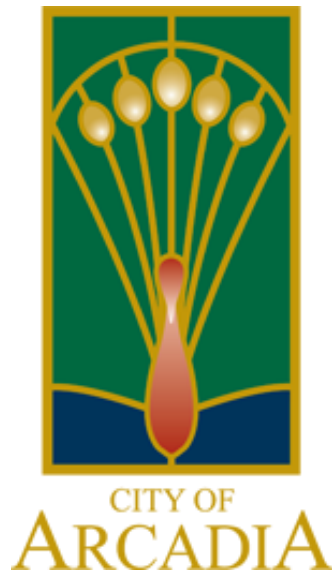


# Attachment No. 6

Addendum to the Adopted Initial  
Study/Negative Declaration for the Housing  
Element Update



**ADDENDUM TO THE  
ARCADIA 6TH CYCLE HOUSING ELEMENT UPDATE  
INITIAL STUDY/NEGATIVE DECLARATION**

**December 2023**

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DRAFT – December 2023

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## 1.0 INTRODUCTION AND PURPOSE

### 1.1 Purpose and Scope of the Addendum

This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.); the CEQA Guidelines (Title 14, California Code of Regulations [CCR] Section 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Arcadia (City). The City is the lead agency under CEQA.

Section 15164(a) of the CEQA Guidelines states that “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR or negative declaration 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.” Section 15162(a) of the CEQA Guidelines indicates that the lead agency may forgo the creation of a subsequent EIR (SEIR) 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
- (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.

The Arcadia Housing Element Update (HEU) was prepared as the fifth element of the Arcadia General Plan (Arcadia GP) and functions as one of seven state-mandated General Plan elements (i.e., Land Use, Housing, Circulation, Noise, Safety, Open Space, and Conservation) that are prepared according to CGC §65583 requirements. California Government Code §65583 sets forth the specific content requirements

of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs.

The Arcadia HEU also includes policies and goals designed to assist the City in meeting its state-mandated Regional Housing Needs Assessment (RHNA) allocation. Like the creation of the Arcadia HEU, the City’s RHNA allocation is mandated by the State Housing Law as part of the periodic process of updating local General Plan Housing Elements. It quantifies the housing needs within each jurisdiction for all economic segments of the community (known as the RHNA allocation plan) in four income categories: very low, low, moderate, and above moderate. Table 1-1: City of Arcadia 2021-2029 RHNA Allocation provides the final RHNA allocation to the City.

**Table 1-1: City of Arcadia 2021-2029 RHNA Allocation**

Income Level	% of Average Median Income (AMI)	RHNA Allocation (Housing Units)
Very Low Income	0-50%	1,102
Low-Income	51-80%	570
Moderate Income	81-120%	605
Above Moderate Income	120% +	937
<b>Total</b>		3,214
<small>Source: Southern California Association of Governments (SCAG). 2021. Retrieved from: <a href="https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196">https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196</a> (accessed November 2023).</small>		

## 2.0 DESCRIPTION OF PROPOSED PROJECT

### 2.1 Project Setting and Location

The City is located in central Los Angeles County (County) in the northwest portion of the San Gabriel Valley (Valley). The City is bounded by the San Gabriel Mountains, the Angeles National Forest, and the City of Sierra Madre to the north, the City of Pasadena to the northwest, the City of Monrovia to the east and northeast, Temple City to the southwest, and unincorporated County communities to the west and southeast. Regional access to the City is provided via the Interstate 210 Freeway (I-210), which runs in an east-west direction through the northern portion of the City. The Interstate 605 Freeway (I-605), known as the San Gabriel River Freeway), runs in a north-south direction, is approximately 0.18 miles east of the City’s southeastern edge. **Exhibit 1: Regional Map** depicts the City’s location in a regional context, while **Exhibit 2: Local Vicinity Map** depicts the City in a local context.

The City is predominantly comprised of residential land uses, with other notable land uses including the Santa Anita Racetrack and Shops at Santa Anita Mall, high density residential in the area of West Huntington Drive, and industrial uses along North Peck Road and Lower Azusa Road.

The City’s topography ranges from approximately 1,800 feet above mean sea level (amsl) at the northwestern corner of the City to 320 feet amsl at the southeastern City boundary.<sup>1</sup>

### Population

<sup>1</sup> BonTerra Consulting. 2010. *Arcadia General Plan Update Draft Program EIR*. Page 4.6-5. <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Geology.pdf> (accessed November 2023).

The 2022 California Department of Finance (DOF) estimates were used for the Approved IS/ND. According to these estimates, Arcadia’s population was 55,503 people in 2022.<sup>2</sup> According to Southern California Association of Governments (SCAG) 2020 Connect SoCal Plan the City’s population in 2016 was approximately 57,300 people, and SCAG forecasts that the population will grow to 62,200 people in 2045.<sup>3</sup> Therefore, the City is projected to grow by approximately 7.8 percent (4,900 people) between 2016 and 2045.

## Housing

In 2022, the California DOF estimated Arcadia’s number of households to be 20,686.<sup>4</sup> SCAG’s 2020 Connect SoCal Plan estimated that the City’s number of households in 2016 was 19,600 and forecasts there will be an increase to 22,400 in 2045.<sup>5</sup> The City’s total number of households is forecasted to grow by approximately 2,800 through 2045, approximately a 12 percent increase. As of January 2023, the California DOF estimates that the City housing stock totaled approximately 20,686 housing units, with single-family homes (detached and attached) as the predominant housing type in the City.<sup>6</sup> Single-family housing units make up approximately 70 percent (or 14,510 units) of the housing stock, multi-family units make up approximately 30 percent (or 6,176 units).<sup>7</sup> The California DOF reports that as of January 2023 there are not any mobile homes in the City.<sup>8</sup>

## General Plan

The Arcadia General Plan (“Arcadia GP”) was adopted in November 2010. The Arcadia GP represents the community’s view of its future and is often referred to as a blueprint for growth and development.<sup>9</sup> The Arcadia GP is the City’s vision for 25 years and beyond.<sup>10</sup> Arcadia GP Chapters include: Land Use and Community Design, Economic Development, Circulation and Infrastructure, Housing, Resource Sustainability, Parks, Recreation, and Community Resources, Safety, and Noise.

The Land Use and Community Design Element identifies, preserves, and enhances the physical aspects of the City that are highly valued by City residents and the business community. The Land Use and Community Design Element also identifies goals and policies that set forth the City’s vision and fundamental land use philosophy regarding appropriate types, intensity, and location of development, and the means for maintaining the community’s environmental, social, physical, and economic health and

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<sup>2</sup> State of California. 2023. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023*. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/> (accessed November 2023).

<sup>3</sup> SCAG. 2020. *Demographics and Growth Forecast*. Page 33. [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579) (accessed November 2023).

<sup>4</sup> State of California. 2023. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023*. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/> (accessed November 2023).

<sup>5</sup> SCAG. 2020. *Demographics and Growth Forecast*. Page 33. [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579) (accessed November 2023).

<sup>6</sup> State of California. 2023. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023*. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/> (accessed November 2023).

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> City of Arcadia. 2022. *General Plan*. [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708) (accessed November 2023).

<sup>10</sup> Ibid.

vitality.<sup>11</sup> The existing Arcadia GP land use designations associated with the Project are described in **Table 2-1: Candidate Housing Sites – Existing General Plan Land Use Designations.**

**Table 2-1: Candidate Housing Sites – Existing General Plan Land Use Designations**

Land Use Designation	Description
Mixed Use (MU) (Density: 22-30 du/ac and 1.0 FAR)	Allows for commercial and residential mixed-use development that takes advantage of easy access to transit and proximity to employment centers, and that provide a complementary mix of uses that support and encourage pedestrian activity.
Commercial (C) (Density: 0.5 FAR)	Allows for a wide range of commercial uses which serve both neighborhood and citywide markets. The designation allows a broad array of commercial enterprises, including restaurants, durable goods sales, food stores, lodging, professional offices, specialty shops, indoor and outdoor recreational facilities, and entertainment uses.
Commercial (C) (Density: 80 du/ac and 1.0 FAR)	Allows for mixed-use development, and is intended to encourage a strong pedestrian-oriented environment that provides a variety of retail and service uses, restaurants, and neighborhood-serving commercial uses that complement development in the Downtown Mixed-Use areas.
Commercial/Light Industrial (C/LI) (Density: 0.5 FAR)	Allows for the development of light manufacturing, auto service and repair, office, and retail uses
High Density Residential (HDR) (Density: 12-30 du/ac)	Allows for higher density attached housing types for both renter and owner households within a neighborhood context.
Source: City of Arcadia. (2010). <i>Chapter 2: Land Use and Community Design Element</i> . Page 2-8 through 2-13. <a href="https://cms9files.revize.com/arcadia/Land%20Use%20Element%20Update%20Final.pdf">https://cms9files.revize.com/arcadia/Land%20Use%20Element%20Update%20Final.pdf</a> (accessed November 2023).	

## Zoning

The City’s Zoning information can be found in the City of Arcadia Development Code (Arcadia DC) Division 2: Zones, Allowable Uses, and Development Standards. The Zoning Code’s intent is to establish permitted land uses and development standards for each zone. It also is intended to implement Arcadia GP goals and objectives; guide and manage development within the City in accordance with the GP; and to reduce hazards to the public resulting from the inappropriate location, use, or design of buildings and other improvements. The existing zoning designations associated with the Project are described in **Table 2-2: Candidate Housing Sites – Existing Zoning.**

<sup>11</sup> City of Arcadia. 2010. *Chapter 2: Land Use and Community Design Element*. Page 2-1.  
<https://cms9files.revize.com/arcadia/Land%20Use%20Element%20Update%20Final.pdf> (accessed November 2023).

**Table 2-2: Candidate Housing Sites – Existing Zoning**

Zone	Description
Downtown Mixed Use (DMU)	Allows for complementary service and retail commercial businesses, professional offices, and residential uses located within the City’s downtown.
Commercial Manufacturing (C-M)	Allows for a complementary mix of light manufacturing businesses, and a mix of commercial and light industrial.
General Commercial (C-G)	Allows for retail and service uses, offices, restaurants, public uses, and similar and compatible uses.
Professional Office (C-O)	Allows for administrative, financial, business, professional, medical, and governmental offices.
Central Business District (CBD)	Allows for retail and service uses, professional offices, restaurants, public uses, and other similar and compatible uses. This zone also allows for residential uses above ground floor commercial or adjacent to a commercial development.
High Density Residential (R-3)	Allows for single unit attached, townhomes, condominiums, and apartment structures at a density of up to 12-30 du/ac.
<small>Source: City of Arcadia. (2023). <i>Chapter 1 Development Code</i>.  <a href="https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV2ZOALUSDEST_S9102.03COINZO">https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV2ZOALUSDEST_S9102.03COINZO</a>                      (accessed November 2023).</small>	

## 2.2 Project Description

The City of Arcadia 6<sup>th</sup> Cycle Housing Element Update Initial Study/Negative Declaration (Approved IS/ND) identified a total of 751 sites within a variety of different residentially and non-residentially zoned areas that had the capacity to accommodate up to approximately 7,222 total housing units. See Appendix A of the Approved IS/ND for a comprehensive inventory of the candidate housing sites.

The Approved IS/ND analyzed the Arcadia HEU prior to additional requested revisions from the California Department of Housing and Community Development. As such a Revised Final Arcadia 6<sup>th</sup> Cycle Housing Element Update (Final Arcadia HEU) was approved. Through revision of the original Arcadia HEU buildout potential, housing buildout for the City was reduced by 500 units to total 6,722 potential units.

The City of Arcadia Housing Element Rezone Project (Project) proposes General Plan Amendments and Zone changes which are intended to modify the existing allowed dwelling unit per acre (du/ac) density for selected parcels within the City. The proposed Project would apply General Plan Amendments and Zone Changes to parcels identified within the Arcadia HEU as well as parcels not originally identified in the Arcadia HEU. The purpose of this is to create a more comprehensive, and consistent land use pattern throughout the City.

Proposed General Plan Amendments would expand the DMU land use designation, add a Downtown Mixed Use Overlay over specific properties, increase the allowed density for the MU and R-3 land use designations, and establish a new Residential Flex Overlay zone in areas along Live Oak Avenue, Las Tunas Drive, and in the General Commercial land use designation. These General Plan Amendments and Zone Changes are listed specifically below, under Section **2.3, Project Approvals**.

The expansion of rezone actions to the land uses and zoning designations listed above is estimated to generate approximately 343 additional units within the City. When combined with the estimates of the Final Arcadia HEU, this would generate a 7,065-unit total increase in housing supply in the City.

This CEQA document addresses the development capacity generated through the combination of additional rezone parcels with the estimates provided in the Final Arcadia HEU and provides a discussion of environmental effects based on the analyses and conclusions provided in the Approved IS/ND.

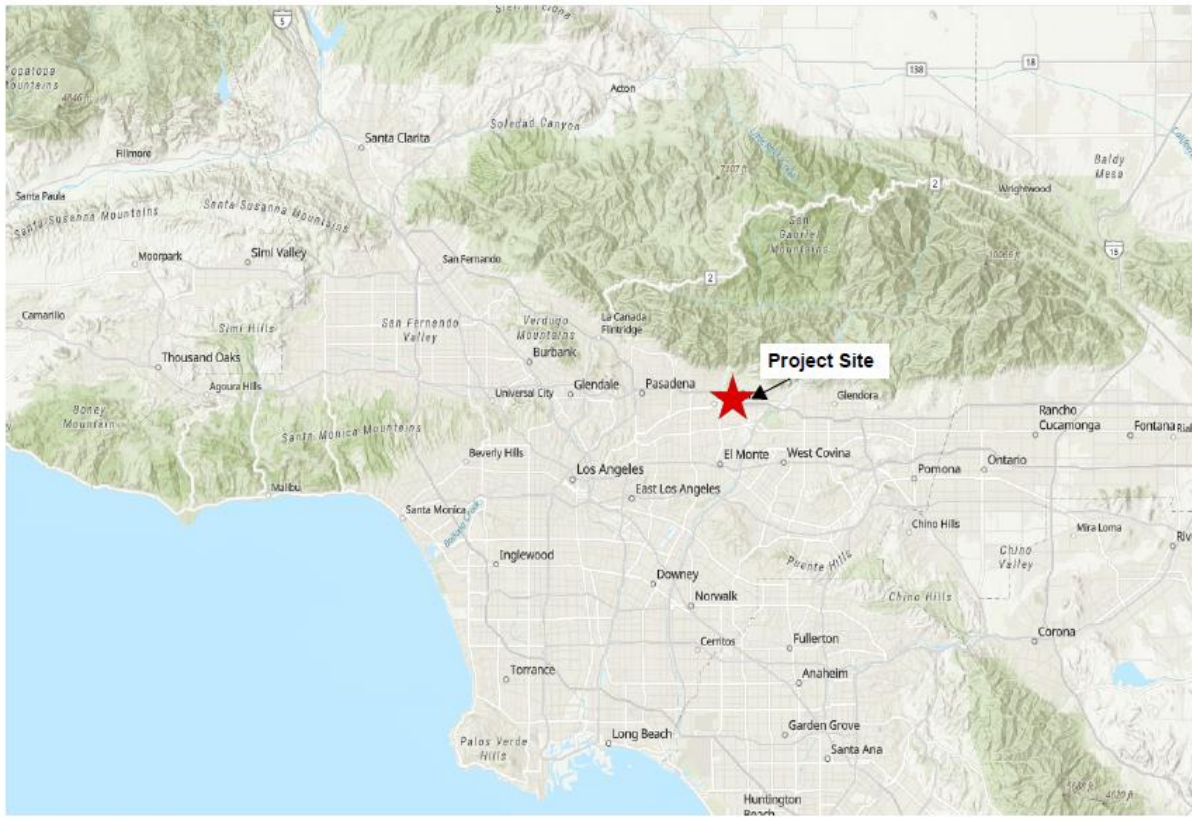
## 2.3 Project Approvals

The City is the Lead Agency as set forth in CEQA Statute Section 21067 and is responsible for reviewing and approving this IS/ND. In addition to this IS/ND, the City will consider the following discretionary approvals for the Project: A General Plan Amendment, Zone Change, and Text Amendments to the Development Code. Each of the land use actions is described below, along with what entitlements are needed to effectuate it. Additionally, each of these rezoning efforts and General Plan Land Use changes are shown in the maps provided as **Exhibit 3** through **Exhibit 10**. It is important to note that the acreages that are listed in the section below represent the acreage of “eligible sites” that are earmarked for potential redevelopment in the future per HCD standards. Any development above and beyond the thresholds and maximums identified in the Housing Element will be subject to additional CEQA review.

Zone Change for 38.8 acres of property from General Commercial (C-G) to Downtown Mixed Use (DMU). Requires a Zone Change, General Plan Amendment and Text Amendment.

- Change the land use designation from Commercial (0.5 floor area ratio [FAR]) to Commercial (80 dwelling units [du]/acre [ac] and 1.0 FAR) for 8 acres of property to allow for a new Downtown Mixed Use Overlay Zone. Requires a Zone Change, General Plan Amendment, and Text Amendment.
- Upzone the density on the City Land Use Map from Mixed Use (22-30 du/ac) to Mixed Use (50 du/ac and 1.0 FAR) for 27.06 acres of property. Requires a General Plan Amendment and Text Amendment.
- Apply a new “Residential Flex” Land Use Designation for 6.15 acres of property along Live Oak Avenue that would change the density on the City Land Use Map from Mixed Use (22-30 du/acre) to Mixed Use (50 du/ac and 1.0 FAR).
- Apply a new “Residential Flex” Land Use Designation for 13.88 acres of property along Las Tunas Drive that would be Commercial (50 du/ac and 0.5 FAR). This includes rezoning several of the Professional Office properties to General Commercial.
- Upzone the High-Density Residential Zone (R-3) on the City Land Use Map and the City GP Land Use Element from 30 du/ac to 40 du/ac for 177.21 acres of property. Requires a General Plan Amendment and Text Amendment.
- Apply a new “Residential Flex” Land Use Designation for 73.5 acres of property in the General Commercial Zone (C-G) that would be Commercial (50 du/ac and 0.5 FAR).

**Exhibit 1: Regional Map**

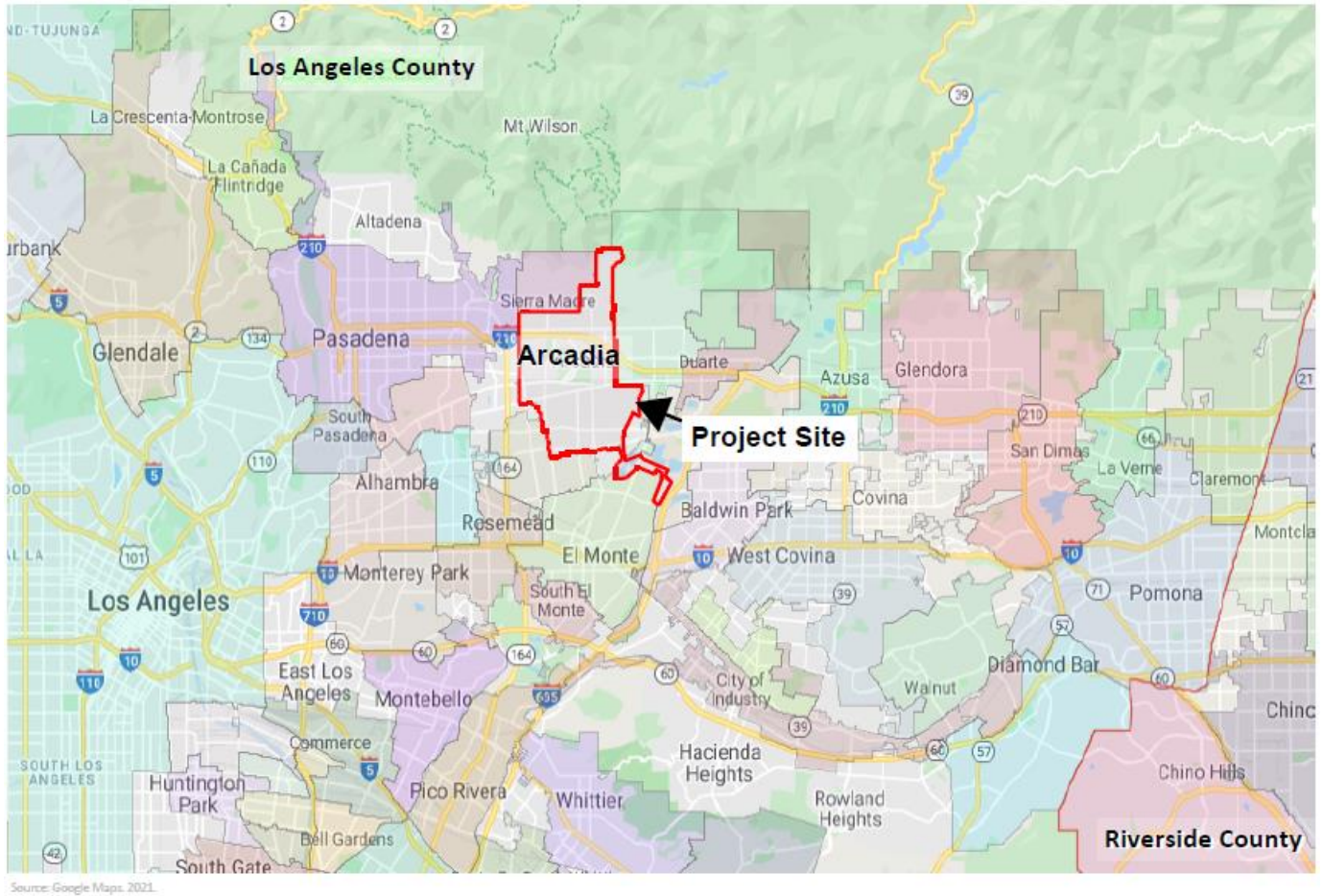


Source: ESRI World Imagery, 2021.

**EXHIBIT 1: Regional Map**  
Arcadia 6<sup>th</sup> Cycle HEU, City of Arcadia



**Exhibit 2: Local Vicinity Map**



**EXHIBIT 2:** Vicinity Map  
*Arcadia 6th Cycle HEU, City of Arcadia*



**Exhibit 3: Housing Element Update Sites – All**

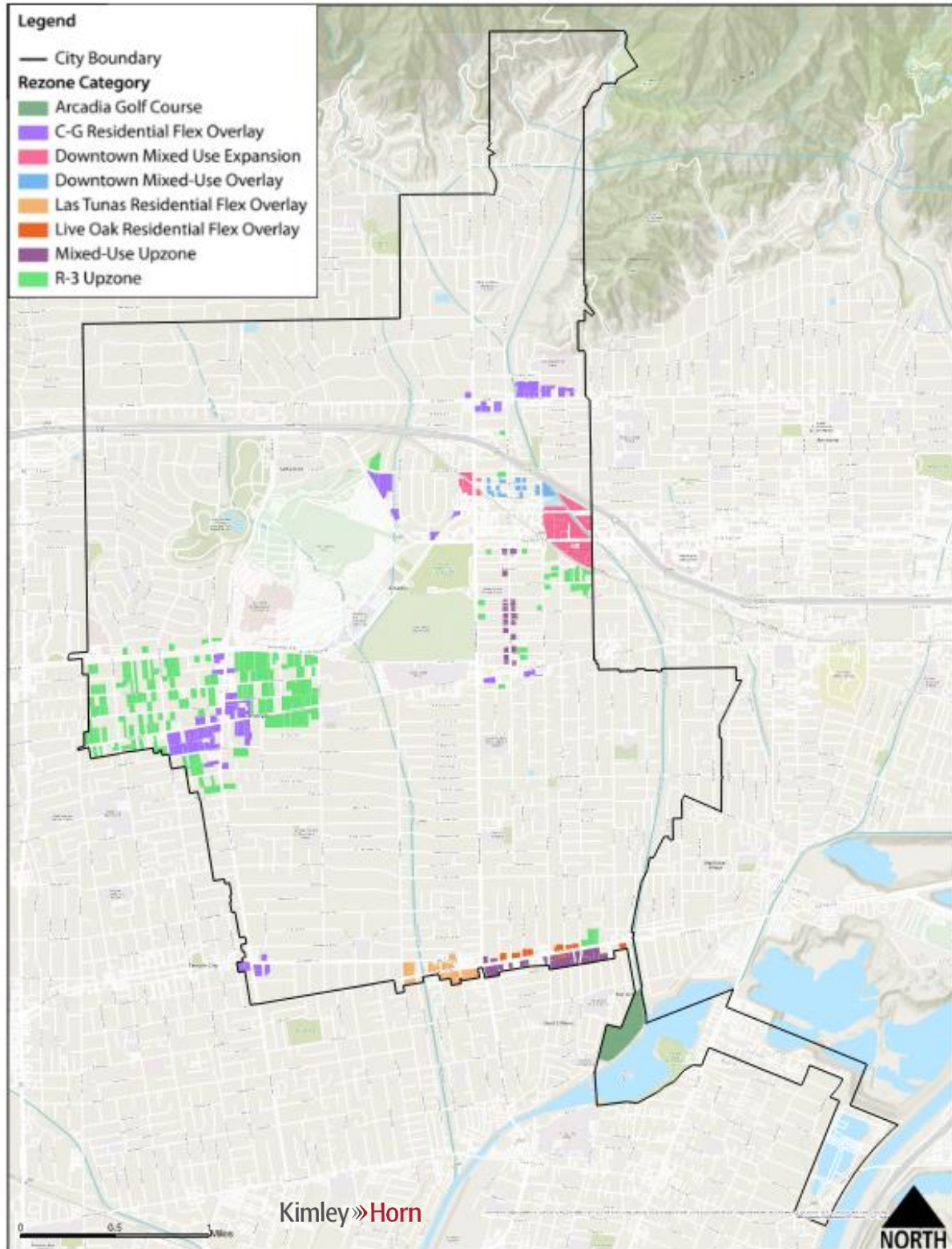
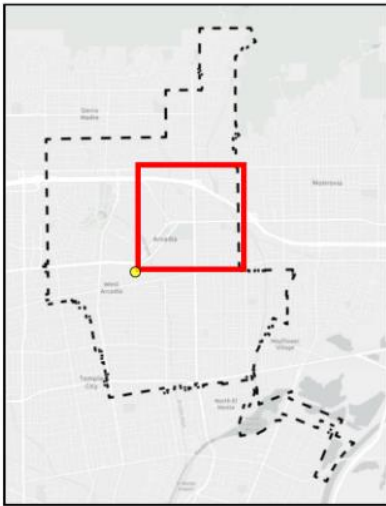


Exhibit 4: Housing Element Update Sites – East



**Legend**

- City Boundary
- Rezone Category**
- Arcadia Golf Course
- C-G Residential Flex Overlay
- Downtown Mixed Use Expansion
- Downtown Mixed-Use Overlay
- Las Tunas Residential Flex Overlay
- Live Oak Residential Flex Overlay
- Mixed-Use Upzone
- R-3 Upzone

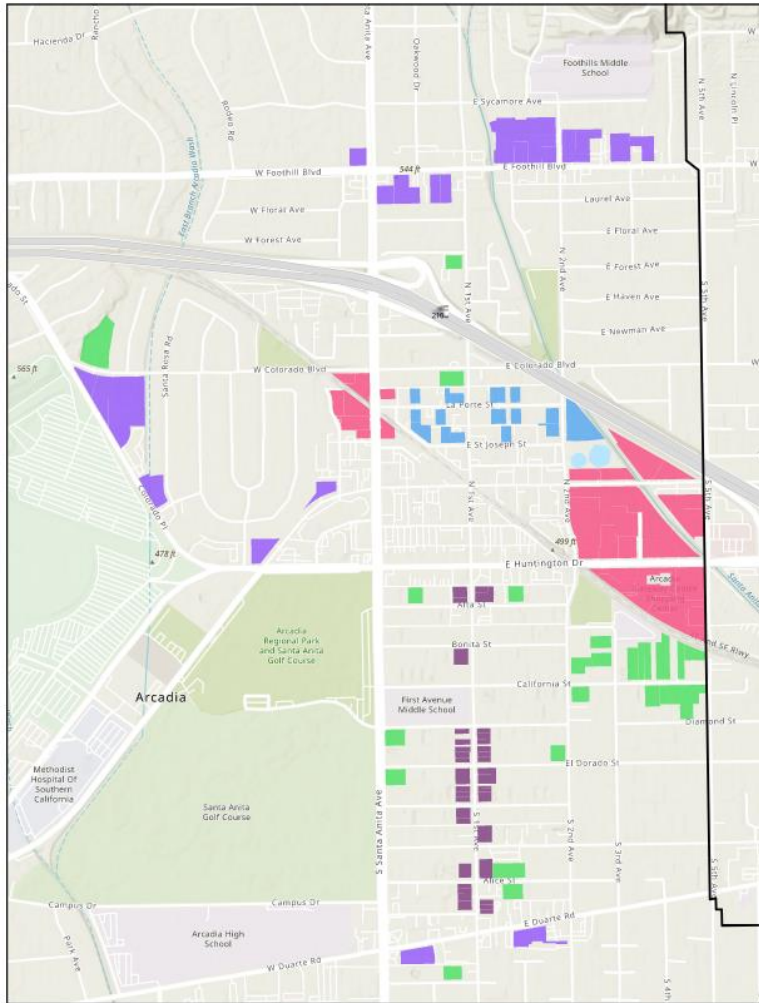


Exhibit 5: Housing Element Update Sites – West



**Legend**

- City Boundary
- Rezone Category**
- Arcadia Golf Course
- C-G Residential Flex Overlay
- Downtown Mixed Use Expansion
- Downtown Mixed-Use Overlay
- Las Tunas Residential Flex Overlay
- Live Oak Residential Flex Overlay
- Mixed-Use Upzone
- R-3 Upzone

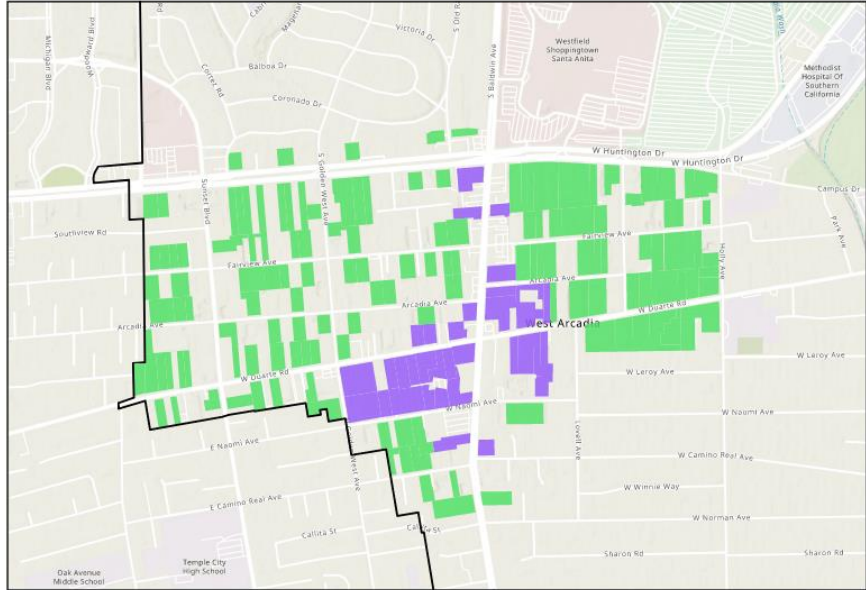
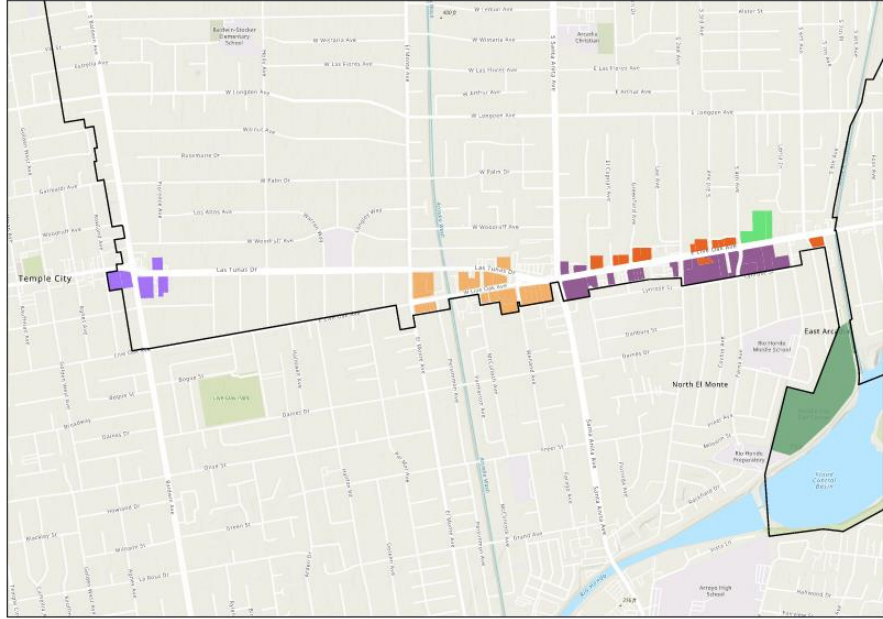


