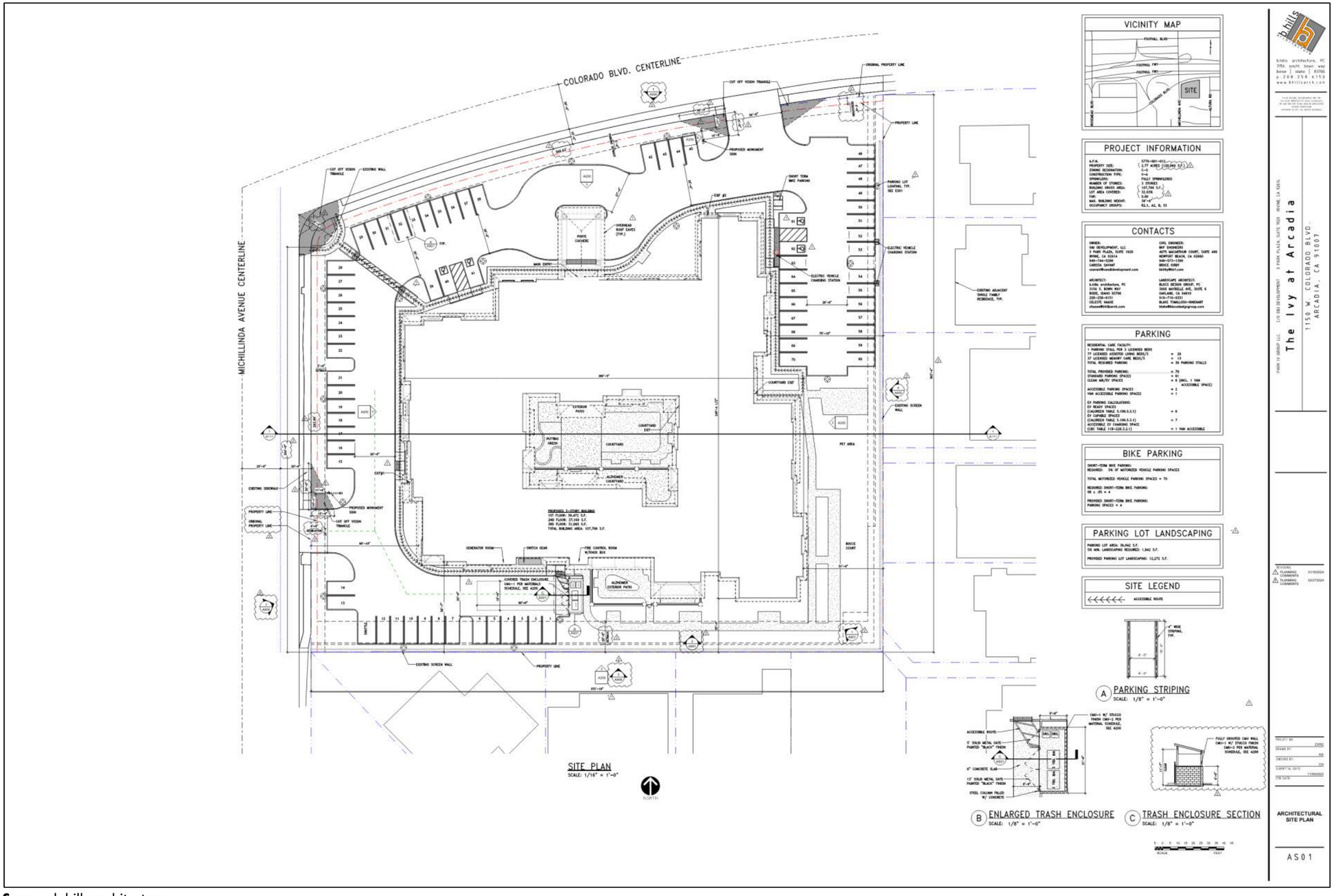
11th Edition of the manual for the Assisted Living use are the same or lower than the 10th Edition rates. Therefore, the difference in the estimated Project trips using both editions of the manual are negligible.

Additionally, after the Approved Project trip generation technical memorandum, the City-adopted the *City of Arcadia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (August 2020). The guidance in that document states that a Traffic Study with Level of Service analysis shall be required for a proposed project when either the AM or PM peak hour trip generation for the proposed development is expected to exceed 100 vehicle trips and for projects that will add 51 or more trips during either the AM or PM peak hour to any intersection. While these guidelines were not adopted at the time of the original analysis, it is interesting to note that the Revised Project generates only a small fraction of the current trip thresholds requiring a Level of Service Traffic Study.

Also, after the Project was analyzed, the CEQA transportation metric changed from Level of Service to Vehicle Miles Traveled (VMT). While VMT is not required in this analysis, it should be noted that the *City of Arcadia Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (August 2020) identifies Assisted Living Facilities as one of the types of land uses under the VMT Project Type Screening criteria. Land uses of this type can be presumed to have a less-than-significant impact absent substantial evidence to the contrary based on those guidelines.

Attachments

Exhibit A-1: Revised Project Site Plan



Source: b.hills architecture.

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

2020 072709
FILED
Apr 24 2020
Dean C. Logan, Registrar – Recorder/County Clerk
Electronically signed by CORTNEY MAFFITT

Notice is hereby given that the public agency named below has completed an Initial Study of the following described project at the following location:	
Public Agency:	**City of Arcadia – Development Services Department** **Community Development Division/Planning Services**
Project Name:	**Artis Senior Living Care Facility**
Project Description:	**Architectural Design Review No. ADR 18-22, Conditional Use Permit No. CUP 19-03, Zone Change No. ZC 19-01, Minor Administrative Modification No. AM Minor 19-22, and Protected Tree Encroachment No. TRE 20-04 -** The proposed project is for a new two-story, 44,192 square foot senior living care facility (includes memory care). The facility will have 80 rooms with on-site amenities such as a community center, a gallery, a café, a barber beauty shop, and a small health center for the residents. The site will have 59 parking spaces and one loading space. The assisted senior care facility requires approval of a Conditional Use Permit for the use, an Architectural Design Review for the site plan and design review, a Zone Change to remove an architectural design overlay and a parking overlay, a Minor Administrative Modification to exceed the maximum permitted fence height and a Protected Tree Encroachment permit.

THIS NOTICE WAS POSTED

ON April 24 2020

UNTIL May 26 2020

REGISTRAR – RECORDER/COUNTY CLERK

Project Location – Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	The Project site is located at the southeast corner of Colorado Boulevard and Michillinda Street at 1150 W. Colorado Boulevard (AIN: 5776-001-012) near the westerly City boundary. The Project site is bounded by the Interstate (I) 210 freeway to the north, commercial uses to the west in the Los Angeles County area, and with residential homes to the east and south of the subject property in the City of Arcadia.

This Initial Study was completed in accordance with the Lead Agency's Guidelines for Implementing the California Environmental Quality Act. This Initial Study was undertaken for the purpose of deciding whether the project may have a significant effect on the environment. On the basis of such Initial Study, the Lead Agency's Staff has concluded that the project will not have a significant effect on the environment, and has therefore prepared a Draft Negative Declaration/Mitigated Negative Declaration. The Initial Study reflects the independent judgment of the Lead Agency.

☐	The Project site IS on a list compiled pursuant to Government Code section 65962.5.
☒	The Project site IS NOT on a list compiled pursuant to Government Code section 65962.5.
☐	The proposed project IS considered a project of statewide, regional or areawide significance.
☒	The proposed project IS NOT considered a project of statewide, regional or areawide significance.
☐	The proposed project WILL affect highways or other facilities under the jurisdiction of the State Department of Transportation.
☒	The proposed project WILL NOT affect highways or other facilities under the jurisdiction of the State Department of Transportation.
☐	A scoping meeting WILL be held by the Lead Agency.
☒	A scoping meeting WILL NOT be held by the Lead Agency.

If the project meets the criteria requiring the scoping meeting, or if the agency voluntarily elects to hold such a meeting, the date, time and location of the scoping meeting are as follows:

Date: N/A	Time: N/A	Location: N/A
Due to COVID-19, City Hall is closed to the public. However, the Initial Study and Draft Mitigated Negative Declaration may be viewed on the City's website at www.arcadiaca.gov/projects. You may also request for a copy of the document by emailing Associate Planner, Vanessa Quiroz at vquiroz@arcadiaca.gov.		
Lead Agency address: 240 W. Huntington Drive, Arcadia, CA 91006		
Comments will be received from Thursday, April 23, 2020 to Thursday, May 22, 2020. Due to COVID-19, the City has extended the review period from 20 days to 29 days to give additional time for comments because of this outbreak.		
Any person wishing to comment on this matter must submit such comments, in writing, to the Lead Agency prior to **May 22, 2020**. Comments of all Responsible Agencies are also requested.		
The Lead Agency will consider the project and the Draft Mitigated Negative Declaration at its regular Planning Commission meeting and then forward a recommendation to the City Council. **Arcadia Planning Commission Meeting** **Tuesday, June 23, 2020 at 3:00 p.m.** **For more information on the format of this meeting during COVID-19, please visit www.arcadiaca.gov/projects or contact Associate Planner, Vanessa Quiroz at (626) 574-5422 or by email at vquiroz@arcadiaca.gov** **City Council Meeting – TBD**		
Date: **June 23, 2020**	Time: **3:00 p.m.**	
If the Lead Agency finds that the project will not have a significant effect on the environment, it may adopt the Negative Declaration/Mitigated Negative Declaration. This means that the Lead Agency may proceed to consider the project without the preparation of an Environmental Impact Report.		

Date Received
for Filing: _____

_____
Signature

(Clerk Stamp Here)

Associate Planner
Title

2020 072709

FILED
Apr 24 2020

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by CORTNEY MAFFITT

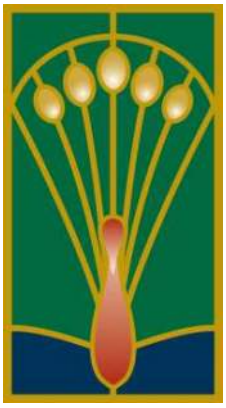
Figure No. 1 Aerial Map

California Environmental Quality Act

INITIAL STUDY

Artis Senior Living Project

Lead Agency:



City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91007
(626) 574-5422
Contact: Vanessa Quiroz, Associate Planner

Prepared by:

Michael Baker INTERNATIONAL

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SECTION A. ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Artis Senior Living Project

2. Lead Agency Name and Address: City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91007

3. Contact Person and Phone Number: Vanessa Quiroz, Associate Planner/(626) 574-5422

4. Project Location: As shown in **Figure A-1, Regional Location Map**, the City of Arcadia is located in the central San Gabriel Valley area in the eastern portion of Los Angeles County. As shown in **Figure A-2, Project Location Map**, the Project Site is located at the southeastern corner of the intersection of Colorado Boulevard and Michillinda Avenue at 1150 West Colorado Boulevard, Arcadia, CA 91007.

   The Project Site comprises Los Angeles County Assessor's Parcel Number 5776-001-012.

5. Project Sponsor's Name and Address: Artis Senior Living of Arcadia, LLC
1651 Old Meadow Road, Suite 100
McLean, VA 22102

6. General Plan Designation: Commercial

7. Zoning: General Commercial (C-G) with an Architectural Design Overlay and an Automobile Parking Overlay

8. Description of Project:

   Existing Conditions

   The proposed Project Site is designated in the City's General Plan as Commercial with a corresponding zoning of C-G, General Commercial. The C-G Zone is intended to provide areas for the development of retail, offices, restaurants, and service uses. The Project Site is included within two municipal overlay zones, the Architectural Design Overlay Zone and the Automobile Parking Overlay Zone. As shown in **Figure A-3, Project Site Overlay Zones**, these overlay zones are limited to the Project Site, with the Architectural Design Overlay Zone covering the central and northwestern portion of the Project Site and the Automobile Parking Overlay Zone covering the southern and eastern portions of the Project Site. The Architectural Design Overlay Zone states that various building design characteristics (such as building exterior materials, roof pitch, window size, landscaping, and automobile parking area) shall be subject to Planning Commission review and approval. Further, the Architectural Design Overlay Zone states that only one free-standing sign shall be permitted and located within 100 feet of the northern and western property lines, the maximum building height shall

not reach 30 feet above ground level, and no structure erected or permitted shall exceed 19,500 square feet of ground floor area.[1,2] The Automobile Parking Overlay Zone restricts the overlay area to ground level parking uses

The Project Site consists of 2.79 acres of developed land in the northwestern portion of the City of Arcadia. The Project Site is located on the southeastern corner of the Colorado Boulevard and Michillinda Avenue intersection, immediately south of Interstate 210 (I-210/ Foothill Freeway).

The Project Site contains an existing Coco's Bakery and Restaurant, which was constructed in 1976. The existing Coco's, which comprises 13,088 square feet in total floor area, is a rectangular, one-story building located in the center of the Project Site. The building is surrounded on all sides by a surface parking lot, with two driveway locations, one at the northeastern corner of the Project Site along Colorado Boulevard and another at the southwestern corner of the Project Site along Michillinda Avenue. Mature eucalyptus trees flank the western and eastern sides of the Coco's building. Additionally, there are decorative shrubs and turf along the northern, eastern, and western façades of the building, with one mature fern pine near the northeastern corner of the building. Currently, there is a mix of trees along the perimeter of the Project Site, serving as a landscape buffer between the Project Site and neighboring streets to the north and west and the residential neighborhoods to the east and south. The parking lot contains pole-mounted security lights, concrete bollards with chains that divide the parking lot on the south side of the lot, and landscape islands with decorative shrubs. Architectural lighting is also mounted along the edge of the roof of the northern façade and on the four corners of the roof of the Coco's building and is directed inwardly. This roof-mounted lighting illuminates the Coco's sign mounted above the building entrance on the north elevation and creates visual interest by illuminating the gently pitched roof line. Photos of the Project Site's existing conditions are shown in **Figures A-4** through **A-8**.

The Colorado Boulevard and Michillinda Avenue frontages are both improved with a sidewalk, curb, gutter, and three streetlights each, with a sidewalk parkway comprising a strip of turf grass. Each frontage is characterized by decorative ground cover; mature trees; a short, white-painted cinderblock wall; and decorative shrubs located between the sidewalk and the property line. A block and wood sign for Coco's (and The Oak Tree Room inside Coco's) is located at the northwestern corner of the Project Site.

Project Characteristics

To accommodate the Proposed Project, the Coco's building would be demolished, and associated landscaping and surface parking lot would be removed. However, the majority of the trees along the perimeter of the Project Site would be retained and incorporated into the Proposed Project's landscaping plan. As shown in **Figure A-9, Proposed Site Plan**, the Proposed Project would develop a W-shaped senior living facility, which would support memory care and assisted living services that would entirely be dedicated to people afflicted with Alzheimer's disease and related memory disorders. The facility would comprise a new two-story 44,192-square-foot building with 80 senior housing units; each unit, which would

1 City of Arcadia Resolution No. 4440, signed and approved July 2, 1974.
2 City of Arcadia Ordinance No. 1510, signed and approved July 16, 1974.

range in size generally between 216 square feet and 302 square feet, would primarily consist of a bed and a private bathroom with a shower.

The first floor of the proposed building would contain 40 senior housing units, a lobby, offices, resident dining rooms, storage, and several large and small activities rooms and common spaces within 23,767 square feet of floor area, while the second floor of the proposed building would contain 40 units of senior housing, as well as dining rooms and activities room and common space, within 20,425 square feet of floor area. The Proposed Project would also include decorative landscaping, private walking paths, and an outdoor plaza on the west and south sides of the Project Site. The proposed building would extend to 37.5 feet in height.

As shown in **Figures A-10** and **A-11**, the proposed structure would feature a traditional/Craftsman-style design with varied massing and materials with articulation on each of the building façades to increase visual interest and avoid flat, street-facing surfaces. The moderately pitched roof would be made of black walnut-colored asphalt shingles and would contain recessed, flat centers, which would screen mechanical equipment, such as heating and air conditioning equipment and exhaust fans, from view from the street. The elevations would feature windows with exterior shutters alongside brick and alternating vertical and horizontal cement fiber board siding. The design would include decorative features, such as trellises on the north, east, and west elevations, as well as columns and decorative railing at the front and rear entrances. An 8-foot-high wooden fence, with a decorative wooden topper, would enclose the southern portion of the Project Site, which would include a gazebo, lawn, outdoor plaza, and walking paths described above. This fence would connect to the northwestern and northeastern corners of the building and extend to the southern property line. There is one gate with a Knox Box that connects the walkways within the fenced enclosure to the parking area on the east side of the Project Site. Two gated pathways with Knox Boxes would connect the enclosed walking paths to Michillinda Avenue on the west side of the Project Site. The majority of the building would extend to approximately 30 feet in height, with the front entrance, located in the center of the building, extending to 37.5 feet in height. The building would be topped with a small, decorative cupola, which would extend to approximately 40 feet, 10 inches in height. A conceptual rendering of the Proposed Project is displayed in **Figure A-12**.

The Proposed Project would include multiple new sources of light, including pole-mounted LED security lighting in parking areas and the passenger drop-off area; path lighting on internal walkways; accent lighting over building doorways; and a lighted sign located on the northwest corner of the Project Site.

Vehicle parking would include 55 regular parking stalls and 4 parking stalls that comply with the requirements of the Americans with Disabilities Act (ADA). Vehicular access to the proposed building would be from a single ingress/egress point on Colorado Boulevard, located at an existing ingress/egress point for the Project Site. A circular drive in front of the proposed building's entrance would accommodate passenger loading and unloading. A separate loading dock for materials and food deliveries would be located near the Project Site's driveway at the northeastern corner of the proposed building. Directly north of the loading space would be the trash enclosure and an emergency generator for the senior care facility. The exterior finishes and materials of the enclosures would match the senior care facility. The

enclosure to the trash area and emergency generator would stand between 8 and 12 feet in height.

The majority of trees along the perimeter of the Project Site would be preserved in place to continue to form a vegetative screen between the Project Site and the residential uses to the east and south. The proposed building would be surrounded by landscaping, including drought-tolerant shrubs and ground cover, flower gardens, decorative trees, a lawn area/outdoor plaza with a gazebo, and a meandering concrete walkway with connections through locked gates to the existing sidewalks on Michillinda Avenue and Colorado Boulevard. The existing curb, gutter, and sidewalks along the Project Site's Colorado Boulevard and Michillinda Avenue frontages would be replaced as part of the Proposed Project. The public right-of-way along the Project Site's Colorado Boulevard frontage would be widened to 12 feet in width, which would require a four-foot dedication from the Project Site, as shown in **Figure A-9**. Additional decorative trees would be planted in the parking area to provide shade and additional screening from adjacent uses. A detailed landscape plan is available as **Figure A-13, Proposed Landscape Plan.**

The Proposed Project would require the following City approvals:

- Adoption of the IS/MND
- Zone Change: To revoke the existing Architectural Design (D) Overlay Zone and Automobile Parking (P) Overlay Zone from the Project Site;
- Architectural Design Review Approval;
- Conditional Use Permit to allow for the development of the Proposed Project in a C-G Zone;
- Tree Encroachment Permit; and
- Minor Administrative Modification for the request to exceed the maximum permitted fence height of 6 feet.

9. Surrounding Land Uses and Setting:

The Project Site is located in a fully urbanized part of the City of Arcadia, where the built environment consists of a mixture of single-family residential and commercial uses to the east in the City of Pasadena, and I-210 to the north, across the street from the Project Site. Colorado Avenue is a four-lane, east-west running roadway with a center turn lane, classified as a Secondary Travel Corridor by the Arcadia General Plan Circulation and Infrastructure Element. Michillinda Avenue is a four-lane, north-south running roadway that forms the western boundary of the City of Arcadia. Land uses west of Michillinda Avenue are located in East Pasadena, a neighborhood in unincorporated Los Angeles County.

Figure A-14, Aerial View of the Project Site and Surroundings, provides a view of the local land use pattern in the vicinity of the Project Site. These surrounding land uses include one-level, detached, single-family homes to the east and south, which were generally constructed between the 1930s and 1970s; a gasoline station with a convenience store and a single-family home across Michillinda Avenue to the west; an approximately 40-foot-high

commercial building to the northwest; and mature trees and I-210 across Colorado Boulevard to the north.

10. Other Public Agencies Whose Approval is Required:

    - California Department of Social Services (DSS)
    - Division of the State Architect

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?[3]

    Yes. The City sent notification letters to the Gabrielino-Tongva Tribe and the Gabrieleño Band of Mission Indians—Kizh Nation on January 10, 2020. On January 23, 2020, Andrew Salas, of the Gabrieleño Band of Mission Indians – Kizh Nation submitted a formal request to consult with the City. The tribal consultation process commenced on April 1, 2020 via a conference call attended by Andrew Salas and Matt Teutimez of the Gabrileño Band of Mission Indians, Lisa Flores and Vanessa Quiroz of the City of Arcadia, and Madonna Marcelo and John Bellas of Michael Baker International (the City's environmental consultant). Please refer to Section XVIII, Tribal Cultural Resources, of this Initial Study for a discussion of the results of the consultation.

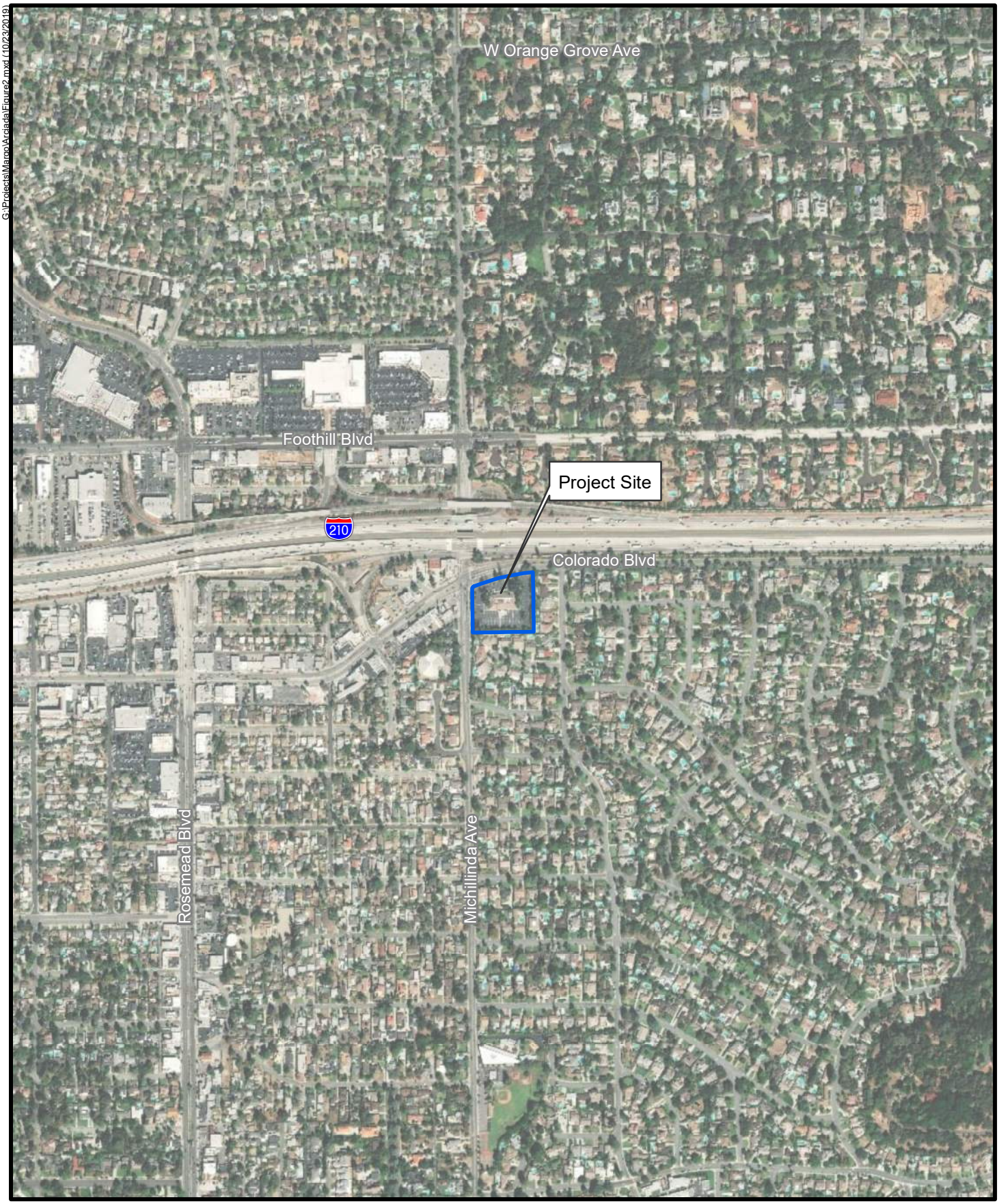
[3] NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Source: ESRI streetmap