Exhibit 6: Housing Element Update Sites – South



- Legend**
- City Boundary
  - Rezone Category**
  - Arcadia Golf Course
  - C-G Residential Flex Overlay
  - Downtown Mixed Use Expansion
  - Downtown Mixed-Use Overlay
  - Las Tunas Residential Flex Overlay
  - Live Oak Residential Flex Overlay
  - Mixed-Use Upzone
  - R-3 Upzone



Exhibit 7: Project Rezone Map – All

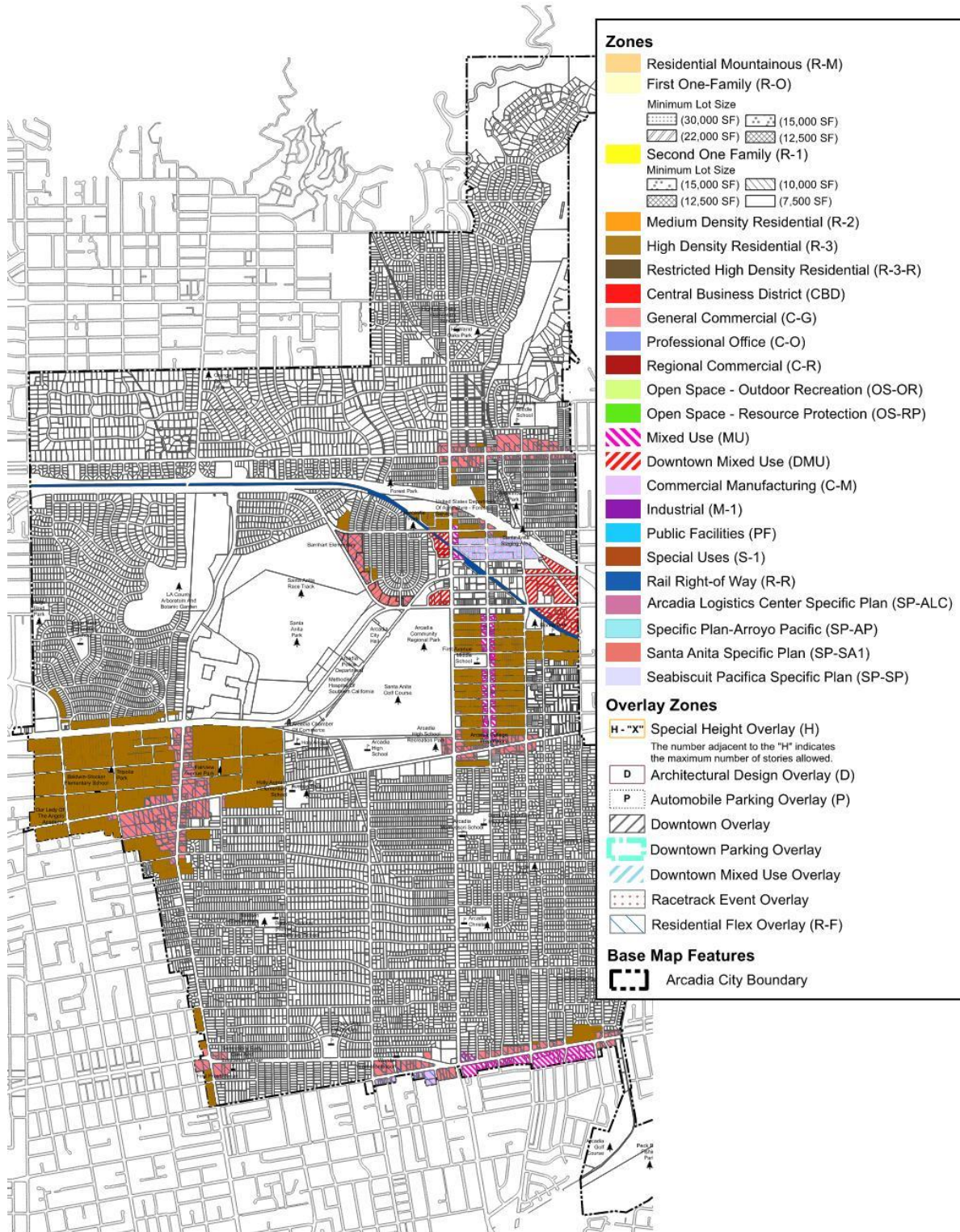


Exhibit 8: Project Rezone Map – East

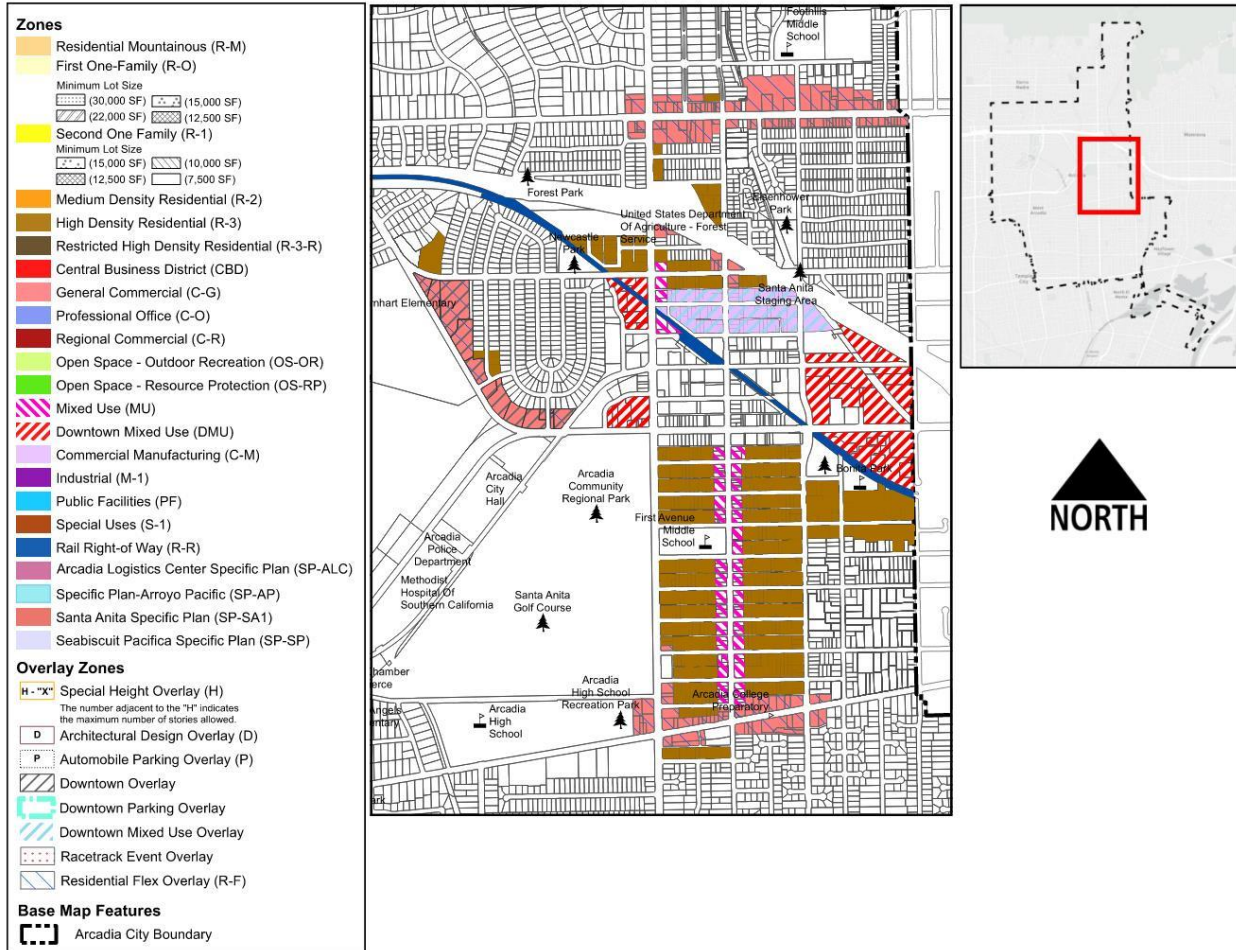


Exhibit 9: Project Rezone Map – West

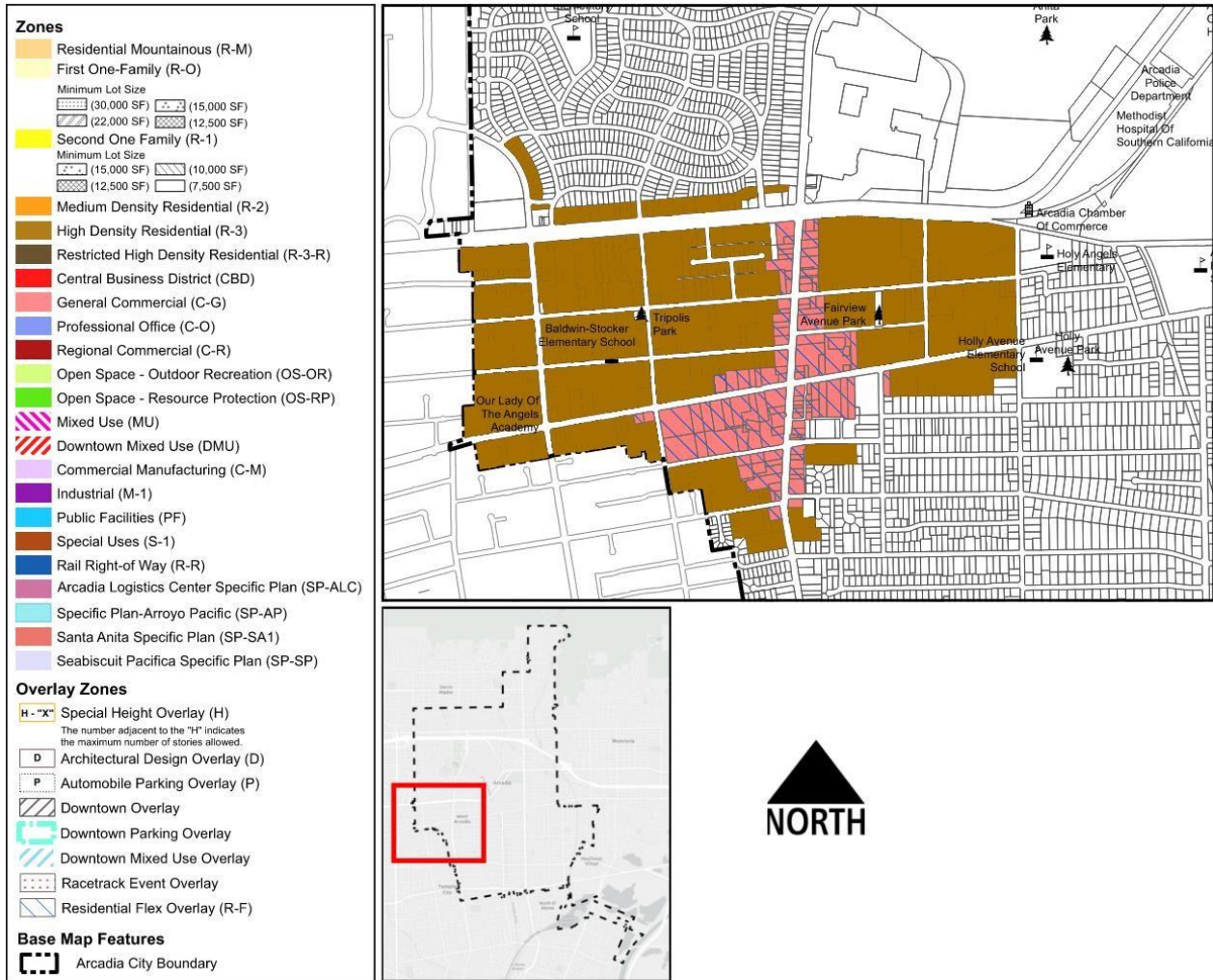
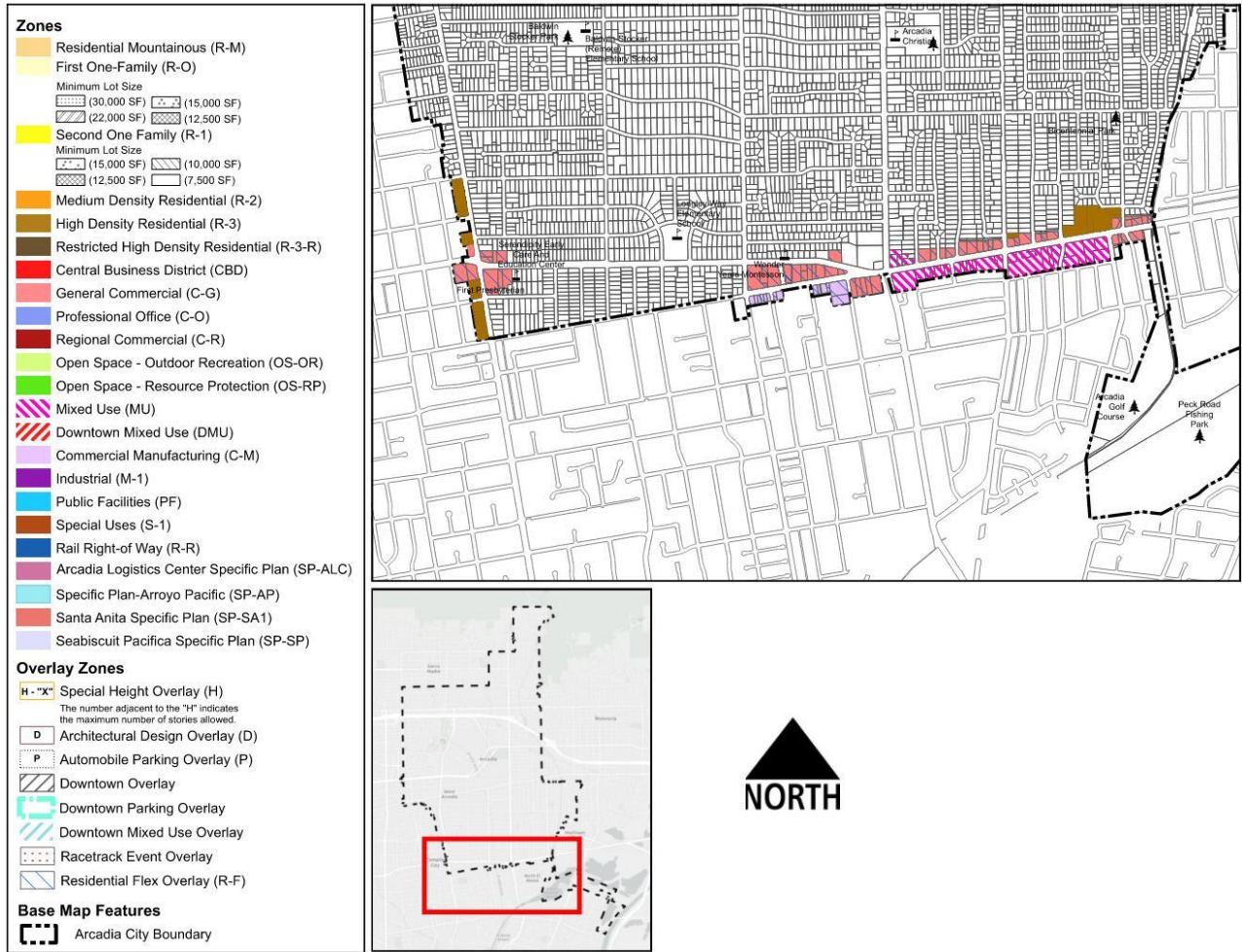


Exhibit 10: Project Rezone Map – South



### 3.0 THE ARCADIA HEU IS/ND ENVIRONMENTAL IMPACT ANALYSIS SUMMARY

The environmental impact findings of the Approved IS/ND are summarized below.

**No Impact:** The Approved IS/ND determined that no impact would occur with respect to the following environmental topic areas below:

- Agriculture and Forestry Impacts 2 (a-e)
- Air Quality Impact 3 (f)
- Biological Resources Impacts 4 (f)
- Geology and Soils Impact 7 (e)

**Less Than Significant Impact:** The Approved IS/ND identified less than significant impacts in the following environmental topic areas:

- Aesthetic Impacts 1 (a-d)
- Air Quality Impacts 3 (a-e)
- Biological Resources Impacts 4 (a-e)
- Cultural Resources Impacts 5 (a-c)
- Energy Impacts 6 (a-b)
- Geology and Soils Impacts 7 (a-d,f)
- Greenhouse Gas Emissions Impacts 8 (a-b)
- Hazards and Hazardous Materials Impacts 9 (a-g)
- Hydrology and Water Quality Impacts 10 (a-e)
- Land Use and Planning Impacts 11 (a-b)
- Mineral Resources Impacts 12 (a-b)
- Noise Impacts 13 (a-c)
- Population and Housing Impacts 14 (a-b)
- Public Services Impacts 15 (a)
- Recreation Impacts 16 (a-b)
- Transportation 17 (a-d)
- Tribal Cultural Resources Impacts 18 (a)
- Utilities and Service Systems Impacts 19 (a-e)
- Wildfire Impacts 20 (a-d)

## **4.0 CITY OF ARCADIA HOUSING ELEMENT UPDATE REZONE PROGRAM ENVIRONMENTAL IMPACT ANALYSIS AND PROJECT APPROVALS**

The scope of the City’s review of the Project is set forth in CEQA and CEQA Guidelines. This review is limited to evaluating the environmental effects associated with the Project when compared to the City Housing Element Update as set forth in the Approved IS/ND. This Addendum also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the Approved IS/ND was certified. This evaluation includes a determination as to whether the changes proposed for the Project would result in any new significant impacts or more severe significant impact.

Although CEQA Guidelines Section 15164 does not stipulate the format or content of an Addendum, the topical areas identified in the Approved IS/ND were used as guidance for this Addendum. In addition, Section 15164(e) of the CEQA Guidelines states that “A brief explanation of the decision not to prepare a subsequent [IS/ND] pursuant to Section 15162 should be included in an addendum to an [IS/ND], the lead agency's findings on the Project, or elsewhere in the record. The explanation must be supported by substantial evidence.” This comparative analysis provides the City with the factual basis for determining whether any changes in the Project, any changes in circumstances, or any new information since the Approved IS/ND was certified would require additional environmental review or preparation of a new IS/ND.

Pursuant to CEQA Guidelines Section 15162, the City has determined, on the basis of substantial evidence in the light of the whole record, that implementation of the Project does not propose substantial changes to the Approved IS/ND, and no new information of substantial importance has been revealed since the certification of the Approved IS/ND that would result in either new significant effects or an increase in the severity of previously analyzed significant effects.

## 4.1 Aesthetics

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since the Arcadia HEU does not result in direct housing construction, no significant impacts were anticipated to aesthetic resources. Future housing development assessed in the Approved IS/ND would be required to undergo project level CEQA analysis, and comply with any relevant local, state, and federal regulations regarding visual resources. Impacts were determined to be less than significant with no mitigation required.

### Analysis of Proposed Project

#### *a. Have a substantial adverse impact on a scenic vista?*

**No New or More Significant Impacts:** The Arcadia GP Final Environmental Impact Report (FEIR) identifies views of the nearby San Gabriel Mountains and San Gabriel Mountain foothills located to the north of the City as a scenic vista.<sup>12</sup> Similar to the Arcadia HEU, the Project would not have a substantial adverse effect on scenic vistas because the Project would not result in direct housing construction but would facilitate and provide a policy framework for future development on candidate housing sites throughout the City.

Additionally, all future housing facilitated by the Project would be subject to environmental review under CEQA, the City's development review process, and would be required to demonstrate consistency with Arcadia GP polices. Future housing facilitated by the Project would also have to demonstrate compliance with Arcadia MC, including Article IX, Chapter 1 – Development Code (Arcadia DC) standards. Accordingly, no new impacts relative to adverse effects on a scenic vista or a substantial increase in the severity of a previously identified significant impact evaluated in the Approved IS/ND would occur. The Project would not have a more severe or substantial adverse effect on a scenic vista than what was originally analyzed in the Approved IS/ND.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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

**No New or More Significant Impacts:** There are no officially state designated state scenic highways within the City.<sup>13</sup> The Project site is not within or adjacent to a scenic highway. The closest officially designated highway is a portion of the State Route (SR) 2 transition from Los Angeles County into San Bernardino County through the San Gabriel Mountains, approximately 6.4 miles north of the City's northern most boundary.<sup>14</sup> Therefore, no new or more severe impacts would occur in this regard. No new mitigation measures are required for issues related to aesthetics.

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<sup>12</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.1-11.

<sup>13</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.1-12.

<sup>14</sup> California Department of Transportation (Caltrans). 2021. *California State Scenic Highway System Map*. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed November 2023).

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

- c. 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?***

**No New or More Significant Impacts:** As discussed above, the Project would not result in direct housing construction, but would facilitate future housing development within urbanized areas throughout the City. The Arcadia GP contains goals and policies that govern scenic quality in the Hillside area.<sup>15</sup> However, these goals would not apply to the Project as candidate sites have not been identified within the Hillside area.

Additionally, any future housing development facilitated by the Project would be subject to the City's development review process, which could include a review pursuant to CEQA, and be required to comply with Arcadia GP policies, Arcadia MC standards, and adhere to all applicable federal, state, and local regulations. Future housing development would have potential to change the appearance of the City. However, because future housing development would be verified through the City's development review process to ensure consistency with Arcadia GP policies and Arcadia MC standards, the Project would not conflict with applicable policies or standards governing scenic quality. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required for issues related to aesthetics.

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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

**No New or More Severe Impacts:** As discussed in the Approved IS/ND, impacts regarding light and glare would remain less than significant as long as future development complies with Arcadia GP policies, Arcadia MC, and Title 24 of the California Green Building Code. The Project would be required to comply with Arcadia MC Section 9103.01.120, requiring that lighting fixtures be shielded appropriately to minimize light trespass onto surrounding properties.<sup>16</sup> The Project would remain consistent with the Approved IS/ND in this regard.

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<sup>15</sup> City of Arcadia. 2010. *Chapter 2: Land Use and Community Design Element*. Page 2-30.  
<https://cms9files.revize.com/arcadia/Land%20Use%20Element%20Update%20Final.pdf> (accessed November 2023).

<sup>16</sup> City of Arcadia. 2023. *9103.01.120 – Exterior Lighting*.  
[https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_CH1DECO\\_DIV3REAPALZOITPLGEDEST\\_S9103.01SIPLGEDEST\\_9103.01.120EXLI](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV3REAPALZOITPLGEDEST_S9103.01SIPLGEDEST_9103.01.120EXLI) (accessed November 2023).

Consistency with these policies and regulations would ensure that potential impacts associated with light and glare would be less than significant. Consistent with the Approved IS/ND, no mitigation measures are required. Therefore, no new or more severe impacts are anticipated.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

**Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to aesthetics.

## 4.2 Agriculture and Forestry

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since the City does not have agriculturally developed land within the Arcadia HEU area there would be no impact.

### Analysis of the Proposed Project

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- 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 land?*

**No New or More Significant Impacts:** As discussed above the Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. The Arcadia GP EIR states that there are no existing agricultural uses in the City or adjacent areas, and there are no lands with Williamson Act contracts in the City.<sup>17</sup> The City is predominantly categorized as urban and built-up. Additionally, future development facilitated by the Project would not occur on lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>18</sup> There are also no designated forest lands or timberlands in the City.<sup>19</sup> As such, the Project would not result in new or more severe impacts related to the loss of farmland would occur and no new mitigation measures are necessary.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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<sup>17</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.2-2.

<sup>18</sup> California Department of Conservation. 2022. *California Important Farmland Finder*. <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed November 2023).

<sup>19</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.2-2.

## **Conclusion**

The Project would not result in new or more severe impacts. No impact was identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to agriculture and forestry.

## 4.3 Air Quality

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that a less than significant impact would occur due to future developments associated with the Arcadia HEU's requirement to comply with State Air Quality regulations. In addition, future housing developments assessed in the Approved IS/ND would be required to comply with any relevant local and federal regulations regarding air quality, impacts were determined to be less than significant with no mitigation required.

### Analysis of the Proposed Project

#### *a. Conflict with or obstruct implementation of the applicable air quality plan?*

**No New or More Significant Impact:** Similar to the Arcadia HEU, the Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development. The future housing development facilitated by the Project would be subject to the City's development review process, which may include review pursuant to CEQA, and be required to comply with Arcadia MC standards, as well as required to adhere to all federal, state, and local regulations for minimizing construction and operational pollutant emissions, including South Coast Air Quality Management District (SCAQMD) Rules 402 (Nuisance), 403 (Fugitive Dust), and 1113 (Architectural Coatings). Future housing development would be required to be consistent with the Arcadia GP, including Goals RS-1, RS-2, and RS-3 which encourages the reduction of toxic emissions and carbon footprint. Therefore, no new or more severe impacts are expected, and no new mitigation measures would be required.

#### Mitigation Program

##### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

#### *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?*

**No New or More Significant Impact:** As discussed above, the Project would not result in direct housing construction, but would facilitate future housing development throughout the City, which would occur as market conditions allow and at the discretion of the individual property owners. Construction emissions would be temporary, with construction activities and associated emissions ceasing once the future housing developments are complete. As discussed above, all future housing development facilitated by the Project would be required to adhere to SCAQMD Rules 402 (Nuisance), 403 (Fugitive Dust), and 1113 (Architectural Coatings). Additionally, all future housing developments would be required to demonstrate that Volatile Organic Compounds

(VOC), Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO), Sulfur Oxides (SO<sub>x</sub>), Particulate Matter with a diameter of 10 microns or less (PM<sub>10</sub>), and Particulate Matter with a diameter of 2.5 microns or less (PM<sub>2.5</sub>) emissions would be below the significance thresholds for both construction and operational activities. In addition to the City's development review process all future housing development facilitated by the Project would be required to demonstrated compliance with federal, state, and local regulations in effect at the time of development, including Arcadia GP policies and Arcadia MC standards. Future development facilitated by the Project would also comply with the City's Environmental Assessment process outlined in the Arcadia MC §9107.03.070<sup>20</sup> which may require future housing development conduct air quality (and other technical) studies to demonstrate compliance with SCAQMD air quality construction thresholds. Therefore, no new or more severe impacts are expected, and no new mitigation measures would be required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***c. Expose sensitive receptors to substantial pollutant concentrations?***

**No New or More Significant Impact:** The Project would not impede future developments from compliance with various pollutant concentration regulations including the California Code of Regulations (CCR) 2449 and 13 CCR 2485, and requirements involving improvements in vehicular emissions. The changes proposed by the Project would not result in an increase in Diesel Particulate Matter (DPM) or potential for CO hotspots in the South Coast Air Basin (SoCAB). Additionally, it is not anticipated that the future development of housing sites facilitated by the Project would substantially increase due to changes the Project proposed and therefore, it is unlikely that future housing development facilitated by the Project would require the extensive operation of heavy-duty construction equipment, or extensive use of diesel trucks. Future housing development facilitated by the Project would be required to go through the City's development review process to demonstrate that both daily construction emissions and operations would not exceed SCAQMD's significance thresholds for any criteria air pollutant. Lastly, future construction activities would be subject to additional environmental review under CEQA and compliance with SCAQMD Rules. Therefore, no new or more severe impact would occur, and no new mitigation measures would be required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

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<sup>20</sup> City of Arcadia. 2023. 9107.03.070 Environmental Assessment. [https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_CH1DECO\\_DIV7PEPRPR\\_S9107.03APPRPR\\_9107.03.070ENAS](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV7PEPRPR_S9107.03APPRPR_9107.03.070ENAS) (accessed November 2023).

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The SCAQMD CEQA Air Quality Handbook identifies land uses such as agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding as sources of odors. The Project would not include any of these land uses that SCAQMD has identified as odor sources. However, vehicles and/or equipment exhaust during future development construction could result in odors. These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. Therefore, the Project would not create objectionable odors and no new or more severe impact would occur and no new mitigation measures would be required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

**Conclusion**

The Project would not result in new or more severe impacts. No impact was identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to air quality.

## 4.4 Biological Resources

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would have no direct physical effects on the environment, and that all future housing development facilitated by the Arcadia HEU would be subject to the City's development review process, which could include environmental review under CEQA, and would be required to demonstrate compliance with relevant federal, state, and local regulations. Impacts were determined to be less than significant.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project does not directly propose the development of housing units within the City. According to the Arcadia GP EIR, the City is predominantly built out and approximately only 91.4 acres or approximately one (1) percent of the City's total land area and its sphere of influence (SOI) remain vacant and undeveloped.<sup>21</sup> The candidate housing sites identified by the Project mostly include properties that have either been developed, disturbed, and/or adjacent to existing development. Future development facilitated by the Project could potentially impact candidate, sensitive, or special status wildlife of plan species through direct or indirect disturbance or elimination of essential habitat. Additionally, future housing development facilitated by the Project may have the potential to impact nesting birds which have acclimated to urban life and nest and forage in the local trees and shrubs. Sensitive bird species are protected under the Migratory Bird Treaty Act (MBTA). The MBTA is no longer interpreted to protect migratory birds and raptors from incidental take, however, State Fish and Game Commission §3503 and §3503.5 still provide these protections. Indirect impacts to nesting birds could occur during future development if vegetation clearing occurs during the bird breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds).

All future housing development facilitated by the Project would be subject to the City's development review process, which may include review pursuant to CEQA that includes site-specific analysis and would be required to demonstrate compliance with federal, state, and local regulations aimed at protecting biological resources. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are necessary.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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<sup>21</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.4-5.  
<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/BiologicalResources.pdf> (accessed November 2023).

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

**No New or More Significant Impact:** The Project does not directly propose housing construction but would facilitate future housing development throughout the City. Future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA which includes site-specific analysis where sensitive vegetation communities are assumed to be present. Surveys conducted as part of site-specific analysis would verify and confirm the presence of sensitive vegetation communities and determine the extent of any potential impacts and if mitigation would be needed.

As discussed above under Threshold (a) all future housing development facilitated by the Project would also be required to demonstrate compliance with federal, state, and local requirements aimed at protecting biological resources, including those in the Arcadia GP. Therefore, Project implementation would not result in new or more severe impacts and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** As discussed above, the Project would not result in direct housing construction but would facilitate future housing development throughout the City and would be subject to the City's development review process which may include project specific review under CEQA. Construction facilitated by the Project would also be required to demonstrate compliance with applicable federal, state, and local regulations for avoiding and minimizing impacts to wetlands and other waters of the U.S. and state. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***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?***

**No New or More Significant Impact:** Future construction facilitated by the Project is not anticipated to substantially interfere with the movement of native species. As discussed above, future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA, and would be required to comply with applicable federal, state, and local regulations for avoiding and minimizing interference with the movement of any native resident or migratory fish and wildlife species, migratory wildlife species, or migratory wildlife corridors. The Arcadia GP notes one area of the City, The Hillside, which contains The Wilderness Park and few private parcels which could provide suitable habitat to accommodate wildlife corridors. However, no sites identified for rezoning in conjunction with this Project would be within the Hillside portion of the City. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** Future housing development facilitated by the Project could lead to the removal of trees during construction activities. The Arcadia MC has policies and ordinances for the protection of trees. Specifically, Arcadia MC § 9110.01.030 lists protected tree species which require the provision of an applicable tree permit. These species include:

- Engelmann Oaks and Coast Live Oaks which have a trunk diameter greater than four inches when measured 4.5 feet above the root crown;
- Any other native/non-native oak tree which has a trunk diameter greater than 12 inches when measured 4.5 feet above the root crown;
- California or western Sycamore trees which have a trunk diameter greater than six inches when measured 4.5 feet above the root crown;
- Any mature tree (except those specifically listed as unprotected) which have a trunk diameter greater than 12 inches, or two trunks measuring 10 or more inches when measured 4.5 feet above the root crown.

Additionally, Arcadia MC § 9110.01.040 provides a list of specific tree species and types which are designated as unprotected. This includes:

- Fruit and Nut trees
- Shamel Ash
- Ficuses, except Moreton Bay fig
- Eucalyptus
- Tree of Heaven
- Palm Tree
- Brazilian Pepper
- Carob
- European White birch
- Silk Oak
- Mulberry
- Silver Maple
- Italian Cypress
- Western Cottonwood
- White Alder
- Black Cottonwood
- All other varieties and/or hybrids of cottonwood
- Arroyo willow
- Sweet Gum

The City has a Comprehensive Tree Management Program for the protection of street trees.<sup>22</sup> As noted above, all future housing construction facilitated by the Project would be subject to the City's development review process which may include environmental review under CEQA, and be required to demonstrate compliance with the Arcadia GP goals and policies, Arcadia MC standards, federal, state, and local regulations. Future housing development facilitated by the Project would also be required to comply with the Oak Tree Regulations and the Comprehensive

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<sup>22</sup> Ibid.

Tree Management Program. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The City currently does not have any adopted, approved, or proposed Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans that cover habitats within the City.<sup>23</sup> As noted above, the Project does not result in direct housing construction, but would facilitate future housing development throughout the City. Additionally, as discussed above all future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA, and be required to demonstrate compliance with applicable federal, state, and local regulations regarding biological resources. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to biological resources.

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<sup>23</sup> Ibid.

## 4.5 Cultural Resources

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that with compliance with established regulatory frameworks the Arcadia HEU would have less than significant impacts on cultural resources.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project proposes updates to the existing Arcadia GP, which is a policy document, and would not result in direct housing construction. Instead the Project would facilitate and provide a policy framework for future housing development throughout the City. Per the Approved IS/ND there are 31 cultural resource studies have been completed within the City, with 70 potential archaeological and historic resources identified per the records at the South Central Coastal Information Center (SCCIC). Of the 70 identified potential cultural resources, only three (3) built environmental historic resources are eligible for listing or listed in the National Register of Historic Places (NRHP). Similar to the Approved IS/ND, potential impacts to known cultural resources resulting from future housing development facilitated by the Project would be determined on a project-by-project basis at the time the projects are proposed. Additionally, all future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA, and the Project would be required to show compliance with all federal, state, and local regulations for avoiding impacts to historical resources, including the National Historic Preservation Act. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would not result in direct housing construction, but would facilitate future housing development throughout the City. A majority of the candidate housing sites identified by the Project are located in urban areas and built areas that have been developed. Future housing development facilitated by the Project could disturb and potentially destroy subsurface prehistoric/historic archaeological resources through ground disturbances. However, as discussed above future development facilitated by the Project would be subject to the City's development review process, which could include project specific environmental

review under CEQA and would be required to comply with site-specific applicable mitigation measures, if any. Additionally, future construction of housing units facilitated by the Project would be required to adhere to all federal, state, and local requirements such as the Arcadia GP which includes goals aimed at reducing impacts to archaeological resources. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***c. Disturb any human remains, including those interred outside of dedicated cemeteries?***

**No New or More Significant Impact:** The Arcadia GP EIR states that no human remains, including those interred outside of formal cemeteries, have been identified in the City.<sup>24</sup> Human remains could be accidentally uncovered during future grading and ground moving activities occurring during future housing development facilitated by the Project. Thus, future construction of the candidate housing sites have the potential to disturb sacred human remains through grading, thereby resulting in a potentially significant impact.

Additionally, in the unlikely event that human remains are discovered, the Project would comply with the provisions set forth in California PRC §5097.98 and State HSC §7050.5 and they would be implemented in consultation with the assigned most likely descendant as identified by the NAHC. No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City would also be required to comply with the California Native American Graves Protection and Repatriation Act (2001) and the Federal Native American Graves Protection and Repatriation Act (1990). Compliance with these regulations would address inadvertent uncovering of human remains during grading. Therefore, it is not anticipated that the Project would result in new or more severe impacts and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained

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<sup>24</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.5-19.  
<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/CulturalResources.pdf> (accessed November 2023).

in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to cultural resources.

## 4.6 Energy

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that with compliance with established local, state, and federal regulations implementation of the Arcadia HEU would have less than significant impacts.

### Analysis of the Proposed Project

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

#### ***Construction and Operations***

**No New or More Significant Impact:** The increased future housing development facilitated by the Project would involve increased construction activities and energy usage. However, future development facilitated by the Project would be required to undergo project level environmental review according to State CEQA Guidelines. Additionally, all future housing development facilitated by the Project would be required to comply with the City development review process, federal, state, and local requirements for energy efficiency, including Senate Bill (SB) 32's Scoping Plan that includes a 50 percent reduction in petroleum use in vehicles and the latest Title 24 standards. The future construction of housing unites facilitated by the Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, it is not anticipated that the Project would directly result in new or more severe impacts and no new mitigation measures would be required.

#### **Mitigation Program**

##### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?***

**No New or More Significant Impact:** As discussed previously, the Project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the Project would be required to comply with most current State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. The Project would also comply with policies included in the Arcadia GP such as Goal RS-5 which is aimed at reducing energy consumption. Additionally, development facilitated by the Project would be reduced compared to the Approved IS/ND. Therefore, it is not anticipated that future development facilitated by the Project would cause inefficient, wasteful, and unnecessary energy consumption. Additionally, any future housing development facilitated by the Project would also be required to obtain permits and comply with federal, state, and local

regulations aimed at reducing energy consumption. Federal and state energy regulations such as the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through future development permit review to minimize future energy consumption. Therefore, through compliance with applicable federal, state, local laws, policies, and regulations related to renewable energy and energy efficiency it is not anticipated that new mitigation measures would be required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to energy.

## 4.7 Geology and Soils

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would have no direct physical effects on the environment, and risks to the future development related to soil conditions would be less than significant.

### Analysis of the Proposed 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?**

**ii. Strong seismic ground shaking?**

**No New or More Significant Impact:** The Alquist-Priolo Zone Earthquake Fault Zoning Act (Act) was passed in 1972 to address the hazard of surface faulting to structures for human occupancy. The City contains four fault zones: the Arcadia – Colton Fault, a portion of the San Jacinto Fault, the Raymond Fault, and a portion of the Sierra Madre Fault. The portion of the Raymond Fault is considered an Alquist-Priolo Fault Zone.<sup>25</sup> However, these areas were previously evaluated in the Arcadia GP EIR analysis and were found to result in less than significant impacts with proper implementation of Arcadia GP EIR mitigation measures. Future housing development facilitated by the Project would be required to adhere to project specific mitigation measures to reduce impacts to less than significant. The Project would not conflict with the requirements of the mitigation proposed in the Arcadia GP EIR. The Project would also comply with relevant goals and policies contained within the Arcadia GP including Goal S-1, Policy S-1.2, and Policy S-1.3. Additionally, future housing development outside of the Alquist-Priolo fault zone area would be required to demonstrate compliance with the seismic design guidelines and requirements contained in the current Title 24 - California Standards Building Code (CBC). Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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<sup>25</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.6-9.  
<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Geology.pdf> (accessed November 2023).

*iii. Seismic related ground failure, including liquefaction?*

*iv. Landslides?*

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. According to the Arcadia GP Figure S-3, some of the candidate housing sites located along Live Oak Avenue and Foothill Boulevard are located in Liquefaction Zone.<sup>26</sup> Future housing facilitated by the Project would be subject to the City’s development review process, environmental review under CEQA, and would be required to comply with all applicable federal, state, and local requirements. Additionally, Arcadia MC §9105.09.110 requires the inclusion of a Soils Report in grading plans.<sup>27</sup> The Project would comply with Arcadia MC §9105.09.110 and it is not anticipated that future housing development facilitated by the Project would create substantial risks to life or property associated with expansive soils. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** As previously mentioned, the Project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development. Future development facilitated by the Project would involve grading activities that would disrupt soil profiles, and result in potential increased exposure of soils to wind and rain. Erosion on graded slopes could cause downstream sedimentation impacts. As discussed previously, future housing development facilitated by the Project would be subject to environmental review under CEQA, the City’s development review process, and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts concerning soil erosion or loss of topsoil. Additionally, prior to initiation of ground disturbing activities, future project applicants would be required to demonstrate compliance with the Arcadia MC including requirements pertaining to erosion control to the satisfaction of the City engineers, and construction-related erosion would be addressed through compliance with the National Pollutant Discharge Elimination System (NPDES) program, which requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) and best management practices (BMPs) intended to reduce soil erosion. Considering these requirements, future housing

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<sup>26</sup> City of Arcadia. 2010. *Arcadia General Plan, Chapter 8: Safety Element*. Page 8-12.

<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/general%20plan/Safety.pdf> (accessed November 2023).

<sup>27</sup> City of Arcadia. 2023. *Section 9105.09.110 – Soils Reports*.

[https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_CH1DECO\\_DIV5SU\\_S9105.09SUDEIM\\_9105.09.110\\_SORE](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV5SU_S9105.09SUDEIM_9105.09.110_SORE) (accessed November 2023).

development facilitated by the Project would not result in substantial soil erosion or loss of topsoil. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- 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?*

**No New or More Significant Impact:** As discussed above some of the candidate housing sites located along Live Oak Avenue are located in Liquefaction Zone.<sup>28</sup> However, all future housing construction facilitated by the Project would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, state, and local requirements, including the City's Building and Construction codes (Arcadia MC Article VIII). The Project would comply with these requirements, including the preparation of a Soils Report for future project level housing developments, and it is not anticipated that development facilitated by the Project would create substantial risks to life or property associated with expansive soils. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- 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?*

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. All future housing developments facilitated by the Project would be in areas served by the City's sanitary sewer system, and would not use septic tanks or other alternative wastewater disposal systems. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

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<sup>28</sup> City of Arcadia. 2010. *Arcadia General Plan, Chapter 8: Safety Element*. Page 8-12.  
<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/general%20plan/Safety.pdf> (accessed November 2023).

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would not result in direct housing construction, it would facilitate and provide a policy framework for future housing development throughout the City. There is a chance that earthwork activities associated with future housing construction facilitated by the Project would encounter a paleontological resource. As previously noted, all future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and relevant federal and State regulations regarding paleontological resources. The City's development review process may require additional studies if paleontological resources are suspected to be impacted by future development on future candidate housing sites. Compliance with the established regulatory framework would ensure potential impacts from future housing development concerning the destruction of a unique paleontological resource or unique geologic feature would be less than significant. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

## Conclusion

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to geology and soils.

## 4.8 Greenhouse Gas Emissions

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the future housing proposed by the Arcadia HEU could increase greenhouse gas emissions (GHG) in the City. However, new developments facilitated by the Arcadia HEU would be required to comply with applicable federal, state, and local regulations regarding GHG emission as a result of increase in greenhouse gas emissions (GHG) due to increased vehicle miles traveled (VMT). Additionally, the Arcadia HEU would be required to comply with energy efficiency regulations. Impacts were determined to be less than significant with no mitigation required.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project would not result in the direct construction of new housing developments in the City. The Project would lead to a reduced housing development capacity as compared to the Approved IS/ND. As such, future housing developments facilitated by the Project would result in an decreased GHG emissions due to decreased VMT, construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. However, the development of future housing units facilitated by the Project would be required comply with the City's discretionary review process, CEQA evaluation, and plan check process, which may require future applicants prepare air quality and greenhouse gas emission studies using the California Emissions Estimator Model (CalEEMod). Additionally, the future housing developments facilitated by the Project would be required to meet the mandatory energy requirements of the California Green Building Standards Code (CALGreen) and the Energy Code (CCR Title 24, Part 6) in effect at the time of development. These regulations would require that the new developments incorporate design features that would capture energy efficiencies associated with building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. The future housing developments facilitated by the Project would also be required to implement strategies outlined in the City's Climate Action Plan, which includes measures aimed at reducing GHG emissions. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### Mitigation Program

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would not result in the direct construction of new housing developments in the City. As discussed above the additional housing associated with the Project could inherently generate GHG at a rate below the previous estimates concluded in the Approved IS/ND. The future housing developments facilitated by the Project would therefore result in an decreased GHG emissions due to decreased VMT, construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. However, like the approved IS/ND new developments facilitated by the Project at the time of initiation would be required to comply with applicable federal, state, and local regulations regarding GHG emissions. This would include policies instituted by SCAQMD in which developers would be required to comply with one of five exclusion tiers to avoid significant environmental impacts. Lastly, future projects facilitated by the Project would be required to comply with the CBC including Title 24, part 11 (CALGreen). Requiring that residential developments be planned and developed in a manner that is consistent with any applicable regulations involving energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

**Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to GHG emissions.

## 4.9 Hazards and Hazardous Materials

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that due to the Arcadia HEU's lack of physical components, a minimal risk of exposure to hazardous materials would occur. Additionally, the Arcadia HEU would not include designs which would impair the implementation of an emergency response plan, or evacuation plan. The Approved IS/ND found that housing development within the Live Oak Corridor would be required to comply with height limitations in the FAR Part 77.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. The construction of future housing development facilitated by the Project would require the transport of hazardous materials (e.g., asbestos containing materials, lead-based paint, and/or contaminated soils). The transport of these materials would be limited in duration. Future development within the City would be required to comply with regulations put in place by the State Department of Toxic Substances Control (DTSC). It is not anticipated that operation of the future housing developments would utilize substantial or severe hazardous materials. Anticipated materials include cleaning solvents, fertilizers, pesticides, and other materials used in regular maintenance. No new or more severe impacts associated with the transport, use, or disposal of hazardous materials are anticipated, and no new mitigation measures would be required.

### Mitigation Program

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***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?***

**No New or More Significant Impact:** As noted above the Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. Future excavation and grading activities associated with the development of housing units could expose construction workers and the general public to unknown hazards materials present in soil or groundwater. However, all future housing developments facilitated by the Project would be subject to the City's development review process, which could include environmental review under CEQA, and be

required to demonstrate consistency with regulatory framework for minimizing upset associated with hazardous materials. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would not result in the direct construction of housing, but would facilitate future housing development throughout the City. The Project would facilitate future housing development throughout the City, including in urbanized areas and areas within 0.25 miles of a school. However, the Project does not propose land uses that would typically emit hazardous materials, substances, or wastes. As previously discussed, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. Additionally, adherence to California Hazardous Waste Control Law, California Health and Safety Code, and Resource Conservation and Recovery Act (RCRA) regulations would reduce potential impacts associated with the accidental release of hazardous materials. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***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?***

**No New or More Significant Impact:** Government Code §65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, the State Department of Health Services' lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board (SWRCB) as having underground storage tank leaks and having had a discharge of hazardous wastes or materials into the water or groundwater; as well as, lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material. The Project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing developments throughout the City. Future development facilitated by the Project would be subject to verification of the site(s) none-inclusion on the list

of hazardous waste sites (Cortese List) compiled by the DTSC pursuant to CGC §65962.5. Additionally, future development facilitated by the Project would be required to comply with Arcadia GP Goal S-4 and Implementation Actions 8-6 and 8-7, future housing development facilitated by the Project would be required to comply with existing regulations; as well as prepare Environmental Site Assessments to identify and abate hazardous material releases from prior land uses.<sup>29</sup> Lastly, compliance with applicable federal, state, and local regulations would ensure no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***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 New or More Significant Impact:** The Arcadia GP EIR, states that the closest airport to the City is the El Monte Airport, and that the Runway Protection Zone (RPZ) for the El Monte Airport does not extend into the City of Arcadia.<sup>30</sup> However, future development facilitated by the Project in the southern portion of the City, within the Live Oak Corridor and the Arcadia Golf Course may extend into the navigable airspace (within two (2) miles) of the El Monte Airport and could affect aircraft landing and take-off operations.<sup>31</sup> Therefore, future housing development facilitated by the HEU in these areas would be required to comply with the height limitations in the FAR Part 77.<sup>32</sup> Lastly, all future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all applicable regulations. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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<sup>29</sup> City of Arcadia. 2010. *Arcadia General Plan, Chapter 10: Implementation Plan*.

<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/general%20plan/Implementation%20Plan.pdf> (accessed November 2023).

<sup>30</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.7-21.

<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Hazards.pdf> (accessed November 2023).

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

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

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. The Project would also decrease allowable housing capacity in certain areas located throughout the City as compared to the Approved IS/ND. The decreased housing density associated with the Project would also decrease emergency response demands during evacuation periods as compared to the Approved IS/ND. Additionally, the Project would not directly result in modifications to circulation systems or methods for responding during periods of emergency. Furthermore, future developments would be required to undergo City review which establishes consistency with applicable building and access regulations as well as fire abatement policies. Future developments would also be required to comply with Arcadia MC §9103.07<sup>33</sup> which requires developers to include suitable site access for emergency vehicles. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** For additional information refer to **Section 4.20: Wildfire**. Future housing development facilitated by the Project would not directly or indirectly expose people or structures to a risk of loss, injury, or death involving wildland fires. As mapped by the California Department of Forestry and Fire Protection (CAL FIRE), the northern portion of the City is designated as a Very High Fire Hazard Severity Zone. The candidate housing sites may be constructed in these areas adjacent to areas near open space; therefore, risk of wildfire could occur. The City has building and fire codes that must be followed such as using fire-resistant building materials, implementing fuel modification zones, and maintaining vegetation clearance around structures is required to protect buildings and reduce the potential loss of life and property. New development in wildland and urban-wildland interface areas must be consistent with the existing regulations, including the State Fire Code, to meet fire safety standards for building construction. Through compliance with the State of California, County of San Bernardino, and the City building codes and review by the fire department to reduce wildland fires, no new or more severe impacts are anticipated, and no new mitigation measures are required.

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<sup>33</sup> City of Arcadia. 2023. *Section 9103.07 – Off-Street Parking and Loading*. [https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_CH1DECO\\_DIV3REAPALZOITPLGEDEST\\_S9103.07O\\_REPALO](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV3REAPALZOITPLGEDEST_S9103.07O_REPALO) (accessed November 2023).

## **Mitigation Program**

### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

## **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to hazards and hazardous materials.

## 4.10 Hydrology and Water Quality

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would result in a less than significant impact to hydrology and water quality resources. This was attributed to compliance with existing regulation and BMPs such as the reception of a NPDES permit and a SWPPP.

### Analysis of the Proposed Project

***a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?***

**No New or More Significant Impact:** The Project would not result in direct housing construction, but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development could result in potential impacts related to water quality over three (3) different periods:

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

To reduce the likelihood of this, housing developments facilitated by the Project would comply with policies such as those requiring the obtainment of an NPDES permit and a project specific SWPPP. Furthermore, each development would be required to complete the City's development review process, which includes review pursuant to CEQA, and the provision of a Construction Activity General Permit associated with a SWPPP. Additionally, the future development projects facilitated by the Project would be required to comply with the City's Storm Water Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8) and the Arcadia GP would need to be adhered to minimize potential impacts. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** As established in the Approved IS/ND the City's potable water supply is served by the City via the Public Works Services Department. These water utilities acquire their water from groundwater basins in the area, surface water, and from importing water from other surrounding utilities and water districts. Future housing development facilitated by the Project could increase water demand by increasing residential density and population, the City would need to meet this demand by potentially increasing the amount of imported water, and would aim to not significantly increase groundwater withdrawal. Additionally, the future construction of housing projects facilitated by the Project would involve excavation into or below the water table which would require dewatering and those dewatering operations would need to comply with all dewatering requirements to protect groundwater quality and supply. This along with BMPs that would be implemented during construction as laid out in the project specific SWPPP would limit the amount of pollution in stormwater that recharges groundwater basins. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***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 storm water drainage systems or provide substantial additional sources of polluted runoff?***
- iv. Impede or redirect flood flows?***

**No New or More Significant Impact:** The Project would not result in direct housing construction. Most candidate housing sites identified for the Project are developed and contain impervious surfaces, which direct surface flows toward existing City facilities. The City is primarily built-out, construction of future housing developments facilitated by the Project would not substantially alter the existing drainage pattern through the addition of impervious surfaces. Additionally, the

Project would result in reduced development as compared to the Approved IS/ND. Furthermore, all future housing development facilitated by the Project would be subject to environmental review under CEQA, the City's development review process, and would be required to adhere to all federal, state, and local requirements for avoiding impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river, including the City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8). Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** As established in the Approved IS/ND the City is located approximately 23.6 miles inland from the Pacific Ocean, given this distance the potential for the Project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are in the vicinity of the City; therefore, the risk of mudflow is insignificant. Additionally, as previously noted the Federal Emergency Management Agency (FEMA) identifies the entire City of Arcadia to be in Flood Hazard Zone X, which is identified as 500-year Floodplain, an area of minimal flood hazard.<sup>34</sup> This, in combination with future developers' requirements to comply with City's development review process and any state or federal regulations, which may include review pursuant to CEQA, would minimize potential risks. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** As discussed under Threshold 4.10b, the City is unlikely to face groundwater impacts through the implementation of the Project. Therefore, future housing development facilitated by the Project would not obstruct implementation of the Sustainable Groundwater Management Act (SGMA) and would comply with the Arcadia MC §7554.9 – Stormwater Management and Rainwater Retention. Additionally, the City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8)

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<sup>34</sup> FEMA. (2008). *FEMA Flood Map Service Center*. <https://msc.fema.gov/portal/search?AddressQuery=arcadia#searchresultsanchor> (accessed November 2023).

aims to protect water resources and improve water quality. The ordinance requires the use of management practices by the City and its citizens that reduce the adverse effects of polluted runoff discharges on waters of the State and control contribution of pollutants to City's municipal separate storm sewer systems (MS4s), and to ensure that the City is compliant with RWQCB and with applicable State and federal law. Like the Approved IS/ND, future developments facilitated by the Project would be required to prepare a stormwater management plan and incorporate stormwater standards manual requirements into design documents to minimize potential impacts to water quality. Further, housing developments facilitated by the Project that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to comply with the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer. It is not anticipated that future housing development facilitated by the HEU would not prevent the City's Clean Water Program from ensuring that MS4 Permit, and Basin Plan requirements are met. Lastly, all future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, state, and local requirements for avoiding and minimizing conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to hydrology and water quality.

## 4.11 Land Use and Planning

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would result in a less than significant impact relative to land use and planning since the Arcadia HEU would act as a state mandated planning document to provide guidance to the City's housing and population growth.

### Analysis of the Proposed Project

#### *a. Physically divide an established community?*

**No New or More Significant Impact:** The Project does not result in direct housing construction and all future housing development facilitated by the Project would be subject to the City's development review process and would occur as market conditions allow and at the discretion of the individual property owners. The Project would remain consistent with the Approved IS/ND in that future housing development facilitated by the Project would largely occur in developed areas and in areas currently zoned for residential uses; therefore, an increase in housing capacity would be consistent with existing zoning and would not divide an established community. Additionally, it is not anticipated that future housing developments facilitated by the Project would require substantial road-widenings or other features which could divide the established community. Lastly, candidate housing sites have been identified throughout the City and are not concentrated in a single area, thus would not divide an established community. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

#### *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?*

**No New or More Significant Impact:** The Project propose modifications to the City's General Plan and Development Code. As noted above, the Project would not result in direct housing construction, but would facilitate future housing development. As part of the Project, additional housing units would be accommodated on the candidate housing sites that are ultimately selected through revisions to the City's Housing Element. Future housing development facilitated by the Project is anticipated to increase the City's housing stock where capacity exists. Additionally, the future housing developments facilitated by the Project would undergo the City's development review process, which may include discretionary permit approval and environmental review under CEQA, as well as, be required to comply with applicable federal, state, and local laws and local policies and regulations, as applicable to new housing development. As such, the Project would be consistent with applicable land use and planning

policies in the state, regional, and local context as necessary to meet that legislation. This includes consistency with the General Plan. Finally, this Project would be implemented as a component of the City's Arcadia HEU and as such is a component of established land use plan. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. Less than significant impacts were identified in the Approved IS/ND. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to land use or planning.

## 4.12 Mineral Resources

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since there are no mining operations currently ongoing in the City and with adherence to Arcadia GP goals and policies the Arcadia HEU would have less than significant impacts on mineral resources.

### Analysis of the Proposed 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?*

**No New or More Significant Impacts:** The Project would not result in direct housing construction in the City, but would facilitate and provide a policy framework for future development throughout the City. Per the Arcadia GP EIR, there are no mining operations currently ongoing in the City.<sup>35</sup> Future housing development facilitated by the Project would be subject to discretionary permits, including the City's development review process, project level environmental review under CEQA, and comply with applicable federal, state, and local laws and local policies and regulations. Therefore, no direct physical environmental impact would occur as a result of the implementation of the Project, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

### Conclusion

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to mineral resources.

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<sup>35</sup> BonTerra Consulting. 2010. *2010 General Plan Environmental Impact Report Section 4.10 – Mineral Resources*. Page 4.10-2. Available at: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/MineralResources.pdf> (accessed November 2023).

## 4.13 Noise

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since there are no mining operations currently ongoing in the City and with adherence to Arcadia GP goals and policies the Arcadia HEU would have less than significant impacts on mineral resources.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the Project would result in construction noise generated from development activities. Generally, construction would typically involve the following construction sequences: (1) site preparation and/or demolition; (2) grading and utilities construction; (3) building construction; (4) paving; and (5) architectural coatings. Typical construction equipment would include backhoes, excavators, graders, loaders, compactors, cranes, trucks, pavers, pneumatic tools, generator sets, and air compressors. Pile driving is the only activity anticipated to generate notable noise. However, as discussed in the Approved IS/ND, future housing development facilitated by the Project is anticipated to occur in incremental phases over time based on market demand, economic, and planning considerations. As a result, construction-related noise would not be concentrated in any one area of the City. Additionally, all future housing development facilitated by the Project would be subject to the City's development review process, which may include environmental review under CEQA, and be required to comply with the Arcadia MC Chapter 6, Noise Regulation. Construction associated with future housing development facilitated by the Project would be required to comply with the Arcadia MC §4610.3 (Noise Limits) and adhere to Arcadia GP Goal N-1 and Policies N-1,1 through N-1.5 which aim to reduce any potential impacts with regard to noise.

In terms of operational noise future housing development facilitated by the Project would result in additional housing, people, pets, and automobiles in the City. Additionally, noise would be generated by stationary operation-related sources, such as heating, ventilation, and air conditioning (HVAC) units, tankless water heaters, generators, lawn maintenance equipment, and swimming pool pumps. All future housing development facilitated by the Project may be subject to discretionary permits and environmental review under CEQA and would be required to demonstrate compliance with Arcadia MC Chapter 6. All future housing development facilitated by the Project would be subject to environmental review under CEQA, the City's

development review process. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***b. Generate excessive ground borne vibration or ground borne noise levels?***

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Construction activities associated with future housing development facilitated by the Project could result in varying degrees of groundborne vibration impacts from heavy equipment operations, depending on the construction procedure and equipment used.

Based on the Federal Transit Administration (FTA) data vibration velocities from typical heavy construction equipment operations that would be used during future house development construction facilitated by the Project range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity. As assessed in the Approved IS/ND, future development facilitated by the Project would occur in incremental phases over time based on market demand, and planning considerations. As a result, ground borne vibration would not be concentrated in any one particular area of the City. Additionally, any future development within the candidate housing sites would be subject to the City's standard development review process, including compliance with the City's GP, compliance with the municipal code, and site-specific CEQA review. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***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 New or More Significant Impact:** As discussed in the Approved IS/ND there are no airports within the City. As previously discussed, the closest airport to Arcadia is the El Monte Airport, which is located approximately 1.25 miles south of the City's southern City boundary. According to the Arcadia GP EIR, aircraft operations at this airport is audible at the southern section of the

City, and flyovers at low levels are audible over the City.<sup>36</sup> Some candidate housing sites identified for the Project are located within the Live Oak Corridor and would be subject to the City's development review process on a case-by-case basis, which may include discretionary permit review and approval and environmental review under CEQA. The Project does not directly involve housing construction, and the Project would not contain policies that would conflict with airport land use plans, nor would it promote development near any airports. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to noise.

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<sup>36</sup> BonTerra Consulting. 2010. *City of Arcadia 2010 General Plan Update*. Page 4.11-30.  
<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Noise.pdf> (accessed November 2023).

## 4.14 Population and Housing

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would result in a less than significant impact related to population and housing. This was attributed to the Arcadia HEU association with the state required housing policy. Additionally, the Arcadia HEU did not directly propose any housing units, impacts were determined to be less than significant with no mitigation required.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** Similar to the Arcadia HEU analyzed in the Approved IS/ND, the Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development within the City. The Approved IS/ND assessed the Arcadia HEU’s associated 7,222 housing units. The Final Arcadia HEU contained a reduced housing development estimate of 6,722 units through the current planning period.<sup>37</sup> The Project is estimated to facilitate the development of an additional 343 housing units based on implementation of proposed General Plan Amendments and Zone Changes. This estimate, applied to the Final Arcadia HEU would facilitate a total of 7,065 housing units. As with the Approved IS/ND it is noted that this growth would occur in urbanized locations near existing utilities and service systems, and areas already served by public services (e.g., police and fire protection, and other emergency responders).

**Table 4.14-1: Population Estimate Comparison** below compares the population estimates included in the Approved IS/ND and those associated with the Project.

**Table 4.14-1: Population Increase from Housing Element**

Definition	Arcadia HEU	Project
Number of Potential Candidate Housing Units	7,222	7,065
Existing Capacity without ADUs	2,178	2,178
Existing Capacity including ADUs	2,386	2,386
New Housing Units	4,836	4,679
Persons per household ( <i>Department of Finance, 2020</i> )	2.86	2.86
Population ( <i>Department of Finance, 2020</i> )	57,820	57,820
Total Population Forecast with HEU/Project	71,651	71,202
Forecasted Population Increase with HEU/Project	13,831	13,382
Population Growth Forecast by Percentage with HEU/Project	24%	23%

<sup>37</sup> City of Arcadia. 2022. City of Arcadia 6<sup>th</sup> Cycle Housing Element Update Technical Background Report. Page A-2. Retrieved from: [https://cms9files.revize.com/arcadia/TBR\\_Arcadia%20HEU\\_Compiled\\_Clean.pdf](https://cms9files.revize.com/arcadia/TBR_Arcadia%20HEU_Compiled_Clean.pdf) (Accessed December 20, 2023)

Definition	Arcadia HEU	Project
2035 Development Capacity of 2010 Arcadia GP (Maximum Buildout)	61,995	61,995
Unplanned Additional Population Growth Forecast from 2035 Maximum Buildout with HEU/Project	9,656	9,207
Population Growth Forecast (2020-2035) percentage without HEU/Project	7.2%	7.2%
Population Growth Forecast (2020-2035) by Percentage with HEU/Project	15.6%	14.9%
Total Forecasted SCAG Population 2045	62,200	62,200
Total Forecasted SCAG Population 2045 with HEU/Project	76,031	75,582
SCAG 2045 Population Growth Forecast Percentage with HEU	22.2%	21.5%

As shown in **Table 14-1: Population Estimate Comparison**, the Project is estimated to generate an overall population growth in the City by approximately 13,382 people; an approximately 3.3 percent decrease compared to the Approved IS/ND. Housing growth and population growth associated with the portions of the Project identified in the Approved IS/ND as well as the proposed Project would continue to require compliance with state-level regulation and would therefore not be considered unplanned. Future development facilitated by the Project would also apply implementing actions included in the Arcadia HEU to increase the City’s housing capacity. Additionally, since the Project does not directly propose housing development within the City, the growth would occur based on market conditions over an extended period (i.e., 2021 through 2035). Furthermore, all future housing development facilitated by the Project would be subject to a development review process along with all federal and state requirements, such as project specific environmental review under CEQA, to assess each development’s potential effects concerning population growth. Additionally, the Project would continue to increase affordable housing units within the City which would provide housing opportunities in proximity to jobs for those employed within the City that meet these household income categories. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures would be required.