0 3
MILES

FIGURE A-1
Regional Location Map

Michael Baker INTERNATIONAL



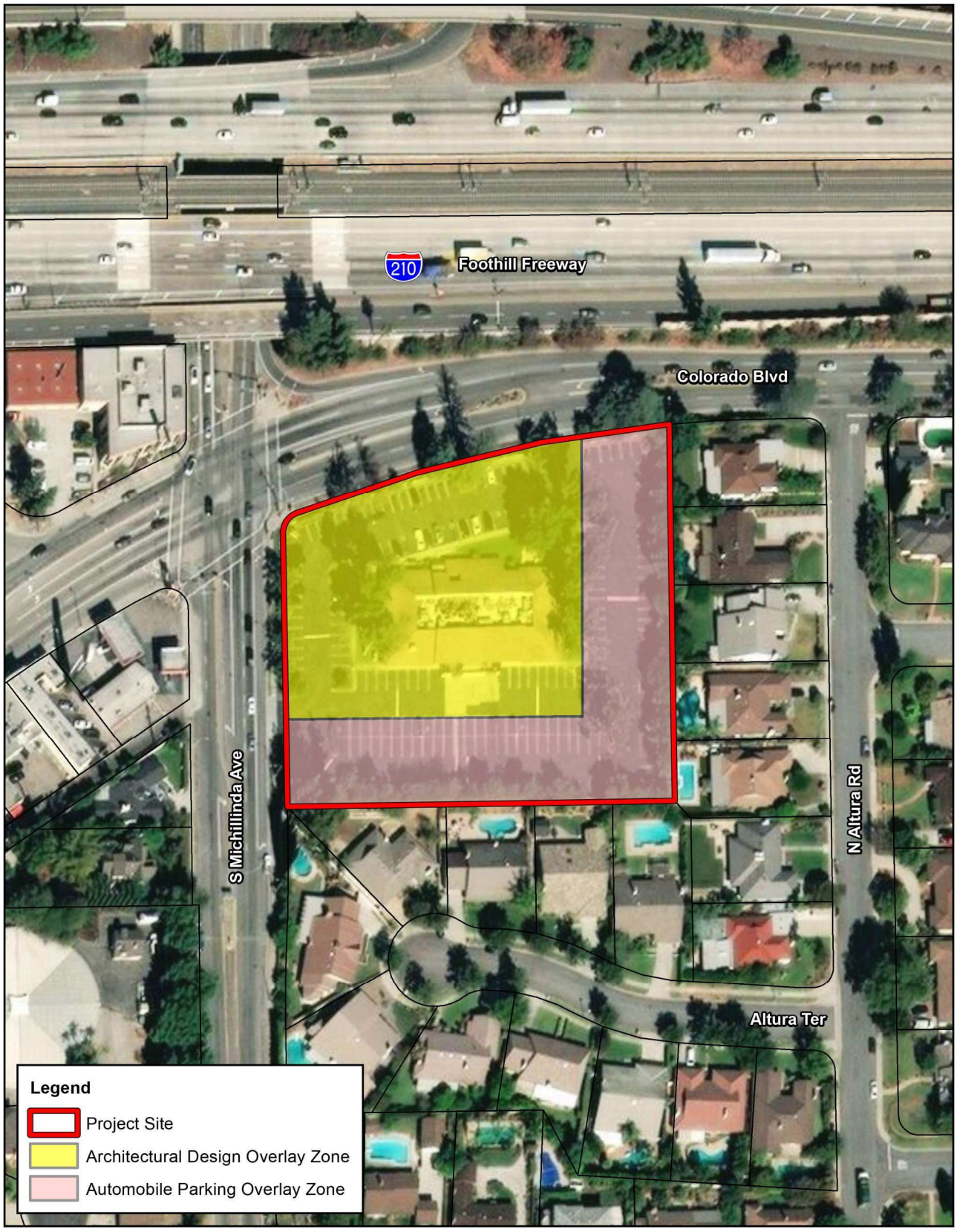
G:\Projects\Maroo\Arcadia\Figure2.mxd (10/23/2019)

Source: ESRI World Imagery Service

0 800
Feet

FIGURE A-2
Project Location Map

Michael Baker INTERNATIONAL



Source: Esri World Imagery, Los Angeles County

FIGURE A-3
Project Site Overlay Zones

Michael Baker
INTERNATIONAL

North and West Elevations of Existing Restaurant Building

North and East Elevations of Existing Restaurant Building

Note: Photos taken November 2019

FIGURE A-4
North Building Elevations

Michael Baker
INTERNATIONAL

South and East Elevations of Existing Restaurant Building

South and West Elevations of Existing Restaurant Building

Note: Photos taken November 2019

FIGURE A-5
South Building Elevations

Michael Baker
INTERNATIONAL

Block Wall and Landscaping Along Eastern Project Site Boundary

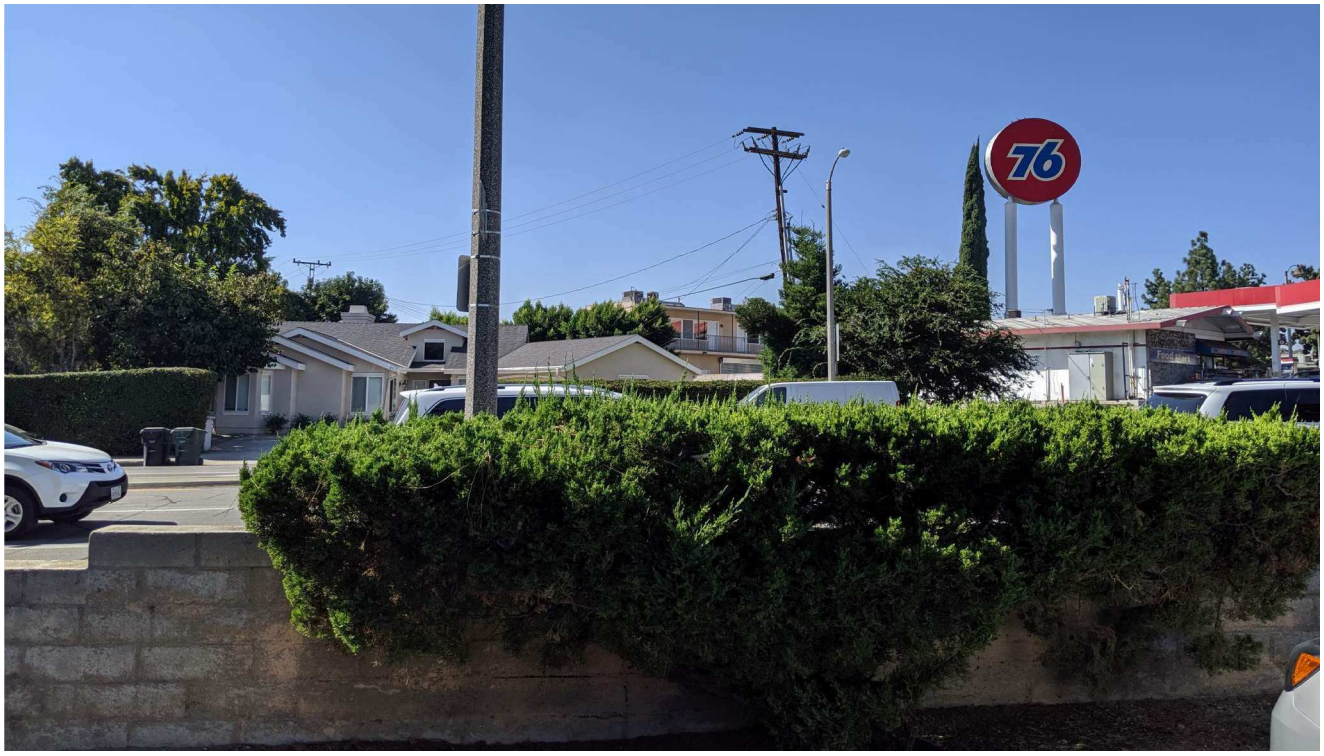
Surface Parking and Landscaping in Parking Area and Along Eastern and Southern Project Site Boundaries

Note: Photos taken November 2019

FIGURE A-6

Eastern and Southern Parking and Landscaping Areas

Michael Baker
INTERNATIONAL



Block Wall and Landscaping Along Western Project Site Boundary

Surface Parking and Landscaping Along Western side of Project Site

Note: Photos taken November 2019

FIGURE A-7
Western Parking and Landscaping Areas

Michael Baker INTERNATIONAL

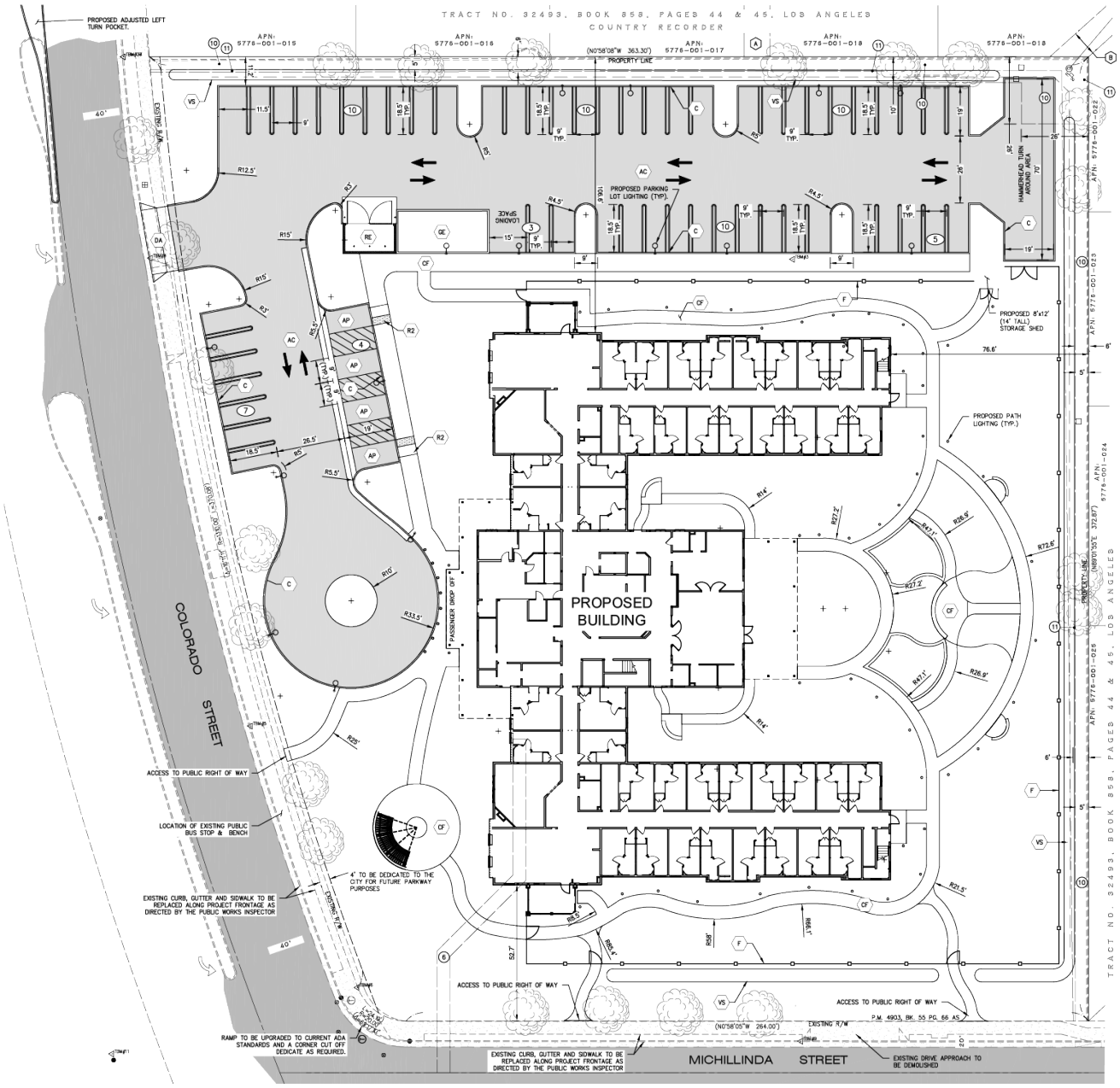
Existing Project Site Entry and Exit Point onto Colorado Boulevard

Existing Project Site Entry and Exit Point onto Michillinda Avenue

Note: Photos taken November 2019

FIGURE A-8
Existing Project Site Entry and Exit Points

Michael Baker
INTERNATIONAL

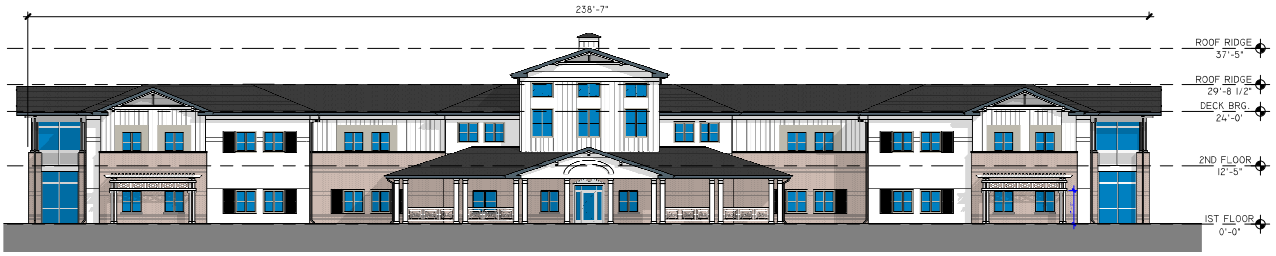


Source: Gateway Engineering, Inc., March 2020

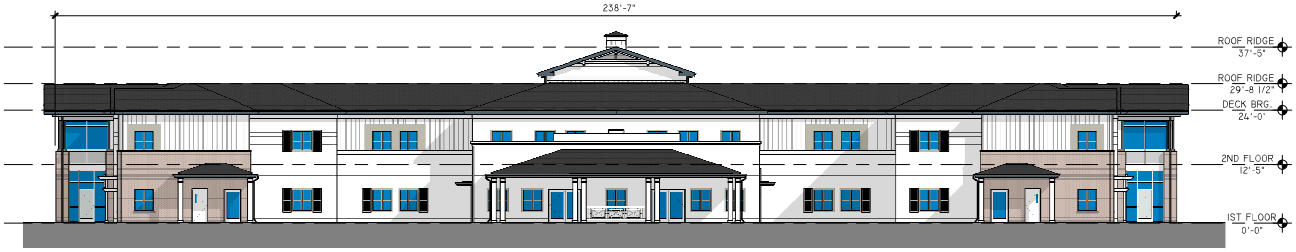
Not to Scale

FIGURE A-9
Proposed Site Plan

Michael Baker INTERNATIONAL



North Elevation

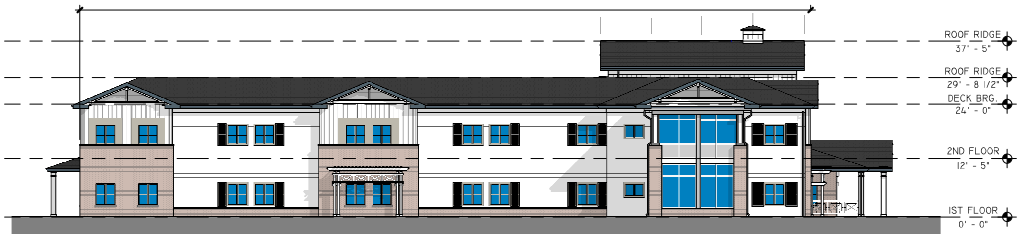


South Elevation

Source: Architecture Incorporated, August 2019

FIGURE A-10
Proposed Elevations North and South

Michael Baker
INTERNATIONAL



West Elevation

East Elevation

Source: Architecture Incorporated, August 2019

FIGURE A-11
Proposed East and West Elevations

Michael Baker
INTERNATIONAL

View of the west elevation looking northwest

View of the north and west elevations looking southwest

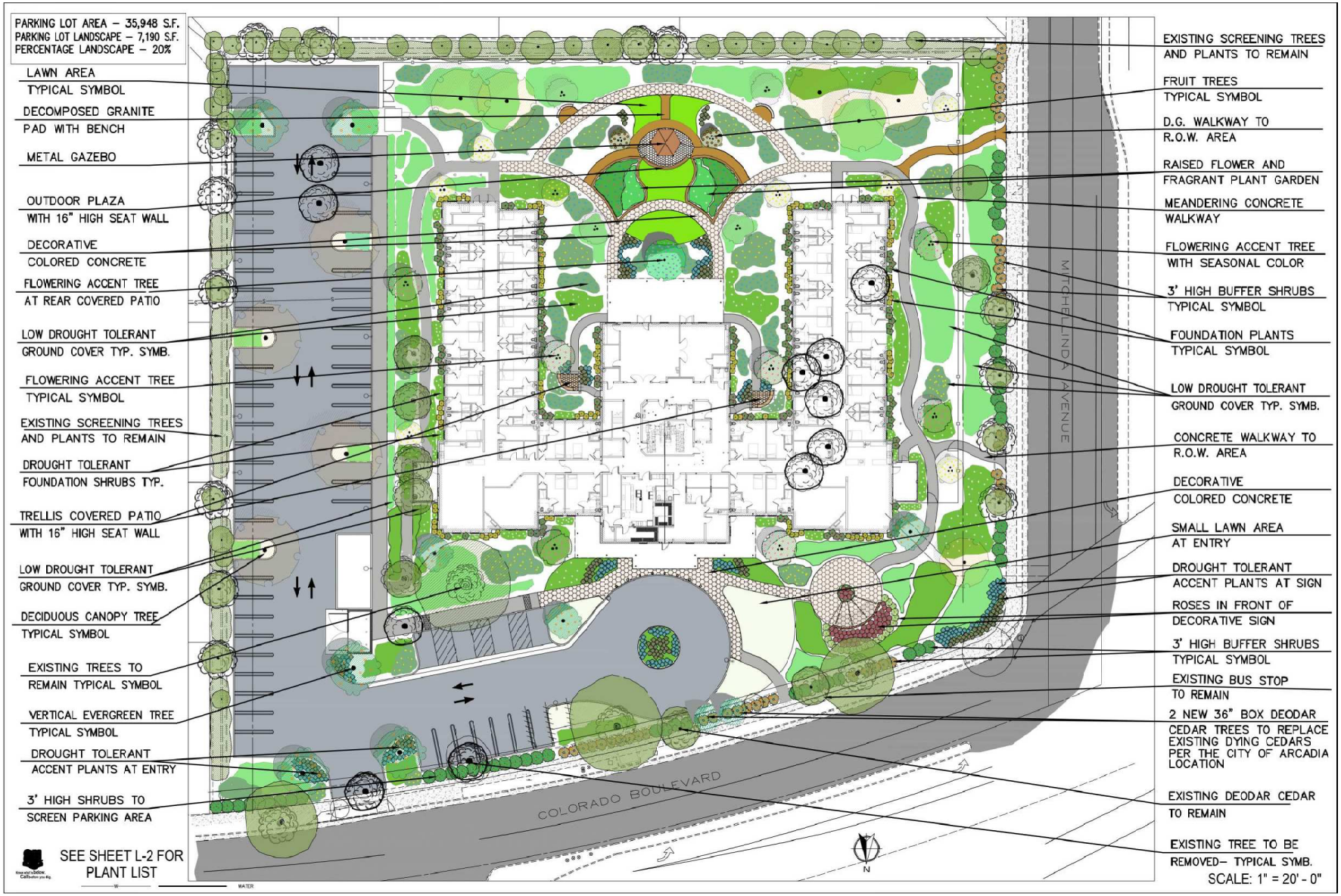
View of the north elevation looking southeast

View of the north and east elevations, looking south

Source: Architecture Incorporated, August 2019

FIGURE A-12
Conceptual Project Rendering

Michael Baker
INTERNATIONAL



Source: Source: Armstrong and Walker Landscape Architecture, December 2019

FIGURE A-13
Proposed Landscape Plan

Michael Baker
INTERNATIONAL

Source: Google Imagery, Esri, Los Angeles County, December 2019

FIGURE A-14
Aerial View of the Project Site and Surroundings

Michael Baker INTERNATIONAL

SECTION B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the project. To each question, there are four possible responses:

- **No Impact**. The project would not have any measurable environmental impact on the environment.
- **Less Than Significant Impact**. The project would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant Impact With Measures Incorporated**. The project would have the potential to generate impacts which may be considered a significant effect on the environment, although measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- **Potentially Significant Impact**. The project would have impacts which are considered significant, and additional analysis is required to identify measures that could reduce these impacts to less than significant levels.

SECTION C. DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

4/9/2020
Date

SECTION D. EVALUATION OF ENVIRONMENTAL IMPACTS

I. Aesthetics

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS: *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

The Proposed Project is not classified as a "transit-oriented infill project" as set forth in Section 21099 of the Public Resources Code (PRC), and, thus, the provisions of that section do not apply to this Project.

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is defined as a publicly accessible, prominent vantage point that provides expansive views of highly valued landscapes or prominent visual elements composed of man-made or natural features. Michillinda Avenue and North Altura Road, which both provide views of the San Gabriel Mountains for northbound travelers, could be considered public vantage points that provide a view of a highly valued landscape (i.e., the San Gabriel Mountains); however, the mountain views are distant, not expansive, and are extensively obstructed by existing development, utilities, and landscaping. Further, because the majority of the City is relatively flat, including the area surrounding the Project Site, the City of Arcadia General Plan does not identify any prominent vantage points from which the public can view an expansive scenic vista within or beyond the City.[4,5]

As discussed in the Project Description of this Initial Study, the Project Site is located in a highly urbanized area, dominated by features of a built environment. The surrounding development includes a mixture of building sizes, styles, and forms, and includes single-family residential, low- and mid-rise commercial, and freeway infrastructure. Many of the main arterial roadways in the City of Arcadia that

[4] City of Arcadia, Arcadia General Plan Land Use and Community Design Element, November 2010.
[5] City of Arcadia, Arcadia General Plan Parks, Recreation, and Community Resources Element, November 2010.

are oriented north and south provide views of the San Gabriel Mountains in the distance. As such, motorists traveling northbound on Michillinda Avenue (along the western boundary of the Project Site) and North Altura Road (one block east of the Project Site) have distant views of the San Gabriel Mountains, which begin approximately 1.9 miles north of the Project Site. Views of the mountains are partially obstructed by mature trees and existing development along both of these streets, I-210, and the overpass over Michillinda Avenue, as well as utility poles, traffic signals, and business signs on either side of Michillinda Avenue. As a result of these existing impediments, views of the San Gabriel Mountains are only available straight north and are obstructed to the northeast and northwest. In addition, because the proposed senior housing building would be set back approximately 106 feet from the Project Site's eastern boundary and set back approximately 52 feet from Michillinda Avenue, the proposed building would not substantially impact the existing, limited mountain views available to motorists. Further, the existing restaurant building is approximately 20 feet in height and is surrounded by mature eucalyptus trees that extend to approximately 60 feet high. The majority of the Proposed Project would extend to approximately 30 feet in height, with the front entrance, located in the center of the building, extending to 37.5 feet in height (see **Figures A-10** and **A-11**, which illustrate the Proposed Project's building elevations and indicate building heights). The building would be topped with a small, decorative cupola, which would extend to approximately 40 feet, 10 inches in height. The existing eucalyptus trees on the Project Site are visible from North Altura Road, looking west over the existing single-family homes. The Proposed Project may also be visible from North Altura Road looking west over the existing single-family homes; however, the Proposed Project would not obstruct any existing views of the San Gabriel Mountains to the north from North Altura Road. Therefore, effects of the Proposed Project on scenic vistas would be less than significant.

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

Less Than Significant Impact. The closest officially designated State scenic highway to the Project Site is part of the Angeles Crest State Scenic Highway, State Route 2 (SR-2), from near La Cañada-Flintridge north to the San Bernardino County line. This State scenic highway is approximately 8.5 miles northwest of the Project Site. The Arroyo Seco Historic Parkway (SR-110), between mileposts 25.7 and 31.9 in Los Angeles, is approximately 5 miles west of the Project Site. The distance between the Project Site and these officially designated scenic highways indicates that the Proposed Project would not be visible from a State scenic highway. Finally, I-210 north of SR-134 is designated as an eligible scenic highway; however, since the Project Site is approximately 5 miles west of this eligible scenic highway, the Proposed Project would not be visible from this viewshed. As such, the Proposed Project would not adversely affect the viewshed from a State scenic highway.

There are a number of scenic resources on the Project Site. Although there are no rock outcroppings or historic buildings on the Project Site, the Project Site's mature trees could be considered scenic resources because the City's General Plan states that "Arcadia's trees are a significant aesthetic and ecological resource" and are "one of the City's real treasures," distinguishing Arcadia from other cities in the vicinity.[6] Specifically, mature trees of various species are located around the perimeter of the Project Site, nearly all of which are protected by the City of Arcadia, as is described in further detail in Section IV, Biological Resources, of this Initial Study. As stated in the Project Description of this Initial Study, these protected trees provide a visual barrier between the Proposed Project and

[6] City of Arcadia, Arcadia General Plan Land Use and Community Design Element, November 2010, page 2-21.

surrounding uses and maintaining the existing visual character of the Project area.[7] Therefore, because of the Project Site's distance from the nearest officially designated scenic highway and the lack of impacts to scenic resources on the Project Site, the Proposed Project would have a less-than-significant impact on scenic resources, such as trees, rock outcroppings, or historic buildings within a State scenic highway.

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

Less Than Significant Impact. The Proposed Project would be located in a fully urbanized area, where there is a variety of nonresidential and residential land uses and extensive urban infrastructure improvements (see **Figure A-14, Aerial View of Project Site and Surroundings**). For purposes of determining impact significance for projects within urbanized areas, a project is evaluated for whether it would conflict with applicable zoning or other regulations governing "scenic quality." The term "scenic quality" is not specifically defined in the threshold language of Appendix G of the CEQA Guidelines. No applicable federal or State regulations pertain to aesthetic impact; however, the Proposed Project would need to comply with Arcadia Municipal Code regulations governing scenic quality for areas zoned General Commercial.

The Project is consistent with the underlying General Commercial (C-G) zone because the development of a residential care facility is allowed with an approved Conditional Use Permit (CUP) from the City.[8] However, the Project would require a zone change to remove an existing Architectural Design (D) Overlay Zone and an Automobile Parking (P) Overlay Zone from the Project Site.

While the Proposed Project would conflict with the existing overlay zones covering the Project Site, the Proposed Project would be consistent with underlying City zoning upon approval of a CUP. Further, the Arcadia Development Code does not contain any specific zoning regulations that govern scenic quality other than the protected tree ordinances described in Section IV, Biological Resources, of this Initial Study. As stated above, all protected trees on the Project Site would be preserved in place, providing visual barriers between the Proposed Project and surrounding uses and maintaining the existing visual character of the Project vicinity, as presented in **Figure A-13, Proposed Landscape Plan**. Per the Protected Tree Report, available as **Appendix A** and further discussed in Section IV, Biological Resources, of this Initial Study, no mitigation measures to offset tree removals would be required as part of the Proposed Project.[9] Therefore, the Proposed Project would be consistent with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

[7] Arbor Care, Inc., Protected Tree Report: Tree Survey, Encroachment, Protection and Mitigation 1150 West Colorado Boulevard, Arcadia, CA 91106, revised December 2019.
[8] City of Arcadia, Arcadia Municipal Code Section 9102.03.020.
[9] Arbor Care, Inc., Protected Tree Report: Tree Survey, Encroachment, Protection and Mitigation 1150 West Colorado Boulevard, Arcadia, CA 91106, revised December 2019.

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

Less Than Significant Impact. The Project Site is currently developed with an existing Coco's building, which is surrounded by a surface parking lot and scattered landscaped areas. Existing sources of light on the Project Site include building security lights on the restaurant building and pole-mounted parking lot lights. The area surrounding the Project Site is highly urbanized and, therefore, is already impacted by nighttime lighting from streetlights along Colorado Boulevard and Michillinda Avenue, as well as traffic signals at the intersection of Colorado Boulevard and Michillinda Avenue, vehicle headlights, and existing parking lot and building security lights at the commercial and gasoline station uses across Michillinda Avenue from the Project Site. The residential neighborhoods south and east of the Project Site do not contribute substantial nighttime lighting to the Project vicinity, apart from residential security and landscape lighting, and overhead streetlights located along North Altura Road and Altura Terrace.

The Proposed Project would contain multiple new sources of nighttime lighting, such as security lighting on internal walkways, overhead LED lights in the parking areas, and lights at building entrances, as well as accent lights along walking paths adjacent to landscaped areas and vehicle headlights from those entering and exiting the Project Site. The Proposed Project would be required to demonstrate compliance with Section 9103.01.120(D) of the Arcadia Development Code as part of the City's design review process, which limits potential light and glare impacts by requiring that lights be directed downward and shielded/recessed to avoid spillage to adjacent properties and prohibits flashing or roof-mounted lights that are directed outward. This Arcadia Development Code section also prohibits light fixtures that are inappropriate for the scale, intensity, and height of the use they are serving. Further, the Project would be allowed one sign, the lighting of which would have to comply with City of Arcadia sign regulations.[10] Additionally, the Project would not utilize glossy or reflective construction materials that would generate significant amounts of glare off-site. Therefore, the Project would not generate excessive light or glare, and by complying with lighting regulations in the Arcadia Development Code, would result in a less-than-significant impact on day or nighttime views in the Project area.

II. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES: *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				

[10] City of Arcadia, Arcadia Municipal Code Article IX, Division 3, Section 9103.11, Signs.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) 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?

No Impact. As stated in the Project Description of this Initial Study, the Project Site is located in a fully urbanized part of the City of Arcadia, where the built environment consists of a mixture of single-family residences, commercial buildings, and major highway infrastructure. The Project Site is currently developed with a Coco's restaurant, which is surrounded by a surface parking lot and ornamental landscaping. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Additionally, neither the Project Site nor the area surrounding it are mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation.[11] Therefore, the Project would not convert farmland to a non-agricultural use, and no impact would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as C-G (General Commercial) by the City and designated for Commercial in the City's General Plan. Agricultural uses are not permitted on properties zoned C-G.

[11] California Department of Conservation, *California Important Farmland Finder*, accessed November 8, 2019, https://maps.conservation.ca.gov/DLRP/CIFF/.

Further, neither the Project Site nor the surrounding area is subject to a Williamson Act contract.[12] Therefore, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and no impact would occur.

c) 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))?

No Impact. The Project Site is zoned as C-G (General Commercial) by the City and designated for Commercial in the City's General Plan. Accordingly, the Project Site does not include any forestland or timberland and is almost entirely covered by man-made, impervious surfaces (i.e., building and surface parking lot). Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production, and no impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is located in a fully urbanized area and does not include any forestland or timberland. Therefore, the Project would not result in the loss or conversion of forestland to non-forest use, and no impact would occur.

e) 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?

No Impact. As stated in the response to Checklist Question II.c, above, the Project Site is fully urbanized and almost entirely covered by impervious surfaces. While the Proposed Project would alter the Project Site, resulting in a greater amount of pervious areas due to the increase in landscaped areas, the Project would not result in conversion of farmland to non-agricultural use or forestland to non-forest use, and no impact would occur.

[12] California Department of Conservation, *The California Land Conservation Act of 1965 2016 Status Report*, December 2016.

III. Air Quality

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

Discussion

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The City of Arcadia is located within the South Coast Air Basin (Basin), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and by the Pacific Ocean to the south and west. The South Coast Air Quality Management District (SCAQMD) has jurisdiction in the Basin, which has a history of recorded air quality violations and is an area where both State and federal ambient air quality standards are exceeded.[13] Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The air quality in the Los Angeles County portion of the Basin does not meet the ambient air quality standards for ozone (O_3), coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and lead and is therefore classified as a nonattainment area for these pollutants.[14] The SCAQMD is required to reduce emissions of air pollutants for which the Basin is in federal nonattainment (i.e., O_3 and $PM_{2.5}$).

In order to reduce emissions, the SCAQMD adopted the 2016 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and federal air quality standards.[15] The 2016 AQMP is a regional and multiagency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the U.S. Environmental Protection Agency (USEPA). In addition to the AQMP, the SCAQMD regulates construction activities through Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures, thus greatly reducing PM_{10} and $PM_{2.5}$ concentrations.

[13] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.
[14] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.
[15] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.

The 2016 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts.[16] SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. Therefore, the SCAQMD considers projects that are consistent with the 2016 AQMP to also have less-than-significant cumulative impacts.[17]

Criteria for determining consistency with the 2016 AQMP are defined by the following indicators:

Criterion 1:

- *The Proposed 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 attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Since this criterion pertains to pollutant concentrations, rather than to total regional emissions, an analysis of the Project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed in the response to Checklist Question III.c, below, localized emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ generated by the Project would be less than significant. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations. Because reactive organic gases (ROGs) are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs. Due to the role ROGs play in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. Further, as discussed in the response to Checklist Question III.b, below, the Proposed Project would result in emissions below the SCAQMD thresholds. Therefore, the Proposed Project would not have the potential to cause or affect a violation of the ambient air quality standards. Finally, the Proposed Project would result in less-than-significant impacts with regard to localized emissions during Project construction and operation. As such, the Proposed Project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions and, therefore, meets the first criterion for consistency with the 2016 AQMP.

Criterion 2:

- *The Proposed Project will be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP and will implement all feasible air quality mitigation measures.*

A project is consistent with the 2016 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2016 AQMP. In the case of the 2016 AQMP, the basis for the projections of air pollutant emissions include the Arcadia General Plan and SCAG's RTP/SCS. The RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The Project proposes to construct a senior living facility and associated surface parking lot. The existing General Plan land use designation for the Project Site is Commercial, with a corresponding zoning of C-G, General Commercial. Further, the Project Site is within two municipal overlay zones, the Architectural

[16] Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.

[17] South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, March 2015.

Design overlay zone and the Automobile Parking overlay zone. While the Proposed Project would conflict with the existing overlay zones covering the Project Site, the Proposed Project would be consistent with the underlying City zoning upon approval of a CUP, as further discussed in response to Checklist Question XI.b, below. Therefore, the Proposed Project is consistent with the General Plan. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the Proposed Project would be consistent with the projections.

The Proposed Project would not require mitigation and would result in less-than-significant air quality impacts, as described in responses to Checklist Questions III.b through III.d, below. Further, compliance with all emissions reduction regulations established by the SCAQMD, such as Rule 403 controlling fugitive dust, would be required. As such, the Proposed Project meets the second AQMP consistency criterion.

In conclusion, the Proposed Project would not result in a long-term impact on the region's ability to meet State and federal air quality standards. As discussed above, the Proposed Project's long-term influence would also be consistent with the SCAQMD's and SCAG's goals and policies and is, therefore, considered consistent with the 2016 AQMP. As such, impacts would be less than significant.

b) 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 federal or state ambient air quality standard?

Less Than Significant Impact. The Project Site is located in the Basin, which is considered a nonattainment area for certain criteria pollutants. The Project would involve demolition, grading, and other construction activities, and would result in long-term operations at the Project Site; therefore, it would contribute to regional and localized pollutant emissions during construction (short-term) and Project occupancy (long-term). Further discussion of construction-related and operation-related emissions are provided below.

Construction

The Project involves construction activities associated with demolition, grading, paving, building construction, and architectural coating phases. It is anticipated that the Project would be constructed over approximately 19 months. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or offsite. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) version 2016.3.2.[18] Refer to **Appendix B**, Air Quality/Greenhouse Gas/Energy worksheets, for the CalEEMod outputs and results. **Table III-1** presents the anticipated daily short-term construction emissions associated with the Project.

[18] South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod), version 2016.3.2.

Table III-1
Short-Term Construction Emissions

Emissions Source	Pollutant (pounds/day)[a,b]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1	4.38	49.34	32.32	0.07	5.53	3.26
Year 2	3.50	17.82	20.01	0.04	1.72	1.02
Year 3	3.48	1.35	2.37	0.00	0.23	0.11
Maximum Daily Emissions	**4.38**	**49.34**	**32.32**	**0.07**	**5.53**	**3.26**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

[a] Emissions were calculated using CalEEMod, version 2016.3.2.

[b] Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stockpiles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.

Source: Refer to **Appendix B** for detailed model input/output data.

Construction activities, such as land clearing and ground disturbance, are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions, and would be short term, ceasing upon Project completion. As stated above, SCAQMD Rule 403 requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SCAQMD Rule 403 would greatly reduce PM_{10} and $PM_{2.5}$ concentrations. As shown in **Table III-1**, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Other construction-related exhaust emissions would result from the transport of machinery and supplies to and from the Project Site and emissions produced by equipment used on-site. As presented in **Table III-1,** construction equipment and worker vehicle exhaust emissions (SO_2, CO, and NO_x) would be below the established SCAQMD significance thresholds.[19]

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. As required, all architectural coatings for the proposed structure would comply with SCAQMD Rule 1113, Architectural Coating, which provides specifications on painting practices and regulates the ROG content of paint.

As shown in **Table III-1**, Project-related total daily construction emissions of particulate matter, equipment and vehicle exhaust, and ROG emissions would not exceed the SCAQMD significance thresholds. As such, air quality impacts would be less than significant.

Operation

Emissions during Project operation would be predominantly associated with motor vehicle use (mobile source emissions). To a lesser extent, area sources, such as the use of landscape maintenance equipment, and architectural coatings, as well as energy sources, such as non-hearth natural gas and

[19] South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, March 2015.

electricity, would also contribute to overall emissions. The total daily operational emissions in winter and summer are displayed in **Table III-2**.

Table III-2
Long-Term Operational Air Emissions

Emissions Source	Pollutant (pounds/day)[a,b]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Coco's Restaurant Emissions						
Area Source Emissions	0.33	0.00	0.01	0.00	0.00	0.00
Energy Emissions	0.09	0.81	0.68	0.00	0.06	0.06
Mobile Emissions	0.87	3.68	8.35	0.02	1.79	0.50
Total Daily Emissions[2]	*1.29*	*4.49*	*9.04*	*0.02*	*1.85*	*0.56*
Proposed Artis Senior Living Facility Emissions						
Area Source Emissions	1.30	1.27	7.13	0.01	0.13	0.13
Energy Emissions	0.03	0.22	0.10	0.00	0.02	0.02
Mobile Emissions[3]	0.39	1.95	5.26	0.02	1.53	0.42
Total Daily Emissions[2]	*1.72*	*3.44*	*12.49*	*0.03*	*1.68*	*0.57*
Total Net Daily Emissions (Proposed – Existing)	***0.43***	***-1.05***	***3.45***	***0.01***	***-0.17***	***0.01***
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter
[a] Emissions were calculated using CalEEMod, version 2016.3.2.
[b] The numbers may be slightly off due to rounding.
Source: Refer to **Appendix B** for detailed model input/output data.

As shown in **Table III-2**, the Project would generate a substantial reduction in mobile source emissions. This is because the Project would result in a net reduction of approximately 374 daily vehicle trips as compared with existing conditions (Coco's Restaurant).[20] This net reduction in vehicle trips is discussed further in Section XVII, Transportation/Traffic, of this Initial Study. Additionally, area source emissions, such as emissions generated from consumer products, architectural coatings, and internal combustion landscaping equipment, would result in a modest increase over existing conditions. As shown in **Table III-2**, the total daily emissions from mobile, area source, and energy emissions would not exceed SCAQMD thresholds for ROG, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Thus, operational air quality impacts would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases, such as asthma, emphysema, and bronchitis.[21] In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LSTs) for construction and

[20] Michael Baker International, Artis Senior Assisted Living Facility Trip Generation Analysis, December 17, 2019.
[21] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, November 1993.

operations impacts (area sources only).[22] The closest sensitive receptors are residences adjoining the Project Site to the east and south. These sensitive receptors may be potentially affected by air pollutant emissions generated during on-site construction activities

Table III-3 presents the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ in comparison to the appropriate LST designated by SCAQMD. The localized emissions presented in **Table III-3** are less than the emissions displayed in **Table III-2** because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust) and do not include off-site emissions (i.e., from hauling activities). As shown in **Table III-3**, the Project's localized construction emissions would not exceed the LST with adherence to SCAQMD rules and requirements. Therefore, localized significance impacts from construction would be less than significant.

Table III-3
Localized Significance of Construction Emissions

Source[a]	Pollutant (pounds/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Year 1[b]	46.40	30.88	5.20	3.16
Year 2[c]	15.62	16.36	0.81	0.76
Year 3[d]	1.30	1.81	0.07	0.07
Maximum Daily Emissions	**46.40**	**30.88**	**5.20**	**3.16**
SCAQMD Localized Significance Threshold[e]	*128*	*953*	*7*	*5*
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes: NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

[a] Modeling assumptions include compliance with SCAQMD Rule 403 which requires properly maintaining mobile and other construction equipment; replacing ground cover in disturbed areas quickly; watering exposed surfaces three times daily; covering stockpiles with tarps; watering all haul roads twice daily; and limiting speeds on unpaved roads to 15 miles per hour.

[b] Year 1 grading phase emissions present the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$.

[c] Year 2 building construction phase emissions present the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$.

[d] Year 3 architectural coating phase emissions present the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$.

[e] The LST was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The LST was based on the anticipated daily acreage disturbance for construction (the thresholds for 2 acres were used), the distance to sensitive receptors (25 meters), and the source receptor area (SRA 9).

Source: Refer to **Appendix B** for detailed model input/output data.

Regarding operational emissions, SCAQMD states that LSTs would apply to the operational phase of a Proposed Project if the Project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities).[23] Because the Proposed Project does not include such uses, no long-term LST analysis is needed and operational LST impacts would be less than significant.

[22] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, July 2008.
[23] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, July 2008.

Therefore, because the Project would not exceed short-term or long-term LSTs, the Project would not expose sensitive receptors to substantial pollutant concentrations, and air quality impacts would be less than significant.

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

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[24] The Proposed Project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the Project may generate other emissions and detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related emissions and odors would be short term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing idling time to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also be required to comply with the SCAQMD Regulation XI, Rule 1113 – Architectural Coatings, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short term and minimal. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

IV. Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES: *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

[24] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, November 1993.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a) 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 Game or U.S. Fish and Wildlife Service?

Less than Significant Impact. The Project Site is located in a fully urbanized area where the built environment consists of a mixture of single-family residential and commercial buildings and major highway infrastructure. The Project Site is currently developed with a restaurant building, which is surrounded by surface parking and landscaping. As stated in the Project Description of this Initial Study, mature eucalyptus trees flank the western and eastern sides of the restaurant building. Additionally, there are decorative shrubs and turf along the northern, eastern, and western façades of the building, with one mature fern pine near the northeastern corner of the building. There is a mix of existing trees along the perimeter of the Project Site, serving as landscape buffers between the Project Site and neighboring streets to the north and west and the residential neighborhoods to the east and south. In total, there are 72 trees located on the Project Site. According to the U.S. Fish and Wildlife Service (USFWS), the only threatened or endangered species that have potential of occurring in this part of Arcadia are the California condor, the coastal California gnatcatcher, and the Braunton's milk-vetch flowering plant.[25] While there are 72 trees on the Project Site, the Site does not contain any native habitat that would support the California condor or the coastal California gnatcatcher. The Project Site's manicured landscaping does not support native plant species, such as the Braunton's milk-vetch. Due to the disturbed nature of the Project Site, the Project Site would not support special-status species listed by the USFWS, or species listed on the California Department of Fish and

[25] U.S. Fish and Wildlife Service (USFWS), Environmental Conservation Online System: Information for Planning and Consultation, resource list generated November 22, 2019.

Wildlife's (CDFW) Special Plant and Animal Lists.[26] Further, the Arcadia General Plan does not identify any sensitive or special-status species, apart from protected trees, which are discussed in the response to Checklist Question IV.e of this Initial Study. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, 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. As such, impacts would be less than significant.

b) 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 Game or US Fish and Wildlife Service?

No Impact. As previously stated, the Project Site is located in an urbanized area and is currently developed as a restaurant with associated parking and landscaping. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[27,28] Further, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the County of Los Angeles.[29] Additionally, there are no other sensitive natural communities or critical habitat identified by the CDFW or USFWS located on or adjacent to the Project Site.[30,31,32] Therefore, the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and no impact would occur.

c) 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?

No Impact. Section 404 of the Clean Water Act defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

The Project Site is located in an urbanized area and is mostly covered by impervious surfaces except for some ornamental landscaping in front of the existing restaurant building and along the site frontages. There are no water bodies or federally protected wetlands on the Project Site or in the immediate vicinity.[33,34] Therefore, the Project would not have an adverse effect on State or federally protected wetlands, and no impact would occur.

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26 California Department of Fish and Wildlife (CDFW), Special Plant and Animal Lists, https://www.dfg.ca.gov/wildlife/nongame/list.html, accessed November 8, 2019.

27 City of Arcadia, Arcadia General Plan, Land Use and Community Design Element, November 2010.

28 U.S. Environmental Protection Agency (USEPA), NEPAssist, National Land Cover Database 2016 Project Site and Area land cover, map generated December 10, 2019.

29 Los Angeles County Department of Regional Planning, GIS-NET Public, Planning & Zoning Information, http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed November 8, 2019.

30 CDFW, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/, accessed November 8, 2019.

31 CDFW, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed November 8, 2019.

32 USFWS, Environmental Conservation Online System: Information for Planning and Consultation, map generated November 22, 2019.

33 USEPA, NEPAssist, , accessed November 8, 2019.

34 USFWS, National Wetlands Inventory, , accessed November 22, 2019.

d) 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?

Less Than Significant with Mitigation Incorporated. There are no waters or streams present on the Project Site. Therefore, the Proposed Project would not impact or interfere with the movement of any native resident or migratory fish. Wildlife corridors are typically made up of undeveloped wildlife habitat and open space linkages between larger patches of wildlife habitat. Habitat linkages may also include more tenuous linkages like narrow vegetated pathways or islands of habitat that act as stepping stones between larger habitat areas for some species. The Project Site has been highly disturbed and is surrounded by developed, urban land uses; however, there are 72 existing trees on the Project Site, which could provide habitat to animals capable of flight (i.e., birds).[35]

The Coco's building, trees, and ornamental landscaping may provide suitable roosting and nesting habitat for bird species. Migratory nongame native bird species are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the federal MBTA). The Proposed Project would result in the removal of unprotected trees, the existing Coco's building, and other landscaping, which could be used as habitat for nesting birds. While migratory bird species are considered highly mobile and would naturally avoid areas with loud construction noise, removal of potential nesting habitat would result in the potential for minor impacts. As such, **Mitigation Measure BIO-1** would be implemented, which would reduce impacts on migratory wildlife species to a less-than-significant level with mitigation incorporated.

BIO-1 Tree removal shall not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions may be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged. This measure shall be implemented to the satisfaction of the City of the Planning & Community Development Administrator or Designee.

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

Less Than Significant with Mitigation Incorporated. The City of Arcadia has a Tree Preservation Ordinance (TPO) that protects trees with a diameter of 12 inches or greater (or greater than 10 inches in diameter if there are multiple trunks), as well as street trees.[36] Several trees are considered

[35] Arbor Care, Inc., Protected Tree Report: Tree Survey, Encroachment, Protection and Mitigation 1150 West Colorado Boulevard, Arcadia, CA 91106, revised December 2019.

[36] City of Arcadia, *Code of Ordinances*, Article IX, Chapter 7, Tree Preservation, and Chapter 8, Comprehensive Tree Management Program.

"unprotected" regardless of their size, including fruit trees, Brazilian pepper trees, palm trees, eucalyptus trees, and Italian cypress trees. Of the 72 trees located on the Project Site, 12 are considered protected under the TPO with all but two of these protected trees considered to be in good health. There are four additional protected trees that are off-site but have canopies that encroach onto the Project Site. In total, there are 16 protected trees located on the Project Site or that have canopies that extend onto the Project Site. As discussed in the Protected Tree Report, included as Appendix A of this Initial Study, these protected trees include species, such as fern pines, carrotwoods, Japanese pear, southern magnolias, deodar cedar, coast redwood, and Canary Island pines, and are primarily located along the perimeter of the Project Site. In particular, Tree No. 49 (see Appendix A), a protected deodar cedar located on the Project Site's Colorado Boulevard frontage, is in fair condition but is showing branch die-back.

The Proposed Project would remove a total of 18 unprotected trees, which include a mix of Victorian box trees, lemon-scented gum trees, a fern pine, and an evergreen pear tree. Of the 18 unprotected trees to be removed, 13 trees are located in the center of the Project Site, around the existing restaurant building; two trees are flanking the existing driveway onto Colorado Boulevard; two trees are located in a planter in the southeastern corner of the parking lot; and one dead tree stump is located on the Project Site's Colorado Boulevard frontage. No healthy, protected trees would be removed as part of Project Site modifications. Of the 16 protected trees that are on or adjacent to the Project Site, all 12 of the on-site protected trees would experience some light grading within their immediate area, less than 6 inches deep within the dripline of the tree. The Protected Tree Report estimates that the Proposed Project would remove or sever less than 20 percent of the total root mass of each of these protected trees. Project-related construction activities would not encroach upon the four off-site protected trees. Accordingly, the Protected Tree Report determined that the Project would not adversely affect the long-term viability of the protected trees on or adjacent to the Project Site. As such, no protected trees would be removed or irrevocably damaged as part of Project-related grading and construction.

While some minor damage to the protected tree root systems are anticipated as part of the Proposed Project, implementation of **Mitigation Measure BIO-2** is required to prevent substantial damage to on- and off-site protected trees, via soil compaction or grading encroachment into protected tree root systems. The goal of **Mitigation Measure BIO-2** would be to enclose the largest possible amount of space underneath the tree so that the heavy equipment required for demolition and construction can be routed away from root zones. Further, the TPO requires an applicant to demonstrate that a proposed project's landscape plan is consistent with the TPO. Therefore, with implementation of **Mitigation Measure BIO-2** to meet the requirements of the TPO, the Proposed Project would not conflict with the City's TPO, and impacts would be less than significant with mitigation incorporated.

BIO-2 Prior to issuance of a building permit, the applicant shall demonstrate that the Project landscaping plan and planned construction are consistent with the City's Tree Protection Ordinance and the Protected Tree Study. The tree protection activities shall include the following:

1. Prior to demolition, the contractor and consulting arborist shall meet on-site to make sure tree protection zones are established around all protected trees to be preserved and to review the goals for the tree protection plan.

2. Tree protection zone fences shall be placed around each protected tree. Fences shall be at least 4 feet tall and constructed of chain-link fencing secured on metal

posts. Where fences are not feasible (e.g., in haul routes or areas where workers will need frequent access), soil and root protection material can be installed.

3. The contractor shall maintain the fences and/or soil protection material throughout the completion of the Project. No staging of materials or equipment or washing out shall occur within the fenced protected zones.
4. Trees should be irrigated throughout the year. A deep watering that provides good soil moisture to a depth of 16 inches is optimal. The trees shall be deeply water once every 21 to 28 days during the summer and fall seasons when rain is unlikely.
5. For Tree No. 49, a protected deodar cedar located on the Project Site's Colorado Boulevard frontage, the deadwood shall be removed to prevent the dead branches from falling. However, no reduction pruning in the live crown of the tree is required. The tree shall be monitored for its health during the life of the Project, and irrigation shall occur at the same frequency of the other trees.
6. The arborist shall monitor a few critical phases of the Project, including pre-demolition, to direct the installation of protective fences and soil protection measures; grading and excavation; any utility or drainage trenching that is required within a tree protection zone; and a final evaluation during the landscape installation phase.
7. Additional construction best practices described in the Protected Tree Report shall be implemented.