**Mitigation Program**

**Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would minimally increase the City’s potential housing stock. However anticipated housing development facilitated by the Project would still constitute an approximately 3.3 percent decrease in housing development potential in the City compared to the Approved IS/ND, and therefore would minimally increase housing availability for residents. The Project assumes future housing units would be developed within acceptable areas of the City. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

### Conclusion

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to population and housing.

## 4.15 Public Services

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since the Arcadia HEU would have no direct physical effects on the environment and would not directly propose the development of additional housing, impacts related to public services would remain less than significant. Additionally, the analysis repeated that the Arcadia HEU would not preclude future development from undergoing the City's full development review and participating in any applicable development impact fees.

### Analysis of the Proposed Project

***a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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?***

**No New or More Significant Impact:** The Project would facilitate fewer housing development compared to the Approved IS/ND while remaining consistent with the policy framework for future housing development throughout the City as provided through the Arcadia HEU. As concluded in the Approved IS/ND, the future housing development within the City would increase demand for fire protection services over time. Fire protection services are provided by the Arcadia Fire Department (AFD). The AFD would continue to provide services to the future housing developments facilitated by the Project. As discussed in the Approved IS/ND, all future housing development facilitated by the Project would be subject to the City development review process, which may include review pursuant to CEQA, and be required to comply with Arcadia GP Goal S-5 and Policies S-5.1 through S-5.12 and to adhere to the 2019 California Fire Code and Arcadia MC §3122.7 (Fire Code). Additionally, all future housing projects facilitated by the Project would be subject to development impact fees and tax revenue would be generated from their development. Future projects would also incorporate fire preventative designs and would provide access for emergency services. However, the Project's reduced development potential

would constitute a reduced demand from public services. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***b. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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?***

**No New or More Significant Impact:** The City receives police protection services from the Arcadia Police Department (APD). Future residential developments facilitated by the Project could slightly increase demand for police protection services, but it is not anticipated to negatively impact the ability of the APD to provide services to the City. Additionally, future residential developments would be pay development impact fees, and continued tax revenue that would go towards supporting public services, such as police services, facilities, and supplies. All future housing development facilitated by the Project would be subject to the City development review process, which may include review pursuant to CEQA, and be required to comply with GP Goal S 5 and Policies S-5.1 through S-5.12. However, the Project's reduced development potential would constitute a reduced demand from public services. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

***c. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 New or More Significant Impact:** As discussed above, the Project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the Project would result in an estimated unplanned population growth of approximately 13,382 people; 449 people fewer than the Approved IS/ND. The Project would generate a lower generate student population growth in the Arcadia Unified School District (AUSD). Nevertheless, a student population growth increase would also increase demand

for school services. However, any future housing development facilitated by the Project would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new residential projects to offset the cost of new development. The Project does not include the construction of new school facilities to serve future housing developments, so no physical impacts would occur in this regard due to Project implementation. However, the Project's reduced development potential would constitute a reduced demand from public services. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- d. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 New or More Significant Impact:** Please refer to Section 4.16: Recreation below.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- e. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 New or More Significant Impact:** As previously discussed, the Project would not result in direct housing construction, but would facilitate future housing development. The future housing development facilitated by the Project would result in unplanned population growth of approximately 13,382 people (an approximate 3.3 percent decrease from the Approved IS/ND), which could incrementally decrease the demand for library facilities as analyzed in the Approved IS/ND. Additionally, future residential developments would pay development impact fees and tax revenue from future residents would partially offset increased demands on library facilities. Therefore, no new or more severe impacts are anticipated, and no new mitigation measures are required.

## **Mitigation Program**

### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to public services.

## 4.16 Recreation

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that impacts to recreational facilities would be less than significant due to the Arcadia HEU's lack of directly proposed physical improvements. However, future developers would be required to adhere to any applicable recreational land development codes associated with residential development.

### Analysis of the Proposed Project

***a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**No New or More Significant Impact:** As previously discussed the Project would not directly impact recreation for the City. The future residential development facilitated by the Project would also induce decreased demand of parks and other recreational facilities compared to the Approved IS/ND. It is currently unknown until future housing projects are proposed if they would include additional recreational facilities. However, future development facilitated by the Project would be required to pay development impact fees and any tax revenue generated will benefit the funding for parks and facilities to offset potential increases in demand. Future housing projects facilitated by the Project would be reviewed by the City. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

***b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

**No New or More Significant Impact:** See threshold (a) above. The Project would not lead to direct impacts to recreation facilities, but future housing projects may necessitate the expansion of recreational facilities. At the time of construction future housing projects would undergo additional environmental review and comply with any applicable discretionary actions related to the expansion of recreational facilities. Since the Project does not propose the creation, modification, or removal of recreational facilities no new or more severe impacts would occur, and no new mitigation measures would be required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

### Conclusion

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be

consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to recreation.

## 4.17 Transportation

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that since the Arcadia HEU would have no direct physical effects on the environment and would not directly propose the development of additional housing, impacts related to public services would remain less than significant. Additionally, the analysis repeated that the Arcadia HEU would not preclude future development from undergoing the City's full development review and participating in any applicable development impact fees.

### Analysis of the Proposed Project

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

**No New or More Significant Impact:** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. The Project does not include any goals, policies, or implementation programs that would conflict with plans or other regulations that address the circulation system. Future development projects would be reviewed on a case-by-case basis to ensure consistency with applicable regulations that address the circulation system. The Project does not propose additional components that would contradict what was established in the Approved IS/ND and is estimated to generate a decreased population. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

***b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?***

**No New or More Significant Impact:** Similar to the Approved IS/ND, all future housing development facilitated by the Project would be required to adhere to all state and local requirements for avoiding significant impacts to VMT. Additionally, any traffic demand measures required for mitigation would be required to comply with Arcadia GP Goals CI-11, CI-2, and CI-5, which encourage the maintenance of efficient roadway capacities and minimization of traffic hazards near residential uses. The candidate housing sites identified by the Project are dispersed throughout the City to reduce the potential for adverse environmental impacts. The intent is to reduce impacts related to VMT by placing housing near public transportation and recreation opportunities and away from environmentally sensitive resources. Future residential development projects would be reviewed on a case-by-case basis to ensure consistency with

application regulations that address the circulation system, including VMT. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** Much of the City is urbanized, and future housing development facilitated by the Project would occur on mostly developed properties. Thus, existing roadways are expected to continue being used as they have been previously connected and adjacent to the existing transportation network. Additionally, hazards due to a geometric design feature or incompatible uses are not anticipated. The Project would be consistent with the Approved IS/ND. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***d. Result in inadequate emergency access?***

**No New or More Significant Impact:** The Project proposes modification to City regulations regarding housing development which would allow for expanded residential development on candidate housing sites throughout the City. The increased housing density associated with the Project may increase emergency response demands during evacuation periods. It is not anticipated that future housing development would result in inadequate emergency access. However, the City has adopted the California Fire Code (CFC) under Arcadia MC §3122.11. The CFC sets standards for road dimension, design, grades, and other fire safety features. Additionally, future housing development would comply with CBC standards regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Future housing development would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

## **Mitigation Program**

### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

## **Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to transportation.

## 4.18 Tribal Cultural Resources

### Summary of Previous Environmental Analysis

The Approved IS/ND included initial consultation with tribes identified through Assembly Bill (AB 52) and Senate Bill (SB 18). No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18.

### Analysis of the Proposed Project

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

**No New or More Significant Impact:** AB 52 does not apply to this Project as this document is an Addendum to the Approved IS/ND and not subject to the provisions of AB 52. The Project contains the same footprint as the Arcadia HEU. Pursuant to AB 52 and SB 18 and as part of the Approved IS/ND the City initiated tribal consultation with interested California Native American tribes on June 10, 2021. No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18. Additionally, on June 1, 2021, the City received the negative result of the Sacred Lands File (SLF) from the Native American Heritage Commission (NAHC). As a result, it is not anticipated that new or more severe impacts would occur, and no new mitigation measures are required.

### Mitigation Program

#### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

### Conclusion

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to tribal cultural resources.

## 4.19 Utilities and Service Systems

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that the Arcadia HEU would have a less than significant impact regarding utilities and service systems within the City. This determination was due to future housing developments facilitated by the Arcadia HEU needing to comply with established regulations including those for wastewater facility usage, state recycling programs, and water usage minimization.

### Analysis of the Proposed Project

*a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

**No New or More Significant Impact:** The Project does not directly propose housing construction and all future housing development facilitated by the Project would be subject to the City's development review process as well as potential CEQA review. The City owns and operates its water distribution system through the Public Works Service Department. Future housing development facilitated by the Project would be located in developed areas of the City where water infrastructure already exists and most of the candidate housing sites also include existing connections to the Public Works Services Department system. Therefore, as concluded in the Approved IS/ND future housing development facilitated by the Project is not anticipated to require or result in the relocation or construction of new or expanded water facilities that would cause significant environmental effects.

In addition, it is anticipated that future residential developments may be required to implement a SWPPP to ensure that water quality is not degraded and that storm water flows do not exceed wastewater treatment requirements. Future housing development would also be required to adhere to all federal, state, and local requirements related to wastewater treatment during construction and operations, including the City's Sewer System guidelines (Arcadia MC Chapter 4) and required construction permits.

It is anticipated that the future residential developments facilitated by the Project would increase the demands for dry utilities. However, the candidate housing sites are located in developed areas of the City that are already served by electric power, natural gas, and telecommunications facilities. Further, most of the candidate housing sites are developed and have connections to existing dry utility infrastructure. Lastly, the future residential development facilitated by the Project would increase population in the City and increase service demand, but growth projections are consistent with regional and local plans used to guide infrastructure development. Similar to the Approved IS/ND all future housing development facilitated by the

Project would be required to meet the mandatory requirements under the City's various programs aimed at ensuring adequate supplies and service infrastructure are available to serve the new developments. Therefore, the Project would result in no new or more severe impacts as it pertains to placement of utilities and sewer systems, or wastewater treatment capacity and no new and/or modified mitigation measures are required.

## **Mitigation Program**

### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impact:** The Project would not result in direct housing construction, but would facilitate future housing development. According to the 2021 City of Arcadia Urban Water Management Plan (UWMP), the City's per capita water usage rate is approximately 230 gallons per day (gpd).<sup>38</sup> When applied to the 13,382-person population facilitated by the Project, the Project would generate a demand of 3,077,860 gpd or approximately 3,450 AFY. This would constitute approximately 25 percent of the current water demand of 13,935 AFY.<sup>39</sup> This would also lead to a 202 AFY reduction in water demand compared to the Approved IS/ND.

During dry years, the City would be able to source water from the Raymond Basin Area and the Main Basin Area. Additionally, it is anticipated that the City's diverse water supply (imported water, surface water, and groundwater) would provide adequate supply through five drought years.<sup>40</sup> Lastly, future residential project development would require preparation of a Water Supply Assessment (WSA) in order to verify sufficient water supply is available to meet the development's water demand. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

## ***Stormwater***

It is anticipated that the future residential developments facilitated by the Project would require the construction of storm drainages to tie into existing stormwater drainage facilities within existing rights-of-way. It is not anticipated that water discharged from the future residential sites would negatively affect off-site or downstream flows. See **Section 4.10: Hydrology and Water Quality** for further discussion. No new or more severe impacts are anticipated, and no new mitigation measures are required.

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<sup>38</sup> City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 4-13.

<https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (accessed November 2023).

<sup>39</sup> Ibid, Page 4-5.

<sup>40</sup> Ibid, Page 7-6.

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project projected demand in addition to the provider's existing commitments?*

**No New or More Significant Impact:** Similar to the Arcadia HEU, future housing developments facilitated by the Project would be subject to discretionary permits and would be required to adhere to all federal, state, and local requirements related to wastewater treatment during construction and operations, including the City's Sewer System guidelines (Arcadia MC Chapter 4) and required construction permits. The Project is only proposing an additional 117 residential dwelling units compared to the Approved IS/ND. Considering these requirements, and the available capacity discussed above, the Project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

## Mitigation Program

### Mitigation Measures from the Approved IS/ND

None identified in the Approved IS/ND.

- 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?*

**No New or More Significant Impact:** Although the Project would facilitate increased housing development, it is not anticipated that the future residential projects would lead to inadequate landfill capacity at the Scholl Canyon Landfill, which has a daily capacity of 3,400 tons per day. The landfill has the capacity for 58.9 million cubic yards and has an operational life through 2030.<sup>41</sup> Solid waste generated from future housing developments facilitated by the Project would represent a reduction in disposal rates in comparison to those analyzed in the Approved IS/ND. It is anticipated that existing landfill capacity would be sufficient to serve future development within the City. Additionally, future housing development facilitated by the HEU would be subject to the City's development review process, which may include discretionary permit review and approval; as well as environmental review under CEQA, and be required to adhere to all federal,

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<sup>41</sup> CalRecycle. 2011. *SWIS Facility/Site Activity Details Scholl Canyon Landfill (19-AA-0012)*.  
<https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3531?siteID=1000> (accessed November 2023).

State, and local requirements for solid waste reduction and recycling. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

#### ***e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?***

**No New or More Significant Impact:** As previously noted, the Project would not result in direct housing construction, but would facilitate future housing development. All future residential developments facilitated by the Project would be required to demonstrate compliance with federal, state, and local statutes and regulations for solid waste. Construction activities would be subject to compliance with the 50 percent diversion of solid waste requirement pursuant to the California Integrated Waste Management Act of 1989 (AB 939). Additionally, AB 341 requires that Cities and Counties implement recycling programs, reduce refuse at the source, and compost waste to achieve the established 75 percent diversion of solid waste from landfills. Further, future construction of residential developments would be required to comply with the most recent CalGreen Code, which implements design and construction measures that aim to reduce construction related waste through material conservation measures and other construction-related efficiency measures. Therefore, no new or more severe impacts would occur, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

### **Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to utilities and service systems.

## 4.20 Wildfire

### Summary of Previous Environmental Analysis

The Approved IS/ND concluded that most of the candidate sites identified for the Arcadia HEU except those in the northernmost portion of the City, are not located within a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (VHFHSZ). Future development facilitated by the Arcadia HEU would also require additional project level City and CEQA review for wildfire risk. The Approved IS/ND determined that the Arcadia HEU would have a less than significant impact in regard to wildfire.

### Analysis of the Proposed Project

#### ***a. Substantially impair an adopted emergency response plan or emergency evacuation plan?***

**No New or More Significant Impact:** As previously discussed the Project would not result in direct housing construction, but would facilitate future housing development. The candidate housing sites are located in developed areas of the City which reduces risk for wildland fire in the wildland urban interface. It is not anticipated that emergency services traveling from the City to undeveloped areas of the City would be impeded by future construction facilitated by the Project. According to the CalFire Hazard Severity Zone Map, the majority of the candidate housing sites, except those north of Foothill Boulevard, are not within an SRA or a VHFHSZ.<sup>42</sup> The candidate housing sites north of Foothill Boulevard are located in a VHFHSZ and a Local Responsibility Area (LRA). Future development facilitated by the Project would be required to comply the California Fire Code (CFC), the California Building Code (CBC), and go through the established City permitting process. As a result, the Project would not substantially impair an adopted local or county-wide emergency response or evacuation plan. Therefore, Project implementation would not result in any new or more severe impacts with respect to emergency response or evacuation plans and no new mitigation measures are required.

### Mitigation Program

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

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

**No New or More Significant Impacts:** As discussed above candidate housing sites located north of Foothill Boulevard are located in a VHFHSZ. To further minimize risk from wildfire, future development on these candidate housing sites would be required to comply with the 2022 CFC, Title 24, Part 9, §304.1.2. Future development facilitated by the Project would adhere to all other

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<sup>42</sup> CAL FIRE. 2022. FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/> (accessed November 2023).

applicable fire prevention requirements and regulations. Therefore, Project implementation would not result in any new or more severe impacts with respect to wildfire, and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

**No New or More Significant Impact:** As previously discussed, the Project would not result in direct housing construction, and would only facilitate future housing development. The candidate housing sites are located primarily in developed parts of the City, and it is anticipated that they would be served by the extension of existing utility infrastructure located in existing rights-of-way. Additionally, the need for installation and maintenance of new infrastructure (such as road, fuel breaks, emergency water resources, power lines, or other utilities) would be evaluated on a project-by-project basis during the discretionary development permit review process. Through compliance with applicable development regulations in the case of future development, Project implementation would not result in any new or more severe impacts and no new mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

- 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?*

**No New or More Significant Impact:** The Project would not result in the construction of housing, but would facilitate future housing development. Future construction facilitated by the Project would adhere to state and City codes, and emergency and evacuation plans set by the City and the County to prevent impacts to people or structures from risks, including downslope or downstream flooding, or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, Project implementation would not result in any new or more severe impacts, and no new modified mitigation measures are required.

### **Mitigation Program**

#### **Mitigation Measures from the Approved IS/ND**

None identified in the Approved IS/ND.

**Conclusion**

The Project would not result in new or more severe impacts. A less than significant impact was identified in the Approved IS/ND along with a no impact determination. The Project would be consistent with the analysis contained in the Approved IS/ND. Therefore, no new mitigation measures are required for issues related to wildfire.

## 5.0 DETERMINATION OF APPROPRIATE CEQA DOCUMENTATION

The following discussion lists the appropriate subsections of Sections 15162 and 15164 of the CEQA Guidelines and provides justification for the City to make a determination of the appropriate CEQA document for the Project, based on the environmental analysis provided above.

### CEQA Guidelines Section 15162 – Subsequent EIRs and Negative Declarations

- (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 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.

The City proposes to implement the Project within the context of the Approved IS/ND, as described in this Addendum. As discussed in the Environmental Impact Analysis section of this Addendum, no new or more severe significant environmental effects beyond what was evaluated in the Approved IS/ND would occur.

- (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.

As documented herein, no circumstances associated with the location, type, setting, or operations of the Project have substantively changed beyond what was evaluated in the Approved IS/ND; and none of the Project elements would result in new or more severe significant environmental effects than previously identified. No major revisions to the Approved IS/ND are required.

- (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 environmental effects not discussed in the previous EIR or negative declaration;

No new significant environmental effects beyond those addressed in the Approved IS/ND were identified.

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

The Approved IS/ND identified no significant effects.

- (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

The Approved IS/ND did not identify any mitigation measures.

- (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.

No other mitigation measures or feasible alternatives have been identified that would substantially reduce significant impacts.

- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subsection (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Subsequent to certification of the Approved IS/ND in February 2022, additional analyses were performed for the Project and are the subject of this Addendum. Based on the analysis in this document, the Project would not result in any new significant environmental effects, nor would it increase the severity of significant effects previously identified in the Approved IS/ND. None of the conditions listed under subsection (1) would occur that would require preparation of a subsequent EIR.

- (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 subsection (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation, no other Responsible Agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

None of the conditions listed in subsection (a) would occur as a result of the Project. No SEIR is required.

**CEQA Guidelines Section 15164 – Addendum to an EIR or Negative Declaration**

- (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.

As described above, none of the conditions described in the CEQA Guidelines Section 15162 calling for the preparation of a SEIR 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.

None of the conditions described in Section 15162 calling for preparation of a subsequent EIR would occur as a result of the Project. Therefore, an addendum to the certified Approved IS/ND is the appropriate CEQA document for the Project.

- (c) An addendum need not be circulated for public review but can be included in or attached to the Approved IS/ND or adopted negative declaration.

This Addendum will be attached to the Approved IS/ND and maintained in the administrative record files at the City.

- (d) The decision-making body shall consider the addendum with the Approved IS/ND or adopted negative declaration prior to making a decision on the project.

The City will consider this Addendum with the Approved IS/ND 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 required findings on the Project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This document provides substantial evidence for City records to support the preparation of this Addendum for the Project.

## 6.0 CONCLUSION

This Addendum has been prepared in accordance with the provisions of the CEQA Statute and the CEQA Guidelines to document the finding that none of the conditions or circumstances that would require preparation of a SEIR, pursuant to Section 15162 and Section 15164 of the CEQA Guidelines, exist in connection with the Project. No major revisions would be required to the Approved IS/ND prepared for the Arcadia HEU as a result of the Project. No new significant environmental impacts have been identified. Since the certification of the Approved IS/ND, there has been no new information showing that alternatives once considered infeasible are now feasible or showing that alternatives substantially different from those analyzed in the EIR that the City declined to adopt. Therefore, preparation of a SEIR is not required and the appropriate CEQA document for the Project is this Addendum to the Approved IS/ND. This document will be maintained in the administrative record files at the City.

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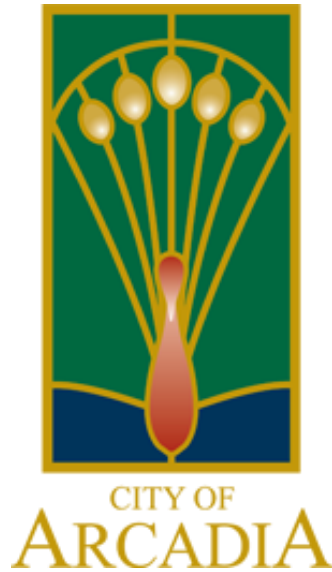
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**Arcadia 6th Cycle HEU  
Administrative Draft  
INITIAL STUDY/NEGATIVE DECLARATION**

**December 2021**

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## 1.0 INTRODUCTION

### 1.1 Project Overview

This Initial Study/Negative Declaration (IS/ND) was prepared by Kimley-Horn and Associates (Kimley-Horn) for the City of Arcadia (City) to assess whether there may be significant environmental impacts of future housing development on the candidate housing sites and of the other Project components described in Section 2.0 Project Description, associated with the proposed 6th Cycle Housing Element Update (HEU) Project (Project). The Project includes 7,222 candidate housing units within the City's boundaries; see **Appendix A: Candidate Housing Sites Inventory**. The candidate housing units are located within 751 sites, totaling approximately 512 acres. The Project area and candidate housing site locations are illustrated on **Exhibit 3: Map of Candidate Housing Sites**.

Per California Government Code (CGC) §§65580 – 65589.11, also referred to as the California Housing Law, jurisdictions are required to maintain and update Housing Elements within their General Plans. Furthermore, CGC §§65580–65589.8 require that jurisdictions evaluate their Housing Elements every eight (8) years. Currently, this regulation requires jurisdictions to update their Housing Element for the 2021 to 2029 6th Cycle Housing Element Update. The City is preparing an update for its Housing Element, which will include updated goals and policies intended to increase the City's housing potential to combat the growing housing scarcity in the State.

The HEU will provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all within the City. The HEU will be prepared to ensure the City establishes policies, procedures, and incentives in its land use planning and development activities that result in maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in the City. The Arcadia's HEU consists of four (4) sections, Chapters 5 and 10 of the Arcadia General Plan (2010), a Technical Background Section, and associated appendices. The HEU is intended to summarize the existing status of the City's communities, the City's existing housing strategy, and provide updated policies to be implemented for the 6th Cycle. To assist the State in mitigating its current housing crisis, in which residents are facing a shortage of housing units, the State Department of Housing and Community Development (HCD) Determines Regional Housing Needs Assessment (RHNA) for all the metropolitan planning organizations (MPOs) statewide. HCD approves and the Southern California Association of Governments (SCAG) adopts SCAG's RHNA allocation methodology for 196 jurisdictions in the SCAG region, which includes the City of Arcadia.

Based on SCAG's final adopted RHNA allocation in March 2020, the City's RHNA allocation was finalized as 3,214 dwelling units (DUs). This is broken down between each income category as:

- 1,102 units for very low-income households;
- 570 units for low-income households;
- 605 units for moderate-income households; and
- 937 units for above moderate-income households

This IS/ND was prepared consistent with the requirements of the California Environmental Quality Act (CEQA) on the basis that there was no substantial evidence that there may have significant environmental impacts on specific environmental areas. If a potentially significant impact may occur, the most appropriate mitigation measure(s) have been identified and would be applied to avoid or mitigate the potential impact to a level of less than significant.

## 1.2 Lead Agency

The lead agency is the public agency with primary responsibility for a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines §15051 establishes criteria for identifying the lead agency. In accordance with CEQA Guidelines §15051(b) (1), “the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” Pursuant to State CEQA Guidelines §15367 and based on the criterion above, the City of Arcadia is the lead agency for the proposed Project.

## 1.3 Purpose and Scope of the Initial Study

In accordance with CEQA (California Public Resources Code [PRC] §21000 et seq.) and its Guidelines (California Code of Regulations [CCR], Title 14, §15000 et seq.), this IS/ND has been prepared to evaluate the potential environmental effects associated with the construction and operation of the Project.

Per State CEQA Guidelines, §15070, a public agency shall prepare or have prepared a proposed negative declaration or ND for a project subject to CEQA when:

- a) The initial study shows no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The initial study identifies potentially significant effects, but:
  - 1) Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
  - 2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

## 1.4 Environmental Resource Topics

This IS/ND evaluates the proposed Project’s impacts on the following resource topics:

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

## 1.5 Document Organization

This IS/ND is divided into the following sections:

**Section 1.0: Introduction** – This section describes the purpose and organization of the document.

**Section 2.0: Project Description** describes the whole of the Project in detail. It also identifies any other public agencies whose review, approval, and/or permits may be required.

**Section 3.0: Initial Study Environmental Checklist and Evaluation** – This section describes the environmental setting and overview for each of the environmental resource topics, using the City of Arcadia’s Form J: Initial Study. It evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” and “potentially significant impact” in response to the CEQA Appendix G: Environmental Checklist Form (Environmental Checklist).

**Section 4.0: References:** The section identifies resources used to prepare the initial study.

## 1.6 Permits and Approvals

Upon its adoption by the Arcadia City Council, the 6<sup>th</sup> Cycle Housing Element Update would serve as a comprehensive statement of City’s housing policy and program of actions to support those policies. The Project involves approval of the following City of Arcadia entitlement:

- General Plan Amendment for Housing Element adoption (GPA 21-02) to include the 6<sup>th</sup> Cycle Housing Element.

## 1.7 Summary of Findings

Section 3.0 of this document contains the Environmental Checklist (Arcadia Form J – Initial Study) that was prepared for the proposed Project pursuant to Appendix G of the State CEQA Guidelines. The Environmental Checklist indicates that the proposed Project would not result in significant impacts with the implementation of mitigation measures, as identified where applicable throughout this document.

## 1.8 Initial Study Review Process

The IS and a Notice of Intent (NOI) to adopt an ND will be distributed to responsible and trustee agencies, other affected agencies, and other parties for a 30-day public review period.

Written comments regarding this ND should be addressed to:

Lisa Flores – Planning & Community Development Administrator  
240 West Huntington Drive  
P.O. Box 60021  
Arcadia, CA 91066-6021  
626-574-5445  
lflores@ArcadiaCA.gov

Comments submitted to the City during the 30-day public review period will be considered and addressed prior to the adoption of the ND by the City.

## 1.9 Project Applicant(s)/Sponsor(s)

**City of Arcadia**  
240 West Huntington Drive  
P.O. Box 60021  
Arcadia, CA 91066-6021

## 2.0 PROJECT DESCRIPTION

### 2.1 Location

The City of Arcadia (City) is located in central Los Angeles County (County) in the northwest portion of the San Gabriel Valley (Valley). The City is bounded by the San Gabriel Mountains, the Angeles National Forest, and the City of Sierra Madre to the north, the City of Pasadena to the northwest, the City of Monrovia to the east and northeast, Temple City to the southwest, and unincorporated County communities to the west and southeast. Regional access to the City is provided via the Interstate 210 Freeway (I-210), which runs in an east-west direction through the northern portion of the City. The Interstate 605 Freeway (I-605), known as the San Gabriel River Freeway), runs in a north-south direction, is approximately 0.18 miles east of the City's southeastern edge. **Exhibit 1: Regional Map** depicts the City's location in a regional context, while **Exhibit 2: Local Vicinity Map** depicts the City in a local context.

This Initial Study considers candidate housing sites to accommodate 7,222 units within the City's boundaries. The proposed number of available candidate housing units exceeds the City's RHNA allocation of 3,214 by 4,008 units.; see **Appendix A: Candidate Housing Sites Inventory**. The candidate housing sites are comprised of 751 parcels totaling approximately 512 acres. The Project area and candidate housing site locations are illustrated in **Exhibit 3: Map of Candidate Housing Sites**. Solely for analysis purposes, the candidate housing sites identified in **Appendix A** have been assigned a numeric label, as depicted on **Exhibits 3 through 13**.

### 2.2 Environmental Setting

#### Physical Setting

Arcadia is located in the northwest portion of the Valley and in the central portion of Los Angeles County. The County covers an approximately 4,084-square-mile area in the Southern California region and the Valley covers approximately 400-square-mile area.<sup>1</sup> The Valley is bounded on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills.<sup>2</sup>

The City encompasses approximately 7,109 acres of land area or 11.1 square miles.<sup>3</sup> As described above, the City is bordered by the San Gabriel Mountains, the Angeles National Forest, and the City of Sierra Madre to the north, the City of Pasadena to the northwest, the City of Monrovia to the east and northeast, Temple City to the southwest, and unincorporated County communities to the west and southeast.

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<sup>1</sup> City of Arcadia. *General Plan Final Environmental Impact Report, November 2010*. Available at [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_\\_\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning___zoning/general_plan.php#outer-708). Accessed on October 15, 2021.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

The City is predominantly comprised of residential land uses, with other notable land uses including the Los Angeles Arboretum, Santa Anita Racetrack, Arcadia County Park, Westfield Santa Anita Mall, and Santa Anita Golf Course; as well as various commercial and industrial areas throughout the City.

## Population

The 2010 Census reported the total population for the City to be 56,364 persons, which is higher than the neighboring City of Monrovia (to the east), but significantly lower than nearby jurisdictions, such as Pasadena (to the west) and El Monte (to the south); as shown in **Table 1: Population Growth (2010 – 2045)**. In addition to the data shown in **Table 1**, the California Department of Finance (DOF) estimated the total population for Arcadia to be approximately 57,660 persons in 2020.<sup>4</sup> Therefore, from 2010 to 2020, the City's population increased by approximately 2.58 percent (or 1,456 persons). The Southern California Association of Governments (SCAG) compiled a Regional Growth Forecast using data and direction from multiple state entities to produce socio-economic estimates and projections at multiple geographic levels and in multiple years. The SCAG's 2020-2045 Regional Transportation Plan and Sustainable Communities (RTP/SCS) projected Arcadia's population to be 62,200 persons by 2045.<sup>5</sup> Therefore, from 2020 to 2045, the City is expected to see an increase in population of 7.58 percent (or 4,380 persons), similar to the City of Pasadena's projected increase, but less than Cities of Monrovia and El Monte. **Table 1** shows the projected growth for Arcadia, the Cities of Monrovia, Pasadena, and El Monte, and the County of Los Angeles.

**Table 1: Population Growth (2010 – 2045)**

Jurisdictions	Population			Percent Change	
	2010 Actual <sup>1</sup>	2020 Estimate <sup>2</sup>	2045 Projected <sup>3</sup>	2010-2020	2020-2045
Monrovia	36,590	37,964	42,100	3.76%	10.90%
Pasadena	137,122	145,061	155,500	5.79%	7.20%
<b>Arcadia</b>	<b>56,364</b>	<b>57,820</b>	<b>62,200</b>	<b>2.58%</b>	<b>7.58%</b>
El Monte	113,475	116,876	137,500	3.00%	17.65%
Los Angeles County	9,818,605	10,135,614	11,674,000	3.23%	15.18%

Sources:  
<sup>1</sup> U.S. Census Bureau, 2010 Census of Population and Housing  
<sup>2</sup> DOF E-5 City/County Population and Housing Estimates 1/1/2020.  
<sup>3</sup> SCAG Connect SoCal 2020-2045 Demographics and Growth Forecast (September 3, 2020).