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

No Impact. There are no adopted, approved, or proposed habitat conservation plans, natural community conservation plans, or other approved local, regional, or State conservation plans that cover habitats located in the City of Arcadia.[37] Therefore, the Proposed Project would not conflict with such plans, and no impact would occur.

[37] City of Arcadia, *General Plan Update Draft Program EIR*, Section 4.4 Biological Resources, June 2010.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES: *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion

The analysis in this section is based on the "Cultural Resources Identification Memorandum for the Artis Senior Living Project" prepared by Michael Baker International in January 2020, included as Appendix C of this Initial Study. The memo report summarized the methods and results of a South Central Coastal Information Center (SCCIC) records search, literature review, and historical map review to determine whether the Project would result in significant impacts to cultural resources, including historical and archaeological resources.

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

No Impact. No historical resources (built environment) were identified on the Project Site. The current restaurant building, built in 1976, does not meet the age requirement for evaluation for eligibility for listing in the California Register of Historical Resources (California Register) and, therefore, is not a historical resource as defined by CEQA Guidelines Section 15064.5(a). Further, there are no cultural resources listed or eligible for listing in the California Register within the immediate vicinity of the Project Site (i.e., within 1.5 blocks of the Project Site). Because physical alterations associated with the Proposed Project would not extend beyond the Project Site, there would be no impact to on-site or off-site historical resources as a result of the Project's implementation. Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and no impact to historical resources would occur.

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

Less than Significant Impact with Mitigation Incorporated. The Project Site is fully paved and landscaped with no exposed soils. No archaeological resources were identified on the Project Site or within a quarter-mile of the Project Site. The Project Site was first developed with a hotel and restaurant known as Eaton's Santa Anita Hotel and Restaurant between 1940 and 1975 when it was demolished for the current 1976-built restaurant. No other historic literature or maps indicate occupation or development of the Project Site prior to circa 1940. Furthermore, neither the current building nor the previous Eaton's restaurant building was identified as significant in the records search

or literature review (see Appendix C of this Initial Study). Accordingly, the site sensitivity for subsurface archaeological resource is considered low because the Project Site has been developed and redeveloped. However, the potential exists for unanticipated discovery of archaeological resources during Project-related ground disturbance activities. Therefore, **Mitigation Measure CUL-1** is required to ensure that impacts to archaeological resources pursuant to CEQA Guidelines Section 15064.5 would be less than significant with mitigation incorporated.

Mitigation Measure

CUL-1 **Treatment of previously unidentified archaeological deposits**. If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits shall be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not eligible, no further protection of the find is necessary. If the deposits are eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project would not likely disturb any human remains, including those interred outside of dedicated cemeteries. Research conducted as part of the preparation of the "Cultural Resources Identification Memo Report for the Artis Senior Living Project" found no indications of any past human burial activities on or near the Project Site. However, there is the potential to discover buried human remains during Project-related earth-moving activities. According to the California Health and Safety Code Section 7050.5, there must be no further excavation or disturbance of a site or any nearby area reasonably suspected to overlie adjacent remains until the Los Angeles County coroner has determined the 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. Project personnel/construction workers are prohibited to collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods. Accordingly, impacts related to the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant with the Project's compliance with California Health and Safety Code Section 7050.5.

VI. Energy

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

Discussion

a) 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.

This analysis focuses on three sources of energy that are relevant to the Proposed Project: electricity, natural gas, and transportation fuel for vehicle trips associated with Project construction and new development. The estimated construction fuel consumption is based on the Project's construction equipment list, timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The analysis of operational electricity/natural gas usage is based on the CalEEMod version 2016.3.2 modeling results for the Project, which quantifies energy use for the proposed occupancy. The Project's estimated electricity/natural gas consumption is based primarily on CalEEMod's default settings for Los Angeles County and consumption factors provided by Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) (the electricity and natural gas providers, respectively, for the City of Arcadia and the Project Site). The results of the CalEEMod modeling are included in **Appendix B**, Air Quality/Greenhouse Gas/Energy Worksheets. The amount of operational fuel consumption was estimated using the CARB Emissions Factor 2017 (EMFAC2017) computer program, which provides projections for typical daily fuel (i.e., diesel and gasoline) usage in Los Angeles County, and the Project's annual vehicle miles traveled (VMT) outputs from CalEEMod.

Construction

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 for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, 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 that heavy-duty diesel equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest USEPA and CARB

engine emissions standards. These emissions standards 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.

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 in minimizing the cost of doing business. As indicated in **Table VI-1**, the Project's fuel consumption from construction would be approximately 36,934 gallons, which would increase fuel use in the County by 0.0069 percent. As such, construction would have a nominal effect on local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. 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 would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. As such, impacts related to energy conservation would be less than significant.

Table VI-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption[a]	Los Angeles County Annual Energy Consumption[b]	Percentage Increase Countywide[b]
Net Electricity Consumption[c]	-257 MWh	68,486,000 MWh	-0.0004%
Net Natural Gas Consumption[d]	-21,351 therms	2,921,000,000 therms	-0.0007%
Fuel Consumption			
• Construction Fuel Consumption[e]	36,934 gallons	533,800,838 gallons	0.0069%
• Net Operational Automotive Fuel Consumption[e,f]	-8,182 gallons	3,975,480,911 gallons	-0.0002%

Notes:

[a] As modeled in CalEEMod version 2016.3.2.

[b] The project net reduction in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2018. The project's automotive fuel consumption is compared with the projected countywide fuel consumption in 2020.
Los Angeles County electricity consumption data source: California Energy Commission, Electricity Consumption by County, http://www.ecdms. energy.ca.gov/elecbycounty.aspx, accessed December 30, 2019.
Los Angeles County natural gas consumption data source: California Energy Commission, Gas Consumption by County, http://www.ecdms.energy. ca.gov/gasbycounty.aspx, accessed December 30, 2019.

[c] Net electricity consumption is calculated by subtracting the existing (i.e., Coco's Restaurant) electricity consumption quantity from the Project's total electricity consumption quantity. Refer to energy calculation sheets in **Appendix B**.

[d] Net natural gas consumption is calculated by subtracting the existing (i.e., Coco's Restaurant) natural gas consumption quantity from the Project's total natural gas consumption quantity. Refer to energy calculation sheets in **Appendix B**.

[e] Project fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the CARB EMFAC2017 model.

[f] Net operational automotive fuel consumption is calculated by subtracting the existing (i.e., Coco's Restaurant) operational automotive fuel consumption quantity from the Project's total operational automotive fuel consumption quantity. Refer to energy calculation sheets in **Appendix B**.

Source: Refer to **Appendix B** for assumptions used in this analysis.

Operation

The Project's estimated energy consumption is summarized in **Table VI-1**, which shows that the Project's electricity usage would constitute an approximate 0.0004-percent reduction from Los Angeles County's typical annual electricity consumption and an approximate 0.0007-percent reduction from Los Angeles County's typical annual natural gas consumption. The Project's construction fuel consumption would increase Los Angeles County's consumption by 0.0069 percent. However, the Project would generate a net decrease of approximately 374 daily trips when compared to the existing use (i.e., Coco's Restaurant). As a result, the Project's operational vehicle consumption would decrease Los Angeles County's fuel consumption by 0.0002 percent.

Building Energy Demand

The Project would consume energy for interior and exterior lighting; heating, ventilation, and air conditioning (HVAC) systems; refrigeration; electronics systems; appliances; and security systems. The Project would be required to comply with Title 24 standards,[38] which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of Title 24 standards significantly reduces energy usage. Furthermore, the electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS), which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030.

As indicated in **Table VI-1**, operational energy consumption would represent an approximate 0.0004-percent reduction in electricity consumption and a 0.0007-percent reduction in natural gas consumption from current countywide usage. Therefore, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy, and impacts related to energy conservation would be less than significant.

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the U.S. **Table VI-1** provides an estimate of the daily fuel consumed by vehicles traveling to and from the Project Site. As indicated in **Table VI-1**, Project operations are estimated to reduce existing vehicle consumption by approximately 8,182 gallons of fuel per year, which would decrease the Los Angeles County's automotive fuel consumption by 0.0002 percent. The Project would not result in any unusual characteristics that would result in excessive operational fuel consumption associated with vehicular travel. Fuel consumption associated with Project-related vehicle trips would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. As such, impacts related to energy conservation would be less than significant.

[38] California Code of Regulations, Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, 2019.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The City adopted the *2019 Energy Action Plan Update* (EAP), which updates the City's 2012 *Energy Action Plan*. The City is part of the San Gabriel Valley Energy Wise Partnership (SGVEWP), which is a collaboration between SCE, SoCalGas, the San Gabriel Valley Council of Governments, and 29 cities in the San Gabriel Valley. Through the SGVEWP, member cities are able to participate in the SCE Energy Leader Model, which recognizes cities for increasing their energy efficiency in municipal facilities and communities, and participating in demand-response programs and long-term strategic planning. Implementation of the EAP has allowed Arcadia to reach the second highest level of energy efficiency, Gold, under the Energy Leader Model.

The 2019 EAP builds on the community goals and policies in the 2012 EAP and adds additional goals and policies for City-owned properties. The 2019 EAP outlines three City energy conservation targets: reduce municipal electricity usage by 780,662 kilowatt hours by 2023; achieve Platinum level status in SCE's Energy Leader Program; and complete three or more municipal energy-efficiency projects by 2023. As these goals are municipal targets, aimed at reducing electricity usage at City-owned and City-controlled facilities, the Proposed Project's energy reduction features would not contribute to or obstruct the attainment of these goals. However, the Project's overall energy-efficiency measures—e.g., installing energy-efficient appliances, heaters, and HVAC systems; using water-efficient landscaping (which would reduce the electricity used for water transport and treatment); and incorporation of building code-mandated energy-efficient designs—would generally support the City's energy reduction goals. The Project's energy consumption would be typical of senior living development projects in Southern California and would not result in an increased energy demand beyond the capacity of SCE or SoCalGas. As such, the Project would not conflict with or obstruct any plans for renewable energy or energy efficiency, and, as such, no impact would occur.

VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS: *Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

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

Less Than Significant Impact. According to the City of Arcadia General Plan Safety Element, the Raymond Hill Fault Zone and the Sierra Madre Fault Zone are the only active or potentially active earthquake faults that pass through the City of Arcadia.[39,40] In addition, two deep blind thrust faults are located beneath Arcadia, i.e., the relatively shallow Elysian Park Fault and the relatively deep Puente Hills Fault. These are considered blind thrust faults due to their depth and because the fault movement consists of upward or thrusting action. The Safety Element states that there is also the Eaton Wash groundwater barrier; however, this fault shows no surface geological evidence of existence and the nature of this buried fault is unknown.[41] The Raymond Fault traverses a large portion of the City and has a potential to cause a 5-6-foot offset if severe ground shaking occurs. The Sierra Madre Fault crosses the northern portion of the City and could result in large ground rupture movements (possibly 10 feet or more in the event of a 7.2 magnitude earthquake).[42]

[39] City of Arcadia, *General Plan Safety Element*, Figure S-1, Regional Faults, November 2010.
[40] California Department of Conservation, Fault Activity Map of California, 2010.
[41] City of Arcadia, *General Plan Safety Element*, November 2010.
[42] City of Arcadia, *General Plan Safety Element*, November 2010.

The Project Site is located north of the Raymond Fault and south of the Sierra Madre Fault. An "inferred or possible groundwater barrier" fault runs directly west and south of the Project Site. As displayed in Figure S-2 of the Safety Element, the Project Site is not located within the Alquist-Priolo Earthquake Fault Zone for either the Sierra Madre Fault or the Raymond Fault; however, the Alquist-Priolo Earthquake Fault Zone for the Raymond Fault is located just one-half mile southeast of the Project Site.[43] Further, the Project Site is not located within a Fault Hazard Management Zone, which would require geologic investigations to be performed if conventional structures that are designed for human occupancy are proposed within the zone.

While the Proposed Project is near these fault zones, the Proposed Project is subject to review by the City of Arcadia Building Services Division to ensure compliance with aspects of the California Building Standards Code pertaining to seismic safety (California Code of Regulations, Title 24), which the City adopted into the City's Code of Ordinances in 2010.[44] Because the Project Site is located outside of Alquist-Priolo Earthquake Fault and Hazard Management Zones identified above and because the Project is required to adhere to building regulations dictating seismic safety, the Project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, potential impacts related to rupture of a known earthquake fault would be less than significant.

a.ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. As with most of Southern California, the Project Site is in an area that is subject to strong ground shaking due to earthquakes on local and regional faults. As stated above, the Raymond Fault and the Sierra Madre Fault are the only faults to traverse the City and are located south and north of the Project Site, respectively. The 2019 California Building Code provides procedures for earthquake-resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. With adherence to the seismic design parameters as outlined in the California Building Code, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, potential impacts related to seismic ground shaking would be less than significant.

a.iii) 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?

Less Than Significant Impact. Liquefaction is the loss of strength in generally cohesionless (granular), saturated soils when the pressure of groundwater held within a soil or rock, in gaps between particles (referred to as "pore-water pressure") induced in the soil by a seismic event, becomes equal to or exceeds the overburden pressure. Lateral spread or flow refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. In general, lateral spreading is a result of liquefaction.

The primary factors that influence the potential for liquefaction include groundwater table elevation; the relative density of the soil; and the intensity and duration of ground shaking. The depth within which the

[43] City of Arcadia, *General Plan Safety Element*, Figure S-2, Alquist-Priolo and Fault Rupture Hazard Zones, November 2010.

[44] City of Arcadia, *Code of Ordinances*, Article VIII, Chapter 1, Building Code.

occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface.

According to the Safety Element, the Project Site is located within a liquefaction zone due to the relatively shallow groundwater depth of approximately 40 feet.[45] However, the 2019 California Building Code provides requirements for earthquake-resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Other mitigation guidance provided by the California Geological Survey (CGS) includes removal and/or densification of liquefiable soils to eliminate liquefaction hazards.[46] With adherence to the seismic design parameters as outlined in the California Building Code, incorporated into the Arcadia Municipal Code by reference, and CGS guidance, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, such as liquefaction. Therefore, potential impacts related to seismic-related ground failure would be less than significant.

a.iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. The Project Site is located in a fully urbanized area and is surrounded by single-family residential buildings, a gas station, highway infrastructure (I-210), and a medium-rise commercial building. The Project Site's topography is relatively flat, with a slight slope to the southeast (a difference in elevation of approximately 10 feet between the northwestern corner and the southeastern corner of the Project Site). Further, the Project Site is not located within an earthquake-induced landslide hazard area, as identified by the Safety Element. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact related to landslides would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Because of the extensive ground alterations that have occurred on-site since the Project Site was originally developed, it is unlikely that any native topsoil is remaining in the near surface. There would, thus, be no impact involving loss of topsoil.

During construction of the Proposed Project, the uncovered soils on-site may become exposed to wind or rainstorms and, thus, subject to erosion. The Proposed Project must comply with SCAQMD Rule 403, Fugitive Dust, to reduce the amount of particulate matter in the ambient air due to man-made fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. This rule requires that construction activities include a variety of best available control measures, including measures that would prevent wind-induced erosion of uncovered soils, such as to apply chemical stabilizers to areas that would remain inactive for 10 days or longer, replant disturbed areas as soon as practical, and suspend grading when wind speeds exceed 25 miles per hour. Storm-related erosion of uncovered soils during construction activities would be prevented by complying with the County of Los Angeles' National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements. These requirements are further discussed in Section X.a, Hydrology and Water Quality, below. In general, the NPDES permit requires construction activities to incorporate best management practices (BMPs) to prevent erosion and prevent loose soils from washing off-site. In general, BMPs for the Proposed Project would include the use of

[45] City of Arcadia, *General Plan Safety Element*, Figure S-3, Liquefaction and Landslide Hazards, November 2010.
[46] California Geological Survey, Special Publication 117A: Guidelines for Evaluating and Mitigating Seismic Hazards in California, 2008.

berms or drainage ditches to divert water around the site and preventing sediment from migrating off the site by using temporary swales, silt fences, or gravel rolls. Additionally, because the Proposed Site is greater than 1 acre, the City requires the preparation of a Stormwater Pollution Prevention Plan, which would establish erosion and sedimentation controls, such as methods to minimize the footprint of the disturbed area, controls to prevent tracking off-site, spill prevention, non-stormwater controls (i.e., vehicle washing), and methods to protect native vegetation and trees. Therefore, the potential for soil erosion during any construction activity would be reduced to less than significant through Project compliance with these existing regulations.

Finally, the Proposed Project would result in almost the entire site covered in either impervious surfaces, such as the building, surrounding parking areas, outdoor structures (i.e., outdoor gathering spaces, refuse and generator enclosures, and storage shed), and concrete walkways, or managed landscaped areas. Because almost the entire site would be covered by either impervious surfaces or managed gardens/turf areas, there would be very little potential for wind- or storm-induced erosion during the long-term operation of the Project. Accordingly, the Project would not result in soil erosion or the loss of topsoil. Therefore, potential impacts related to soil erosion or the loss of topsoil would be less than significant.

c) 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. As stated above, the Project Site's topography is relatively flat, with a slight slope to the southeast. Further, the Project Site is not located within an earthquake-induced landslide hazard area, as identified by the Safety Element. Therefore, there would be no risk resulting from on- or off-site landslide. Further, while the project is located in a liquefaction area, the Project would be required to comply with seismic design parameters as outlined in the California Building Code, incorporated into the Arcadia Municipal Code by reference. Further, compliance with CGS guidance described above for addressing liquefaction hazards would reduce potential liquefaction impacts to site improvements to a less-than-significant level.

Other hazards include subsidence, which is the compaction of the ground when large amounts of groundwater or oil have been withdrawn from fine-grained sediments or when underlying limestone deposits dissolve, as well as collapsible soils, which undergo a volume reduction when the pore spaces become saturated with water, with the weight of overlying structures causing settlement. Both of these hazards can result in building settlement and damage to foundations and walls. Subsidence may cause differential settlement of the overlying structure and substantially more damage than if the structure were to settle evenly throughout. Large-scale subsidence due to fluid withdrawal (water or oil) has not been reported in or near the City.[47] Therefore, it is unlikely that the Project Site is located on soils that are vulnerable to subsidence or collapse. Nevertheless, the Project would be required to comply with seismic safety design regulations required by the California Building Code or those described by the CGS guidance, such as extending piles or caissons to non-collapsible soils, or utilizing various methods of soil compaction prior to construction. These building regulations would provide appropriate building design criteria needed to protect structural integrity of structures against such geologic hazards. Accordingly, with compliance with required design criteria, the Project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, potential impacts related to unstable soils would be less than significant.

[47] City of Arcadia, General Plan Update Draft Program EIR, 2010.

d) 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?

Less Than Significant Impact. Expansive soils are generally associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic deposit, volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork.[48]

Hanford, Vista Amargosa, and Tujunga-Soboba soils that underlie the City do not have high shrink-swell potential and thus are not considered expansive. However, due to the granular (sandy) nature of the alluvium in the flatter areas of the City, expansive clays would most likely be present in older alluvial, bedrock formation soils in the hillside areas, and in sag-pond areas (e.g., the Los Angeles Arboretum and Santa Anita Racetrack areas) caused by past impoundments along the northern side of the Raymond Fault.

While the Project Site is located in an area with potential to contain expansive soils, the Project would be required to adhere to seismic safety design regulations required by the California Building Code, such as those described above. Further, the City's Building regulations provide appropriate building design criteria needed to protect structural integrity of structures against soil expansion. Accordingly, with compliance with required design criteria, the Project would not result in direct or indirect risks to life or property due to expansive soils. Therefore, potential impacts related to expansive soils would be less than significant.

e) 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 wastewater?

No Impact. All wastewater generated by the Proposed Project would be discharged via a lateral connection to an existing sanitary sewer infrastructure in Michillinda Avenue and Colorado Boulevard. There would be no on-site wastewater disposal system. Therefore, no impact related to unstable soils due to the use of septic tanks would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources, as defined by the Bureau of Land Management, U.S. Department of the Interior, are the physical remains or other physical evidence of plants and animals preserved in soils and sedimentary rock formations.

The Project Site has been extensively disturbed in the past and is currently covered with a restaurant structure and other improvements (such as outdoor parking areas). However, there would be some potential for encountering vertebrate paleontological resources during grading activities for the Proposed Project. To avoid the potential destruction of undiscovered paleontological resources, **Mitigation Measure GEO-1** would be imposed to ensure proper identification and treatment of paleontological resources that may be discovered during grading. Therefore, with mitigation incorporated, potentially significant impacts would be reduced to less than significant.

GEO-1 **Paleontological Resource Monitor.** If paleontological resources (fossils) are discovered during Project grading, work shall be halted in that area until a qualified paleontologist can be retained to assess the significance of the find. The Project

[48] City of Arcadia, General Plan Update Draft Program EIR, 2010.

paleontologist shall monitor remaining earth-moving activities at the Project Site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the CEQA Guidelines and offered for curation at an accredited facility approved by the City of Arcadia. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS: *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

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

Less Than Significant Impact. California is a substantial contributor of greenhouse gases (GHGs), emitting over 440 million tons of carbon dioxide (CO_2) per year.[49] Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission.

The City of Arcadia has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, SCAQMD, CARB, or any other State or regional agency has not yet adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Notwithstanding, for informational purposes, the following analysis calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

[49] California Energy Commission, *California Greenhouse Gas Emissions for 2000 to 2017*, https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf, accessed December 27, 2019.

However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Direct, Project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect, Project-related GHG emissions include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. **Table VIII-1** presents the estimated CO_2, N_2O, and CH_4 emissions of the Proposed Project. In accordance with SCAQMD guidance, projected GHGs from construction have been quantified and amortized over 30 years (representing the life of the Project), which are added to the annual average operation emissions.[50] As shown in **Table VIII-1**, the Project would result in a GHG emissions reduction of approximately 209.75 metric tons of carbon dioxide equivalent (MT CO_2e) per year when compared to the existing Coco's Restaurant. This overall reduction in GHG emissions can be attributed to the decrease in total daily vehicle trips associated with the development as compared with existing conditions.[51] This reduction in total daily vehicle trips is further discussed in Section XVII, Transportation/Traffic, of this Initial Study.

Table VIII-1
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e[c]
	Metric Tons/year[a]	Metric Tons/year[a]	Metric Tons of CO_2e[b]	Metric Tons/year[1]	Metric Tons of CO_2e[b]	
Construction Emissions						
• Total Construction Emissions[c] (amortized over 30 years)	21.48	0.00	0.10	0.00	0.00	21.58
Operational Emissions						
Existing Coco's Restaurant Emissions						
• Area	0.00	0.00	0.00	0.00	0.00	0.00
• Mobile Source	395.80	0.02	0.62	0.00	0.00	396.43
• Energy	302.82	0.01	0.28	0.00	1.37	304.48
• Solid Waste	2.43	0.14	3.59	0.00	0.00	6.02
• Water Demand	12.77	0.10	2.61	0.00	0.77	16.15
Total Existing Operational Emissions[c]	*713.83*	*0.28*	*7.10*	*0.01*	*2.14*	*723.08*
Proposed Artis Senior Living Facility Emissions						
• Area	18.64	0.00	0.04	0.00	0.10	18.77
• Mobile Source	309.49	0.02	0.41	0.00	0.00	309.91
• Energy	129.10	0.01	0.14	0.00	0.54	129.78
• Solid Waste	3.75	0.22	5.54	0.00	0.00	9.28
• Water Demand	26.33	0.14	3.43	0.00	1.04	30.81
Total Project Operational Emissions[c]	*487.31*	*0.38*	*9.56*	*0.01*	*1.68*	*498.55*
Total Project Net Operational Emissions[3]	*-226.52*	*0.10*	*2.46*	*0.00*	*-0.46*	*-224.53*
Total Project Emissions						
Total Project Emissions (Construction + Net Operational)	-205.04	0.10	2.56	0.00	-0.46	-202.95
Total Project-Related Emissions[c]	***-202.95 MTCO$_2$e***					

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide

[50] South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod), version 2016.3.2.
[51] Michael Baker International, Artis Senior Assisted Living Facility Trip Generation Analysis, dated December 17, 2019.

[a] Emissions calculated using the CalEEMod version 2016.3.2.
[b] Carbon dioxide equivalent values calculated using the EPA Website, *Greenhouse Gas Equivalencies Calculator*, https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed January 22, 2020.
[c] Totals may be slightly off due to rounding.
Refer to Appendix B for detailed model input/output data.

Because the Proposed Project would result in a net reduction in overall Project-related emissions, the Project would not generate GHG emissions that would have a significant impact on the environment. Rather, the Project would represent a reduction in GHG emissions as compared to existing conditions. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. As described above, there is no applicable adopted or accepted numerical threshold of significance for GHG emissions. Therefore, a methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

2017 CARB Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the California legislature as the 2006 Global Warming Solutions Act (Assembly Bill [AB] 32).[52] In 2008, CARB approved a Scoping Plan as required by AB 32, which was updated in 2017.[53] This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate-changing gases in every sector of the economy, such as clean cars and trucks, renewable energy, reduction of pollutants such as hydrofluorocarbon refrigerants and methane, and cleaner fuels. Achieving the 2030 target under the updated Scoping Plan will also spur the transformation of the California economy and fix its course securely on achieving an 80 percent reduction in GHG emissions by 2050, consistent with the global consensus of the scale of reductions needed to stabilize atmospheric GHG concentrations at 450 ppm carbon dioxide equivalent, and reduce the likelihood of catastrophic climate change.

Table VII-2 evaluates applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan.

[52] California Air Resources board, *California's 2017 Climate Change Scoping Plan*, November 2017.
[53] The Climate Change Scoping Plan was approved by CARB on December 11, 2008.

Table VIII-2
Project Consistency with the 2017 CARB Scoping Plan

Actions and Strategies	Project Consistency Analysis
SB 350 Clean Energy and Pollution Reduction	
Achieve a 50 percent RPS by 2030, with a doubling of energy efficiency savings by 2030.	**Consistent.** The Project would not be an electrical provider or delay the goals of Senate Bill (SB) 350. Furthermore, the Project would utilize electricity from Southern California Edison (SCE), which would be required to comply with SB 350. As the Project would use the electricity from SCE, the Project would be in compliance with SB 350.
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	**Consistent.** Motor vehicles driven by the Proposed Project's employees, residents, and visitors would be required to use LCFS-compliant fuels; thus, the Project would be in compliance with this goal.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light- and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	**Consistent.** The Project would be required to comply with the CALGreen Residential Mandatory Measure 4.106.4 *Electric vehicle (EV) charging for new construction.* As such, the Project would support the use of ZEV vehicles and would not conflict with the goals of the Mobile Source Strategy.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	**Consistent.** The Project does not involve sources that would emit large amounts of methane (refer to **Table VIII-1**). Furthermore, the Project would comply with all CARB and SCAQMD hydrofluorocarbon regulations. As such, the Project would not conflict with the SLCP reduction strategy.
SB 375 Sustainable Communities Strategies	
Increase the stringency of the 2035 GHG emissions per capita reduction target for MPOs.	**Consistent.** As shown in **Table VIII-3**, the Project would be consistent with the SCAG 2016 RTP/SCS and would not conflict with the goals of SB 375.

Source: California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017.

SCAG 2016-2040 RTP/SCS

The 2016-2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 13 percent by 2035.[54] Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016-2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[55] At the regional level, the 2016-2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. In order to assess the Project's consistency with the 2016-2040 RTP/SCS, **Table VIII-3** evaluates the Project's land use assumptions for consistency with those included in the 2016-2040 RTP/SCS. Generally, Projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not

[54] California Air Resources Board, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.

[55] Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, p. 153, April 2016.

preclude the attainment of their primary goals. **Table VIII-3** demonstrates the Project's consistency with applicable actions and strategies set forth in the 2016-2040 RTP/SCS.

Table VIII-3
Project Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as neighborhood-oriented development, complete streets, and electric (and other alternative fuel) vehicle supply equipment in public parking lots.	Local Jurisdictions, Councils of Government, SCAG, County Transportation Commission (CTCs)	**Consistent.** The Project would not impair the City or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs. Specifically, the Project would be required to comply with the CALGreen Residential Mandatory Measure 4.106.4 *Electric vehicle (EV) charging for new construction*.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG, State, Local Jurisdictions	**Consistent.** The Project would not impair the ability of the City, SCAG, or State to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	**Consistent.** The Project would include opportunities for healthy, physical activities for its patrons, including walking paths, landscaped open space areas, and an outdoor plaza.
Support projects, programs, policies, and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment, and services all within a relatively short distance.	Local Jurisdictions, SCAG	**Consistent.** As the Project proposes the development of a senior living facility, the Project would provide increased housing choices and job opportunities.
Transportation Network Actions and Strategies		
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles or other alternative fueled vehicles.	SCAG, CTCs, Local Jurisdictions	**Consistent.** Per CALGreen, the Project would be required to provide electric vehicle (EV) charging spaces. Therefore, the Project would serve to reduce vehicle trips that generate GHG emissions, thereby contributing to a reduction in GHG emissions.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new transit-oriented development (TOD), high-quality transit areas (HQTAs), and neighborhood commercial centers. Thus, providing an incentive for residents and employees to make trips on transit.	SCAG, CTCs, Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, CTCs, or the City to provide such a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers.

Table VIII-3 (Continued)
Project Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood EV or other ZEV options.	CTCs, Local Jurisdictions	**Consistent.** The Project would not impair the CTCs or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, the Project would provide EV parking on-site.
Transportation Demand Management (TDM) Actions and Strategies		
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	**Consistent.** The project would not impair the CTCs or City's ability to encourage the development of telecommuting programs by employers.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State, SCAG, Local Jurisdictions	**Consistent.** The Project would not impair the CTCs or City's ability to develop infrastructure plans and education programs to promote active transportation options and other alternative fueled vehicles.
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG, Local Jurisdictions, State	**Consistent.** The Project would not impair the ability of the State, SCAG, or City to work with relevant transportation authorities to increase the efficiency of the existing transportation system.

Source: Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016.

In summary, the plan consistency analyses provided above demonstrates that the Project complies with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2017 CARB Scoping Plan and SCAG 2016-2040 RTP/SCS. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project would result in a net reduction of GHG emissions and the Project is consistent with the aforementioned plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to consistency with climate change programs and policies would be less than significant.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS: *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

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

Less Than Significant Impact. Materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term "hazardous material" is defined in California Health and Safety Code as any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (Section 25501(n)(1)). The code additionally states that a hazardous material becomes a hazardous waste once it is abandoned, discarded, or recycled.

The transportation, use, and disposal of hazardous materials, as well as the potential release of hazardous materials to the environment, are closely regulated through State and federal laws. Such laws include those incorporated into the California Health and Safety Code, such as the California Hazardous Materials Release Response Plans and Inventory law and the California Hazardous Waste Control law, as well as other regulations governing hazardous waste promulgated by State and federal agencies, such as the Los Angeles County Department of Public Works, California Department of Toxic Substances Control (DTSC), California Division of Occupational Safety and Health, the Regional Water Quality Control Board, and the USEPA.

The Proposed Project would include a memory care facility, along with associated surface parking and landscaping areas. Maintenance of the facility and grounds by employees and contractors would likely involve the routine transport, use, and disposal of minor quantities of typical household hazardous materials, such as cleaning products, solvents, adhesives, refrigerants, paints, other chemical materials used in building maintenance, small amounts of oil and fuels from internal combustion engines, pesticides and herbicides, sharp or used needles, and electronic waste. This level of hazardous materials use would be typical for institutional uses and has not been identified as a significant threat to the environment. Regulations, such as those mentioned above, strictly regulate the use, transportation, and disposal of hazardous waste; they include training for employees in how to properly handle and dispose of hazardous materials, as well as filing floor plans with the Los Angeles County Fire Department showing locations of hazardous material storage.

Given the age of the existing restaurant building on-site (constructed in the 1970s), there is potential for the building to contain asbestos-containing materials (ACM) and/or lead-based paint (LBP). If ACM or LBP is found during the demolition phase of construction, the applicant would be required to comply with 40 CFR Part 61, Cal OSHA rule 1529, and South Coast Air Quality Management District Rule 1403 when it comes to identification, removal, handling, and disposal of ACM. The applicant must also comply with requirements detailed in 24 CFR Part 35, Cal OSHA rule 1532.1, and 40 CFR Part 745 regarding evaluation, testing, and reducing lead-based paint hazards. Compliance with these regulations would ensure that Project-related contamination would be effectively disposed of during the demolition phase and would, therefore, have no effect on the health and safety of area residents.

Based on the type of land use proposed, the relatively minor anticipated level of use, storage, and disposal of hazardous materials, and the requirement to comply with various State and federal laws regulating hazardous materials, the Project would not result in a significant impact involving the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts related to hazardous materials would be less than significant.

b) 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?

Less Than Significant Impact. Locations known to contain toxic substances and contamination are identified using data from DTSC. The Project Site is not identified as a clean-up site or located within one-half mile of a clean-up site listed in the DTSC EnviroStor database.[56] However, the GeoTracker database, maintained by the California State Water Resources Control Board (SWRCB), identified five clean-up sites within one-half mile of the Project Site. These clean-up sites are located at 3706 Foothill Boulevard (two clean-up sites at this address), 3698 Colorado Boulevard, 4000 Foothill Boulevard, and 3880 Colorado Boulevard and are all leaking underground storage tank (LUST) clean-up sites. According to the SWRCB, each of these clean-up sites was addressing soil contamination associated with leaking gasoline tanks. Each site has been cleaned up (as of 2008), and each of the individual cases closed. Because Project-related ground disturbance would be limited to the Project Site, which is not listed on hazardous waste disposal or clean-up databases maintained by the State, the Project

[56] California Department of Toxic Substances Control (DTSC), EnviroStor Database search, accessed October 21, 2019.

would not result in reasonably foreseeable upset of existing contamination located at the clean-up sites in the Project vicinity.

Construction activities may also include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills; however, as described in the response to Checklist Question X.a, below, a variety of routine construction control measures would be incorporated, including spill prevention/containment, sedimentation and erosion controls, and irrigation controls, to prevent conditions that would release hazardous materials into the environment during Project construction.

Additionally, as stated above, operation of the proposed institutional facility would not result in substantial use, transport, or disposal of hazardous materials. Further, any such use, transport, and disposal of hazardous materials would be strictly regulated by State and federal laws. As such, there would not be a significant hazard to the public involving the accidental release of hazardous materials into the environment during Project operation.

Therefore, the Proposed Project would not result in any reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

c) 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?

No Impact. The nearest school to the Project Site is Hugo Reid Primary School, which is located approximately one-half mile south of the Project Site (located at 1153 de Anza Place).[57] Therefore, there are no existing or proposed schools within one-quarter mile of the Project Site, and no impact would occur.

d) 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?

No Impact. The Project Site is not included on the Cortese list, which is the list of sites compiled by DTSC under Government Code Section 65962.5. As such, the Project Site is not included on DTSC's list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code; land designated as hazardous waste property or border zone property pursuant to Article 11; information received regarding waste disposals on public land; all sites listed pursuant to Section 25356 of the Health and Safety Code; or all sites included in the Abandoned Site Assessment program.[58,59] As such, the Proposed Project would not create a significant hazard to the public or the environment, and no impact would occur.

[57] City of Arcadia, *General Plan Parks, Recreation, and Community Resources Element*, Figure PR-4: AUSD School Locations, November 2010.

[58] California Department of Toxic Substances Control (DTSC), Cortese List: Section 65962.5(a), https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/, accessed October 21, 2019.

[59] California DTSC, EnviroStor Hazardous Waste and Substance Site List, 2019.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest airport to the Project Site is the San Gabriel Airport (also known as El Monte Airport), which is approximately 4.5 miles southeast. Therefore, the Project Site is not within 2 miles of a public airport and would not result in a safety hazard or excessive noise for people residing or working in the Project area, and no impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is currently occupied by a restaurant building, which is currently receiving police, fire, and paramedic services provided by the City of Arcadia. Access to the Project Site is currently available on Michillinda Avenue and Colorado Boulevard. The Proposed Project would have one ingress and egress point onto Colorado Boulevard, with available right-turn and left-turn egress options. Project inhabitants would have access to major thoroughfares such as Michillinda Avenue, I-210, and Foothill Boulevard (identified as a Principal Travel Corridor by the City's General Plan) during an emergency evacuation. Further, the Proposed Project would be consistent with the General Plan land use and zoning designations. Therefore, development of the Project Site as proposed would not impair implementation of an adopted emergency response plan or evacuation plan. As such, potential impacts related to emergency response or evacuation would be less than significant.

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

No Impact. The Project Site is not located within a Very High Fire Hazard Severity Zone, as identified by the California Department of Forestry and Fire Protection.[60,61] Very High Fire Hazard Severity Zones in the City of Arcadia are concentrated on the northeast side of the City, in the foothills near the Cities of Monrovia and Sierra Madre, approximately 2.1 miles northeast of the Project Site. The Project Site is in a fully urbanized area with an urban street network, a fully pressurized water system, and managed landscaping limited to decorative trees and shrubs. The Project Site does not include and is not surrounded by wildland areas, such as low-density hillside areas with large quantities of uncultivated, combustible plants. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. As such, no impact related to wildland fire would occur.

[60] California Department of Forestry and Fire Protection, Very High Fire Hazard Severity Zones in LRA Arcadia, September 2011.

[61] City of Arcadia, *General Plan Safety Element*, Figure S-6: Fire Hazard Zones, November 2010.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY: *Would the project:*				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) substantially 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?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Los Angeles Regional Water Quality Control Board (LARWQCB) prepares and maintains a basin plan which identifies narrative and numerical water quality objectives to protect all beneficial uses of the waters of that region. The basin plan strives to achieve the identified water quality objectives through implementation of Waste Discharge Requirements (WDRs) and by employing three strategies for addressing water quality issues: control of point source pollutants, control of nonpoint source pollutants, and remediation of existing

contamination. The project site is located in the Los Angeles region and is, therefore, covered under the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan).

Point sources of pollutants are well-defined locations at which pollutants flow into water bodies (discharges from wastewater treatment plants and industrial sources, for example). These sources are controlled through regulatory systems including permitting under California's WDRs and the NPDES program; permits are issued by the appropriate RWQCB and may set discharge limitations or other discharge provisions. According to the Basin Plan, nonpoint sources of pollutants are typically derived from project site runoff caused by rain or irrigation and have been classified by the USEPA into one of the following categories: agriculture, urban runoff, construction, hydromodification, resource extraction, silviculture, and land disposal.

The Project could have both short- and long-term impacts on water quality. Short-term impacts would occur during the construction phase of the Project, when the pollutants of greatest concern are sediment, which may run off the Project site due to site grading or other site preparation activities, and hydrocarbon or fossil fuel remnants from the construction equipment. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in surface runoff. However, construction runoff is regulated by the NPDES Construction General Permit, which requires identification of a variety of water quality control BMPs to be specified on construction plans and implemented throughout construction. Measures are required to keep stormwater out of construction zones; conduct regular site maintenance and "good housekeeping practices" to prevent, minimize, and dispose of solid and liquid wastes; capture and control any site runoff so that water pollutants don't enter storm drains; and have response procedures in place in the event of accidental spills of water contaminants. This permit applies to all construction which disturbs an area of at least 1 acre and is administered by the relevant RWQCB. As stated in response to Checklist Question VII.b of this Initial Study, the City would require the preparation of a Stormwater Pollution Prevention Plan for the Proposed Project, which would establish erosion and sedimentation controls, such as methods to minimize the footprint of the disturbed area, controls to prevent tracking off-site, spill prevention, non-stormwater controls (i.e., vehicle washing), and methods to protect native vegetation and trees. Further, the City would require a NPDES Construction General Permit for discharge of stormwater associated with Project construction activities. Through these existing, mandatory regulatory compliance measures, potential water quality impacts during construction would be avoided or reduced to less than significant levels and would avoid conflicts with water quality standards established by the LARWQCB.

Long-term impacts would result from operation of the completed Project. Such impacts could result from stormwater runoff of impervious surfaces on the Project site. The Project is considered a Planning Priority Project as it is a development equal to or greater than 1 acre in size that adds more than 10,000 square feet of impervious surface area. As such, the Project would require a Low Impact Development Plan (LID Plan), which would be reviewed and approved through the City's plan check process, to comply with the following requirements:[62]

- Retain stormwater runoff on-site for the Stormwater Quality Design Volume (SWQDv) defined as the runoff from:

[62] City of Arcadia, *Code of Ordinances*, Article VII, Chapter 8, Part 2, Section 7828, Low Impact Development – Control of Runoff Required for Planning Priority Projects.

- The 85th percentile 24-hour runoff event as determined from the Los Angeles County 85th percentile precipitation isohyetal map; or
- The volume of runoff produced from a 0.75 inch, 24-hour rain event, whichever is greater.

- Minimize hydromodification impacts to natural drainage systems.
- When, as determined by the City, 100 percent on-site retention of the SWQDv is technically infeasible, the infeasibility shall be demonstrated in the submitted LID plan.

If partial or complete on-site retention is technically infeasible, the Project Site may biofiltrate 1.5 times the portion of the remaining SWQDv that is not reliably retained on-site.

BMPs required by the City's LID ordinance include ensuring sidewalks fronting the Project Site are clear of dirt or litter; cleaning parking lots with 25 or more spaces as frequently and thoroughly as practicable; diverting surface and roof flows to landscaped areas before discharge; and treating any portion of the SWQDv that cannot be retained or biofiltered on-site in order to reduce pollutant loading. Therefore, with conformance to the City's LID requirements and incorporation of required construction and post-construction BMPs, the Project would not result in the violation of any water quality standards or WDRs, and impacts would be less than significant.

b) 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?

Less Than Significant Impact. The City is a retail water supplier that serves the majority of its residents. In 2016, the City prepared the most recent Urban Water Management Plan (UWMP) in cooperation with other water-serving agencies in the surrounding region. The City is a subagency of the Upper San Gabriel Valley Municipal Water District (Upper District), a wholesale water agency. The UWMP states that the City currently derives its water supply from groundwater wells that produce water from two groundwater basins: the Main San Gabriel Basin (the City's main groundwater source) and the Raymond Basin. In the 2014-2015 fiscal year, the City pumped a total of 12,010 acre-feet from the Main Basin and 3,316 acre-feet from the Raymond Basin.[63] Further, the City can purchase imported water from the Metropolitan Water District of Southern California (MWD); however, the City does not typically use this alternative (the last time water was imported was in the 2009-2010 fiscal year) because the City's groundwater supplies are sufficient to meet water demands.[64] The City owns and operates seven active groundwater wells in the Main Basin, with a collective capacity of 15,200 gallons per minute (gpm). Additionally, there are seven groundwater wells in the Raymond Basin, with a collective capacity of 4,300 gpm.[65] The UWMP concluded that based on current management practices, including reduced pumping in the Raymond Basin, the City would be able to rely on the Main Basin, the Raymond Basin, and imported water for adequate supply for 20 years (as of publication of the UWMP in 2016), under single-year and multiple-year drought scenarios.

There are no groundwater wells on the Project Site and none are proposed. Further, the Proposed Project would not involve a General Plan amendment or zone change. The City's UWMP has

[63] City of Arcadia, *2015 Urban Water Management Plan*, prepared by Stetson Engineers, Inc., Page 6-1, June 2016.
[64] City of Arcadia, *2015 Urban Water Management Plan*, prepared by Stetson Engineers, Inc., June 2016.
[65] City of Arcadia, *2015 Urban Water Management Plan*, prepared by Stetson Engineers, Inc., June 2016.

accounted for future water consumption of existing and planned land uses, such as the Proposed Project.

Operation of the Proposed Project would not interfere with groundwater recharge. The Project Site is located in an urbanized area and is currently developed with a restaurant building and a surface parking lot. The Proposed Project would replace these existing improvements with an approximately 44,000-square-foot assisted living and memory care facility surrounded by surface parking, drive aisles, outdoor walking paths and community areas, and managed landscaping. As such, the Proposed Project would reduce, but not substantially change, the amount of impervious surface area on-site to affect groundwater levels beneath the Project Site. If groundwater levels were to be affected, the effect would be minimal and likely beneficial given the Project's reduction in overall impervious surfaces as compared with existing conditions. Therefore, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts to groundwater would be less than significant.

c.i) 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 result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Site is fully developed and landscaped and does not contain any natural drainage courses. There is also no historical evidence of localized ponding or flooding on the Project Site. Because the Project Site is currently fully developed, the Proposed Project would not result in a substantial alteration of the existing drainage pattern, as the Proposed Project would continue to discharge excess stormwater into the City's storm sewer system.

Construction and operation of the Proposed Project could result in some erosion or siltation on- or off-site. As stated in the response to Checklist Question VII.b of this Initial Study, erosion of uncovered soils during construction activities would be prevented by complying with the NPDES Construction General Permit requirements, which require construction activities to incorporate BMPs to prevent erosion off-site. Additionally, because the Proposed Site is greater than 1 acre, the City requires the preparation of a Stormwater Pollution Prevention Plan, which would establish erosion and sedimentation controls. Otherwise, the operation of the Proposed Project would result in almost the entire site covered in either impervious surfaces, such as the building, surrounding parking areas, outdoor structures (i.e., outdoor gathering spaces, refuse and generator enclosures, and storage shed), and concrete walkways, as well as managed landscaped areas. Because almost the entire site would be covered by either impervious surfaces or managed gardens/turf areas, there would be very little potential for erosion during long-term operation of the Project.

Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in erosion or siltation, on- or off-site, and impacts related to erosion and siltation would be less than significant.

c.ii) 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As stated in response to Checklist Question X.c.i, the existing, relatively flat Project Site is fully developed with a restaurant building and an impervious, surface parking lot. Therefore, the Proposed Project, which would include a slight reduction in impervious surfaces due to the increase in landscaped areas, would not result in a substantial alteration of the existing drainage pattern of the Project Site. Because the Project Site is not located within a Federal Emergency Management Agency (FEMA) Flood Hazard Zone (the Project Site is located in a Zone X, Area of Minimal Flood Hazard), there is no evidence that the site or the immediately surrounding area is subject to flooding.[66] Therefore, potential impacts of the Proposed Project on local drainage and flooding would be less than significant.

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

Less Than Significant Impact. See the responses to Thresholds X.c.i and X.c.ii, above. The existing, relatively flat Project Site is fully developed with a restaurant building and an impervious, surface parking lot. Therefore, the Proposed Project, which would include a slight reduction in impervious surfaces, would not result in a substantial alteration of the existing drainage pattern of the Project Site. As the Proposed Project would increase the total amount of pervious landscape areas on the Project Site, it would not contribute additional runoff as compared with existing conditions. Further, the Project would be required to develop a LID Plan, which would retain stormwater runoff on-site for the SWQDv defined as the runoff from the 85th percentile 24-hour runoff event. Further, the SWPPP discussed above would prevent discharge of sediment or other water pollution commonly generated by Project construction. Therefore, the Proposed Project would not alter the existing drainage pattern of the site or area in a manner which would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. As such, potential impacts of the Proposed Project on stormwater drainage systems would be less than significant.

c.iv) 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 impede or redirect flood flows?

Less Than Significant Impact. As stated above, the Project Site is located within a Zone X, Area of Minimal Flood Hazard, according to the FEMA Flood Insurance Rate Map for the area. Further, because the project would not substantially alter the existing drainage pattern of the Project Site, the Project would not alter the site or area in a manner which would impede or redirect flood flows, and impacts would be less than significant.

[66] Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map 06037C1400F, September 26, 2008.

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

No Impact. A seiche is the sudden oscillation of water that occurs in an enclosed, landlocked body of water due to wind, earthquake, or other factors. There are no reservoirs or other bodies of water near the Project Site that could result in seiche impacts to the Project; therefore, the Project would not place structures in areas subject to inundation by seiche.

A tsunami is an unusually large wave or set of waves that is triggered in most cases by a seaquake or an underwater volcanic eruption. The Project Site is located more than 25 miles away from the Pacific Ocean. Given this distance, the Project would not place structures in areas subject to inundation by tsunami.

Finally, as stated above, the Project Site is located within a Zone X, Area of Minimal Flood Hazard, according to the FEMA Flood Insurance Rate Map for the area. However, the Project Site is located within a designated inundation area for the Morris S. Jones Reservoir. As stated in the General Plan Safety Element, the dams above Arcadia are regulated and monitored for structural safety by the California Department of Water Resources, in accordance with Division 3 of the California State Water Code. Such regulation reduces the chance of catastrophic failure and inundation of downstream areas, such as the Project Site.[67] Water quality controls on-site, such as maintenance of landscape areas, and proper storage of any hazardous materials would prevent the release of pollutants in the unlikely event that the Project Site would be inundated by catastrophic dam failure. Therefore, the Project Site is not located within a flood hazard, tsunami, or seiche zone and would have no impact as it relates to the release of pollutants due to flood-, tsunami-, or seiche-related inundation.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As stated above, the City of Arcadia's 2015 UWMP states that the Main Basin groundwater supply is the City's main source of water, accounting for approximately 78 percent of the City's water supply. The Main Basin Watermaster, an organization created in the 1970s to resolve water demand issues that arose in the San Gabriel Basin, is tasked with general management of the groundwater basin, including addressing volatile organic compound (VOC) contamination that was discovered in the 1970s and 1980s. The Watermaster's Five Year Water Quality and Supply Plan is an annually updated document that projects both water supply and water quality. In the 2019 plan update (2019 Supply Plan), the Watermaster reports that total groundwater production for the Main Basin in fiscal year 2018-2019 was 189,100 acre-feet, which is lower than the 10-year average of 203,000 acre-feet.[68] While groundwater production has experienced a general long-term increase, corresponding to a population increase in the Main Basin's service area, a gradual decrease in production since the late 2000s is likely resulting from increased water conservation practices by consumers. The 2019 Supply Plan shows that 2018-2019 fiscal year groundwater production in the City of Arcadia was approximately 10,774 acre-feet and projects groundwater demands to fluctuate between 9,565 and 10,953 acre-feet between the 2019-2020 and the 2023-2024 fiscal years.[69] Further, the groundwater elevations at all seven of the Main Basin groundwater wells in the City of Arcadia are projected to increase between 2018 and 2024, indicating a projected increase in water supplies.[70] Lastly,

[67] City of Arcadia, *General Plan Safety Element*, November 2010.
[68] Main San Gabriel Basin Watermaster, *Five-Year Water Quality and Supply Plan*, Figure 10, November 2019.
[69] Main San Gabriel Basin Watermaster, *Five-Year Water Quality and Supply Plan*, Appendix A, November 2019.
[70] Main San Gabriel Basin Watermaster, *Five-Year Water Quality and Supply Plan*, Appendix B, November 2019.

the 2019 Supply Plan details how the Watermaster coordinates with local and regional agencies to monitor groundwater quality and potential groundwater well contamination points.