## Housing

In 2020, the California Department of Finance (DOF) estimated a total of 21,237 housing units in the City. According to the DOF, the City's housing stock increased by 2.66 percent (551 housing units) between 2010 and 2020. Single-family detached housing units were the most common

<sup>4</sup> California Department of Finance. *E-5 City/County Population and Housing Estimates with 2010 Census Benchmark, 1/1/2020*. Available at <https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>. Accessed on October 17, 2021.

<sup>5</sup> Southern California Association of Governments (SCAG). Retrieved from *2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction*. Accessed on October 6, 2021.

housing type in Arcadia in 2020, comprising approximately 70.34 percent (or 14,939 units). **Table 2: Housing Units (2010-2020)** shows the increase in the number of housing unit comparison between the City of Arcadia and neighboring Cities of Monrovia, Pasadena, and El Monte, and the County of Los Angeles. Arcadia experienced a smaller increase when compared to Monrovia, Pasadena, and the County. However, the City had a higher increase in the number of housing units when compared to the City of El Monte.

**Table 2: Housing Units (2010-2020)**

Jurisdictions	Housing Units		Percent Change
	2010	2020 Estimate	2010-2020
Monrovia	14,473	15,084	4.22%
Pasadena	59,551	62,753	5.38%
<b>Arcadia</b>	<b>20,686</b>	<b>21,237</b>	<b>2.66%</b>
El Monte	29,069	29,588	1.79%
Los Angeles County	3,443,087	3,590,574	4.28%

*Source: Department of Finance. May 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. <https://www.dof.ca.gov/forecasting/demographics/estimates/e-5/>.*

### Candidate Housing Sites

Every eight (8) years, SCAG prepares and designates Regional Housing Needs Allocation (RHNA) for each local jurisdiction. For the 2021-2029 planning period, Arcadia is required to meet the RHNA number of 3,214 housing units. The Housing Element is required to identify potential candidate housing sites by income category to meet the City's RHNA Allocation. The sites identified within the Housing Element represent the City's plan for housing at the designated income levels within the 6th housing cycle planning period. The identified sites are either residentially zoned at a minimum of 30 dwelling units per acre (du/ac) or within areas of focus identified by the City with supporting strategies to stimulate future housing growth.

To select the sites, the City evaluated candidate housing sites based on surrounding and existing on-site development to determine the extent to which on-site uses have the potential to redevelop within the planning period (2021-2029). The City identified 751 parcels within a variety of different residentially and non-residentially zoned areas. These 751 parcels have the capacity to accommodate up to approximated 7,222 total housing units, which includes 1,087 units under pipeline projects, 1,091 units within existing residentially zoned land, 385 projected accessory dwelling units (ADUs), and 4,748 units under rezone strategies. The candidate housing site inventory in **Appendix A** provides a breakdown of these housing sites.

### General Plan

The Arcadia General Plan (Arcadia GP) and the Arcadia GP Environmental Impact Report (Arcadia GP EIR) were adopted and certified in November 2010. The Arcadia GP provides the City's long-range planning goals and policies for development within the City. The Arcadia GP is the City's vision for growth to 2035. Arcadia GP Chapters 2 through 9 include the necessary GP elements: Land Use and Community Design, Economic Development, Circulation and

Infrastructure, Housing, Resources Sustainability, Parks, Recreation, and Community Resources, Safety, and Noise.

The Land Use and Community Design Element establishes land use designations for the City. The existing land use designations for the identified candidate housing sites are described in **Table 3: Candidate Housing Sites - Existing General Plan Land Use Designations.**

**Table 3: Candidate Housing Sites - Existing General Plan Land Use Designations**

Land Use Designation	Description
Commercial (C)	<p>The Commercial designation with a 0.5 Floor Area Ratio (FAR) is intended to permit a wide range of commercial uses which serve both neighborhood and citywide markets. The designation allows a broad array of commercial enterprises, including restaurants, durable goods sales, food stores, lodging, professional offices, specialty shops, indoor and outdoor recreational facilities, and entertainment uses. Adjacent to Downtown, the Commercial designation is intended to encourage small-scale office and neighborhood-serving commercial uses that complement development in the Downtown Mixed-Use areas. While the land use designation provides the general parameters within which development must take place, the Zoning Code or other land use regulatory document specifies the type and intensity of uses that will be permitted in a given area. In the Downtown area, for example, where properties are designated Commercial, land use regulations might specify that restaurants and cafes are permitted, but secondhand stores are not. The Zoning Code and other regulatory documents also indicate permitted building height limits for specific properties. Maximum FAR – 0.50 (0.30 FAR for Santa Anita Park) Higher intensity overlays are applied to portions of Downtown along Santa Anita Avenue, Colorado Place, and Huntington Drive (1.0 FAR).</p> <p>Building Height: up to 48 feet in the Downtown area (including Santa Anita Avenue, Colorado Place, and Huntington Drive); up to 40 feet for commercial uses outside of Downtown</p>
Commercial (C 1.0)	<p>The Commercial designation that allows mixed-use development with a density of 80 du/acre and a 1.0 Floor Area Ratio (FAR) is within the City's Downtown area. This Commercial designation is intended to encourage a strong pedestrian-oriented environment that provides a variety of retail and service uses, restaurants, and neighborhood-serving commercial uses that complement development in the Downtown Mixed-Use areas. In order to provide the residential population that is required to support the uses in the downtown and around the Metro Gold Line transit station, residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. The Development Code and other regulatory documents also indicate permitted building height limits for specific properties. Maximum FAR – 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: Up to 80 du/ac - Maximum Height: Up to 60 feet</p>
Downtown Mixed Use (DMU)	<p>The Downtown Mixed-Use designation provides opportunities for complementary service and retail commercial businesses, professional offices, and residential uses to locate within the City's downtown. Downtown Mixed Use encourages the inclusion of a ground-floor, street-frontage commercial component, but is not required. Residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. Mixed commercial/office and residential tenancies and standalone commercial or office uses are allowed. However, exclusively residential buildings are not allowed. Development approaches encourage shared use of parking areas and</p>

Land Use Designation	Description
	public open spaces, pedestrian travel ways, and interaction of uses within the district. Particular features that will define Downtown include public open space as an integral component of the Gold Line station, as well as any larger mixed-use or commercial developments. Guided by the policies and vision of the General Plan, a specific plan or subsequent zoning changes for Downtown will contain detailed development standards, infrastructure requirements, land use regulations, and implementation measures for coordinated development. Maximum FAR: 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: Up to 80 du/ac - Maximum Height: up to 60 feet
Mixed Use (MU)	The Mixed-Use designation provides opportunities for commercial and residential mixed-use development that takes advantage of easy access to transit and proximity to employment centers, and that provide complementary mixes of uses that support and encourage pedestrian activity. Mixed-use districts support commercial uses that integrate well with residential activity without creating conflicts. Development approaches encourage shared use of parking areas and public open spaces, pedestrian movement, and interaction of uses within a mixed-use district. Design approaches should minimize or limit curb cuts/driveways at the front of the development when rear or side egress options are available. Residential uses in a mixed-use development are permitted above ground floor commercial or adjacent to a commercial use. Mixed commercial/office and residential tenancies and stand-alone commercial or office uses are allowed. However, exclusively residential buildings are not. Maximum FAR – 1.0 (only commercial square footage is counted in calculation of FAR) Unit Density: 22 -30 du/ac - Maximum Height: up to 40 feet
Medium Density Residential (MDR)	The Medium Density Residential designation accommodates varied housing types and sizes within a suburban neighborhood context. Permitted residential uses include detached and attached residences with private and/or shared yards and open space areas. Other uses that may be appropriate, consistent with zoning regulations, include public and private schools, public parks, and other open space uses. Unit Density: 6 to 12 du/ac Typical Population Density: 17-35 persons per acre
High Density Residential (HDR)	The High-Density Residential designation accommodates higher-density attached housing types for both renter and owner households within a neighborhood context. Such housing types generally are located near transit stops, along arterials and transit corridors, and within easy walking distance of shops and services. Appropriate transition to adjacent lower-density neighborhoods is required through the use of yards, other open areas, and building heights. Other uses that may be appropriate, consistent with zoning regulations, include public and private schools, public parks, and other open space uses. Unit Density: 12 to 30 du/ac - Typical Population Density: 34-86 persons per acre
Commercial/ Light Industrial (C/LI)	The Commercial/Light Industrial designation provides areas for a complementary mix of light manufacturing businesses, limited auto service and repair, and support office and retail uses. The designation recognizes the importance of small-scale industrial and quasi-industrial businesses for the community in terms of business start-ups/entrepreneurship, job provision, residents' access to needed goods and services, and revenue from point-of-sales operations. Such uses are low scale, with development and operating conditions built into the development to minimize impact on surrounding uses. Permitted retail uses are limited to those that support the industrial businesses. Larger-scale commercial uses will be considered on a case-by-case basis in the Lower Azusa Road Reclamation area. Maximum FAR: 0.50

Land Use Designation	Description
Open Space – Outdoor Recreation (OS-OR)	The Open Space–Outdoor Recreation designation encompasses all City, county, state, and federal parks and associated facilities, including private facilities on leased public lands. The designation identifies public lands intended to be used for active and passive recreational activities, such as parks, golf courses, trails, and the Arboretum. Public lands used as detention basins may also be designated Open Space – Outdoor Recreation when co-located with active recreational uses or when open spaces serve two uses, such as a sports field and a detention basin. Maximum FAR: N/A
Source: City of Arcadia. (2010). <i>City of Arcadia General Plan</i> . Chapter 2: Land Use and Community Design Element. Retrieved from: <a href="https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/general%20plan/Land%20Use%20Element%20Update%20Final.pdf">https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/general%20plan/Land%20Use%20Element%20Update%20Final.pdf</a> . Accessed on October 15, 2021.	

## Zoning

The City’s Zoning Code/Development Code (Arcadia DC) can be found in City of Arcadia Municipal Code (Arcadia MC) Article IX Chapter 1. The Arcadia DC’s intent is to regulate the use and development of land within the City, consistent with the Arcadia GP.<sup>6</sup> The existing zoning for each of the candidate housing sites is specified in **Appendix A** and each zone is described below in **Table 4: Existing Zoning**.

**Table 4: Candidate Housing Sites - Existing Zoning**

Zone	Description
Commercial Manufacturing (C-M)	The C-M zone is intended to provide areas for a complementary mix of light manufacturing businesses, minor vehicle service and repairs, and support office and retail uses. A wide range of small-scale industrial and quasi-industrial uses with minimal impact to surrounding uses are appropriate. Retail uses are limited to business services, food service, and convenience goods for those who work in the area. Residential uses are not permitted in this zone. This zone implements the General Plan Commercial/Light Industrial designation.
Downtown Mixed Use (DMU)	The Downtown Mixed-Use zone is intended to provide opportunities for complementary service and retail commercial businesses, professional offices, and residential uses located within the City’s downtown. A wide range of commercial and residential uses are appropriate, oriented towards pedestrians to encourage shared use of parking, public open space, and interaction of uses within the zone. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site, and exclusive residential structures are not allowed. This zone implements the General Plan Downtown Mixed-Use designation.
General Commercial (C-G)	The C-G zone is intended to provide areas for retail and service uses, offices, restaurants, public uses, and similar and compatible uses. This zone implements the General Plan Commercial designation.
Specific Plan-Arroyo Pacific (SP-AP)	The purpose of the Arroyo Pacific Academy Specific Plan is to create an educational campus that is pedestrian-oriented and integrated with the surrounding area. More specifically, the Specific Plan creates a zone for a high school use on N. Santa Anita Avenue at the edge of Downtown Arcadia.

<sup>6</sup> City of Arcadia. *Municipal Code Article IX Chapter 1 – Development Code*. Available at [https://library.municode.com/ca/arcadia/codes/code\\_of\\_ordinances?nodeId=ARTIXDIUSLA\\_CH1DECO\\_DIV1ENAPEN\\_S9101.01PUAPDECO](https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV1ENAPEN_S9101.01PUAPDECO) Accessed on October 15, 2021.

Zone	Description
Commercial Business District (CBD)	The Commercial Business District zone is intended to promote a strong pedestrian-oriented environment and to serve community and regional needs for retail and service uses, professional offices, restaurants, public uses, and other similar and compatible uses. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site. This zone implements the General Plan Commercial designation.
Medium Density Residential (R-2)	The R-2 zone is intended to provide areas for a variety of dwelling types and accessory uses compatible with the residential use of the zone. Types of dwelling units include attached or detached single- unit and multi-unit homes and duplexes at a density of six to 12 dwelling units per acre. This zone implements is the General Plan Medium Density Residential designation.
High Density Residential Zone (R-3)	The R-3 zone is intended to provide areas for a variety of medium- to high-density residential development and accessory uses compatible with the residential use of the zone. Types of dwelling units include single unit attached, townhomes, condominiums, and apartment structures at a density of 12 to 30 units per acre. This zone implements the General Plan High Density Residential designation.
Mixed Use (MU)	The Mixed-Use zone is intended to provide opportunities for commercial and residential mixed-use development that takes advantage of easy access to transit and proximity to employment centers and encourages pedestrian activity. A wide range of integrated commercial and residential uses are appropriate. Residential uses are permitted above ground floor commercial or adjacent to a commercial development. Both uses must be located on the same lot or on the same project site, and exclusive residential structures are not allowed. This zone implements the General Plan Mixed Use designation.
Professional Commercial (C-O)	The C-O zone is intended to provide sites for development as administrative, financial, business, professional, medical and governmental offices. This zone implements the General Plan Commercial designation.
Open Space – Outdoor Recreation (OS-OR)	The OS-OR zone is intended to provide areas to be used for active and passive recreational activities, such as parks, golf courses, trails, and the Los Angeles County Arboretum. This zone implements the General Plan Open Space-Outdoor Recreation designation.
Source: City of Arcadia. (2016). <i>City of Arcadia Development Code Title IX, Division 2</i> . Available at <a href="https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/development%20code/2021%20Update/Arcadia%20DevCode%20-%20Division%20%20Zones,%20Uses,%20and%20Standards%20-TA%207-19-2021.pdf">https://www.arcadiaca.gov/Shape%20Arcadia/Development%20Services/development%20code/2021%20Update/Arcadia%20DevCode%20-%20Division%20%20Zones,%20Uses,%20and%20Standards%20-TA%207-19-2021.pdf</a> . Accessed on October 15, 2021.	

## 2.3 Background

### State Policy and Authorization

California State Housing Element Law (California Government Code Article 10.6), enacted in 1969, establishes the requirements for Housing Elements. California Government Code (CGC) §65583 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years. Additionally, the California Legislature identifies overall housing goals for the state to ensure every resident has access to housing and a suitable living environment.

## Housing Element

Through the Housing Element, all California jurisdictions (cities and counties) are mandated to adequately plan to meet the housing needs of everyone in the community, regardless of economic status.<sup>7</sup> State law requires each city and county to adopt a General Plan as a “blueprint” for its physical development. A General Plan is a key tool that addresses a variety of subject areas and expresses the community's development goals related to the jurisdiction’s future land uses. The Housing Element, one of seven State-mandated General Plan elements (i.e., Land Use, Housing, Circulation, Noise, Safety, Open Space, and Conservation), is prepared according to CGC §65583 requirements. California Government Code §65583 sets forth the specific content requirements of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs.

The City’s Housing Element is designated as Arcadia GP Chapter 5. Arcadia’s Housing Element was last adopted in 2013 for the 5th Cycle Update – 2013-2021 planning period. The City of Arcadia 6th Cycle Housing Element Update 2021-2029 (HEU or Project) is a comprehensive update to the 5th Cycle Update. The HEU is part of a new update cycle for jurisdictions within the SCAG region to allow for synchronization with SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Housing Element sets forth an eight (8) -year strategy to address the City’s identified housing needs, including specific implementing programs and activities. Some amendments have been made to Housing Element law since adoption of the City’s 5th Cycle Housing Element 2013-2021. These new statutory provisions change the Housing Element’s analysis reporting and policy requirements. The Project complies with these amendments to state housing law and all other federal, state, and local requirements.

## Household Income

The California State Department of Housing and Community Development (HCD) has identified the following income categories based on the County of Los Angeles’ Area Median Income (AMI):

- Extremely Low-income: households earning up to 30 percent of the AMI
- Very Low-income: households earning between 31 and 50 percent of the AMI
- Low-income: households earning between 51 percent and 80 percent of the AMI
- Moderate Income: households earning between 81 percent and 120 percent of the AMI
- Above Moderate Income: households earning over 120 percent of the AMI

Lower income groups refer to extremely low, very low, and low-income groups. Arcadia’s household income characteristics can help identify housing types that would be affordable to the City’s population. Income characteristics assist in determining what housing types and

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<sup>7</sup> California Department of Housing and Community Development (HCD). Available at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>. Accessed on October 6, 2021.

characteristics are required to meet the population’s needs. **Table 5: Households by Income Category in Arcadia** shows that lower income categories represent 28.74 percent of Arcadia’s households, while moderate to above moderate-income households represent 71.26 percent.

**Table 5: Households by Income Category in Arcadia**

Income Category (Percent of County MFI)	Households	Percent
Extremely Low (30% AMI or less)	2,515	8.48%
Very Low (31 to 50% AMI)	2,115	7.63%
Low (51 to 80% AMI)	2,455	12.63%
Moderate or Above (over 80% AMI)	14,245	71.26%
<b>Total</b>	<b>19,990</b>	<b>100.0%</b>

*Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.*

### Regional Housing Needs Assessment

As previously noted, CGC §65583 sets forth the specific content requirements of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs. Local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by HCD.

The City is a member agency of SCAG, who is responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region and therefore acts as the COG for San Bernardino County in this case. The RHNA is mandated by State Housing Law as part of the periodic process of updating local General Plan Housing Elements.<sup>8</sup> It quantifies the housing need within each jurisdiction for all economic segments of the community (known as RHNA allocation plan) in four (4) income categories: very low, low, moderate, and above moderate.

Per CGC §65584(d), the RHNA allocation plan determines existing and projected housing need with the following objectives:

- Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low-income households.
- Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to CGC §65080.

<sup>8</sup> Southern California Association of Governments (SCAG). *What is RHNA?* Available at <https://scag.ca.gov/rhna>. Accessed on August 10, 2021

- Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
- Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- Affirmatively furthering fair housing.

Each jurisdiction must demonstrate within its Housing Element that it can accommodate its RHNA allocation at all income levels. The California Department of Finance (DOF)'s population estimates and RHNA are also used for regional transportation planning purposes. Senate Bill (SB) 375 integrates RHNA with SCAG's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). In the past, the RHNA was undertaken independently from the RTP. However, in 2008, the California Legislature passed SB 375 as the land use and transportation planning component of the State's effort to reduce vehicle miles traveled (VMT) to achieve the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) GHG emission reduction. The law recognizes the importance of planning for housing and land use in creating sustainable communities where residents of all income levels have access to jobs, services, and housing by using transit, walking, or bicycling.

In addition, SB 166 ensures that jurisdictions at all times have sites available and identified in their Housing Elements to meet their RHNA allocation if unmet. In the event that at any time during the 6th Cycle planning period, the City does not have sufficient sites to meet their RHNA need, the City will be required to take remedial action by identifying and if necessary, rezoning, alternative sites to replace the ones not developed at the affordability or densities projected in the candidate housing sites inventory so that there is no net loss of residential unit capacity.

### **RHNA Allocation**

As previously mentioned, RHNA allocates housing need based on future estimates of housing unit growth need over the RHNA planning period (2021-2029). The RHNA allocation plan identifies the projected number of housing units that will be needed to accommodate estimated future growth need during the planning period at specified levels of affordability.

On March 4, 2021, SCAG adopted the final RHNA allocations and distributed the RHNA allocation to all local jurisdictions. **Table 6: City of Arcadia 2021-2029 RHNA Allocation** provides the final RHNA allocation to the City. The City's projected housing need for the 6<sup>th</sup> Cycle planning period is 3,214 housing units, including 1,102 very low-income units and 570 low-income units.

**Table 6: City of Arcadia 2021-2029 RHNA Allocation**

Income Level	% of Average Median Income (AMI)	RHNA Allocation (Housing Units)
Very Low Income	<50%	1,102
Low-income	50-80%	570
Moderate Income	80-120%	605
Above Moderate Income	>120%	937
<b>Total</b>		<b>3,214</b>
Source: SCAG, 2021		

In accordance with State Housing law, local governments must be accountable for ensuring that projected housing needs can be fully accommodated at all times during the Housing Element planning period. The HEU provides a framework for evaluating the adequacy of local zoning and regulatory actions to ensure each local government is providing sufficient appropriately designated land throughout the planning period. The Housing Element must identify and analyze the City’s housing needs and establish reasonable goals, objectives, and policies based on those needs. The HEU must also identify candidate housing sites with the potential to accommodate housing at higher densities to meet the City’s assigned low-income RHNA (extremely low, very low and low-income) category need.

## 2.4 Project Characteristics

### Housing Element Overview and Organization

The City of Arcadia is proposing the 6<sup>th</sup> Cycle Housing Element (2021–2029 planning period) as a comprehensive update to the City’s 5<sup>th</sup> Cycle (2013-2021) Housing Element. The City’s goal for the HEU Project is to achieve HCD certification of its 6<sup>th</sup> Cycle Housing Element. The Housing Element includes the City’s Housing Policy Plan in Chapter 10 of the Arcadia GP, which addresses the City’s identified housing needs, and includes goals, policies, and programs concerning housing and housing-related services, and the City’s approach to addressing its share of the regional housing need.

The City’s 6<sup>th</sup> Cycle Housing Element (2021-2029) has been prepared in compliance with State Housing Element law, contains the following components:

- **City of Arcadia General Plan Chapter 5: Housing Element**
- **City of Arcadia General Plan Chapter 10: Implementation Plan**
- **Technical Background Report:**
  - **Section 1: Introduction** contains a summary of the Housing Element’s content, organization, and statutory considerations;

- **Section 2: City of Arcadia Community Profile** contains analysis of the City's population, household and employment base, and the characteristics of the housing stock;
- **Section 3: Housing Constraints, Resources, and Affirmatively Furthering Fair Housing (AFFH)** examines governmental and non-governmental constraints on housing production, maintenance, and affordability and summarizes housing resources, including identification of housing sites, and funding and financial considerations
- **Section 4: Review of Past Performance** reviews and evaluations the City's housing project and program performance from the 5<sup>th</sup> Cycle (2013-2020 Planning Period).
- **Appendices:**
  - Appendix A: Adequate Sites
  - Appendix B: Community Engagement Summary
  - Appendix C: Glossary of Housing Terms

### Candidate Housing Sites Inventory

To demonstrate the availability of sites, the City completed a land inventory that identifies potential candidate housing sites with capacity to accommodate the 2021-2029 RHNA allocation. These sites represent the City's plan for housing at the designated income levels within the 6th housing cycle planning period (2021 – 2029) and are either residentially zoned at a minimum of 30 du/ac or are within areas of focus identified by the City with supporting strategies to stimulate future housing growth. It should be noted that while all the candidate sites were found to be suitable for future housing development, the HEU does not necessitate or directly propose the full development of the identified candidate sites, especially those beyond the established RHNA allocation for the City.

Through the analysis of existing residentially zoned sites and non-residentially zoned sites, the City has identified the following categories of properties to accommodate the 6th Cycle RHNA:

- 23 existing residentially zoned parcels at their existing densities
- 30 parcels as part of the Downtown Mixed Use expansion strategy
- 75 parcels as part of the Downtown Mixed Use residential flex overlay implementation strategy
- 106 parcels as part of the Mixed Use Upzone strategy
- 31 parcels as part of the Las Tunas Residential flex overlay implementation strategy
- 26 parcels as part of the Live Oak residential flex overlay implementation strategy

- 76 parcels as part of the C-G residential flex overlay implementation strategy
- 355 parcels as part of the High Density Residential (R-3) Upzone strategy
- The Arcadia Golf Course site

The City has identified a total of 751 parcels within a variety of different residentially and non-residentially zoned areas that have the capacity to accommodate up to approximately 7,222 total housing units. **Appendix A** provides a comprehensive inventory of the candidate housing sites. Each site is identified by assessor parcel number (APN) and a unique identifier. **Table 7: Summary of RHNA Status and Sites Inventory** identifies the City’s 2021-2029 RHNA by income category that meet the RHNA allocation.

**Table 7: Summary of RHNA Status and Sites Inventory (Housing Units)**

	Very Low Income	Low Income	Moderate Income*	Above Moderate Income	Total
<b>RHNA (2021-2029)</b>	<b>1,102</b>	<b>570</b>	<b>605</b>	<b>937</b>	<b>3,214</b>
	<b>1,672</b>				
<b>Unit Capacity on Site Inventory</b>					
Pipeline Projects	26	80	981	1,087	
Existing Residentially Zoned Land	277	112	702	1,091	
Accessory Dwelling Unit Projection	202	6	88	296	
<b>Total Existing Capacity</b>	<b>303</b>	<b>192</b>	<b>1,683</b>	<b>2,178</b>	
<b>Total Existing Capacity plus ADUs</b>	<b>443</b>	<b>198</b>	<b>1,771</b>	<b>2,474</b>	
<b>Remaining Unmet RHNA</b>	<b>1,167</b>	<b>407</b>	--	<b>1,574<sup>1</sup></b>	
<b>Focus Areas</b>					
Downtown Mixed-Use	375	148	960	1,483	
Mixed-Use Upzone	124	51	302	477	
Live Oak Residential Flex	203	82	509	794	
C-G Residential Flex	252	100	640	992	
R-3 Upzone	213	84	513	810	
Arcadia Golf Course	48	72	72	192	
<b>Total Potential Development Capacity with Focus Areas</b>	<b>1,215</b>	<b>669</b>	<b>4,184</b>	<b>4,748</b>	
<b>Total Potential Development Capacity</b>	<b>1,658</b>	<b>866</b>	<b>5,979</b>	<b>7,222</b>	
Sites Surplus/Shortfall	48	130	3,830	+4,008	
Percentage Buffer	3%	22%	409%	125%	
<sup>1</sup> The total remaining unmet RHNA is calculated from the remaining unmet Very Low, Low, and Moderate income units. Above Moderate Income inventory was not included in this calculation.					

**Table 7** demonstrates the capacity to accommodate up to a total of 7,222 candidate housing units through existing capacity, which includes 1,087 units under pipeline projects and 1,091 units within existing residentially zoned land, 296 projected ADUs, and 4,748 units within Focus Areas. **Exhibit 3** depicts the candidate housing sites identified for future housing development, as facilitated by Project implementation. The City has identified candidate sites that yield 7,222 potential housing units within the City, which exceed the total required RHNA growth need of 3,214 housing units and results in a surplus of 4,008 housing units or 125 percent.

### ***Projects in the Pipeline***

The City has identified a number of projects currently in, or that have completed the entitlement process. These projects are likely to be developed and/or first occupied during the planning period and count as credit towards the 2021-2029 RHNA allocation. As shown in **Table 7**, the City has currently identified 28 parcels with a planned development of 1,087 units, 26 of 1,087 units will be affordable to Low and Very Low-income households.

### ***Redevelopment of Nonvacant Sites for Residential Use***

The City of Arcadia does not have sufficient vacant land available to accommodate 50 percent of the low/very-low income RHNA. To accommodate the need at all income levels, the City has analyzed sites that currently permit residential development. As part of the candidate housing sites analysis, the City has evaluated recent projects that have redeveloped on non-vacant sites to include residential units. The City has also conducted a parcel specific analysis of existing uses for each of the identified sites. This analysis is based on existing use data and other information that can be found through online research. As part of the site selection process, the City identified 23 parcels to accommodate a total of 1,091 units, 277 of 1,091 units can accommodate Low and Very Low-income households.

### ***Accessory Dwelling Units***

Accessory dwelling units (ADUs) are housing units which may be developed in addition to an existing single- or multi-family residential use. These housing units can be free-standing or attached to a primary structure and provide additional housing on an existing residential lot. Other ADUs provide housing for family members or are rented to members of the community. In accordance with State Law, ADUs are allowed in all zones that allow single dwelling unit or multiple dwelling unit development. Junior Accessory Dwelling Units (JADUs) are permitted only in single dwelling unit zones.

The City of Arcadia has determined based on past performance that it is appropriate to anticipate the development of 296 accessory dwelling units from 2021 to 2029. To facilitate the development of ADUs available for lower income households, the City has developed relevant policies and programs as contained in Arcadia GP Chapter 10: Implementation Plan. The City has allocated 202 ADUs to Low- and Very-Low Income, 88 ADUs to Above Moderate Income, and six

ADUs to Moderate Income categories. To assist the City's ADU development projections, Arcadia has included **Housing Program 5-12**, which explores actions the City will take to promote and monitor the development of ADUs during the planning period.

### ***Selection of Sites to Accommodate Remaining Need***

In addition to sites that can accommodate housing at their existing capacity, the City identified six (6) Focus Areas that would benefit from residential development to apply strategies such as upzoning and rezoning to achieve the remaining unmet RHNA. These six (6) Focus Areas are (1) Downtown Mixed-Use Expansion and Overlay, (2) Mixed-Use Upzone, (3) Live Oak Corridor, (4) C-G Residential Flex Overlay, (5) R-3 Upzone, and (6) Arcadia Golf Course.

#### ***(a) Downtown Mixed-Use Expansion & Overlay***

The City has identified properties zoned as General Commercial and Commercial Manufacturing in and adjacent to Downtown Arcadia. These properties provide an opportunity to introduce high density residential flex overlays and Downtown Mixed-Use zoning that are compatible with adjacent Central Business District and Downtown Mixed-Use zoned parcels. The existing Central Business District and Downtown Mixed-Use zoned currently allow up to 80 units per acre in conjunction with a commercial development and other uses that will support residential development.

These parcels were identified due to dilapidated commercial uses and at an assumed density of 64 du/ac, the assumed capacity of these sites is projected at 1,480 units, 374 of which are projected to develop affordably for Low and Very Low-income households. **Exhibit 4: Downtown Mixed-Use Expansion** and **Exhibit 5: Downtown Mixed-Use Overlay** show the candidate housing sites identified within the Downtown Mixed-Use Focus Area which can help accommodate a portion of the City's RHNA allocation.

#### ***Mixed-Use Upzone***

The City has identified parcels in the Mixed-Use zone that have the potential to accommodate 477 units of development at an assumed density of 50 du/acre, 124 of which are projected to develop affordably. **Exhibit 6: Map of Site Inventory - Mixed Use Upzone (1)** and **Exhibit 7: Map of Site Inventory - Mixed Use Upzone (2)** show the candidate housing sites identified within the Mixed-Use Focus Area.

#### ***(b) Live Oak Corridor***

The City has identified the Live Oak Corridor as an opportunity to both increase density and introduce residential density on viable commercial properties. The adjacent Mixed-Use zoning and access to transit supports the increase of residential uses in the corridor. The City identified two opportunities based on adjacent use and densities to introduce Residential Flex Overlays on

commercial properties within the corridor. The two opportunity areas, referred to as Las Tunas Residential Flex Overlay and Live Oak Residential Flex Overlay, have the total capacity to accommodate up to 794 units, as shown on **Exhibit 8: Map of Site Inventory – (Live Oak Corridor) Residential Flex Overlay**.

(i) *Las Tunas Residential Flex Overlay*

The City identified parcels west of Santa Anita Avenue, along Las Tunas suitable for higher density development. The identified parcels within the Las Tunas Residential Flex Overlay have the capacity to accommodate up to 609 units of development at an assumed density of 48 du/acre.

(ii) *Live Oak Residential Flex Overlay*

The City identified parcels east of Santa Anita Avenue, along Live Oak Avenue suitable for higher density development. The identified parcels within the Live Oak Residential Flex Overlay have the capacity to accommodate up to 118 units of development at an assumed density of 40 du/acre.

(c) ***C-G Residential Flex Overlay***

The City has identified General Commercial zoned properties as a redevelopment opportunity where underutilized, smaller scale commercial development can transition to support residential development. The identified parcels have the capacity to accommodate 992 units of development at an assumed density of 24 du/acre, as shown on **Exhibit 9: Map of Site Inventory – C-G Residential Flex Overlay**. An assumption of approximately 50% redevelopment has been applied considering development history, economic factors, and AFFH requirements. In addition, the 80% redevelopment limit would preserve commercial zoned parcels to maintain a commercial base throughout the City.