Because the Proposed Project would not result in a substantial increase in potable water demand, and because it would not involve the use, disposal, or storage of hazardous chemicals that could impact water quality, the Proposed Project would not interfere with the Main Basin Watermaster's 2019 Supply Plan, and impacts would be less than significant.

XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING: *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion

a) Would the project physically divide an established community?

No Impact. As shown in **Figure A-13, Aerial View of the Project Site and Surroundings,** of this Initial Study, the Project Site is located within a fully urbanized area where the built environment consists of single-family residential uses to the east and south, commercial uses to the west, and I-210 to the north. The physical arrangement of the surrounding private lots, streets, and utility infrastructure has been established for many years. The Proposed Project would use an existing public street (Colorado Boulevard) for access to the senior living facility and would connect to existing utilities in adjacent streets. The Proposed Project would not result in the construction of a linear feature, such as railroad tracks, a flood control channel, or a major roadway, or the removal of a means of access that would result in a physical division of an established community. No physical alterations to any land use or the physical structure of this part of the City of Arcadia are proposed outside of the Project Site. Therefore, the Proposed Project would not physically divide an established community and there would be no impact.

b) 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?

Less Than Significant Impact. As stated in the Project Description of this Initial Study, the existing General Plan land use designation for the Project Site is Commercial, with a corresponding zoning of C-G, General Commercial. A residential care facility is allowed within the C-G, General Commercial with an approved CUP.[71] The Project Site is also included within two existing overlay zones, the Architectural Design Overlay Zone and the Automobile Parking Overlay Zone. The Architectural Design Overlay Zone states that various building design characteristics (such as building exterior materials, roof pitch, window size, landscaping, and automobile parking area) shall be subject to

[71] City of Arcadia, Development Code Section 9102.03.020.

Planning Commission review and approval. Further, the Architectural Design Overlay Zone states that only one free-standing sign shall be permitted and located within 100 feet of the northern and western property lines, the maximum building height shall not reach 30 feet above ground level, and no structure erected or permitted shall exceed 19,500 square feet of ground floor area.[72,73] The Automobile Parking overlay zone states that the overlay area shall be limited to ground level parking only.

As part of the Project, the Applicant has requested a zone change to remove these two overlay zones. Regardless, the Project would not represent a substantial change in urban form over existing conditions. More specifically, the eastern portion of the Project Site, which is currently included within the Automobile Parking Overlay Zone, would remain as surface parking under the Proposed Project conditions. The southern portion of the Project Site, which is also included within the Automobile Parking Overlay Zone, would include developed open space with no above-ground structures except a small storage shed in the southeastern corner of the Project Site and an eight-foot-high decorative fence around the perimeter of the open space area. Further, the majority of the proposed memory care facility located on the northeastern portion of the Project Site would be limited to 30 feet in height, consistent with the existing Architectural Design Overlay Zone, with only the north-central portion of the facility extending to 37.5 feet in height (with an additional 2.5-foot-high decorative cupola). With the removal of these two overlay zones, development on the Project Site would be regulated by the development standards of the underlying General Commercial (C-G) zone, such as regulations regarding building height and setback distance from residential land uses. These development standards include, but are not limited to, a 40-foot building height maximum and a 20-foot building setback when abutting residential uses. Based on the Project details included in the Project Description, the Project would be consistent with the development standards and regulation of the underlying General Commercial (C-G) zone upon approval of a CUP. Further, the Arcadia General Plan Parks, Recreation, and Community Resources Element does not identify any land use restrictions for the Project Site that would require conservation of the Project Site for purposes of protecting wildlife habitat or other natural resources. There are no policies in the Safety Element that establish land use restrictions for the Project Site pertaining to avoidance of environmental hazards on or near the Project Site. The Project Site is not within an area where special land use policies or zoning standards have been created for the purpose of avoiding or mitigating environmental effects, nor is it within a local coastal program. As such, the Project would not conflict with an applicable land use plan, policy, or regulation established for the purpose of avoiding or mitigating an environmental effect, and impacts related to land use and planning would be less than significant.

[72] City of Arcadia Resolution No. 4440, signed and approved July 2, 1974.
[73] City of Arcadia Ordinance No. 1510, signed and approved July 16, 1974.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES: *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

a) 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?

No Impact. The Project Site is located within a fully urbanized area and is currently developed with a restaurant building and a surface parking lot. The City's General Plan EIR Mineral Resources Section states that there are no oil, gas, or geothermal resources within the City of Arcadia.[74] The only oil well in the City of Arcadia is owned by the Vosburgh Oil Corporation and is plugged and abandoned.[75] Because this well is abandoned and located approximately 2.5 miles southeast of the Project Site, the Project Site is not located within any known oil, gas, or geothermal resource areas, and the Project Site is already developed with a non-extraction use, the Project would not result in the loss of availability of a known mineral resource that would be of regional or Statewide value. Therefore, no impact to mineral resources would occur.

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

No Impact. As stated above, the Project Site is located in a fully urbanized area and is currently developed with a restaurant building and a surface parking lot. The City's General Plan EIR Mineral Resources section states that the Project Site is located within a Mineral Resource Zone-3 (MRZ-3) area, which is composed of the northwestern and southern portions of the City where the available data which would be used to determine the significance of mineral deposits are unavailable.[76] Other areas of the City, including areas along the Sierra Madre Wash, Santa Anita Wash, and the San Gabriel River, are designated as MRZ-2 because significant mineral deposits may be present and development in such areas should be controlled. The City's General Plan EIR identifies four sites within the City that are located within MRZ-2 zones and remain undeveloped at the time of the General Plan update in 2010. These are the Los Angeles County flood control wash and infiltration basin, the former Rodeffer sand and gravel excavation site, the Peck Road Spreading Basins/Water Conservation Park, and the Livingston-Graham sand and gravel excavation site. The Project Site is not located within or adjacent to these MRZ-2 locations. Therefore, the Proposed Project would not result in the loss of

[74] City of Arcadia, *General Plan Update Draft Program EIR*, Section 4.10 Mineral Resources, July 2010.
[75] California Department of Conservation, Department of Oil, Gas, and Geothermal Resources, Well Finder online mapping application, map generated December 3, 2019.
[76] City of Arcadia, *General Plan Update Draft Program EIR*, Exhibit 4.10-1, July 2010.

availability of a locally important mineral resource recovery site delineated on a local general plan. As such, no impact to mineral resources would occur.

XIII. Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE: *Would the project result in:*				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

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

Less Than Significant Impact with Mitigation Incorporated. The Project vicinity consists of residential and commercial uses. The primary sources of stationary noise in the Project vicinity are urban activities (e.g., mechanical equipment, HVAC units, and parking areas). The noise associated with these sources may represent a single-event noise occurrence, or short-term or long-term/continuous noise. The majority of existing noise in the Project vicinity is generated by vehicular sources along I-210 and Colorado Boulevard. According to the Arcadia General Plan, traffic noise levels along I-210 and Colorado Boulevard range from 60 to 85 dBA CNEL. Additionally, aircraft overflights and trains are a source of noise in the City of Arcadia.

To quantify existing ambient noise levels in the Project vicinity, three noise measurements were taken on December 11, 2019 (see **Table XIII-1**). The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project Site. Ten-minute measurements were taken between 10:00 a.m. and 11:30 a.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day.

Table XIII-1
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	In front of 1159 Altura Terrace, Arcadia, CA 91007	73.5	93.3	47.8	100.3	10:09 a.m.
2	Northeast corner of Catalpa Road and North Altura Road	55.5	67.7	51.3	87.2	10:26 a.m.
3	Corner of 21 South Michillinda Avenue, adjacent to Michillinda Avenue	66.8	79.9	58.8	99.4	10:57 a.m.

Notes: dBA = A-weighted decibels; L_{eq} = Equivalent Sound Level; L_{min} = Minimum Sound Level; L_{max} = Maximum Sound Level
Source: Michael Baker International, December 11, 2019, available as Appendix D of this Initial Study.

Construction

Construction of the Proposed Project would occur over approximately 19 months and would include demolition, grading, paving, building construction, and architectural coating. Ground-borne noise and other types of construction-related noise impacts would typically occur during the grading phase. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in **Table XIII-2**. It should be noted that the noise levels identified in **Table XIII-2** are maximum sound levels (L_{max}), which are the highest individual sounds occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table XIII-2
Maximum Noise Levels Generated by Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 10 Feet (dBA)	L_{max} at 50 Feet (dBA)
Concrete Saw	20	104	90
Crane	16	93	81
Concrete Mixer Truck	40	93	79
Backhoe	40	92	78
Dozer	40	96	82
Excavator	40	95	81
Forklift	40	92	78
Paver	50	91	77
Roller	20	94	80
Tractor	40	98	84
Water Truck	40	94	80
Grader	40	99	85
General Industrial Equipment	50	99	85

Notes: dBA = A-weighted decibels; L_{max} = Maximum Sound Level
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Source: Federal Highway Administration, *Roadway Construction Noise Model (FHWA-HEP-05-054),* January 2006.

Pursuant to Arcadia Municipal Code Article IV, Chapter 2, *Disorderly Conduct, Nuisances, Etc.*, construction activities may only occur between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on Saturday. Construction activities are prohibited on Sundays and holidays. These permitted hours of construction are included in the Arcadia Municipal Code in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption. The potential for construction-related noise to affect nearby residential receptors would depend on the location and proximity of construction activities to these receptors. Construction would occur throughout the Project Site and would not be concentrated or confined in the area directly adjacent to sensitive receptors. Therefore, construction noise would be acoustically dispersed throughout the Project Site and not concentrated in one area near adjacent sensitive uses. It should be noted that the noise levels depicted in **Table XIII-2** are maximum noise levels, which would occur sporadically when construction equipment is operated in proximity to sensitive receptors.

The closest existing sensitive receptors are residents adjoining (i.e., approximately 10 feet) the Project Site to the east and south. As indicated in **Table XIII-2**, typical construction noise levels would range from approximately 91 to 104 dBA at this distance. Although construction noise is allowed during the City's allowable construction hours and is not considered to be a significant impact during those hours, the Project could expose adjoining residential uses to temporary high noise levels (91 to 104 dBA) during construction activities. Consequently, **Mitigation Measure NOI-1** is recommended to reduce short-term construction noise impacts through noise reduction methods. **Mitigation Measure NOI-1** requires all construction equipment to be equipped with properly operating and maintained mufflers, stationary construction equipment to be located such that emitted noise is directed away from the nearest noise sensitive receptors, and equipment staging is in areas farthest away from sensitive receptors. Implementation of **Mitigation Measure NOI-1** would ensure that construction noise impacts at nearby sensitive receptors do not interfere with normal residential activities. Therefore, with implementation of **Mitigation Measure NOI-1**, noise impact from construction activities would be considered less than significant.

Operation

Mobile Noise

The existing Coco's Restaurant generates approximately 582 trips per day, and the Proposed Project would generate approximately 208 trips per day.[77] Therefore, the Proposed Project would generate a net decrease of approximately 374 daily trips when compared to the existing use. As such, the Project's trip generation would reduce existing traffic volumes and, in turn, reduce traffic noise levels along local roadways. Therefore, Project-related traffic noise would be less than significant.

In addition to the mobile sources of noise identified above, the Project vicinity may also be impacted by noise generated by emergency ambulance visits to the Project Site. While there may be a perception that the proposed use would result in a greater number of ambulance visits to the area than the existing commercial use, it is not possible and highly speculative to predict medical emergencies that require visits from emergency vehicles. Ambulances traveling to and from the Project Site would likely use high-volume transit corridors, such as Colorado Boulevard and Michillinda Avenue, to access the Project Site, rather than passing through the residential neighborhoods to the east and south. Further, the decision to use a siren and lights is made by the vehicle driver and is dependent upon traffic

[77] Michael Baker International, Artis Senior Assisted Living Facility Trip Generation Analysis, December 17, 2019.

conditions and the welfare of the patient. As such, emergency response vehicles may not engage the siren in every instance and would likely turn off the siren upon arriving at the facility. Thus, because an ambulance siren may not be engaged in every emergency response situation, and because a siren would likely be turned off upon arrival, noise impacts resulting from ambulance visits to the Project Site are anticipated to be infrequent and short-lived in nature. Additionally, the proposed memory care facility would employ medical staff who would be able to address non-life-threatening medical emergencies, such as minor injuries and falls, thus reducing the number of visits from rapid-response emergency vehicles. Regular trips by Project residents to health care facilities would be accommodated through family members or other non-emergency medical transport services, none of which would be equipped with sirens. Finally, Arcadia Municipal Code Section 4610.1(I) exempts emergency vehicles from the restrictions placed on sound amplifying equipment. Therefore, Project-related ambulance noise associated with the Project would be less than significant.

Stationary Noise

Stationary noise sources associated with the Proposed Project would include mechanical equipment, slow-moving trucks, and parking activities. These noise sources are typically intermittent and short in duration and would be comparable to existing sources of noise experienced in the Project vicinity.

Mechanical Equipment

Typically, mechanical equipment can result in noise levels of approximately 55 dBA at 50 feet from the source. Mechanical equipment (e.g., HVAC units and emergency generators) for the Project would be located in fully enclosed spaces throughout the proposed senior living facility. Therefore, the Project would not place mechanical equipment near sensitive receptors (i.e., existing residences adjoining the Project Site to the east and south). As such, noise from mechanical equipment would not be perceptible at the closest sensitive receptors. Impacts from mechanical equipment would be less than significant.

Slow-Moving Trucks

The Proposed Project may involve occasional deliveries and trash/recycling pickups from slow-moving trucks. Typically, a medium two-axle delivery truck can generate a maximum noise level of 75 dBA at a distance of 50 feet.[78] This maximum noise level is assumed to be generated by a truck that is operated by an experienced "reasonable" driver with typically applied accelerations. Noise associated with deliveries and trash/recycling pickups would be consistent with the existing noise environment, as these activities already occur at the commercial uses in the surrounding area. Additionally, slow-moving truck noise would be intermittent, short in duration, and would not generate excessive noise levels over an extended period of time. Therefore, impacts resulting from truck delivery activities would be less than significant.

Parking Areas

Traffic associated with senior living facility parking areas is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the Day-Night Sound Level (L_{dn}) scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with some parking activities are presented

[78] Measurements taken by Michael Baker International in 2006.

in **Table XIII-3**. The Project proposes a surface parking lot with approximately 55 regular parking stalls and 4 parking stalls that comply with Americans with Disabilities Act (ADA) requirements.

Table XIII-3
Maximum Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 10 Feet from Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	75.0 dBA L_{eq}	61 dBA L_{eq}
Car starting	74.0 dBA L_{eq}	60 dBA L_{eq}
Car idling	67.0 dBA L_{eq}	53 dBA L_{eq}

Notes: dBA = A-weighted Decibels; L_{eq} = Equivalent Sound Level
Source: Kariel, H. G., "Noise in Rural Recreational Environments," *Canadian Acoustics* 19(5), 3-10, 1991.

It should be noted that parking lot noise generates instantaneous noise levels compared to noise standards in the L_{dn} scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower. The adjoining residences to the east and south would be located approximately 10 feet from the proposed surface parking lot. As such, parking lot noise levels would be approximately 67 to 75 dBA at these sensitive receptors. However, parking lot activities and associated noise levels are intermittent and sporadic, and an existing parking lot is located within the same distance to the nearest adjoining residences as the proposed surface parking lot. Therefore, as the Project would not introduce a new source of noise in the Project vicinity, and parking lot noise would be infrequent, noise impacts would be less than significant.

Mitigation Measure

NOI-1 Prior to issuance of a Grading Permit, the Project applicant shall demonstrate, to the satisfaction of the City of Arcadia Planning Division, that the Project complies with the following:

- Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.
- The contractor shall provide evidence that a construction staff member will be designated as a noise disturbance coordinator and will be present on-site during construction activities. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the noise disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early or bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Planning & Community Development Administrator (or designee). All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. All necessary signage and notices shall be posted on or sent to residential units immediately surrounding the construction site no less than two weeks prior to the start of noise-generating construction activities on the Project Site.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- Prior to issuance of any Grading or Building Permit, the Project applicant shall demonstrate to the satisfaction of the Community Development Director (or designee) that construction noise reduction methods shall be used where feasible. These reduction methods may include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and utilizing electric air compressors and similar power tools.
- Construction haul routes shall be designed to avoid noise-sensitive uses (e.g., residences and convalescent homes) to the extent feasible.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

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. For example, buildings that are constructed with typical timber frames and masonry show that a vibration level of up to 0.2 inch-per-second peak particle velocity (PPV) is considered safe and would not result in any construction vibration damage.[79] The City currently does not have a significance threshold to assess construction vibration impacts.[80] Therefore, this analysis uses the Federal Transit Administration (FTA) architectural damage criterion for continuous vibrations at non-engineered timber and masonry buildings of 0.2 inch-per-second PPV and human annoyance criterion of 0.2 inch-per-second PPV in accordance with California Department of Transportation (Caltrans) guidance.[81] The FTA has

[79] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
[80] City of Arcadia Municipal Code Article IX, Division 3, Section 9103.13, Performance Standards, exempts vibration generated from construction activities.
[81] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, Table 20, September 2013.

published standard vibration velocities for construction equipment operations. The vibration levels produced by construction equipment is illustrated in **Table XIII-4**.

Table XIII-4
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 28 feet (inches/second)[a]	Approximate peak particle velocity at 40 feet (inches/second)[a]
Vibratory roller	0.177	0.104
Large bulldozer	0.075	0.044
Loaded trucks	0.064	0.038
Jackhammer	0.030	0.017
Small bulldozer	0.003	0.001

Notes:
[a] 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 FTA *Transit Noise and Vibration Impact Assessment Manual*
D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Ground-borne vibration decreases rapidly with distance. The nearest structures are located approximately 28 feet to the south and 40 feet to the east of the proposed construction activities. As indicated in **Table XIII-4**, vibration velocities from typical heavy construction equipment used during Project construction would range from 0.003 (a small bulldozer) to 0.177 (vibratory roller) inch-per-second PPV at the nearest structure (i.e., 28 feet) from the source of activity, which would not exceed FTA's 0.2 inch-per-second PPV threshold. Further, construction vibration would not cause excessive human annoyance as the highest ground-borne vibration nearest sensitive receptors (i.e., 0.177 inch-per-second PPV) would not exceed the 0.2 inch-per-second PPV human annoyance criteria. Therefore, the proposed construction activities associated with the Project would not expose sensitive receptors to excessive ground-borne vibration levels. As such, vibration impacts associated with construction would be less than significant.

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

No Impact. The nearest airport to the Project Site is the San Gabriel Airport (also known as El Monte Airport), which is approximately 4.5 miles to the southeast. According to the County of Los Angeles' *Airports and Airport Influence Areas Map*, the Project Site is not located within the El Monte Airport Influence Area.[82] Additionally, the Project Site is not located within the vicinity of a private airstrip or related facilities. Therefore, Project implementation would not expose people residing or working in the Project area to excessive noise levels associated with aircraft, and no impacts would occur.

[82] County of Los Angeles, Airports and Airport Influence Areas Map, http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf, accessed December 26, 2019.

XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING: *Would the project:*				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) 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. The Proposed Project would construct an 80-bed senior-living, memory care facility; however, it would not include construction of growth-inducing infrastructure, such as roadway or utility extensions to areas not already provided with such services. The Project is anticipated to generate approximately 80 residents and approximately 40 employees.[83,84] Because the Project is consistent with the underlying zoning and General Plan designation for the parcel, the population growth associated with the Project would have been anticipated and planned for in the City of Arcadia General Plan. Further, the SCAG 2016-2040 RTP/SCS provides population and employment growth estimates for municipalities within its jurisdiction, including the City of Arcadia. The 2016-2040 RTP/SCS estimates that population in Arcadia will increase from 56,700 in 2012 to 65,900 by 2040, and employment would increase from 28,900 in 2012 to 34,400 in 2040.[85] Using these growth forecasts, the Proposed Project would account for approximately 0.9 percent of forecasted population growth between 2012 and 2040 and 0.7 percent of forecasted employment growth between 2012 and 2040 in the City of Arcadia. As such, the Proposed Project would not result in substantial unplanned population growth in the area, either directly or indirectly and impacts would be less than significant.

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

No Impact. The Project Site currently contains a restaurant building and surface parking lots and does not currently contain any housing units. Thus, there are no current on-site residents or housing

[83] Employees were calculated using the Southern California Association of Government's Employment Density Report, which provided an average employee density of 14.24 employees per acre for Special Care Facilities in Los Angeles County. As the Project Site is 2.79 acres in size, the estimated number of employees serving the project would be 40.

[84] Southern California Association of Governments (SCAG), *Employment Density Study Summary Report*, Table B-1, Employment Densities (employees per acre) by Anderson Code, All Counties, 2001.

[85] Southern California Association of Governments, Appendix, *Demographics and Growth Forecast*, Table 11, April 2016.

units on the Project Site that would be displaced as part of the Proposed Project. Therefore, there would be no impact.

XV. Public Services

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

Discussion

a.i) 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. The development of 80 assisted living and memory care residential units, along with landscaping, outdoor living areas, drive aisles, and a surface parking lot, would incrementally increase the demand for fire protection and emergency medical services.

In compliance with Standard Condition 4.13-1 in the City's General Plan EIR, new development in the City must comply with the California Fire Code and Arcadia Fire Department regulations pertaining to building construction, fire flows and pressures, hydrant placement, and other requirements that would reduce the creation of fire hazards and would facilitate emergency response. Further, building plans and structures are reviewed by the Arcadia Fire Department for compliance with applicable safety and emergency access standards. This review would determine if fire flow (1,000 gallons per minute for two hours for residential construction), access, and fire hydrant placement would be sufficient or if expanded facilities are required. Upon review of the Project's Site plan, the Arcadia Fire Department determined that site circulation and emergency access would be sufficient to accommodate a fire engine.

Therefore, with compliance with California Fire Code and Arcadia Fire Department regulations governing hydrant placement, fire flows, and building construction, and with the Arcadia Fire Department's review and approval of the Project Site's access and circulation plans, the Project would have a less-than-significant impact on service ratios, response times, or other performance objectives for fire protection and emergency medical services.

a.ii) 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. The development of 80 assisted living and memory care residential units, along with landscaping, outdoor living areas, drive aisles, and a surface parking lot, would incrementally increase the demand for police protection (such as Project Site security and responding to minor crimes). Law enforcement is provided by the Arcadia Police Department, with the nearest police station located approximately 1.7 miles southeast of the Project Site, at 250 West Huntington Drive. The Arcadia Police Department is equipped with an 18-bed, pre-arraignment jail, an evidence lab, a computer forensics lab, and other investigative equipment.[86] The Police Department is staffed by 68 sworn officers and 33 non-sworn support staff for an officer to population ratio of 1.36 sworn officers per 1,000 persons.[87]

As discussed in Section XIV, Population and Housing, above, the Proposed Project is anticipated to generate approximately 80 residents and approximately 40 employees. The Proposed Project would also include on-site security resources, such as security guards and orderlies, to patrol the grounds, monitor locked entry and exit points to the property, and protect residents. Therefore, the Proposed Project is anticipated to have limited need for police services, other than to address infrequent minor crimes or vandalism issues on the property. Further, the Proposed Project would be required to comply with Policy S-5.11 of the Arcadia General Plan, which states that new development projects would be required "to pay their fair share of costs associated with any necessary increases in public safety equipment, facilities, and staffing to provide life safety protection."[88]

Therefore, because the Proposed Project would include security personnel to address Project-specific security concerns, and because any other Project-related police service demands would be mitigated by the required fair share fees paid by the Project applicant, impacts would be less than significant.

a.iii) 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 schools?

No Impact. The Project Site is located within the Arcadia Unified School District; however, the Project would include demolition of an existing restaurant building and construction of 80 memory care residential units. Because the 80 units would be inhabited by seniors affected by memory loss,

86 City of Arcadia, *General Plan Update Draft Program EIR*, Section 4.13, Public Services, 2010.
87 City of Arcadia, *General Plan Update Draft Program EIR*, Section 4.13, Public Services, 2010.
88 City of Arcadia, *General Plan Safety Element*, Policy S-5.11, page 8-37, November 2010.

there would be no school-age children living on the Project Site. The Project may indirectly result in the increase of school-age children living in Arcadia through the addition of approximately 40 employees. A portion of these employees may choose to live in Arcadia; however, the City is surrounded by urban areas that offer many housing options in other school districts. As such, the number of school-age children associated with the Proposed Project that would live within the Arcadia Unified School District would be negligible. Therefore, impact on schools would not occur.

a.iv) 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 parks?

No Impact. As previously discussed, the Proposed Project would involve demolition of an existing restaurant use and construction of an 80-unit memory care facility. The Project would include an enclosed landscaped outdoor area with gardens, walking paths, and a gazebo on the south side of the Project Site for use by the Project's residents. As such, the Proposed Project would provide outdoor recreation space for Project residents and would, therefore, not create a substantial adverse physical impact on City park facilities. No impact to parks would occur.

a.v) 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 other public facilities?

No Impact. The Project would involve the development of an 80-unit memory care facility, which would provide on-site services, such as activities rooms and outdoor recreation space, for Project residents. As such, Project residents are anticipated to have limited mobility and are not expected to substantially increase the demand on public facilities, such as libraries and other government buildings. Therefore, no impact other public facilities would occur.

XVI. Recreation

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

Discussion

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

No Impact. As discussed in response to Checklist Question XV.a.iv, above, the Proposed Project would involve demolition of an existing restaurant building and construction of an 80-unit memory care facility. As such, Project residents are expected to have limited mobility and are not expected to increase the demand on municipal park facilities. Further, the Proposed Project would provide an enclosed, outdoor recreation area for residents, which would include walking paths, gardens, and a plaza. Therefore, the Proposed Project is anticipated to have no impact on park or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

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

No Impact. As stated above in response to Checklist Question XVI.a, the Project is not anticipated to increase the demand on municipal parks and recreational facilities in Arcadia. The Proposed Project would include construction of an outdoor, enclosed recreation space for Project residents that would include walking paths, gardens, and a plaza. The environmental impacts associated with construction of these outdoor amenities are included in the Project analysis discussed in this Initial Study. Therefore, there would be no additional impacts associated with constructing these outdoor recreation amenities beyond those already discussed.

XVII. Transportation/Traffic

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

Discussion

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities??

Less Than Significant Impact.

Construction

Project construction is proposed to be completed in approximately 19 months. The phases of construction include demolition, grading, paving, building construction, and architectural coating. Demolition, grading, and paving are anticipated to take three months to complete; building construction would be completed in 12 months; and architectural coating would be completed in four months. The grading phase would occur over 10 days and would result in 1,485 cubic yards of cut and 3,350 cubic yards of fill. Therefore, 1,865 cubic yards of soil would be imported to the Project Site during the grading phase. The City of Arcadia limits construction activities to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturday; therefore, construction-related traffic would occur only during those time periods, on an intermittent basis, depending on the scope and intensity of the work taking place.[89] While construction traffic would temporarily affect traffic flow on the surrounding street network, particularly along the truck haul routes, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following the demolition and grading phases. Because the construction traffic impacts associated with the Proposed Project would be temporary, they would not significantly affect the performance of the vehicular transportation network with respect to level of service standards or other metrics related to congestion and travel delay.

Operation

Project-related, long-term traffic impacts include those of employee, visitor, and delivery vehicles associated with the proposed memory care facility. A trip generation analysis, conducted for the Proposed Project, compared anticipated trip generation associated with the Proposed Project to traffic count data collected for the existing restaurant and bakery building.[90] The analysis used the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition (2017) to determine the trip generation rates appropriate for an assisted living facility. The results of the Project trip generation analysis are provided in **Table XVII-1**.

[89] City of Arcadia, Municipal Code Article IV, Chapter 2, Part 6, Nighttime Construction.

[90] Michael Baker International, Inc., Technical Memorandum: *Artis Senior Assisted Living Facility Trip Generation Analysis*, December 17, 2019, available as Appendix E of this Initial Study.

Table XVII-1
Estimated Number of Project Trips

Land Use	Source	ITE Code	Intensity		Daily Trips			AM Peak Hour Trips			PM Peak Hour Trips		
					Total	In	Out	Total	In	Out	Total	In	Out
Assisted Living (Proposed Project)	ITE Trip Generation Manual, 10th Edition	254	80	Beds	208	104	104	15	9	6	21	8	13
Coco's Bakery Restaurant (Existing)	Traffic Count Data	--	13,000	Square Feet	582	297	285	26	17	9	32	19	13
Estimated New Trips (Proposed Project minus Existing)					-374	-193	-181	-11	-8	-3	-11	-11	0

Sources: Michael Baker International, Technical Memorandum: *Artis Senior Assisted Living Facility Trip Generation Analysis*, December 17, 2019, available as Appendix E of this Initial Study; ITE, Trip Generation Manual, 10th Edition, 2017.

As shown in **Table XVII-1**, the Proposed Project is eligible for a trip credit since the existing restaurant building is currently in operation. Therefore, while the Proposed Project would result in an estimated 208 total daily vehicle trips, the number of new trips associated with the Project would be less than zero because the existing restaurant use currently generates 374 more daily trips than would be expected from the Proposed Project. Therefore, the Project would have a less-than-significant impact regarding trip generation.

Regarding trip distribution, the existing Project Site has two access points, as shown in **Figure A-7**. The West Colorado Boulevard driveway provides full access (right- and left-turn for both ingress and egress) and the Michillinda Avenue driveway provides partial access (right-turn ingress and right-turn egress only). The Proposed Project would have a single, full-access driveway along West Colorado Boulevard, which would be shifted slightly east of the existing driveway. While the Project would concentrate all Project-related ingress and egress to the West Colorado Boulevard driveway, the overall estimated reduction in Project-related trips as compared with the existing restaurant use would result in a negligible impact on intersection impacts at this driveway. Specifically, the anticipated change in site trips entering and exiting the site at the West Colorado Boulevard driveway would range from negative four to three during the a.m. and p.m. peak hours. As such, it is anticipated that these minimal changes in site trips would not impact intersection operations at the proposed West Colorado Boulevard driveway. Further, all traffic associated with the Project Site would be removed from the existing Michillinda Avenue driveway. Therefore, the Proposed Project would have a less-than-significant impact on trip distribution and intersection performance.

Finally, the Proposed senior living facility would include 80 units and would be dedicated to people afflicted with Alzheimer's disease or other memory disorders. The outdoor spaces on the south side of the Proposed Project, which would be accessible to residents, would be contained/secured and monitored by facility staff. As such, there would be little to no impact on surrounding bus, pedestrian, or bicycle transit systems as a result of resident demand. Project employees would have a small impact on bus, pedestrian, or bicycle systems; however, the difference between the number of employees and visitors that would utilize transit or bicycle infrastructure to access the Project as compared with the number of employees and patrons using transit or bicycle infrastructure to access the existing restaurant is anticipated to be negligible. Further, the Proposed Project would not alter the existing

bus stop in the West Colorado Boulevard right-of-way on the north side of the Project Site. As such, there would be no impact on transit, bicycle, or pedestrian facilities as a result of the Proposed Project.

In summary, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities, and, as such, impacts related to transportation would be less than significant.

b) Would the project conflict with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. By July 1, 2020, transportation impact assessments prepared in accordance with CEQA will be required to determine if a Proposed Project would conflict with CEQA Guidelines Section 15064.3(b), which outlines a new set of criteria for analyzing transportation impacts using vehicle miles traveled (VMT) as the primary measure of transportation impact. VMT is generally defined as the amount and the distance of automobile travel associated with a Project. The City has not adopted guidelines to set new significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with this checklist question. However, since the Project will be considered for approval prior to July 1, 2020, the Project is not required to demonstrate compliance with CEQA Guidelines Section 15064.3(b).

Nevertheless, as discussed in Checklist Question XVII.a, above, the Project would replace an existing Coco's restaurant with an 80-bed assisted living facility. As shown above, when compared to existing conditions, the Project would result in a substantial reduction in daily trips. Given the overall substantial reduction in trips based on the trip generation analysis, the Project's impact on Citywide and regional VMT would be considered less than significant.

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

Less Than Significant Impact. The Proposed Project is located on a 2.79-acre property at the corner of a major intersection. The Project proposes a surface parking lot with drive aisle and a drop-off circle in front of the main entrance (northern building elevation). The Project would not generate incompatible uses of area roadways, such as large farm equipment, that could impair circulation or safety on area roads. Further, there is no internal street network proposed as part of the Project and, therefore, no potential hazards associated with a geometric design feature, such as a sharp curve, would occur within the Project Site. The Project would result in a single entrance and exit driveway onto West Colorado Boulevard, as described above; however, this driveway would be designed to meet the mandatory design standards of the City of Arcadia as it relates to width, intersection control, and sight distance. Therefore, adherence to applicable City requirements would ensure the Proposed Project would not result in any hazardous geometric design feature, and impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. Project-related building plans and structures would be reviewed by the Arcadia Fire Department for compliance with applicable safety and emergency access standards. This review would determine if fire flow, access, and fire hydrant placement are sufficient or if expanded facilities are required. Further, the Project Site is located in an urban setting, surrounded by multiple arterial roadways that could lead to the Proposed Project's driveway on West Colorado Boulevard. As such, because the Project Site would be designed to accommodate emergency response vehicles and because it is located in an urban environment where the surrounding street network

allows for access to the Project Site from multiple directions, impacts related to emergency access would be less than significant.

XVIII. Tribal Cultural Resources

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

Discussion

a.i) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. The Project Site is currently developed with a restaurant building constructed in 1976 along with a paved surface parking and vehicle driveways. As discussed in Section V, Cultural Resources, the current restaurant building does not meet the age requirement for evaluation for eligibility for listing in the California Register or in a local register. Further, a records search at the South Central Coastal Information Center (SCCIC) determined that there are no documented historic or prehistoric cultural resources on or within a quarter-mile radius of the Project Site. Therefore, the Project would not cause an 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 or in a local register of historical resources.

a.ii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, AB 52 established a formal consultation process for California Native American tribes to identify potential significant impacts to tribal cultural resources as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project site if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin consultation within 30 days of receiving the request for consultation.

In compliance with AB 52, on January 10, 2020, the City of Arcadia sent a notice to the Gabrieleño Band of Mission Indians–Kizh Nation (Gabrieleño) and the Gabrielino-Tongva Tribe. On January 23, 2020, Andrew Salas, of the Gabrieleño submitted a formal request to consult with the City. The City did not receive a consultation request from the Gabrielino-Tongva Tribe within the 30 day consultation request period.

The tribal consultation process commenced on April 1, 2020 via a conference call attended by Andrew Salas and Matt Teutimez of the Gabrieleño, Lisa Flores and Vanessa Quiroz of the City of Arcadia, and John Bellas and Madonna Marcelo of Michael Baker International (the City's environmental consultant). During the phone consultation, City staff discussed the receipt of the Gabrieleño's request for consultation, described the scope of the Project, and provided general information, including proposed excavation activities. In response, the Gabrieleño provided their knowledge of Arcadia and the Project area, including Rancho Santa Anita (within the boundaries of which the Project Site is located), the former Gabrieleño Native American village, the sacred village of Sheshiikwanonga/ Sisitcanongna, and trade routes in the vicinity of the Project Area, indicating that these trade routes were considered cultural landscapes that are protected under AB 52 as a tribal cultural resources.

On April 2, 2020, City staff requested, via e-mail, the documents that were referenced by the Gabrieleño representatives during the phone consultation. On April 2, 2020, the Gabrieleño provided the articles, maps, and explanatory text that were verbally explained during the phone consultation. Review of the maps and articles provided by the Gabrieleño included information about trade routes and identified structures within the greater Arcadia area; however, these resources did not demonstrate that there is an existing tribal cultural resource within the Project Site. As such, no evidence has been submitted which identifies the specific location of the Project Site as sensitive or containing tribal cultural resources, and no criteria have been provided to indicate why the Project area should be

considered sensitive enough such that monitoring for tribal cultural resources would be required to avoid adverse impacts. CEQA only requires mitigation measures if substantial evidence exists of potentially significant impacts. CEQA Guidelines Section 15126.4(a)(4)(A) states "there must be an essential nexus (i.e., connection) between the mitigation measure and a legitimate government interest." Therefore, based upon the record, the City has determined that no substantial evidence exists to support a conclusion that the Proposed Project may cause a significant impact on tribal cultural resources. As such, the City has no basis under CEQA to impose any related mitigation measures.

Nevertheless, while no tribal cultural resources are anticipated to be affected by the Project, the City will voluntarily impose mitigation measures as an additional protection to address the inadvertent discovery of tribal cultural resources. These voluntarily-imposed mitigation measures, **Mitigation Measure TCR-1** through **Mitigation Measure TCR-4**, are described in further detail below.

TCR-1 **Retail a Native American Monitor/Consultant.** The Project Applicant shall be required to retain and compensate for the services of a tribal monitor/consultant, who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The tribal Monitor/consultant shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural resources.

TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources.** Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources. For unique archaeological resources, preservation in place is the preferred manner of treatment in accordance with PRC Section 21083.2(b). If

preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the tribe or a local school or historical society in the area for educational purposes.

TCR-3 **Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.

Upon discovery of human remains, the tribal and/or archaeological monitor/ consultant/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) shall then notify the tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by State law, who will then appoint a Most Likely Descendent (MLD). If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the tribe, the term "human remains" encompasses more than human bones. In ancient, as well as, historic times, tribal traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The tribe

shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery are approved by the tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the tribe and the NAHC. The tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

TCR-4 **Professional Standards.** Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior's Standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The qualified archaeologist shall ensure that all other personnel are appropriately trained and qualified.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS: *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

The City of Arcadia provides water service to a majority of the City and currently derives its water supply from groundwater wells that produce water from two groundwater basins, the Main San Gabriel Basin and the Raymond Basin, with the Main San Gabriel Basin as the City's primary groundwater source.[91] According to the City's 2015 Urban Water Management Plan (UWMP), the City has not experienced water supply deficiencies as a result of current management practices in the Main San Gabriel Basin and the Raymond Basin. As determined in the 2015 UWMP, the minimum water supplies available at the end of an average water year, single dry year, and multiple dry years would be at least equal to, if not greater than, the City's water demand. In addition, as concluded in the 2015 UWMP, based on current management practices and reduced pumping in the Raymond Basin, the City will be able to rely on the Main San Gabriel Basin, the Raymond Basin, and imported water for adequate supply through year 2035 under single year and multiple year droughts.

As shown in **Table XIX-1**, the Proposed Project does not meet the criteria to prepare a project-specific Water Supply Assessment under Senate Bill (SB) 610.[92] In addition, as presented in **Table XIX-1**, the Proposed Project would result in a net reduction in water consumption due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the Project would

[91] City of Arcadia, *2015 Urban Water Management Plan*, June 2016.

[92] SB 610 requires urban water suppliers to prepare a WSA for projects that include, but not limited to, the following: more than 500 dwelling units; shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space; or hotels, motels, or both, having more than 500 rooms.

not require or result in the relocation or construction of new or expanded water treatment facility, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to water consumption and water supply would be less than significant.

Table XIX-1
Water Consumption and Wastewater Generation Estimates[a]

Land Use	Unit	Rate[b]	Quantity (gpd)
Existing Coco's Restaurant			
Restaurant	13,088 sf	1,000 gpd/1,000 sf	13,088 gpd
Proposed Project			
Assisted Living Facility	80 beds	125 gpd/bed[c]	10,000 gpd
Net Consumption/Generation (Proposed – Existing)			***-3,088 gpd***

Notes: gpd = gallons per day; sf = square feet

[a] Based on a review of other projects and water supply assessment reports prepared for projects in the Los Angeles Metropolitan area, the amount of wastewater generated by a project has been estimated to be approximately the same as the amount of water consumed by such project. It is noted that some amount is lost due to evapotranspiration and landscaping irrigation; however, these quantities are minimal compared to the consumption and generation by the actual uses.

[b] Rates from the Sanitation Districts of County of Los Angeles.

[c] Rate for convalescent homes was utilized.

Wastewater

Wastewater generated by the City is treated by the Sanitation Districts of Los Angeles County (Sanitation Districts). Wastewater is collected within the City's local sewer collection system, which tie into one of the Sanitation Districts' regional truck sewer lines traversing the City.[93] The regional truck sewer lines deliver wastewater to one or more water reclamation plants owned by the Sanitation Districts for treatment, including the Whittier Narrows Water Reclamation Plant (WNWRP) and the Joint Water Pollution Control Plant (JWPCP).

As presented above in **Table XIX-1**, the Proposed Project would result in a net reduction in wastewater generation due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facility, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to wastewater generation, specifically to the WNWRP and the JWPCP, would be less than significant.

Storm Drains

The Project Site currently drains to an existing private storm drain located at the southeastern corner of the Project Site. As discussed above in Section X, Hydrology and Water Quality, of this Initial Study, the Project would slightly reduce the amount of impervious surfaces on the Project Site due to the increase in the amount of pervious landscape areas proposed by the Project as compared to existing conditions. Further, the Project's LID Plan would be reviewed and approved by the City during the plan-check process, ensuring that the Project's drainage plan would conform to local and regional regulations governing Project Site discharge to storm drains. Specifically, the LID Plan would result in stormwater runoff retention on-site for the runoff from the 85th percentile 24-hour runoff

[93] City of Arcadia, *2015 Urban Water Management Plan*, June 2016.

event. Only stormwater overflow from the Project Site would drain to the existing private storm drain at the southeastern corner of the Project Site. Therefore, the Project would not contribute to additional runoff as compared to existing conditions. Accordingly, the Project would not require or result in the relocation or construction of new or expanded storm drain facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to storm drains would be less than significant.

Electricity and Natural Gas

Southern California Edison (SCE) and Southern California Gas Company (SoCalGas) provide electricity and natural gas services to the Project Site, respectively. As presented in **Table VI-1** in Section VI, Energy, of this Initial Study, the Proposed Project would result in a net reduction in electricity and natural gas consumption due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the Project would not require or result in the relocation or construction of new or expanded power or natural gas lines, the construction or relocation of which could cause significant environmental effects. Therefore, impacts related to electricity and natural gas would be less than significant.

Telecommunications

Telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users are determined by telecommunication providers and is subject to its own environmental review. Accordingly, Project impacts to telecommunication facilities would be less than significant.

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

Less Than Significant Impact. As discussed above, the 2015 UWMP concluded that the City will be able to rely on the Main San Gabriel Basin, the Raymond Basin, and imported water for adequate supply through year 2035 under single year and multiple year droughts. In addition, as shown in **Table XIX-1**, the Proposed Project would result in a net reduction in water consumption due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, impacts to water supplies would be less than significant.

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

Less Than Significant Impact. As presented above, the Proposed Project would result in a net reduction in wastewater generation due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the Project would not affect the capacity of the WNWRP or the JWPCP for treatment of wastewater. Therefore, impacts related to wastewater treatment would be less than significant.

d) Would the project 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?

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project Site is currently served by a commercial hauler, which collects and transports waste generated by the existing restaurant to multiple local landfills. The City's General Plan Update Program Environmental Impact Report determined that there would be no significant adverse impact on landfill capacity and that continuation of existing City and County programs and implementation of pertinent goals, policies, and implementation actions in the General Plan Update would provide for future developments' compliance with solid waste regulations.[94] In addition, the Project would be required to comply with federal, State, and local management and reduction statutes and regulations related to solid waste to ensure that the solid waste stream diverted to landfills and recycling facilities is reduced in accordance with existing regulations. Furthermore, as shown in **Table XIX-2**, the Proposed Project would result in a net reduction in solid waste generation due to the change in land use from a high turnover restaurant to an assisted living facility. Accordingly, the Project would not 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. Therefore, impacts related to solid waste generation would be less than significant.

Table XIX-2
Solid Waste Generation Estimates

Land Use	Unit	Rate[a]	Quantity (lbs per day)
Existing Coco's Restaurant			
Restaurant	409 seats[b]	1 lb/seat/day	409
Proposed Project			
Assisted Living Facility	80 persons[c]	5 lbs/person/day	400
Net Solid Waste Generation (Proposed – Existing)			***-9***

Notes: lb = pound; sf = square feet

[a] California Department of Resources Recycling and Recovery (CalRecycle), Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed January 27, 2020.

[b] CalRecycle rate that assumes 50% of restaurant is seating and 15 sf per seat.

[c] Based on an 80-bed facility, resulting in 80 full-time residents.

[94] City of Arcadia, *General Plan Update Draft Program EIR*, September 2010, p. 4.16-33.

XX. Wildfire

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE: *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
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 to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As stated in Section IX.g, above, the Project Site is not located within or adjacent to a Very High Fire Hazard Severity Zone (VHFHSZ), as designated by the California Department of Forestry and Fire Protection.[95] VHFHSZs in the City of Arcadia are concentrated on the northeastern side of the City, in the foothills near the Cities of Monrovia and Sierra Madre, approximately 2.1 miles northeast of the Project Site. The Project Site is in a fully urbanized area with an urban street network, a fully pressurized water system, and managed landscaping limited to decorative trees and shrubs. As such, wildland fires would not occur on or near the Project Site. Regardless, in any disaster warranting evacuation, the exact emergency routes used would depend on a number of variables, including the type, scope, and location of the incident. It is the responsibility of emergency service and/or appropriate public officials to adequately assess the situation so that safe and efficient evacuation routes are selected. As the Project Site is in a fully urbanized area with multiple major arterial streets and a major highway within close proximity, the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

[95] California Department of Forestry and Fire Protection, Very High Fire Hazard Severity Zone in Local Responsibility Area, September 2011.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not within or near a VHFHSZ. Therefore, the Proposed Project would not have the potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, or exacerbate wildfire risks. As such, no impact would occur.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not within or near a VHFHSZ. Therefore, the Proposed Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. As such, no impact would occur.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not within or near a VHFHSZ. The Project Site is within a flat, urbanized area that is adjacent to existing commercial and residential structures. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As such, no impact would occur.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE:				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

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

Less Than Significant Impact With Mitigation Incorporated. Based on the analysis in Section IV, Biological Resources, of this Initial Study, the Proposed Project would not have substantial impacts to special-status species, stream habitat, and wildlife dispersal. A mitigation measure is proposed (i.e., **Mitigation Measure BIO-1**) to ensure that tree removal would not pose a significant impact on migratory wildlife species. Furthermore, the Proposed Project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in Section V, Cultural Resources, and Section VII, Geology and Soils, of this Initial Study, with the incorporation of **Mitigation Measures CUL-1** and **GEO-1**, the Proposed Project would not have substantial impacts to historical, archaeological, or paleontological resources and, thus, would not eliminate any important examples of California history or prehistory. Therefore, the Proposed Project would not result in a Mandatory Finding of Significance due to impacts to biological, cultural, or paleontological resources.

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

Less Than Significant Impact. A significant cumulative impact may occur if the Project, in conjunction with related projects in the region, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the Proposed Project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the Project Site, the Proposed Project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the Proposed Project would not result in any significant and unmitigable impacts in any environmental categories. In all cases, the impacts associated with the Project are limited to the Project Site and are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts. In some cases, the

Project would result in a net reduction when compared to existing conditions (i.e., related to emissions, water consumption, and wastewater and solid waste generation). Therefore, the Proposed Project would not result in a Mandatory Finding of Significance due to cumulative impacts.

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

Less Than Significant Impact With Mitigation Incorporated. As detailed above, the Proposed Project does not have the potential to result in direct or indirect substantial adverse effects on human beings. Although construction noise is allowed during the City's allowable construction hours and is not considered to be a significant impact during those hours, the Project could expose adjoining residential uses to temporary high noise levels (91 to 104 dBA) during construction activities. However, **Mitigation Measure NOI-1** is recommended to reduce short-term construction noise impacts through noise reduction methods to a less-than-significant level. In all other environmental issue areas, the Proposed Project does not approach or exceed any significance thresholds typically associated with direct or indirect effects on people, such as air, water, or land pollution, natural environmental hazards, transportation-related hazards, or adverse effects to emergency service response. Therefore, the Proposed Project would not result in a Mandatory Finding of Significance due to direct or indirect effects on human beings.

SECTION E. LIST OF MITIGATION MEASURES

Biological Resources

BIO-1 Tree removal shall not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions may be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged. This measure shall be implemented to the satisfaction of the City of the Planning & Community Development Administrator or Designee.

BIO-2 Prior to issuance of a building permit, the applicant shall demonstrate that the Project landscaping plan and planned construction are consistent with the City's Tree Protection Ordinance and the Protected Tree Study. The tree protection activities shall include the following:

1. Prior to demolition, the contractor and consulting arborist shall meet on-site to make sure tree protection zones are established around all protected trees to be preserved and to review the goals for the tree protection plan.
2. Tree protection zone fences shall be placed around each protected tree. Fences shall be at least 4 feet tall and constructed of chain-link fencing secured on metal posts. Where fences are not feasible (e.g., in haul routes or areas where workers will need frequent access), soil and root protection material can be installed.
3. The contractor shall maintain the fences and/or soil protection material throughout the completion of the Project. No staging of materials or equipment or washing out shall occur within the fenced protected zones.
4. Trees should be irrigated throughout the year. A deep watering that provides good soil moisture to a depth of 16 inches is optimal. The trees shall be deeply water once every 21 to 28 days during the summer and fall seasons when rain is unlikely.
5. For Tree No. 49, a protected deodar cedar located on the Project Site's Colorado Boulevard frontage, the deadwood shall be removed to prevent the dead branches from falling. However, no reduction pruning in the live crown of the tree is required. The tree shall be monitored for its health during the life of the Project, and irrigation shall occur at the same frequency of the other trees.
6. The arborist shall monitor a few critical phases of the Project, including pre-demolition, to direct the installation of protective fences and soil protection measures; grading and excavation; any utility or drainage trenching that is required within a tree protection zone; and a final evaluation during the landscape installation phase.

7. Additional construction best practices described in the Protected Tree Report shall be implemented.

Cultural Resources

CUL-1 Treatment of previously unidentified archaeological deposits: If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits shall be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not eligible, no further protection of the find is necessary. If the deposits are eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.

Geology and Soils

GEO-1 Paleontological Resource Monitor: If paleontological resources (fossils) are discovered during Project grading, work shall be halted in that area until a qualified paleontologist can be retained to assess the significance of the find. The Project paleontologist shall monitor remaining earth-moving activities at the Project Site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the CEQA Guidelines and offered for curation at an accredited facility approved by the City of Arcadia. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued.

Noise

NOI-1 Prior to issuance of a Grading Permit, the Project applicant shall demonstrate, to the satisfaction of the City of Arcadia Planning Division, that the Project complies with the following:

1. Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices.