(d) ***R-3 Upzone***

The R-3 Zone has been identified by the City as an area with the opportunity to support increased density that is compatible with adjacent higher density residential uses and other uses that support residential development. Higher density within this Focus Area can be expected to accommodate lower income units. The identified parcels within the Sites Inventory have the capacity to accommodate 810 units of development at an assumed density of 32 du/acre, as shown on **Exhibit 10: Map of Site Inventory – R-3 Upzone (1)**, **Exhibit 11: Map of Site Inventory – R-3 Upzone (2)**, and **Exhibit 12: Map of Site Inventory – R-3 Upzone (3)**. An assumption of approximately 25% redevelopment has been applied considering development history, economic factors, and AFFH requirements.

***Arcadia Golf Course***

The City has identified the Arcadia Golf Course as a site to accommodate residential units across all of the income categories. As shown on **Exhibit 13: Map of Site Inventory – Arcadia Golf**

**Course**, the Arcadia Golf Course is approximately 25.86 acres in size and has the capacity to accommodate up to 192 units. However, future development of the Arcadia Golf Course may not generate the full 192 units due to the intention of retaining a portion of the site for open space and recreation uses.

***(e) Goals and Policies***

As required by State Housing Element law, the proposed Project includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA. The plan would implement strategies and programs intended to address the City's housing needs and meet the City's current housing goals, which are:

**Housing Goal #1**: Preservation, conservation, and enhancement of existing housing stock and residential neighborhoods within Arcadia.

**Housing Goal #2**: Provide suitable sites for housing development to accommodate a range of housing for residential use that meet the City's RHNA growth needs for all income levels.

**Housing Goal #3**: A range of housing choices for all social and economic segments of the community, including housing for persons with special needs.

**Housing Goal #4**: Mitigated governmental and non-governmental constraints to housing production and affordability.

**Housing Goal #5**: Equitable and fair housing opportunity in the City's housing market.

The goals listed above are described throughout the Arcadia GP Chapter 5: Housing Element with accompanying policies and programs to achieve them. The goals and policies are provided in their entirety in Plan to The Housing Element Update (see Appendix A).

***(f) Implementation Programs***

The Implementation Programs proposed to implement each goal and policy are included in their entirety in the Arcadia GP Chapter 10: Implementation Plan and Housing Element.

**Housing Program 5-1**: Home Rehabilitation

**Housing Program 5-2**: Code Enforcement

**Housing Program 5-3**: Residential Design Guidelines

**Housing Program 5-4**: Prevention of At-Risk Units

**Housing Program 5-5**: Preservation of Middle-Income Housing through New Housing Authorities

**Housing Program 5-6**: Residential Sites Inventory

**Housing Program 5-7**: Establish and Overlay to Permit Residential

**Housing Program 5-8:** Expansion of the Downtown Mixed-Use Area to Permit Residential Use

**Housing Program 5-9:** Expand and Update the Residential Flex Mixed Use Overlay in the Live Oak Corridor

**Housing Program 5-10:** Encourage Development of Housing Sites Listed in Inventory

**Housing Program 5-11:** Housing Density Bonus

**Housing Program 5-12:** ADU and JADU Incentive and Monitoring

**Housing Program 5-13:** Candidate Sites Used in Prior Housing Element Planning Cycle

**Housing Program 5-14:** Inclusionary Housing Policy

**Housing Program 5-15:** Lot Consolidation Incentives

**Housing Program 5-16:** Preservation of Rental Opportunities

**Housing Program 5-17:** Public Information About Affordable Housing

**Housing Program 5-18:** Emergency Shelters, Transitional, and Supportive Housing

**Housing Program 5-19:** Participation in the San Gabriel Valley Housing Trust

**Housing Program 5-20:** SB 35 Streamlining

**Housing Program 5-21:** Section 8 Housing Choice Voucher Program

**Housing Program 5-22:** Affordable Housing for Families and Persons with Special Needs

**Housing Program 5-23:** Homeless Program Assistance

**Housing Program 5-24:** Housing Sustainability

**Housing Program 5-25:** Fair Housing

**Housing Program 5-26:** Fair Housing Assistance

**Housing Program 5-27:** Supportive Housing/Low Barrier Navigation Centers

**Housing Program 5-28:** Water and Sewer Service Providers

## 2.5 Development Capacity Projections for Future Site Development

State CEQA Guidelines § 15378(a) defines a “project” as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” The proposed HEU Project does not propose new residential or other development on the 751 candidate sites evaluated in this IS/ND; rather, it provides capacity for future development consistent with State law. Future development would occur on these sites in incremental phases over time depending upon

numerous factors such as market conditions, and economic and planning considerations, and at the individual property owners' discretion. Additionally, future development facilitated by the proposed HEU Project would be required to undergo environmental review and evaluation under CEQA and other applicable federal, state and local regulations as each project is proposed.

## 2.6 Project Approvals

The City is the Lead Agency under CEQA and is responsible for reviewing, approving, and adopting this IS/ND. The City will consider the following discretionary approvals for the Project:

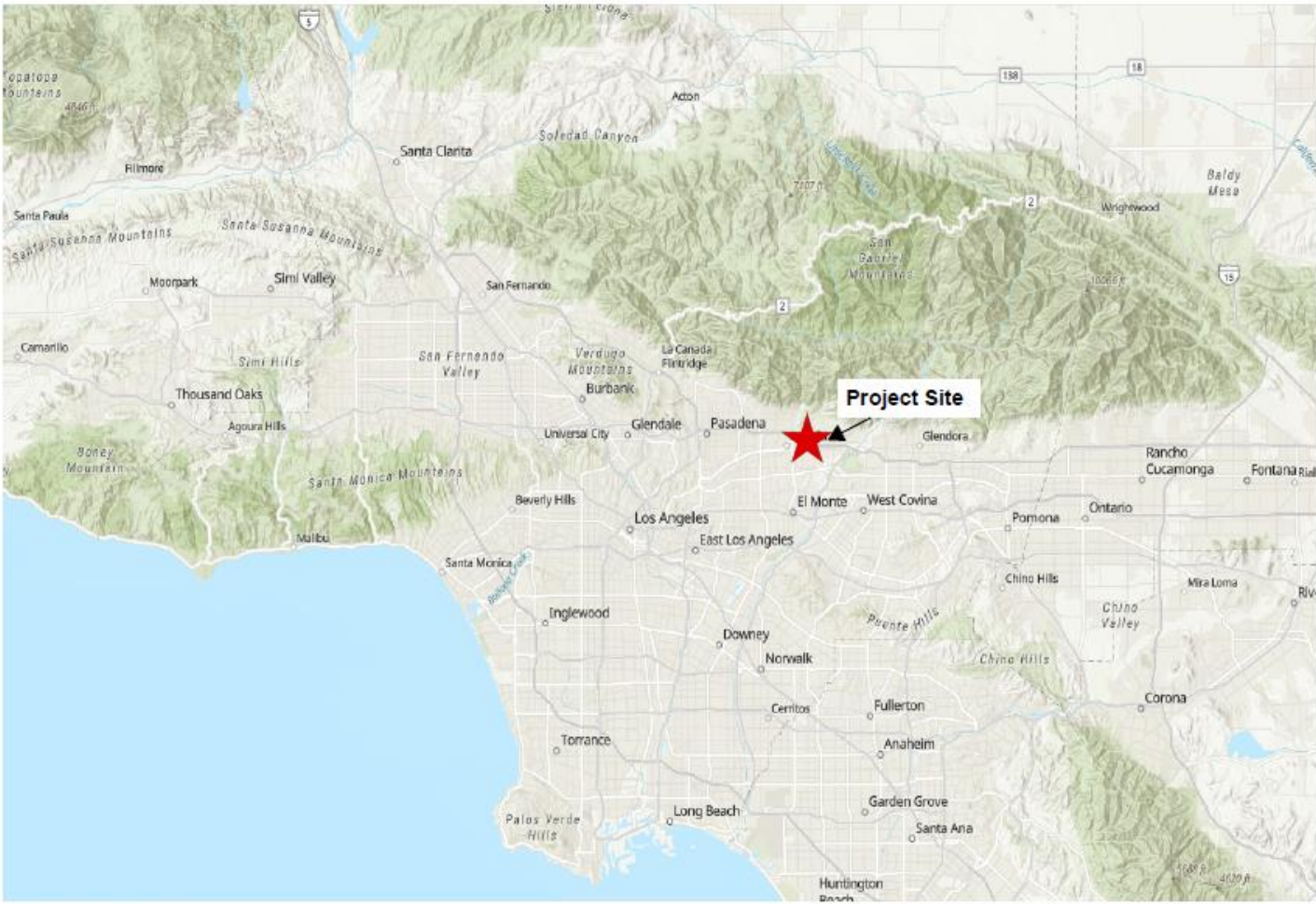
- Adoption of the 6<sup>th</sup> Cycle Housing Element Update (2021-2029)

The Project additionally requires the following approval from HCD following the City's final adoption of the 2021-2029 Housing Element Update:

- Review of the draft 2021-2029 Housing Element Update to determine compliance with state law and submittal of written findings to the City.

No discretionary approvals from other agencies are required.

**Exhibit 1: Regional Map**

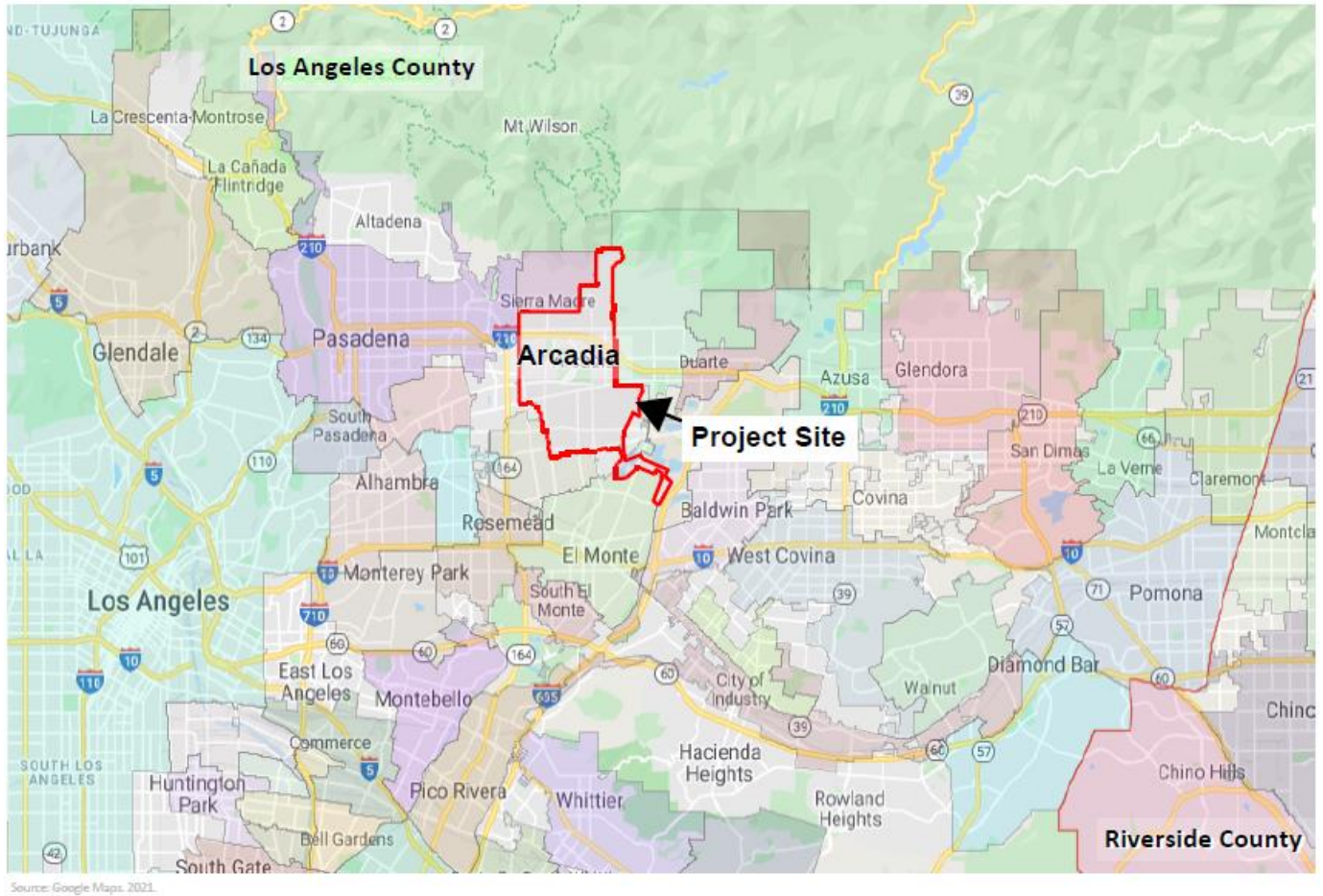


Source: ESRI World Imagery, 2021.

**EXHIBIT 1: Regional Map**  
Arcadia 6<sup>th</sup> Cycle HEU, City of Arcadia



**Exhibit 2: Vicinity Map**



**EXHIBIT 2: Vicinity Map**  
*Arcadia 6th Cycle HEU, City of Arcadia*



Exhibit 3: Map of Candidate Housing Sites

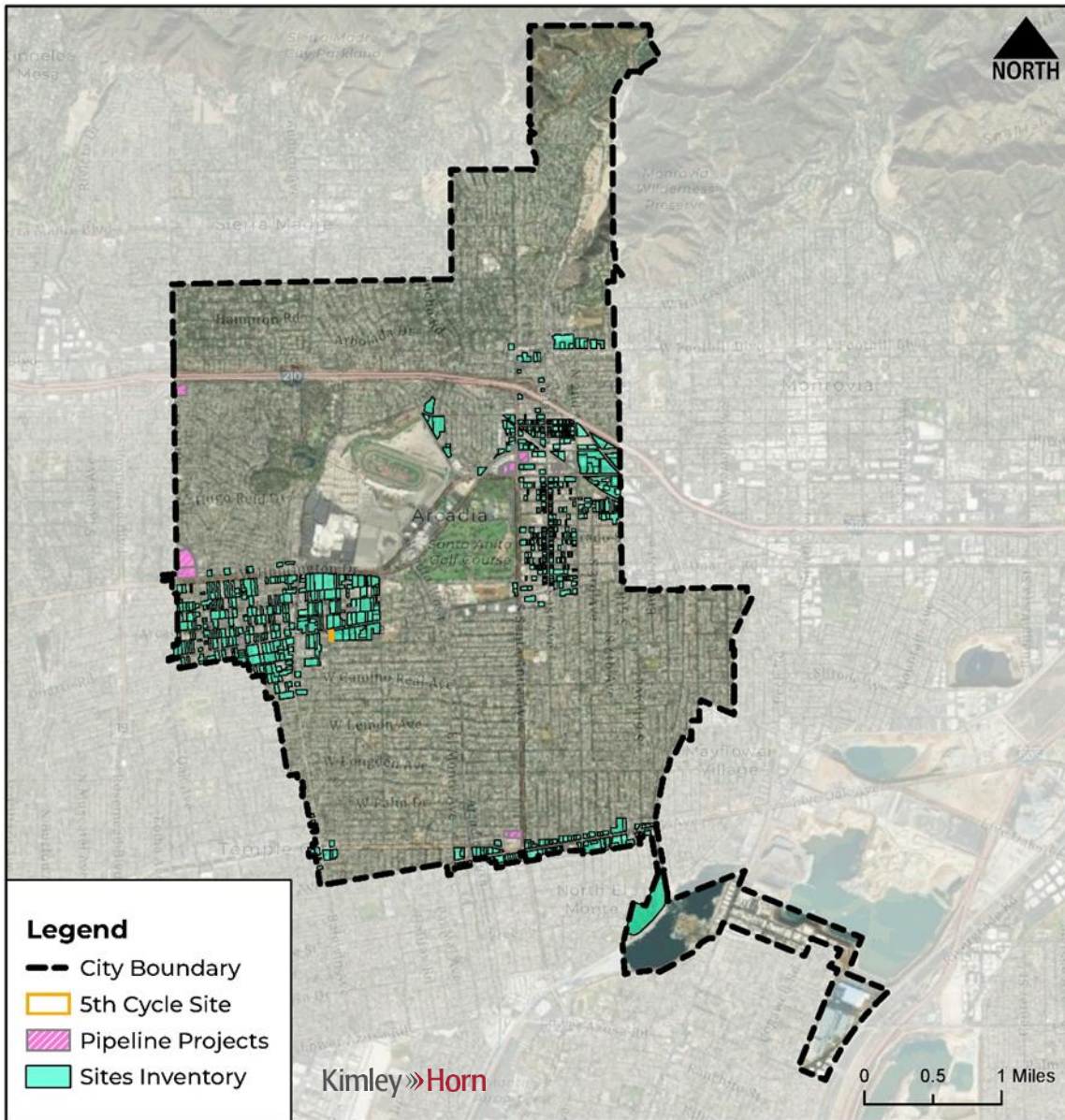
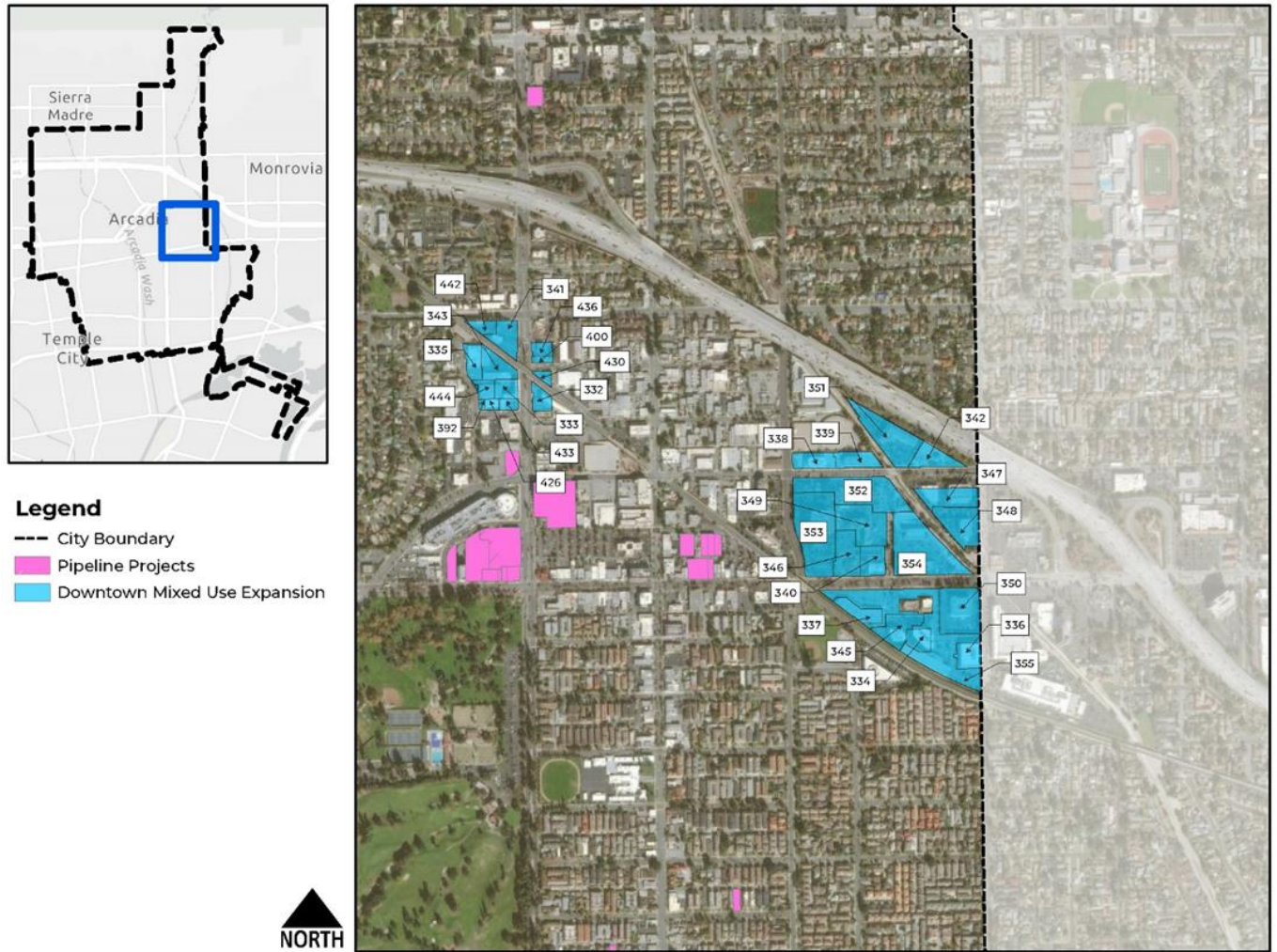


Exhibit 4: Map of Downtown Mixed-Use Expansion



### Exhibit 5: Map of Downtown Mixed-Use Overlay



Exhibit 6: Map Site Inventory – Mixed-Use Upzone (1)

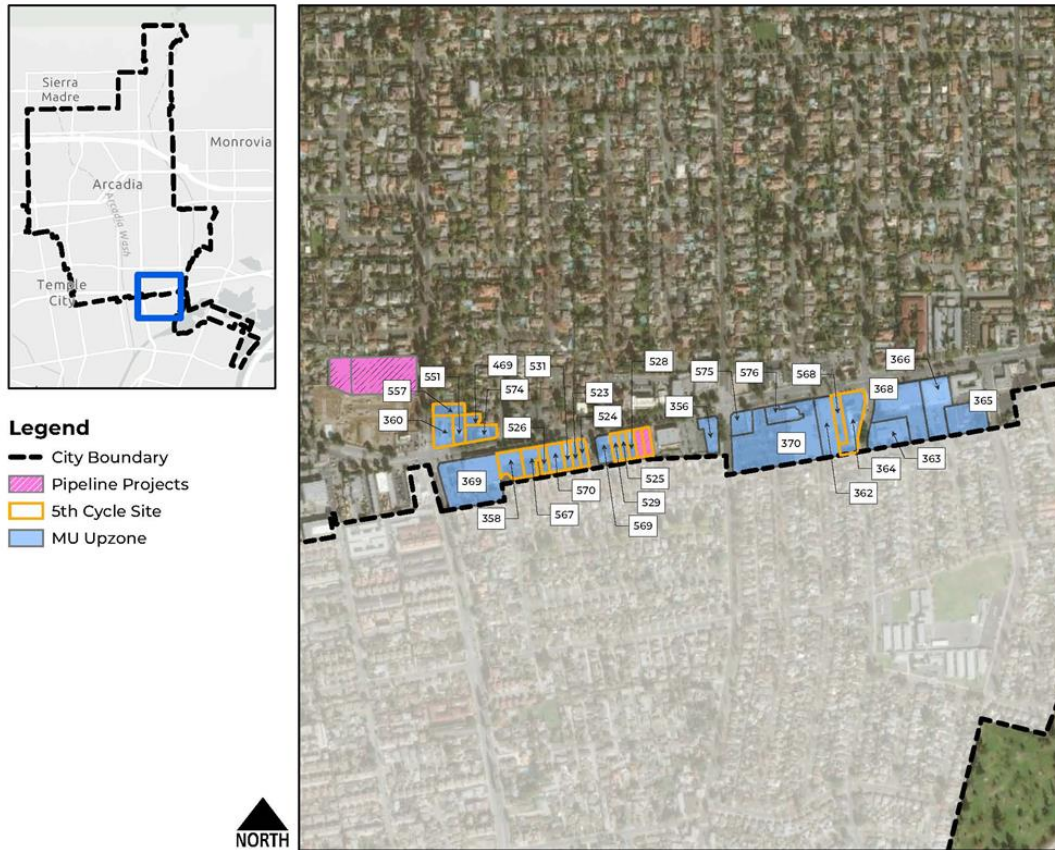


Exhibit 7: Map of Site Inventory – Mixed-Use Upzone (2)



Legend

- City Boundary
- MU Upzone
- Pipeline Projects
- 5th Cycle Site

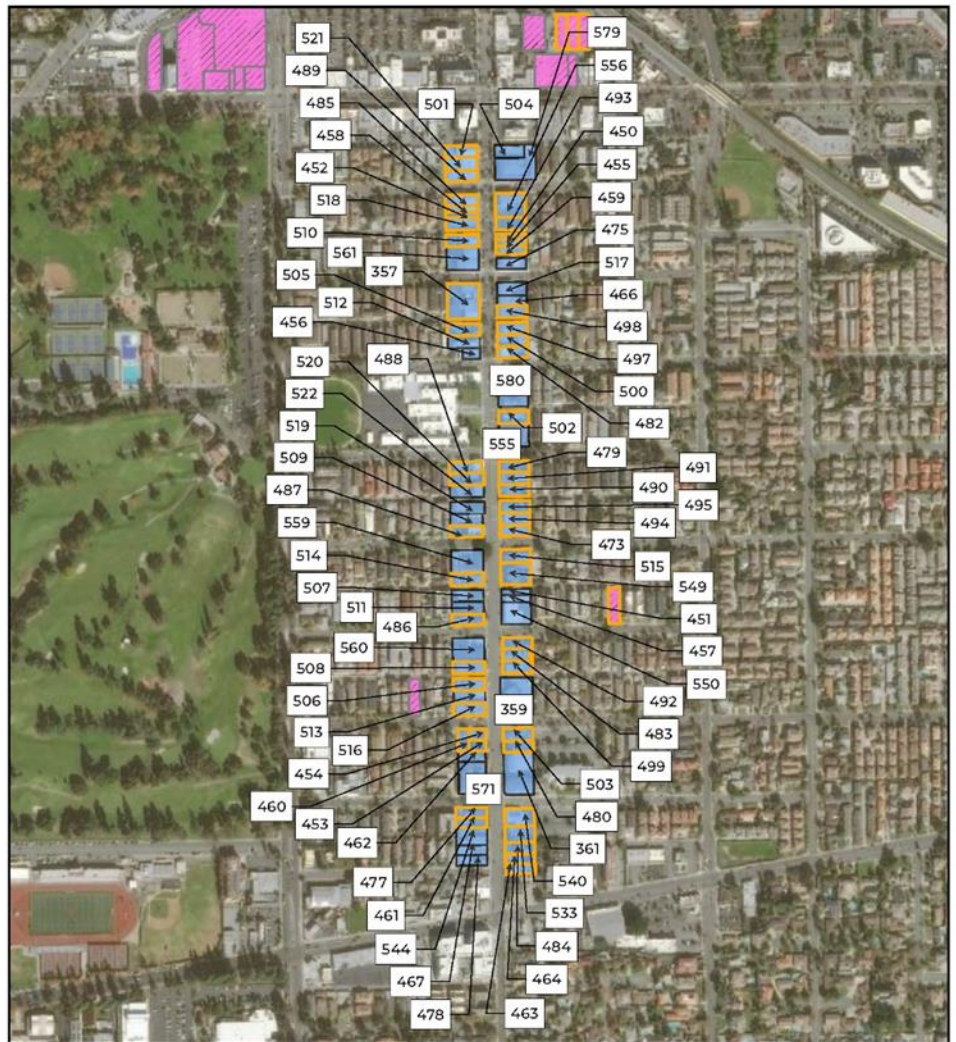


Exhibit 8: Map of Site Inventory – (Live Oak Corridor) Residential Flex Overlays



Exhibit 9: Map of Site Inventory – C-G Residential Flex Overlay



Exhibit 10: Map of Site Inventory – R-3 Upzone (1)

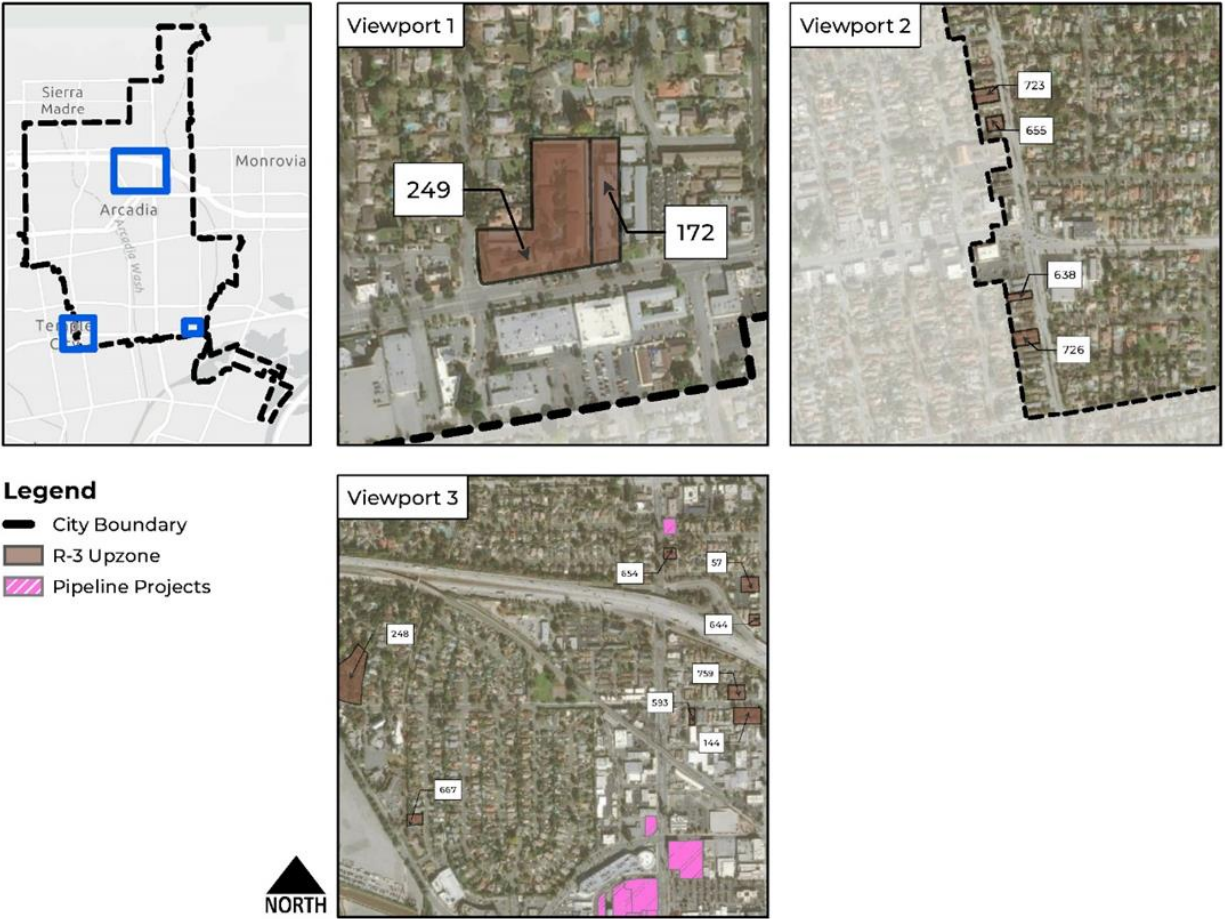


Exhibit 11: Map of Site Inventory – R-3 Upzone (2)

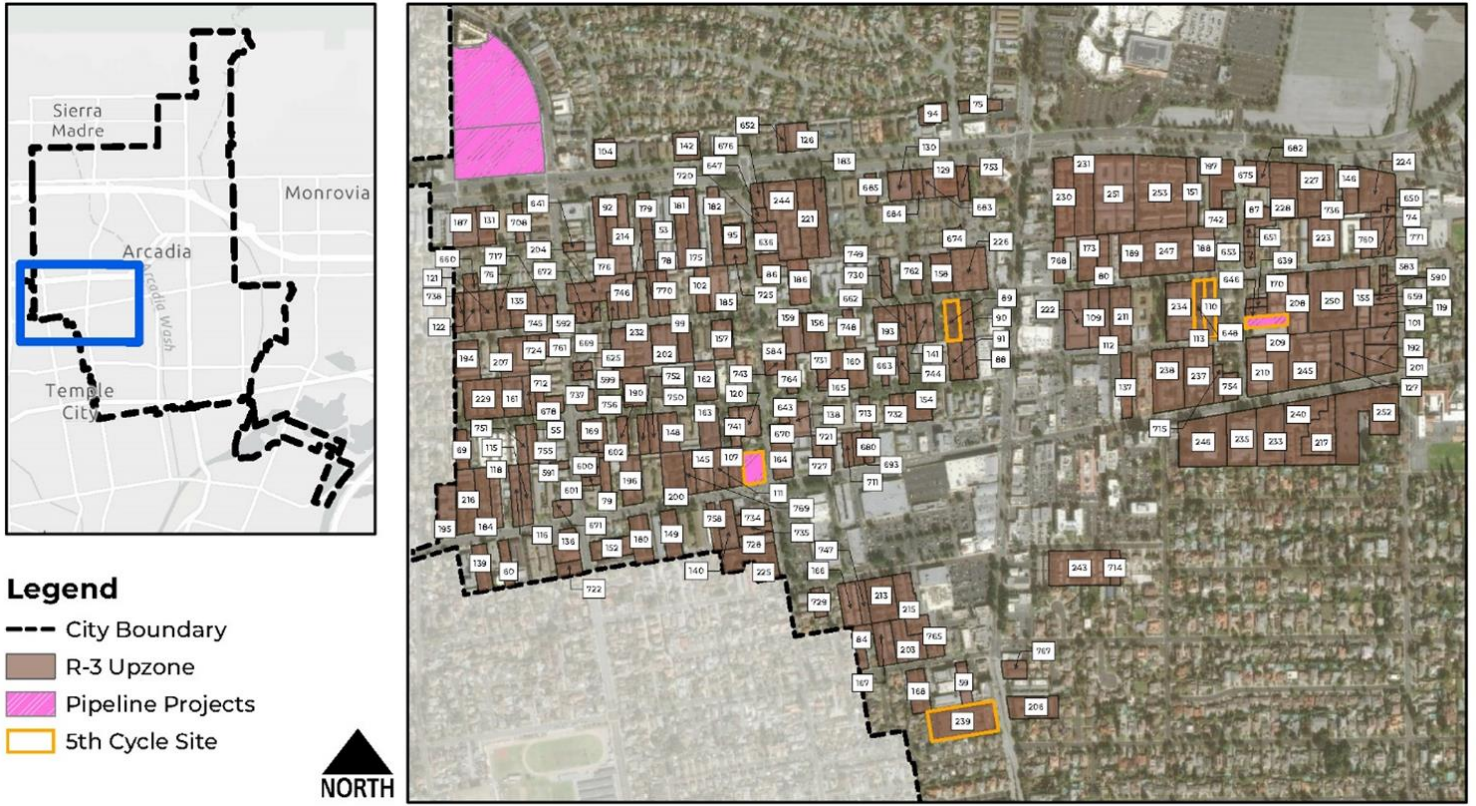
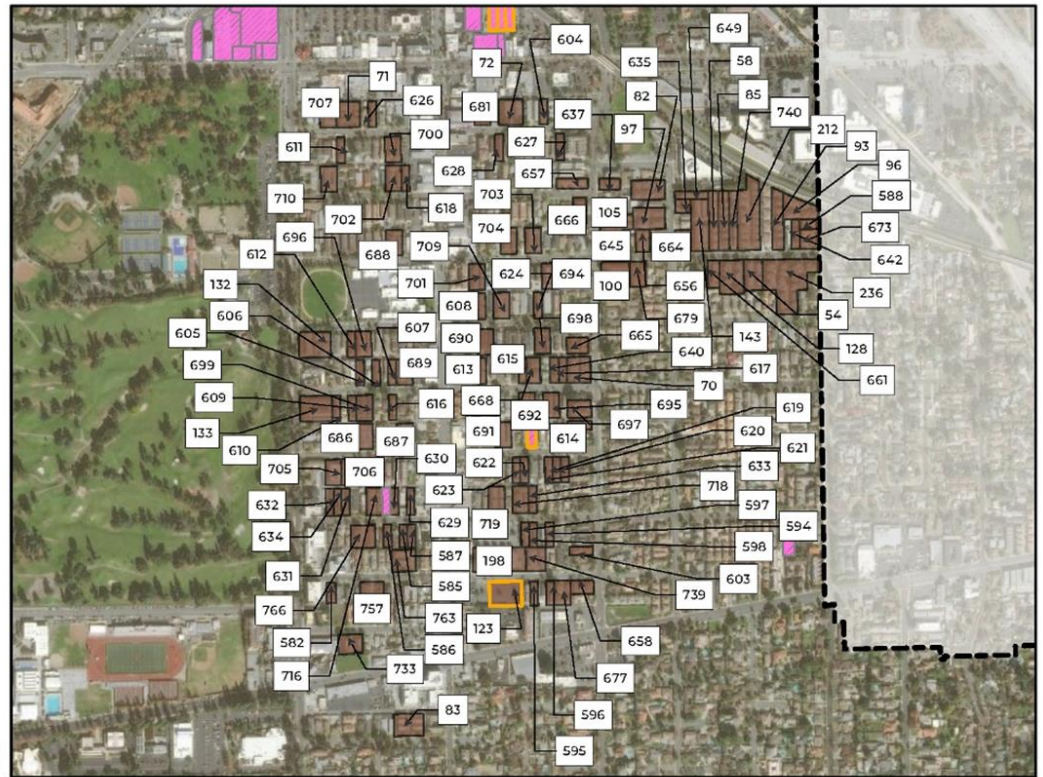


Exhibit 12: Map of Site Inventory – R-3 Upzone (3)

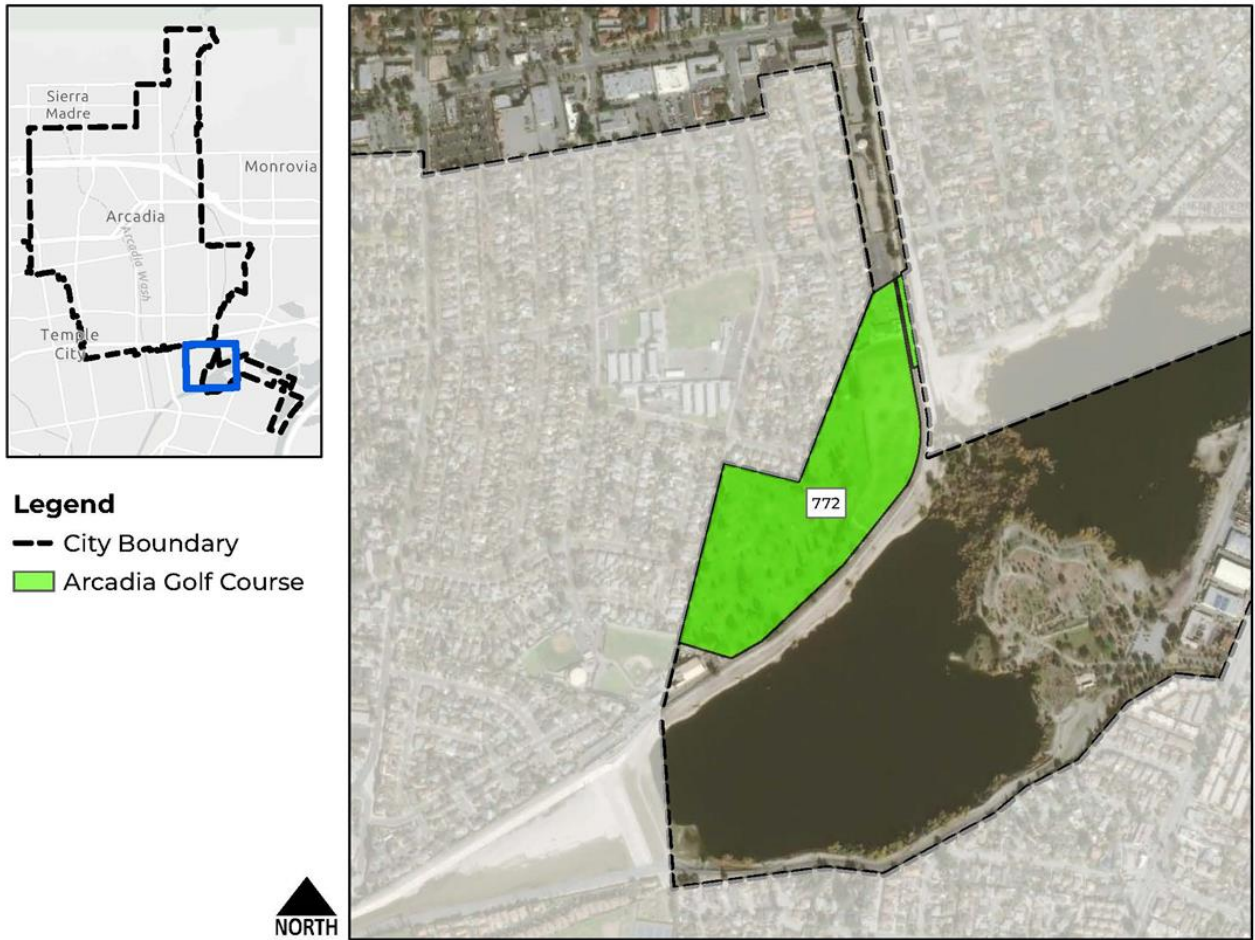


**Legend**

- City Boundary
- R-3 Upzone
- Pipeline Projects
- 5th Cycle Site



**Exhibit 13: Map of Site Inventory – Arcadia Golf Course**



### 3.0 INITIAL STUDY

1. Project Title: City of Arcadia 6th Cycle Housing Element Update (2021-2029)  
\_\_\_\_\_
  
2. Lead Agency Name and Address:  
City of Arcadia  
240 West Huntington Drive  
Arcadia, CA 91007  
\_\_\_\_\_
  
3. Contact Person and Phone Number: Lisa Flores at 626-574-5445  
\_\_\_\_\_
  
4. Project Location: City of Arcadia  
\_\_\_\_\_
  
5. Project Sponsor's Name and Address:  
City of Arcadia  
240 West Huntington Drive  
Arcadia, CA 91007  
\_\_\_\_\_
  
6. General Plan Designation: City-Wide      7. Zoning: City-Wide
  
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheet(s) if necessary.)  
  
See Section 2.0 Project Description.  
\_\_\_\_\_
  
9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings.)  
  
The Project encompasses the entire City.  
\_\_\_\_\_
  
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):  
  
California Department of Housing and Community Development (HCD)  
\_\_\_\_\_

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

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 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.*

On June 1, 2021, the City received the negative result of the Sacred Lands File (SFL) from the Native American Heritage Commission (NAHC). On June 10, 2021, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18. No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

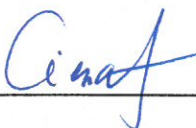
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

**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" 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

Lisa Flores  
\_\_\_\_\_  
Printed Name

12/14/21  
\_\_\_\_\_  
Date

City of Arcadia  
\_\_\_\_\_  
For

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

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

Issues:

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

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III.	AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV.	BIOLOGICAL RESOURCES -- Would the project:				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	CULTURAL RESOURCES -- Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI.	ENERGY. Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VII.	GEOLOGY AND SOILS -- Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii)	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii)	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv)	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VIII.	<b>GREENHOUSE GAS EMISSIONS -- Would the project:</b>				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IX.	<b>HAZARDS AND HAZARDOUS MATERIALS -- Would the project:</b>				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X.	HYDROLOGY AND WATER QUALITY -- Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XI. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.	NOISE -- Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIV.	POPULATION AND HOUSING -- Would the project:				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XV.	PUBLIC SERVICES -- Would the project:				
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVI. RECREATION --</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVII. TRANSPORTATION -- Would the project:</b>				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 <sup>9</sup> or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>9</sup> CEQA Guidelines section 15064.3(c) provides that a lead agency “may elect to be governed by the provisions” of the section immediately; otherwise, the section’s provisions apply July 1, 2020. Here, the District has not elected to be governed by Section 15064.3. Accordingly, an analysis of vehicle miles traveled (VMT) is not necessary to determine whether a proposed project will have a significant transportation impact.

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

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIX.	WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XX. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 project, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Note: Authority cited: Public Resources Code sections 21083, 21083.05, 21083.09.

Reference: Gov. Code section 65088.4; Public Resources Code sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21080.3.1, 21080.3.2, 21082.3, 21083, 21083.3, 21083.5, 21084.2, 21084.3, 21093, 21094, 21095 and 21151; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

## ENVIRONMENTAL IMPACT DISCUSSION

A brief discussion of each impact conclusion is included below based on the environmental issues listed above and in Appendix G of the CEQA Guidelines.

### I. Aesthetics

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Would the Project:

***a. Have a substantial adverse impact on a scenic vista?***

**Less Than Significant Impact.** According to the Arcadia GP, the City's scenic resources and vistas include the San Gabriel Mountains and San Gabriel Mountains foothills located to the north of the City. A substantial adverse effect to visual resources could result in situations in which a development project introduces physical features that are not characteristic of current development, obstructs an identified public scenic vista, impairs views from other properties, or has a substantial change to the natural landscape.

The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. The proposed HEU would not result in a significant adverse effect on a scenic vista. All future housing development facilitated by the HEU would be subject environmental review under CEQA, the City's development review process, and required to demonstrate consistency with Arcadia GP policies and compliance with Arcadia Municipal Code (Arcadia MC), including Article IX, Chapter 1 - Development Code (Arcadia DC) standards. The City contains policies within the Arcadia GP which focus on the preservation of scenic vistas. These scenic vistas are visible mainly from the Hillside area of the City and are the focus of the policies within the Arcadia GP. The Project, however, does not identify any candidate sites within the Hillside area of the City, as shown in ***Exhibit 3***. Furthermore, the Arcadia GP EIR notes that the City does not contain any scenic vistas.<sup>10</sup>

Although the Project would not result in direct housing construction, any future housing developments would be required to demonstrate consistency with the above General Plan policies and ensuring that any proposed building heights would be consistent with the scale of surrounding and existing development. The proposed HEU would not result in a significant adverse effect on a scenic vista. Therefore, impacts to scenic vistas would be less than significant.

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

**Less Than Significant Impact.** There are no officially designated State scenic highways within the City. The nearest officially designated highway is a portion of SR 2 transition from Los Angeles

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<sup>10</sup> City of Arcadia. (2010). City of Arcadia General Plan EIR. Page 4.1-5.

County into San Bernardino County through the San Gabriel Mountains, starting at and Los Angeles Post Mile (PM) 27.2 and finishing at PM 82.265.<sup>11</sup> The final location of the SR 2 is approximately 2.7 miles north of Route 210 in the City of La Canada Flintridge, approximately 8.4 miles northwest of the City.<sup>12</sup> This scenic highway is approximately 6.4 miles north of the City's northernmost boundary. There are no highways within the City which are eligible for scenic highway classification.

Despite the lack of officially designated and eligible highways within the City, all future housing development facilitated by the HEU would be subject to the City's development review process and required to demonstrate consistency with Arcadia GP policies and compliance with Arcadia MC standards, including those intended to protect scenic resources. Therefore, project implementation would not substantially damage scenic resources associated with a scenic highway, historic building, or scenic resource. A less than significant impact would occur.

***c. 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.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development, which is anticipated to occur in urbanized areas throughout the City. The Arcadia GP contains goals and policies that govern scenic quality. However, these goals apply to the Hillside area which has not been identified with any candidate sites.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA, and be required to comply with Arcadia GP policies, Arcadia MC standards, as well as be required to adhere to all federal, State, and local regulations for avoiding impacts to existing visual character or quality of public views of the site and its surroundings., including those that protect against degradation of visual resources by requiring project modifications, conditions of approval or mitigation measures, as needed. Because future housing development consistency with General Plan policies and compliance with Arcadia MC standards would be verified through the City's development review process, the project would not conflict with applicable policies or standards governing scenic quality. Therefore, impacts would be less than significant.

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<sup>11</sup> California Department of Transportation (Caltrans). (2021). California State Scenic Highway System Map. Retrieved from: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed October 12, 2021

<sup>12</sup> Ibid.

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

**Less Than Significant Impact.** As previously noted, the Project would not result in direct housing construction, but would facilitate future housing development throughout the City. Future housing development could add a new source of substantial light and glare. Potential new light sources include exterior nighttime lighting fixtures, parking area lighting, light glow from windows, doors and skylights, and accent lighting. The introduction of concentrated or multiple sources of nighttime lighting near low-density areas could result in potential impacts.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA and be required to comply with all applicable requirements concerning light and glare, including the California Green Building Standards Code (Title 24 Part 11) and Arcadia MC §9103.01.120 – Exterior Lighting, which control light emissions in the City, and requires that lighting fixtures be shielded appropriately to eliminate light directed above the horizontal. Therefore, the HEU would not create a new source of substantial light or glare. Impacts would be less than significant.

## II. Agriculture and Forestry

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Would the Project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- 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 land?*

**No Impact.** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. The City is predominantly categorized as urban and build-up and there are no properties within or near the candidate housing sites designated Prime Farmland, Unique Farmland or Farmland of Statewide Importance, as classified by the State Department of Conservation Farmland Mapping and Monitoring Program (FMMP).<sup>13</sup> Therefore, Project implementation would not conflict with existing agricultural zoning or a Williamson Act contract, or result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, or conversion or loss of forest land. Future housing development facilitated by the HEU would allow for residential development on vacant and developed sites that are zoned for residential development and sites zoned for non-residential development that would be amended through prospective discretionary actions to allow future residential development. Future discretionary actions would be implemented in a case-by-case basis for future housing developments facilitated by the Project. Consequently, the HEU would not conflict with existing zoning nor would it cause rezoning of forest land, timberland, or timberland zoned Timberland Production. Project implementation would not rezone or convert forest land or timberland. Therefore, the HEU would result in no impact to agricultural or forest resources.

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<sup>13</sup> California Department of Conservation, California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>, Accessed October 7, 2021.

### III. Air Quality

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Would the Project:

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

**Less Than Significant Impact.** The City is located in the South Coast Air Basin (SoCAB). The South Coast Air Quality Management District (SCAQMD) and SCAG are responsible for developing and implementing the clean air plans for attainment and maintenance of ambient air quality standards in the SoCAB - specifically, the State Implementation Plan (SIP) and SCAG's Connect SoCal RTP/SCS, which includes the urbanized portions of Los Angeles, Riverside, Orange, and San Bernardino Counties.

The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. In 2016, the SCAQMD adopted the Air Quality Management Plan (AQMP) that integrated strategies and measures needed to meet the national ambient air quality standards (NAAQS) and the California ambient air quality standards (CAAQS). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving State and national air quality standards. The primary purpose of an air quality plan is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act and California Clean Air Act. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the NAAQS and CAAQS.

Air quality impacts were assessed in accordance with methodologies recommended by California Air Resources Board (CARB) and the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod). The CARB mobile source emission projections and SCAG growth projections are based on population forecasts, vehicle trends, and land use plans developed by SCAG and the member counties, cities, as part of their general plan development.

As previously discussed, the HEU Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would allow for residential development on vacant and developed sites that are zoned for residential development and sites zoned for non-residential development that would be amended through prospective discretionary actions to allow future residential development. Future discretionary actions would be limited to the candidate housing sites.

Additionally, all future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local regulations for minimizing construction and operational pollutant emissions, including the SCAQMD Rules listed below:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM<sub>10</sub> suppression techniques are summarized below.
  - Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
  - All on-site roads are paved as soon as feasible, watered regularly, or chemically stabilized.
  - All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
  - The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
  - Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down following the workday to remove soil from pavement.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Future housing development would be required to be consistent with the Arcadia GP, including Goals RS-1, RS-2, and RS-3 which encourages the reduction of toxic emissions and carbon

footprint. Therefore, air quality impacts from future development on candidate housing sites would be less than significant following compliance with the existing regulatory framework.

It is noted, the City's goal for the Project is to achieve Housing and Community Development (HCD) HEU certification; therefore, the project must comply with applicable federal, State, regional, and local housing laws, and policies. As a result, it is not anticipated that future housing development facilitated by the HEU would interfere with SCAQMD goals for improving air quality in the SoCAB or conflict with or obstruct implementation of applicable air quality plans. Therefore, anticipated air quality impacts would be less than significant.

***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?***

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development throughout the City, which would occur as market conditions allow and at the discretion of the individual property owners. Future housing development could result in temporary, short-term pollutants from construction-related soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions would be temporary, with construction activities and associated emissions ceasing once housing development is complete. Further, construction emissions can vary substantially from day to day depending on activity level, the specific operation type, and, for dust, prevailing weather conditions.

California has 35 specific air districts, which are each responsible for ensuring that the criteria pollutants are below the NAAQS and CAAQS. Air basins that exceed either the NAAQS or the CAAQS for any criteria pollutants for set periods are designated as "non-attainment areas" for that pollutant. The cumulative setting for air quality includes Arcadia and the SoCAB. The SoCAB is designated as a nonattainment area for State standards of ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Cumulative growth in population and vehicle use could inhibit efforts to improve regional air quality and attain the ambient air quality standards.

The SCAQMD's approach to assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. The AQMP is designed to assist the region in attaining the applicable State and national ambient air quality standards and is intended to bring the SoCAB into attainment for all criteria pollutants.

All future housing development facilitated by the HEU would be subject the City's development review process and required to demonstrate compliance with federal, State, and local regulations in effect at the time of development, including the Arcadia GP policies and Arcadia MC standards.

The City's Environmental Assessment process outlined in the Arcadia MC §9107.03.070 and development process may require future housing development conduct air quality (and other technical) studies to demonstrate compliance with SCAQMD air quality construction thresholds. SCAQMD Rules 402 and 403 (e.g., prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) would be applied to future developments on a project-by-project basis in order to minimize those potential negative air quality effects. Emissions resulting from construction would be temporary and construction activities and associated emissions would cease following completion of each housing development.

Concerning operational thresholds, future housing development facilitated by the HEU would likely generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> operational emissions from mobile sources (i.e., vehicle trips), use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources (i.e., combustion of fuels used for space and water heating and cooking appliances). In analyzing cumulative impacts for future housing development facilitated by the HEU, an analysis must specifically evaluate a development's contribution to the cumulative increase in pollutants for which the SoCAB is designated as nonattainment for the CAAQS and NAAQS. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SoCAB. Future housing developments would be required to demonstrate that VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would be below the significance thresholds for both construction and operational activities.

All future housing development would require further evaluation under this criterion to demonstrate that both daily construction emissions and operations would not exceed SCAQMD's significance thresholds for any criteria air pollutant. Additionally, future housing development construction activities would be subject to SCAQMD Rule 403: Fugitive Dust, which requires actions to restrict visible emissions of fugitive dust beyond the property line. Compliance with Rule 403 would limit fugitive dust (i.e., PM<sub>10</sub> and PM<sub>2.5</sub>) that may be generated during grading and construction activities.

Future housing developments would also be subject to SCAQMD Rule 1113: Architectural Coatings, which establishes maximum VOC contents. All future development facilitated by the HEU would also be subject to environmental review under CEQA, the City's development review process, and required to adhere to relevant federal, State, and local regulations for minimizing construction and operational pollutant emissions. Future housing development, at a minimum, would be required to meet California Green Building Standards Code (CALGreen) and Energy Code (Title 24, Part 6 of the California Code of Regulations) mandatory energy requirements in effect at the time of the development application. Projects would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Considering these

requirements, future development housing development facilitated by the HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the SoCAB is in nonattainment under an applicable federal or State ambient air quality standard. Therefore, impacts would be less than significant.

***c. Expose sensitive receptors to substantial pollutant concentrations?***

**Less Than Significant Impact.** As discussed above, the Project does not propose any development; however, the Project facilitates future housing development consistent with State Housing laws. The candidate housing sites were evaluated in this IS/ND at a programmatic level, as discussed above. Future housing development would be evaluated on a case-by-case basis. As a result, no air modeling was conducted for this analysis

***Toxic Air Contaminants***

Future housing development facilitated by the Project could include emissions of pollutants identified by the State and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. Compliance with various measures (e.g., 13 California Code of Regulations (CCR) 2449 and 13 CCR 2485) would be required by State law to reduce DPM emissions. It is unlikely that future housing development facilitated by the HEU would require the extensive operation of heavy-duty construction equipment, or extensive use of diesel trucks, which would be subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. The following measures are required by State law to reduce DPM emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for in-use off-road diesel vehicles (13 CCR 2449), the purpose of which is to reduce DPM and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

***Carbon Monoxide Hot Spots***

Mobile-source impacts, including those related to CO, occur essentially on two scales. Regionally, construction travel associated with future housing development would add to regional trip generation and increase the vehicle miles travelled (VMT) within the local airshed and the SoCAB. Locally, construction traffic would be added to the roadway system in the vicinity of future housing development sites. There is a potential for the formation of microscale CO “hotspots” to

occur immediately around points of congested traffic. Hotspots can form if traffic occurs during periods of poor atmospheric ventilation that is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and/or is operating on roadways already congested with existing traffic.

Typically, high CO concentrations are associated with congested roadways. Traffic associated with future housing development facilitated by the HEU could contribute to traffic congestion that could result in the formation of CO hotspots. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SoCAB is steadily decreasing.

All future housing development facilitated by the HEU would require further evaluation under this criterion through the City's development review process to demonstrate that both daily construction emissions and operations would not exceed SCAQMD's significance thresholds for any criteria air pollutant.

Future construction activities would be subject to environmental review under CEQA and comply with SCAQMD Rules. Therefore, future housing development facilitated by the HEU would not 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?***

**Less than Significant.** The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

However, future housing development facilitated by the Project could result in odors generated from vehicles and/or equipment exhaust emissions during construction. These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. The HEU Project does not propose any development nor include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors and a less than significant impact would occur.

## IV. Biological Resources

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Would the Project:

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

**Less Than Significant Impact.** According to the Arcadia GP EIR, the City is nearly built out and only approximately one (1) percent of the total land area in the City and its SOI remain as vacant and undeveloped.<sup>14</sup> As such, the majority of plant and animal habitats are located in urban environments with non-native and ornamental landscaping.<sup>15</sup> Outdoor recreation areas in the City include the Arboretum of Los Angeles County, Arcadia County Park, Santa Anita County Golf Course, Wilderness Park (which includes high quality alder riparian forest), and a few other smaller parks and a private golf course.<sup>16</sup> Although the vegetation consists mainly of non-native ornamental landscaping in these areas, some patches of native vegetation remain, and many native trees exist including coast live oaks and western sycamores.<sup>17</sup> There are open spaces are found along the Sierra Madre, Santa Anita, and Arcadia Washes, with larger areas in the upper Santa Anita Wash in the northeastern portion of the City and Peck Road County Park in the southeastern portion of the City.<sup>18</sup> The Santa Anita Wash open space area consists mainly of mechanically disturbed areas that function as access routes and spreading grounds for flood control activities. It also supports many coast live oak and western sycamore trees, along with patches of native habitat, including oak-sycamore riparian forest with native understory components and high quality coastal sage scrub.<sup>19</sup> Peck Road County Park was once a gravel mining pit, and now consists of a large lake fed by the Santa Anita and Sawpit Washes. The park is utilized by the public for fishing and bird-watching and supports a few stands of willow (*Salix* spp.) riparian forest and scrub vegetation at the lake margins.<sup>20</sup>

The California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) may list species as threatened or endangered under the California Endangered Species Act (CESA) or Federal Endangered Species Act (FESA), respectively. The USFWS can designate critical habitat that identifies specific areas that are essential to the conservation of a listed species.

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<sup>14</sup> City of Arcadia. *2010 General Plan Update Environmental Impact Report*. Available at [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708). Accessed November 2021.

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. However, given the City is predominantly urban and developed, the candidate housing sites mostly include properties that have either been developed, disturbed, and/or adjacent to existing development. However, future housing development could potentially impact candidate, sensitive, or special status wildlife or plan species through direct or indirect disturbance or elimination of essential habitat.

Additionally, future housing development facilitated by the HEU may have the potential to impact nesting birds which have acclimated to urban life and nest and forage in the local trees and shrubs. These bird species are protected under the Migratory Bird Treaty Act (MBTA). Although the MBTA is no longer interpreted to protect migratory birds and raptors from incidental take, State Fish and Game Commission §3503 and §3503.5 still provide these protections. If vegetation clearing would occur during the bird breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds), direct impacts to nesting birds could occur.

The City has identified the Arcadia Golf Course as a site to accommodate residential units across all of the income categories. As shown on **Exhibit 2-13**, the Arcadia Golf Course is approximately 25.86 acres in size and has the capacity to accommodate up to 192 units. Future development of the Arcadia Golf Course facilitated by the HEU would be subject to project-specific CEQA review and would be required to comply with site-specific applicable mitigation measures, if any. Future development of the Arcadia Golf Course site would also be subject to the City's development review process. However, as stated above, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City, including the Arcadia Golf Course.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include review pursuant to CEQA that includes site-specific analysis and would be required to demonstrate compliance with federal, State, and local regulations aimed at protecting biological resources.

Following compliance with the established regulatory framework described above, future housing development would not result in substantial adverse effect, either directly or indirectly, or through habitat modifications to special status wildlife and plants. Therefore, impacts would be less than significant level.

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

**Less Than Significant Impact.** The HEU Project would not result in direct housing construction but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA which includes site-specific analysis where sensitive vegetation communities are assumed to be present. Surveys would verify and confirm the presence of sensitive vegetation communities and determine the extent of any potential impacts and the need for mitigation.

All future housing development facilitated by the HEU would be required to demonstrate compliance with federal, State, and local requirements aimed at protecting biological resources, including those in the Arcadia GP, as discussed in Threshold 4(a) above. Therefore, the HEU would not result in substantial adverse effect, either directly or indirectly, on any sensitive vegetation communities and impact would be less than significant in this regard.

***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?***

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and required to demonstrate compliance with relevant federal, State, and local regulations for avoiding and minimizing impacts to wetlands and other waters of the U.S. and State. Following compliance with the established regulatory framework future housing development would not result in substantial adverse effect, either directly or indirectly, on any known wetlands or other waters of the U.S. and State. A less than significant impact would occur.

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

**Less Than Significant Impact.** Future projects are not expected to substantially interfere with the movement of any native species. All future housing development facilitated by the HEU would also be subject to environmental review under CEQA, the City's development review process, and required to adhere to relevant federal, State, and local regulations for avoiding and minimizing interference with the movement of any native resident or migratory fish and wildlife species, migratory wildlife species, or migratory wildlife corridors. Future housing development where the City has determined a potential for impacts to a wildlife corridor, would be required to comply with the established regulatory framework and mitigation measures of the Arcadia GP and Arcadia MC. Therefore, future housing development would result in a less than significant impact on wildlife corridors. Anticipated impacts would be less than significant.

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

**Less Than Significant Impact.** The City has policies and ordinances for the protection of trees. The City's Oak Tree Regulations protect Engelmann oaks, coast live oaks, and other oak trees. The City also has a Comprehensive Tree Management Program for the protection of street trees.<sup>21</sup> As previously stated, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process which may include environmental review under CEQA and be required to demonstrate compliance with the Arcadia GP goals and policies, Arcadia MC standards, federal, State, and local regulations. Future housing development would also be required to comply with the Oak Tree Regulations and the Comprehensive Tree Management Program. Therefore, HEU would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant.

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

**No Impact.** Currently, the City does not have Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans that cover habitats located within the City. As discussed above, the project would not result in direct housing construction, but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to demonstrate compliance with federal, State, and local regulations regarding biological resources and policies. The Project would not conflict with any local policies or ordinances protecting biological resources, and no impact is anticipated in this regard.

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<sup>21</sup> City of Arcadia. 2010 General Plan Update Environmental Impact Report. Available at [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708). Accessed November 2021

## V. Cultural Resources

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Would the Project:

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

**Less Than Significant Impact.** The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Therefore, future housing development facilitated by the HEU could cause a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines §15064.5, through demolition, destruction, relocation, or alteration, if such a resource is present on or near the site. There are 31 cultural resources, including both archaeological and historic resources, recorded at the South Central Coastal Information Center (SCCIC). In addition, there are three (3) built environmental historic resources that are eligible for listing or listed in the National Register of Historic Places (NRHP). The potential impacts to known cultural resources resulting from future housing development facilitated by the HEU would be assessed on a case-by-case basis at the time of the projects are proposed. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA and be required to adhere to all federal, State, and local regulations for avoiding impacts to historical resources, including the National Historic Preservation Act. Arcadia GP Goal PR-9 aims to retain and preserve the City's significant historical and cultural resources and provide public understanding and involvement of the unique heritage of the City.