2. The contractor shall provide evidence that a construction staff member will be designated as a noise disturbance coordinator and will be present on-site during construction activities. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the noise disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early or bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the

Planning & Community Development Administrator (or designee). All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. All necessary signage and notices shall be posted on or sent to residential units immediately surrounding the construction site no less than two weeks prior to the start of noise-generating construction activities on the Project Site.

3. During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

4. Prior to issuance of any Grading or Building Permit, the Project applicant shall demonstrate to the satisfaction of the Community Development Director (or designee) that construction noise reduction methods shall be used where feasible. These reduction methods may include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and utilizing electric air compressors and similar power tools.

5. Construction haul routes shall be designed to avoid noise-sensitive uses (e.g., residences and convalescent homes) to the extent feasible.

Tribal Cultural Resources

TCR-1 **Retail a Native American Monitor/Consultant.** The Project Applicant shall be required to retain and compensate for the services of a tribal monitor/consultant, who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The tribal Monitor/consultant shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural resources.

TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources.** Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place

or recovery for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources. For unique archaeological resources, preservation in place is the preferred manner of treatment in accordance with PRC Section 21083.2(b). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the tribe or a local school or historical society in the area for educational purposes.

TCR-3 **Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.

Upon discovery of human remains, the tribal and/or archaeological monitor/ consultant/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) shall then notify the tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by State law, who will then appoint a Most Likely Descendent (MLD). If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the tribe, the term "human remains" encompasses more than human bones. In ancient, as well as, historic times, tribal traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items

made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery are approved by the tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the tribe and the NAHC. The tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

TCR-4 **Professional Standards.** Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior's Standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The qualified archaeologist shall ensure that all other personnel are appropriately trained and qualified.

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Michael Baker INTERNATIONAL

80 YEARS Making a Difference

MEMORANDUM

To: Vanessa Quiroz, City of Arcadia Associate Planner

From: Madonna Marcelo, Michael Baker International

CC: Lisa Flores, City of Arcadia Planning & Community Development Administrator

Date: June 19, 2020

Subject: Artis Senior Living Project Responses to Comments on the Draft Initial Study/Mitigated Negative Declaration

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A Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) was prepared for the Artis Senior Living Project (Proposed Project) in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Draft IS/MND was circulated for public review and comment from April 23, 2020 to May 22, 2020. One letter was received by the City from the following agency and attached hereto:

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

Below presents the comments followed by the corresponding response to each of the comments.

Comment No. 1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended revisions to the air quality analysis and health risk assessment that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Description
The Lead Agency proposes to a [sic] 44,192-square-foot senior living care facility with 80 rooms on 2.79 acres (Proposed Project). Based on a review of Figure A-2, Project Location Map, in the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project is located immediately south of Interstate 210 (I-210) and within 100 feet from a gasoline service station. Construction is expected to take 19 months.

South Coast AQMD Staff's Summary of Air Quality Analysis
In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's

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recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant.

South Coast AQMD Staff's Comments
Based on reviews of the Air Quality Analysis in the MND, South Coast AQMD staff recommends that the Lead Agency perform a mobile source health risk assessment (HRA) to disclose the potential health risks in the Final MND, incorporate strategies to reduce exposures by senior residents to toxic air contaminants from vehicles and trucks traveling on I-210, and protect public health of those living at the Proposed Project. Detailed comments are provided as follows.

Response to Comment No. 1

The introductory comment is noted for the administrative record. The South Coast AQMD staff's summary of the project description and air quality analysis correctly identifies the aspect of the Project and significance conclusions provided in the Draft Initial Study/Mitigated Negative Declaration (IS/MND). This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 2

Health Risk Assessment (HRA) from Freeways and Other Sources of Air Pollution

1. Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD's concern about the potential public health impacts of siting sensitive populations within close proximity of I-210, South Coast AQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

   Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project will include the operation of a senior living care facility. Based on a review of Figure A-2 in the MND, South Coast AQMD staff found that the Proposed Project immediately south of I-210. Senior residents living at the Proposed Project will be exposed to diesel particulate matter (DPM) emitted from vehicles and trucks traveling on I-210. The California Air Resources Board has identified DPM as a toxic air contaminant (TAC) based on its carcinogenic effects. Additionally, the Proposed Project is located within 100 feet of a gasoline service station to the west. Senior residents will also be exposed to other TACs such as benzene. Therefore, South Coast AQMD staff recommends that the Lead Agency consider health impacts on future senior residents living at the Proposed Project and perform a mobile source HRA analysis to disclose the potential health risks in the Final MND. This recommendation will facilitate the purpose and goal of CEQA on public disclosure and enable

decision-makers with meaningful information to make an informed decision on project approval. It will also foster informed public participation by providing the public with useful information that is needed to understand the potential health risks from living in close proximity to a high-volume freeway.

Response to Comment No. 2

The concerns identified by SCAQMD are acknowledged. The Project Site is immediately south of I-210. However, the analysis of potential health risks due to exposure of future Project residents to emissions from I-210 is not considered within the scope of CEQA in general, or the IS/MND in particular, as that pertains to the effects of the environment on the Project rather than the effects of the Project on the environment. This perspective on the intent and scope of CEQA was affirmed in the California Supreme Court opinion in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369. The court held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents." However, it should be noted that there are exceptions to the court's decision. For instance, when a project has potentially significant exacerbating effects on existing environmental hazards, those impacts are properly within the purview of CEQA because they can be considered as impacts of the project on existing conditions rather than impacts of the environment on the project. The court concluded that it is proper under CEQA to undertake an analysis of the dispersal of existing contaminants because such an analysis would be focused on how the project "would worsen existing conditions." Finding that CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present, the court held that most of CEQA Guidelines Section 15126.2(a) is valid. Thus, simply attracting residents or users to a site containing an environmental hazard or risk is not an impact that must be analyzed. Instead, project-induced changes that worsen an existing hazard or risk are.

The Proposed Project would not worsen existing environmental conditions and would not exacerbate an existing environmental condition. As noted in the discussion of the Project's traffic impacts on pages 82 through 85 of the Draft IS/MND, the Project would result in a reduction in total daily and peak hour trips when compared to the existing restaurant use and would, thus, not exacerbate the level of air pollutants generated by freeway vehicle traffic on I-210, resulting in a less-than-significant impact related to transportation. As such, the assessment of the Project's air quality impacts has not encompassed an evaluation of potential health risks associated with traffic exhaust emissions along I-210. Please refer to Response to Comment No. 3 below for a discussion of the gasoline service station located to the west of the Project Site.

Comment No. 3

Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

2. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast

AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. In addition, guidance on siting incompatible land uses (such as placing residential uses near freeways and gasoline service stations) can be found in the California Air Resources Board (CARB)'s Air Quality and Land Use Handbook: A Community Health Perspective (Handbook). In the Handbook, CARB recommends avoiding siting new sensitive land uses such as the Proposed Project within 500 feet of a freeway, and 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater.) A 50-foot separation is recommended for typical gasoline dispensing facilities. Therefore, South Coast AQMD staff recommends that the Lead Agency review the guidance documents when making local planning and land use decisions.

Response to Comment No. 3

When determining whether or not an HRA was required for the Proposed Project, the City relied on the guidance in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. This document recommends that lead agencies avoid siting residences within 300 feet of a large gas station (i.e., a facility with a throughput of 3.6 million gallons per year or greater) or 50 feet for a typical gas station (i.e., a facility with a throughput of less than 3.6 million gallons per year). Based on the small size (five fueling islands) of the 76 gas station across Michillinda Avenue on the southwestern corner of Colorado Boulevard and Michillinda Avenue, this gas station is considered to be a typical gas station within the meaning of CARB's *Air Quality and Land Use Handbook*. Accordingly, pursuant to CARB's guidance, the Proposed Project should be sited 50 feet or more from the gas station's emission sources (i.e., the fueling islands/pumps). The distance between the Proposed Project's property boundary along Michillinda Avenue and the closest fueling canopy at the gas station is approximately 90 feet, with a distance between the property boundary and the nearest fueling island of approximately 100 feet. Therefore, the Proposed Project complies with CARB's guidance. It should also be noted the CARB's guidance is advisory and not regulatory; however, the City strives to comply with this guidance, as discussed herein.

As discussed in Response to Comment No. 2, the Court found in *California Building Industry Association v. Bay Area Air Quality Management District* that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future residents or users (i.e., reverse CEQA) but need to focus on the impacts of the project's effects on the environment. Since the nearby gas station is already part of the existing environment, the City is not required to evaluate its potential impacts on the Proposed Project.

Operation of the nearby gas station is permitted by SCAQMD, and fuel-related emissions are regulated by SCAQMD Rule 461. Gasoline-dispensing facilities are required to use Phases I/II enhanced vapor recovery systems. Thus, the potential for fugitive volatile organic compounds (VOC) or toxic air contaminant (TAC) emissions from the nearby gasoline pumps is negligible. As such, the fueling pumps would not be a significant source of TACs, and the sensitive receptors

that would be located on the Project Site (approximately 150 feet from the existing fueling pumps) would not be exposed to TAC emissions from the gasoline pumps across Michillinda Avenue. In addition, the Proposed Project would not change the VOC or TAC emissions from this gas station and, thus, would not have any potentially significant exacerbating effects on existing environmental hazards. No further analysis of this issue is warranted, and the determination of the significance of impacts in the Initial Study remains valid and applicable to the Proposed Project.

Comment No. 4

Health Risk Reduction Strategies

3. Many strategies are available to reduce exposures to DPM, including, but are not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

4. Enhanced filtration systems have limitations. South Coast AQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that South Coast AQMD conducted to investigate filters, a cost burden is expected to be within the range of $120 to $240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to toxic emissions.

5. Because of the limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular inspection, maintenance, and monitoring of filters in the Final MND. To facilitate a good faith effort at full disclosure and provide useful information to future sensitive receptors who will live in close proximity to I-210 and a gasoline service station, the Lead Agency should include the following information in the Final MND, at a minimum:

    - Disclosure on potential health impacts to prospective senior residents from living in proximity to a freeway and other sources of air pollution, and the reduced effectiveness of air filtration system when windows are open and when senior residents are outdoor;

- Identification of the responsible implementing and enforcement agency such as the Lead Agency for ensuring that enhanced filters are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identification of the responsible implementing and enforcement agency such as the Lead Agency's building and safety inspection unit to provide periodic, regular inspection on filters;
- Provide information and guidance to the Project developer or proponent on the importance of filter installation and ongoing maintenance;
- Provide information to the Project developer or proponent about where the MERV filers [sic] can be purchased;
- Disclosure on increased costs for purchasing enhanced filtration systems;
- Disclosure on increased energy costs for running the HVAC system with MERV filters;
- Disclosure on recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;
- Identification of the responsible entity such as residents or property management to ensure filters are inspected for replacement and maintenance on time, if appropriate and feasible;
- Develop ongoing cost sharing strategies, if available, for replacing the enhanced filtration units;
- Set up criteria for assessing progress in installing, replacing, and maintaining the enhanced filtration units; and
- Set up process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

Response to Comment No. 4

It is noted that the regulations set forth in Section 150 of Subchapter 7 of the 2019 California Building Energy Efficiency Standards require that residential uses, including the Proposed Project, be equipped with MERV 13 air filters in the mechanical ventilation systems, to provide enhanced filtration of outdoor air before passing through any system thermal conditioning components. These filters are designed to remove small and medium diameter particles. As noted in the SCAQMD comments, these filters can be effective in reducing exposure to DPMs. Although these filters are only effective while mechanical ventilation systems are operating, residents of the Proposed Project could be exposed to freeway emissions while outdoors or when the ventilation systems are not operating. However, the health effects from DPMs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration.

Project residents are anticipated to remain mostly indoors since many of them would require continuous supervision and care. In addition, the City will impose a condition of approval that requires the operators of the Proposed Project to submit a copy of the lease agreement. The lease agreement will require all future residents to acknowledge the potential health risk associated with living within 500 feet of a freeway.

Comment No. 5

Conclusion
Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Response to Comment No. 5

The City's responses to the AQMD comments are provided in this Response to Comments. All written comments received have been adequately responded to in accordance with CEQA Guidelines Section 15074. The determination of the significance of impacts in the Initial Study, particularly as it relates to air quality, remains valid and applicable to the Proposed Project. Therefore, no further analysis is warranted. No other agency and public comments were received during the Draft IS/MND's public review period.

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SENT VIA E-MAIL:
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May 5, 2020

Mitigated Negative Declaration (MND) for the Proposed Artis Senior Living Care Facility

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended revisions to the air quality analysis and health risk assessment that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Description
The Lead Agency proposes to a 44,192-square-foot senior living care facility with 80 rooms on 2.79 acres (Proposed Project). Based on a review of Figure A-2, *Project Location Map*, in the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project is located immediately south of Interstate 210 (I-210) and within 100 feet from a gasoline service station. Construction is expected to take 19 months[1].

South Coast AQMD Staff's Summary of Air Quality Analysis
In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant.

South Coast AQMD Staff's Comments
Based on reviews of the Air Quality Analysis in the MND, South Coast AQMD staff recommends that the Lead Agency perform a mobile source health risk assessment (HRA) to disclose the potential health risks in the Final MND, incorporate strategies to reduce exposures by senior residents to toxic air contaminants from vehicles and trucks traveling on I-210, and protect public health of those living at the Proposed Project. Detailed comments are provided as follows.

Comment No. 1

Health Risk Assessment (HRA) from Freeways and Other Sources of Air Pollution

1. Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD's concern about the potential public health impacts of siting sensitive populations within close proximity of I-210, South Coast AQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

   Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care

Comment No. 2

[1] MND. Page 30

facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project will include the operation of a senior living care facility. Based on a review of Figure A-2 in the MND, South Coast AQMD staff found that the Proposed Project immediately south of I-210. Senior residents living at the Proposed Project will be exposed to diesel particulate matter (DPM) emitted from vehicles and trucks traveling on I-210. The California Air Resources Board has identified DPM as a toxic air contaminant (TAC) based on its carcinogenic effects[2]. Additionally, the Proposed Project is located within 100 feet of a gasoline service station to the west. Senior residents will also be exposed to other TACs such as benzene. Therefore, South Coast AQMD staff recommends that the Lead Agency consider health impacts on future senior residents living at the Proposed Project and perform a mobile source HRA[3] analysis to disclose the potential health risks in the Final MND[4]. This recommendation will facilitate the purpose and goal of CEQA on public disclosure and enable decision-makers with meaningful information to make an informed decision on project approval. It will also foster informed public participation by providing the public with useful information that is needed to understand the potential health risks from living in close proximity to a high-volume freeway.

Comment No. 2 (Continued)

Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

2. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005[5]. This Guidance document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. In addition, guidance on siting incompatible land uses (such as placing residential uses near freeways and gasoline service stations) can be found in the California Air Resources Board (CARB)'s *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook)[6]. In the Handbook, CARB recommends avoiding siting new sensitive land uses such as the Proposed Project within 500 feet of a freeway[7], and 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater.) A 50-foot separation is recommended for typical gasoline dispensing facilities[8]. Therefore, South Coast AQMD staff recommends that the Lead Agency review the guidance documents when making local planning and land use decisions.

Comment No. 3

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Comment No. 4

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[9]This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

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Comment No. 4 (Continued)

Conclusion

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Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC200501-05
Control Number

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SENT VIA E-MAIL: May 5, 2020

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    - Disclosure on increased energy costs for running the HVAC system with MERV filters;
    - Disclosure on recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;

[9]This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

- Identification of the responsible entity such as residents or property management to ensure filters are inspected for replacement and maintenance on time, if appropriate and feasible;
- Develop ongoing cost sharing strategies, if available, for replacing the enhanced filtration units;
- Set up criteria for assessing progress in installing, replacing, and maintaining the enhanced filtration units; and
- Set up process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC200501-05
Control Number

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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 21, 2020

Vanessa Quiroz
Associate Planner
240 W. Huntington Drive
Arcadia, CA 91007
vquiroz@arcadiaca.gov

Subject: CEQA Filing Fee Exemption Request
Project Name: Artis Senior Living Project
SCH Number and/or local agency ID number: N/A

Dear Ms. Quiroz:

Based on a review of the project referenced above, the California Department of Fish and Wildlife has determined that for the purposes of the assessment of CEQA filing fees (Fish and G. Code § 711.4(c)) the project has the potential to affect fish and wildlife, or their habitat, and the project as described requires payment of a CEQA filing fee pursuant to the California Code of Regulations, Title 14, Section 753.5(d). At the time of filing of the Notice of Determination with the county clerk or Office of Planning and Research (State Clearinghouse), the appropriate CEQA filing fee will be due and payable. Please see the following website for a list of current fees: https://www.wildlife.ca.gov/Conservation/CEQA/Fees.

This determination is for the purpose of assessment of CEQA filing fees and is independent of a lead agency's conclusion or determination regarding a project's effect on the environment pursuant to CEQA Guidelines section 15064. If you have any questions, please contact Andrew Valand at (562) 342-2142 or by email at Andrew.Valand@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Megan Evans
93F0E529BCA44B5...

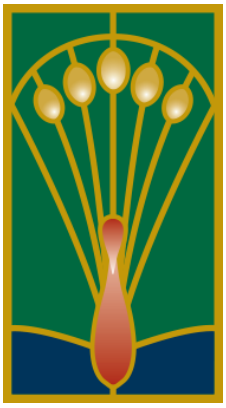
For Victoria Tang
Sr. Environmental Scientist, Supervisor

California Environmental Quality Act

MITIGATION MONITORING AND REPORTING PROGRAM

Artis Senior Living Project

Lead Agency:



City of Arcadia
240 W. Huntington Drive
Arcadia, CA 91007
(626) 574-5422
Contact: Vanessa Quiroz, Associate Planner

Prepared by:

Michael Baker INTERNATIONAL

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Office: (562) 200-7165
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I. Introduction

To ensure that the mitigation measures identified in a project's Initial Study are implemented, the California Environmental Quality Act (CEQA) requires the Lead Agency for a project to adopt a program for monitoring or reporting on the measures it has imposed to mitigate or avoid significant environmental effects. As specifically set forth in Section 15097(c) of the CEQA Guidelines, the public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Monitoring" is generally an ongoing or periodic process of project oversight, while "reporting" generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

An Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to address the Artis Senior Housing Project's (Project) potential environmental impacts. The evaluation of the Project includes mitigation measures to avoid or substantially lessen potentially significant impacts to less-than-significant levels. Specifically, the IS/MND includes mitigation measures related to the following environmental issue areas: Biological Resources, Cultural Resources, Geology and Soils, Noise, and Tribal Cultural Resources. This Mitigation Monitoring and Reporting Program (MMRP) is designed to monitor implementation of these Project-specific mitigation measures.

II. Purpose

The overall intent of this MMRP is to:

- Verify compliance with mitigation measures identified in the IS/MND prepared for the Proposed Project;
- Provide a framework to document implementation of the identified mitigation measures;
- Provide a record of mitigation requirements;
- Identify monitoring and enforcement agencies;
- Establish and clarify administrative procedures for the clearance of mitigation measures; and
- Establish the frequency and duration of monitoring.

III. Organization

As shown in Table 1, each mitigation measure for the Proposed Project is listed by environmental issue area, with accompanying information identifying the:

- Enforcement Agency – the agency with the power to enforce the Project's mitigation measures.
- Monitoring Agency – the agency to which reports involving compliance and implementation of the mitigation measures are made.
- Monitoring Phase – the phase of the Project (e.g., pre-construction, construction, architectural coatings, occupation, etc.) during which the mitigation measure shall be monitored.
- Monitoring Frequency – the frequency at which the mitigation measure shall be monitored during the phase identified in the prior column.
- Action Indicating Compliance – the action or actions by which the enforcement/monitoring agency indicates that compliance with the identified mitigation measure has been determined.

Table 1 – Mitigation Monitoring and Reporting Program

No.	Mitigation Measures	Enforcement Agency	Monitoring Agency	Monitoring Phase	Monitoring Frequency	Action Indicating Compliance
Biological Resources						
BIO-1	Tree removal shall not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions may be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged. This measure shall be implemented to the satisfaction of the City of the Planning & Community Development Administrator or Designee.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Pre-Construction/ Construction	During all grading and tree-removal activities	Submittal of compliance documentation by a qualified biologist
BIO-2	Prior to issuance of a building permit, the applicant shall demonstrate that the Project landscaping plan and planned construction are consistent with the City's Tree Protection Ordinance and the Protected Tree Study. The tree protection activities shall include the following: 1. Prior to demolition, the contractor and consulting arborist shall meet on-site to make sure tree protection zones are established around all protected trees to be preserved and to review the goals for the tree protection plan. 2. Tree protection zone fences shall be placed around each protected tree. Fences shall be at least 4 feet tall and constructed of chain-link fencing secured on metal posts. Where fences are not feasible (e.g., in haul routes or areas where workers will need frequent access), soil and root protection material can be installed. 3. The contractor shall maintain the fences and/or soil protection material throughout the completion of the Project. No staging of materials or equipment or washing out shall occur within the fenced protected zones. 4. Trees should be irrigated throughout the year. A deep watering that provides good soil moisture to a depth of 16 inches is optimal. The trees shall be deeply water once every 21 to 28 days during the summer and fall seasons when rain is unlikely. 5. For Tree No. 49, a protected deodar cedar located on the Project Site's Colorado Boulevard frontage, the deadwood shall be removed to prevent the dead branches from falling. However, no reduction pruning in the live crown of the tree is required. The tree shall be monitored for its health during the life of the Project, and irrigation shall occur at the same frequency of the other trees. 6. The arborist shall monitor a few critical phases of the Project, including pre-demolition, to direct the installation of protective fences and soil protection measures; grading and excavation; any utility or drainage trenching that is required within a tree protection zone; and a final evaluation during the landscape installation phase. 7. Additional construction best practices described in the Protected Tree Report shall be implemented.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Pre-Construction/ Construction	During Plan Check and construction	Submittal of compliance documentation by a Certified Arborist
Cultural Resources						
CUL-1	Treatment of previously unidentified archaeological deposits: If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professional Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits shall be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not eligible, no further protection of the find is necessary. If the deposits are eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by a qualified archaeologist

Table 1 – Mitigation Monitoring and Reporting Program

No.	Mitigation Measures	Enforcement Agency	Monitoring Agency	Monitoring Phase	Monitoring Frequency	Action Indicating Compliance
Geology and Soils						
GEO-1	Paleontological Resource Monitor: If paleontological resources (fossils) are discovered during Project grading, work shall be halted in that area until a qualified paleontologist can be retained to assess the significance of the find. The Project paleontologist shall monitor remaining earth-moving activities at the Project Site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the CEQA Guidelines and offered for curation at an accredited facility approved by the City of Arcadia. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by qualified Paleontologist
Noise						
NOI-1	Prior to issuance of a Grading Permit, the Project applicant shall demonstrate, to the satisfaction of the City of Arcadia Building Division, that the Project complies with the following: 1. Construction contracts specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other State-required noise attenuation devices. 2. The contractor shall provide evidence that a construction staff member will be designated as a noise disturbance coordinator and will be present on-site during construction activities. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the noise disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early or bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the Building Official (or designee). All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. All necessary signage and notices shall be posted on or sent to residential units immediately surrounding the construction site no less than two weeks prior to the start of noise-generating construction activities on the Project Site. 3. During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers. 4. Prior to issuance of any Grading or Building Permit, the Project applicant shall demonstrate to the satisfaction of the Building Official (or designee) that construction noise reduction methods shall be used where feasible. These reduction methods may include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and utilizing electric air compressors and similar power tools. 5. Construction haul routes shall be designed to avoid noise-sensitive uses (e.g., residences and convalescent homes) to the extent feasible.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Pre-Construction/ Construction	During Plan Check and construction	Approval of a grading permit
Tribal Cultural Resources						
TCR-1	Retain a Native American Monitor/Consultant. The Project Applicant shall be required to retain and compensate for the services of a tribal monitor/consultant, who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the Native American Heritage Commission's (NAHC) Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant shall only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by tribal monitor

Table 1 – Mitigation Monitoring and Reporting Program

No.	Mitigation Measures	Enforcement Agency	Monitoring Agency	Monitoring Phase	Monitoring Frequency	Action Indicating Compliance
	activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The tribal Monitor/consultant shall complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural resources.					
TCR-2	Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the Project Site while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources. For unique archaeological resources, preservation in place is the preferred manner of treatment in accordance with PRC Section 21083.2(b). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the tribe or a local school or historical society in the area for educational purposes.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by tribal monitor
TCR-3	Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed. Upon discovery of human remains, the tribal and/or archaeological monitor/ consultant/consultant shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) shall then notify the tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by State law, who will then appoint a Most Likely Descendent (MLD). If the Gabrieleño Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the tribe, the term "human remains" encompasses more than human bones. In ancient, as well as, historic times, tribal traditions included, but	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by tribal monitor

Table 1 – Mitigation Monitoring and Reporting Program

No.	Mitigation Measures	Enforcement Agency	Monitoring Agency	Monitoring Phase	Monitoring Frequency	Action Indicating Compliance
	were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The tribe shall make every effort to recommend diverting the Project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials shall be removed. The tribe shall work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery are approved by the tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the tribe for data recovery purposes. Cremations shall either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the tribe and the NAHC. The tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony shall be removed to a secure container on site if possible. These items shall be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.					
TCR-4	Archaeological and Native American monitoring and excavation during construction projects shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior's Standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The qualified archaeologist shall ensure that all other personnel are appropriately trained and qualified.	City of Arcadia Development Services Department	City of Arcadia Development Services Department	Construction	During all ground disturbing activities	Submittal of compliance documentation by tribal monitor