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

**Less Than Significant Impact.** As previously noted, the HEU is a policy document and would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, ground-disturbing activities such as grading or excavation, associated with future housing development facilitated by the HEU could impact archaeological resources. The likelihood of encountering archeological resources on undeveloped sites is greatest given these have been minimally disturbed in the past (e.g., undeveloped parcels, vacant lots, and lots containing undeveloped areas). Alternately, previously disturbed sites are generally considered to have a lower potential for archeological resources, since previous construction activities may have already removed or disturbed soil that may have contained resources. A majority of the candidate housing sites are located in areas urban and built areas that have been developed, except for the approximately 25.86-acre Arcadia Golf Course. However, future development of the proposed 192-unit within the Arcadia Golf Course facilitated by the HEU would be subject to project-specific CEQA review and would be required to comply with site-specific applicable

mitigation measures, if any. Future development of the Arcadia Golf Course site would also be subject to the City's development review process. However, as stated above, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City, including the Arcadia Golf Course.

Future housing development could disturb and potentially destroy subsurface prehistoric/historic archaeological resources through ground disturbances. All future housing development facilitated by the HEU would therefore be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for avoiding impacts to archeological resources. This includes compliance with the Arcadia GP, which includes goals aimed at reducing archeological impacts. Compliance with the established regulatory framework would reduce any potential impacts to less than significant.

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

**Less Than Significant Impact.** According to the Arcadia GP EIR, no known human remains, including those interred outside of formal cemeteries, have been identified in the City.<sup>22</sup> While it is not expected human remains within a formal cemetery would be disturbed as a result of future development facilitated by the Project, human remains could be accidentally uncovered during grading and ground moving activities occurring during future housing development facilitated by the Project. Thus, future construction of the candidate housing sites has the potential to disturb sacred human remains through grading, thereby resulting in a potentially significant impact.

In the unlikely event that human remains are discovered, the provisions set forth in California PRC §5097.98 and State HSC §7050.5 would be implemented in consultation with the assigned most likely descendant as identified by the NAHC. In this event, no further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City would be required to comply with the California Native American Graves Protection and Repatriation Act (2001) and the Federal Native American Graves Protection and Repatriation Act (1990). These regulations would address inadvertent uncovering of human remains during grading. Compliance with the established regulatory framework would result in a less than significant impact.

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<sup>22</sup> City of Arcadia. 2010 General Plan Update Environmental Impact Report. Available at [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708). Accessed November 2021.

## VI. Energy

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Would the Project:

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

### **Construction**

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Therefore, future housing development facilitated by the HEU would result in the direct consumption of electricity and natural gas resources. Energy use from construction activities would primarily result from the use of diesel fuel (e.g., mobile construction equipment), fuel use by vehicles and construction equipment and vehicle trips associated with workers commuting to and from construction sites, and electricity (e.g., power tools) and fuel use. During construction, some incidental energy conservation would occur through compliance with State requirements. Construction equipment would also be required to comply with the latest Environmental Protection Agency (EPA) and CARB engine emissions standards. Construction-related energy consumption associated with future housing developments would be subject to project-level review, approval by the City, and environmental review under CEQA.

Future construction activities associated with future housing development would also be required to monitor air quality emissions using applicable regulatory guidance per SCAQMD. This requirement indirectly relates to construction energy conservation because when air pollutant emissions are reduced as a result of monitoring and the efficient use of equipment and materials, this results in reduced energy consumption. There are no aspects of the HEU that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during construction activities of future housing developments.

There are no unusual characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Future housing developments would be subject to environmental review under CEQA and project-specific review and approval to ensure compliance with applicable City goals, policies, and code requirements. Therefore, it is expected that construction fuel consumption associated with the HEU would not be any more inefficient, wasteful, or unnecessary than other similar projects of this nature. Impacts to energy resources associated with the future developments' construction activities would be less than significant. Project implementation would not grant any entitlements or building permit issuances that would result in wasteful, inefficient, or unnecessary consumption of energy resources.

## **Operations**

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU would consume energy during operations through building electricity, water, and natural gas usage, as well as fuel usage from on-road vehicles. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas and could potentially be fueled by electricity. All future housing development facilitated by the HEU would be subject to the City's development review process and required to adhere to all federal, State, and local requirements for energy efficiency, including Senate Bill (SB) 32's Scoping Plan that includes a 50 percent reduction in petroleum use in vehicles and the latest Title 24 standards. It is also be noted that the project design and materials would be subject to compliance with the most current Building Energy Efficiency Standards. Prior to issuance of a building permit, the City would review and verify that the project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The project would also be required adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore, project implementation would not result in a substantial increase in transportation-related energy uses, such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources.

### ***b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?***

**Less Than Significant Impact.** As previously discussed, the Project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the Project would be required to comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful, and unnecessary energy consumption, and no adverse impact would occur. Further, the Project would also be required to comply with the policies included in the Arcadia GP Goal RS-5 aimed at reducing energy consumption.

Future housing development facilitated by the proposed project would be required to obtain permits and comply with federal, State, and local regulations aimed at reducing energy consumption. Federal and State energy regulations, such as the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through future development permit review to minimize future energy consumption. Therefore, future housing development facilitated by the HEU would be required to be consistent with applicable federal, State, and local laws, policies, and regulations related to renewable energy and energy efficiency. No direct physical environmental impacts would occur.

## VII. Geology and Soils

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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?***
  - ii. *Strong seismic ground shaking?***

**Less Than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act (Act) was passed in 1972 to address the hazard of surface faulting to structures for human occupancy. Alquist-Priolo fault zones are those that contain active faults that have erupted within the last 11,000 years. Alquist-Priolo fault zones prohibit the development of structures which allow for human occupancy within their boundaries or along their fault lines. The City contains two fault zones; the Arcadia – Colton Fault, and a portion of the San Jacinto Fault. The City contains two fault zones; the Raymond Fault, and a portion of the Sierra Madre Fault. The portion of the Sierra Madre Fault is not considered an Alquist-Priolo Fault Zone, the Raymond Fault is. A portion of the candidate housing sites in are located in the Alquist-Priolo fault zone. However, these areas were previously evaluated in the Arcadia GP EIR analysis and future housing development facilitated by the HEU would be required to adhere to the applicable mitigation measures to reduce impacts to less than significant. Furthermore, the Project would comply with applicable goals and policies contained within the Arcadia GP including Goal S-1, Policy S-1.2, and Policy S-1.3.

All other future housing development outside of the Alquist-Priolo fault zone area would also be required to demonstrate conformance with seismic design guidelines and requirements contained in the current Title 24 - California Standards Building Code (CBC). The CBC contains design and construction regulations pertaining to seismic safety for buildings, which covers issues such as ground motion, soil classifications, redundancy, drift, and deformation compatibility. The City's Geotechnical Investigation Ordinance requires new developments to fully analyze the geological condition of their project sites as well as any potential effect associated with development of their project sites. Therefore, impacts would be less than significant, and no mitigation is required.

- iii. *Seismic related ground failure, including liquefaction?***
- iv. *Landslides?***

**Less Than Significant Impact.** Liquefaction is the loss of strength where loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions. According to the Arcadia GP's Figure S-3, Liquefaction and Landslide Hazards, the Project site contains a general area designated as an Area of Moderately Liquefaction Susceptibility in the City's northern and southern portions. The project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, future housing facilitated by the HEU could be subject to liquefaction. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local requirements. The City requires inclusion of a Soils Report, per the Arcadia MC §9105.09.110, to be included in grading plans. Therefore, future housing development would be subject to the requirements of the Arcadia MC §9105.09.110. Considering these requirements, including the preparation of Soils Reports for future housing developments, as required by City Codes, future housing development facilitated by the HEU would not create substantial risks to life or property associated with expansive soils. The Project candidate housing focus areas are relatively flat and not within an area susceptible to landslides. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, future development facilitated by the HEU would involve grading activities that would disrupt soil profiles, and thereby result in potential increased exposure of soils to wind and rain. Erosion on graded slopes could cause downstream sedimentation impacts. Other related impacts resulting from substantial short-term erosion or loss of topsoil include topography changes and the creation of impervious surfaces. As previously noted, all future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts concerning soil erosion or loss of topsoil.

Prior to initiation of ground disturbing activities, future project applicants would be required to demonstrate compliance with the Arcadia MC including requirements pertaining to erosion control to the satisfaction of the City engineers. Short-term construction-related erosion would be addressed through compliance with the NPDES program, which requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) and best management practices (BMPs) intended to reduce soil erosion. Considering these requirements, future housing development facilitated by the HEU would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be less than significant.

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

*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?*

**Less Than Significant Impact.** Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The potential for liquefaction is greatest in the northeast portion of the City, away from potential candidate sites.

The project would not result in direct housing construction but would facilitate future housing development throughout the City. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local requirements, including the City's Building and Construction codes (Arcadia MC Article VIII). Considering these requirements, including the preparation of Soils Reports for future housing developments, future housing development facilitated by the HEU would not create substantial risks to life or property associated with expansive soils. Therefore, impacts would be less than significant.

*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?*

**No Impact.** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. All future housing development facilitated by the HEU would be in areas served by the City's sanitary sewer system and would therefore not use septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur.

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

**Less Than Significant Impact.** While the Project would not result in direct housing construction, it would facilitate and provide a policy framework for future housing development throughout the City. Therefore, there is a likelihood that earthwork activities associated with future housing development facilitated by the HEU would encounter a paleontological resource. Direct impacts to paleontological resources could occur when earthwork activities (e.g., grading) cut into sensitive paleontological areas, thereby directly damaging the resource, or exposing paleontological resources to potential indirect impacts (e.g., surficial erosion, uncontrolled specimen collection). All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and relevant federal

and State regulations regarding paleontological resources. The City's development review process may require additional studies if paleontological resources are suspected to be impacted by future development on future candidate housing sites. Compliance with the established regulatory framework would ensure potential impacts from future housing development concerning the destruction of a unique paleontological resource or unique geologic feature would be less than significant.

## VIII. Greenhouse Gas Emissions

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Would the Project:

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

**Less Than Significant Impact.** The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. As noted in **Section 14: Population and Housing**, the future housing development facilitated by the HEU could potentially result in a population growth of 17,346 persons or approximately 30 percent from the estimated 2020 population of 57,820, as shown in **Table 1**.

Future housing development facilitated by the HEU would result in an increase in GHG due to increased VMT, construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. GHG emissions associated with future development are anticipated to include CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>. Future housing development would be subject to the City's discretionary review process, CEQA evaluation, and plan check process, which may require future applicants prepare air quality and greenhouse gas emission studies using the California Emissions Estimator Model (CalEEMod). CalEEMod relies upon project-specific land use data to calculate emissions. Site-specific details are not available for this analysis of the HEU, which is programmatic in nature.

The SCAG's Connect SoCal: The 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals.<sup>23</sup> The City's existing zoning designations could potentially facilitate housing developing in certain commercially zoned areas, and therefore reduce VMT and GHG impacts by creating housing opportunities in areas with pedestrian connectivity between residential and commercial uses and in proximity to public transportation, along established transportation corridors, near recreation opportunities, and away from environmentally sensitive resources. Future housing development facilitated by the HEU would be required to meet the mandatory energy requirements of California Green Building Standards Code (CALGreen) and the Energy Code (CCR Title 24, Part 6) in effect at the time of development. These regulations require that new development incorporate design features to capture energy efficiencies associated with building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Future housing development would

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<sup>23</sup> SCAG. *Connect SoCal (2020)*. Retrieved from <https://scag.ca.gov/connect-socal>. Accessed on August 25, 2021.

also be required to implement strategies outlined in the City's climate action plan, which includes several measures that have the potential to reduce GHG emissions. As a result, fewer VMT results in fewer GHGs. Therefore, future development facilitated by the HEU would not generate significant greenhouse gas emissions impacts. Impacts are anticipated to be less than significant.

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

**Less Than Significant Impact.** The Project does not include physical alterations to the City which could directly create changes to the City's existing air quality or regional air quality. Instead, the Project proposes multiple regulatory changes to the City's General Plan. The City has identified candidate housing sites which would allow for the future development of additional DUs. These candidate housing sites are spread throughout the City. **Exhibit 3: Map of Candidate Housing Sites** shows the location of the identified candidate housing sites within the City.

As summarized in **Section 14: Population and Housing**, additional housing developments facilitated by the Project would exceed the City's buildout growth projections in 2035. Therefore, the additional housing associated with the Project could inherently generate GHG at a rate that exceeds previous estimates or established limitations. Future housing development facilitated by the Project would result in an increase in GHG due to increased vehicle miles traveled (VMT), construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. GHG emissions associated with future development are anticipated to include CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>. At the time of their initiation, new developments facilitated by the Project would be required to comply with applicable federal, State, and local regulations regarding GHG emission. This includes policies instituted by SCAQMD in which developers would be required to comply with one of five exclusion tiers in order to avoid significant environmental impacts. Furthermore, future projects facilitated by the Project would continue to be required to comply with the California Building Code, which includes Title 24, Part 11. This requires residential developments to be planned and developed in a manner that is consistent with any applicable regulations involving energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality.

The HEU is a policy document and would not directly generate additional GHG emissions within the City. The Project is being created in accordance with the State Housing Law and general plan laws. To comply with the laws, the Project would need to be created within the framework provided by State law and would therefore not conflict with other established State laws such as GHG regulations. Further, future development facilitated by the Project would be required to comply with existing GHG regulations and with the proposed additions to the Arcadia GP.

Therefore, potential impacts to GHG levels as a result of Project implementation would be less than significant without mitigation.

## IX. Hazards and Hazardous Materials

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Would the Project:

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

**Less Than Significant Impact.** Exposure of the public or the environment to hazardous materials can occur through transportation accidents; environmentally unsound disposal methods; improper handling of hazardous materials or hazardous wastes (particularly by untrained personnel); and/or emergencies, such as explosions or fires. The severity of these potential effects varies by type of activity, concentration and/or type of hazardous materials or wastes, and proximity to sensitive receptors.

The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Demolition and construction activities associated with future housing development facilitated by the HEU would require transport of hazardous materials (e.g., asbestos containing materials, lead-based paint, and/or contaminated soils). This transport would be limited in duration. Compliance with handling measures is required by the City and the State Department of Toxic Substances Control (DTSC) during construction and operational phases of future development projects. These measures include standards and regulations regarding the storage, handling, and use of hazardous materials.

Future housing development facilitated by the HEU would not involve ongoing or routine use of substantial quantities of hazardous materials during operations (occupancy of future housing). Only small quantities of hazardous materials would be anticipated including cleaning solvents, fertilizers, pesticides, and other materials used in regular maintenance. Impacts associated with the transport, use, or disposal of hazardous materials would be less than significant.

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

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Therefore, excavation and grading activities associated with future development facilitated by the HEU could expose construction workers and the general public to unknown hazardous materials present in soil or groundwater. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to demonstrate consistency with the regulatory framework for minimizing upset associated with hazardous materials. Following compliance with the established regulatory

framework potential impacts involving the accidental discovery of unknown wastes or suspect materials during construction would be less than significant.

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

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. The future housing development facilitated by the HEU would have a potentially significant impact on the environment if it would emit hazardous emissions or substances within 0.25-mile of an existing or proposed school. However, by its nature, and compared to existing land uses, future residential uses from the proposed candidate housing sites would not typically emit hazardous materials, substances, and wastes that are more hazardous than that of more intense uses such as commercial, industrial, and mixed uses. Further, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. Adherence to California Hazardous Waste Control Law, California Health and Safety Code, and Resource Conservation and Recovery Act (RCRA) regulations would reduce potential impacts associated with the accidental release of hazardous materials. As a result, future housing development facilitated by the HEU would not conflict with any State or local plan aimed at preventing emissions or handling of hazardous materials near schools. Therefore, impacts would be less than significant.

***d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

**Less Than Significant Impact.** Refer to the responses above. The Department of Toxic Substance Control (DTSC) is a department of Cal/EPA and is the primary agency in California that regulates hazardous waste, clean-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Government Code §65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, the State Department of Health Services' lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board (SWRCB) as having underground storage tank leaks and having had a discharge of hazardous wastes or materials into the water or groundwater; as well as, lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

As previously noted, the HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. As Such, all future development would be subject to verification of the site(s) none-inclusion on the list of hazardous waste sites (Cortese List) compiled by the DTSC pursuant

to CGC §65962.5. Per Arcadia GP Goal S-4 and Implementation Actions 8-6 and 8-7, future housing development facilitated by the HEU would be required to comply with existing regulations; as well as prepare Environmental Site Assessments to identify and abate hazardous material releases from prior land uses.<sup>24</sup> In addition, compliance with applicable federal, State, and local regulations would result in a less than significant impact concerning hazardous materials sites.

***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?***

**Less Than Significant Impact.** As discussed in the Arcadia GP EIR, the nearest airport to the City is the El Monte Airport; however, the Runway Protection Zone (RPZ) for the El Monte Airport does not extend into the City of Arcadia.<sup>25</sup> However, future housing development facilitated by the HEU in the southern section of the City, including development within the Live Oak Corridor and the Arcadia Golf Course may extend into the navigable airspace (within two (2) miles) of the El Monte Airport and could affect aircraft landing and take-off operations.<sup>26</sup> As such, future housing development facilitated by the HEU in these areas would be required to comply with the height limitations in the FAR Part 77.<sup>27</sup> Further, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all applicable regulations. A Less than significant impact would occur in this regard.

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

**Less Than Significant Impact.** The project would not result in direct housing construction but would facilitate future housing development throughout the City. Future housing development facilitated by the HEU would increase allowable housing capacity in certain areas located throughout the City. This increase in density could result in an increased demand on emergency evacuation services in the event of a citywide or partial city emergency. However, the increased housing capacity associated with the HEU would predominantly occur within areas that have already been developed with residential and non-residential uses. Therefore, no changes in the City's existing circulation network are proposed or required under the HEU and no impact to emergency response or evacuation is anticipated. All future housing development facilitated by the HEU would be subject to the City's development review process, which may include

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<sup>24</sup> City of Arcadia. 2010 General Plan – Section 10 Implementation Plan. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/general%20plan/Implementation%20Plan.pdf>. Accessed November 2021.

<sup>25</sup> City of Arcadia. 2010 General Plan Environmental Impact Report – Section 4.7 Hazards and Hazardous Materials. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Hazards.pdf>. Accessed November 2021.

<sup>26</sup> Ibid.

<sup>27</sup> Ibid.

environmental review under CEQA, Arcadia MC, including §9103.07 which requires developers to include suitable site access for emergency vehicles. As a result, future housing development facilitated by the HEU would not conflict with any State, County, or local plan aimed at preserving and maintaining adopted emergency response or emergency evacuation plans. Impacts would be less than significant.

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

**Less Than Significant Impact.** Refer to **Section 20: Wildfire**. Future housing development facilitated by the Project would not directly or indirectly expose people or structures to a risk of loss, injury or death involving wildland fires. The City has significant interface areas where a proactive approach to preventing the start and spread of wildland fire is vital to protecting lives and property. The northern portion of the City's area is designated as Very High fire hazard severity zones, as mapped by CAL FIRE. The candidate housing sites may be developed in these areas adjacent to areas near open space; therefore, risk of wildfire could occur.

Federal, State, and county fire suppression agencies have responsibility areas in the City. To protect the City and its residents from fire hazards, the City has building and fire codes that must be followed. Using fire-resistant building materials, implementing fuel modification zones, and maintaining vegetation clearance around structures is required to protect buildings and reduce the potential loss of life and property. New development in wildland and urban-wildland interface areas must be consistent with the existing regulations, including the State Fire Code, to meet fire safety standards for building construction. Additionally, the California Building Code includes sections on fire-resistant construction material requirements based on building use and occupancy. The construction requirements are a function of building size, purpose, type, materials, location, proximity to other structures, and the type of fire suppression systems installed. Because the State of California, County of San Bernardino, and the City require adherence to building codes and review by the fire department to reduce wildland fires, fire hazard impacts would be less than significant.

## X. Hydrology and Water Quality

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Would the Project:

***a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?***

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development could result in potential impacts related to water quality over three (3) different periods:

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

Urban runoff, both dry and wet weather, discharges into storm drains, and in most cases, flows directly to creeks, rivers, lakes, and the ocean.

### ***Construction***

Short-term impacts related to water quality can occur during the earthwork and construction phases of future housing development projects. During this phase, the potential for erosion, siltation, and sedimentation would be the greatest. Additionally, impacts could occur prior to the establishment of ground cover when the erosion potential may remain relatively high. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and compliance with the established regulatory framework pertaining to water quality. If future developments disturb more than one acre of land surface, they would be required to obtain coverage under the National Pollution Discharge Elimination System (NPDES) storm water program. The NPDES Construction General Permit program calls for the implementation of best management practices (BMPs) to reduce or prevent pollutant discharge from these activities to the Maximum Extent Practicable for urban runoff and meeting the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology standards for construction storm water. Construction activities would be required to comply with a project-specific Stormwater Pollution Prevention Program (SWPPP) that identifies erosion-control and sediment-control BMPs that would meet or exceed measures required by the Construction Activity General Permit to control potential construction-related

pollutants. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized.

Additionally, the future development projects facilitated by the HEU would be required to comply with the City's Storm Water Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8). The Stormwater Ordinance establishes requirements for the management of storm water flows from development projects, both to prevent erosion and to protect and enhance existing water-dependent habitats. The Ordinance assures consistency with the purpose and intent of this chapter and shall implement the requirements of an NPDES Permit.

### **Operations**

Due to the built-out nature of the City, most surface flows are directed toward existing stormwater drainage facilities. The project would not result in direct housing construction but would facilitate future housing development throughout the City.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, to install, implement, and maintain the BMPs identified in Arcadia MC §7823 including, but not limited to erosion management; materials storage; inspection, maintenance, repair, upgrade of BMPs; and preparation of SWPPP. Additionally, future developments would be required to comply with Arcadia MC §7823 pertaining to Residential BMP requirements including minimum BMPs specified for landscaping, home care and maintenance, and motor vehicle maintenance.

All new development would also be required to comply with existing water quality standards and waste discharge regulations set forth by the State Water Quality Control Board (SWQCB). Future developments facilitated by the HEU would comply with these regulations and waste discharges would be connected to the public wastewater system.

Future housing development facilitated by the HEU would be required to adhere to all federal, State, and local requirements for avoiding violation of water quality standards during construction and operations. Considering these requirements, future housing development facilitated by the HEU would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** In 2014, the State of California adopted the Sustainable Groundwater Management Act (SGMA) to help manage its groundwater. The SGMA requires that local Groundwater Sustainability Agency (GSAs) be formed for all high and medium priority basins

in the State. These GSAs must develop and implement Groundwater Sustainability Plans (GSPs) for managing and using groundwater without causing undesirable results.

The City's potable water supply is served by the City via the Public Works Services Department. These water utilities acquire their water from groundwater basins in the area, surface water, and from importing water from surrounding utilities and water districts. While potential projects could increase water demand by increasing residential density and population, the City would need to meet this demand without increasing groundwater withdrawal significantly. Examples of achieving this would be to increase the amount of water imported, implementing water conservation measures, increase recycled water use, and/or implement groundwater recharging projects.

Future developments facilitated by the Project could potentially increase the amount of impervious surface area in the City from development of undeveloped parcels, particularly the 25.86-acre Arcadia Golf Course. As such, future development within the Arcadia Golf Course will be required to comply with the Arcadia MC §7554.9 – Stormwater Management and Rainwater Retention and implement BMPs into the landscape and grading design plans to minimize runoff and to increase on-site infiltration that recharges groundwater and improves water quality. However, a large portion of the identified candidate housing site areas have been developed into residential and non-residential uses. Because redevelopment of existing structures is a primary effort, any potential project would not significantly interfere substantially with groundwater recharge.

Additionally, construction of any potential project that would involve excavation into or below the water table would require dewatering and those dewatering operations would need to comply with all dewatering requirements to protect groundwater quality and supply. This is coupled with the BMPs that will be utilized during construction as laid out in the SWPPP to limit the amount of pollution in stormwater that recharges groundwater basins. With the proper implementation of stormwater BMPs, the impact of potential projects on groundwater resources would be minimized and these impacts would be less than significant.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
- i. Result in 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 storm water drainage systems or provide substantial additional sources of polluted runoff?***

***iv. Impede or redirect flood flows?***

**Less Than Significant Impact.** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Most candidate housing candidate sites are developed and contain impervious surfaces, which direct surface flows toward existing City facilities. Due to the primarily built-out nature of the City, construction of future housing developments facilitated by the HEU would not substantially alter the existing drainage pattern through the addition of impervious surfaces. The drainage areas, as well as the drainage characteristics/patterns in the implementation condition would be similar to existing conditions.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local requirements for avoiding impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river, including the City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8).

Considering these requirements, future housing development facilitated by the HEU would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** The City of Arcadia is located approximately 23.6 miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the Project site to be inundated by a large, catastrophic tsunami is extremely low. No steep slopes are in the vicinity of the City; therefore, the risk of mudflow is insignificant. Additionally, as previously noted the Federal Emergency Management Agency (FEMA) identifies the entire City of Arcadia to be in Flood Hazard Zone X, which is identified as 500-year Floodplain, an area of minimal flood hazard.<sup>28</sup>

Furthermore, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for avoiding and minimizing

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<sup>28</sup> FEMA. (2008). FEMA Flood Map Service Center: Search By Address. Retrieved from: <https://msc.fema.gov/portal/search?AddressQuery=arcadia#searchresultsanchor> Accessed October 12, 2021.

impacts related to flood hazards, tsunamis, or seiches, including the Arcadia GP policies and Arcadia MC codes. Considering these requirements, the future housing development facilitated by the HEU would not result in significant increased risk concerning release of pollutants due to inundation, tsunami, or seiche zones. Therefore, HEU impacts would be less than significant.

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

**Less Than Significant Impact.** As previously noted, in 2014, the SGMA was passed, The SGMA provides authority for agencies to develop and implement groundwater sustainability plans (GSP) or alternative plans that demonstrate the water basins are being managed sustainably. As discussed under Threshold 10b, the City is unlikely to face groundwater impacts through the implementation of the Project. Therefore, future housing development facilitated by the HEU would not obstruct implementation of the Sustainable Groundwater Management Act (SGMA) and would comply with the Arcadia MC §7554.9 – Stormwater Management and Rainwater Retention.

The City's Stormwater Management and Discharge Control Ordinance (Arcadia MC Article VII Chapter 8) aims to protect water resources and improve water quality. The ordinance causes use of management practices by the city and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the State and control contribution of pollutants to City's municipal separate storm sewer systems (MS4s), and to ensure that the City is compliant with RWQCB and with applicable State and federal law.

Future developments facilitated by the HEU would be required to prepare a stormwater management plan and incorporate stormwater standards manual requirements into design documents to minimize potential impacts to water quality. Submitted materials would be required to demonstrate how the requirements of this stormwater ordinance would be met, and the permit or approval would not be approved unless the decision maker determines that the application complies.

Further, dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to comply with the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer.

All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to all federal, State, and local requirements for avoiding and minimizing conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan.

Further, future housing development facilitated by the HEU would not prevent the City's Clean Water Program from ensuring that MS4 Permit, and Basin Plan requirements are met. As a result, future housing development facilitated by the HEU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant.

## XI. Land Use and Planning

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State Housing law requires that the Housing Element identify specific sites that are potentially suitable for residential development. The City has compiled an inventory of candidate housing sites, which includes properties that are dispersed throughout the community to minimize the potential for adverse changes to the neighborhood character and aesthetics and reduce the potential for adverse environmental impacts. As part of the initial site investigation, the candidate housing sites inventory encompassed six focus areas that were identified as potentially suitable areas for future housing expansion (see **Exhibit 3**). The opportunity area locations and candidate housing sites are summarized here and described later in this section

Would the Project:

***a. Physically divide an established community?***

**Less Than Significant Impact.** Projects that divide an established community can involve large scale linear infrastructure, such as freeways, highways, and drainage facilities, that bisect an established community or create barriers to movement within that community. Additionally, “local undesirable land uses,” such as prisons or landfills sites within economically depressed areas can also divide an established community.

As previously noted, the HEU does not propose any development. The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. All future housing development facilitated by the HEU would be subject to discretionary permits and would occur as market conditions allow and at the discretion of the individual property owners. However, the HEU would identify a series of implementation actions that would increase housing capacity. Future housing development would largely occur in developed areas and in areas currently zoned with allowed residential uses; therefore, an increase in housing capacity would be consistent with existing zoning and would not divide an established community. Further, it is not anticipated that future housing development facilitated by the HEU would require substantial road-widenings or other features which could divide the established community. As well, candidate housing sites have been identified throughout the City, rather than concentrated in a single area, thus would not divide an established community. For this reason, a less than significant impact would occur.

***b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

**Less Than Significant Impact.** The HEU includes focus areas for future housing development to meet the City’s RHNA allocation of 3,214 units. a. As noted above, the project would not result in direct housing construction, but would facilitate future housing development. Future housing

development facilitated by the HEU, which would occur as market conditions allow and at the discretion of the individual property owners. However, the HEU would identify a series of implementing actions to increase the City's housing capacity. As part of the HEU, additional housing units would be accommodated on the candidate housing sites that are ultimately selected through revisions to the City's Housing Element. Future housing development facilitated by the HEU is anticipated to increase the City's housing stock where capacity exists.

Future housing development facilitated by the HEU would be the City's development review process, which may include discretionary permit approval and environmental review under CEQA, as well as, be required to comply with applicable federal, State, and local laws and local policies and regulations, as applicable to new housing development. The HEU is subject to comply with applicable State Housing law. As such, the HEU would be consistent with applicable land use and planning policies in the State, regional, and local context as necessary to meet that legislation. This includes consistency with the General Plan. Future housing development facilitated by the HEU would therefore be consistent with all applicable land use and planning policies and regulations intended to minimize environmental effects; therefore, a less than significant impact would occur.

## XII. Mineral Resources

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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?*

**Less Than Significant Impact.** According to the Arcadia GP EIR, there are no mining operations currently ongoing in the City. The Rodeffer Quarry operated at the southern end of the City from 1967 to 1990.<sup>29</sup> In 1994, the City approved the reclamation plan for the quarry that allowed the import of inert materials to fill the quarry pit.<sup>30</sup> Landfilling operations are regulated by the RWQCB, CalRecycle, the California Department of Mines and Geology (CDMG).<sup>31</sup> To date, the Rodeffer Quarry is partly filled and landfilling operations are ongoing.<sup>32</sup> The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. As previously noted, future housing development facilitated by the HEU would be subject the City’s development review process, which may include discretionary permit review and approval and environmental review under CEQA, as well as, be required to comply with applicable federal, State, and local laws and local policies and regulations, as applicable to new housing development. Future housing development will also be required to adhere to Arcadia GP Goals RS-7 and Policies RS-7,1 through 7,3 which aim to prevent the loss of availability of regionally or locally significant aggregate resources. Therefore, impact would be less than significant with respect to mineral resources.

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<sup>29</sup> City of Arcadia. 2010 General Plan Environmental Impact Report Section 4.10 – Mineral Resources. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/MineralResources.pdf>. Accessed November 2021.

<sup>30</sup> Ibid.

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

### XIII. Noise

Would the Project:

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

**Less Than Significant Impact.**

**Construction Noise.** The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would result in construction noise generated from development activities.

In general, construction would typically involve the following construction sequences: (1) site preparation and/or demolition; (2) grading and utilities construction; (3) building construction; (4) paving; and (5) architectural coatings. Typical construction equipment would include backhoes, excavators, graders, loaders, compactors, cranes, trucks, pavers, pneumatic tools, generator sets, and air compressors. With exception to pile-driving activities, construction equipment with substantially higher noise-generation characteristics (such as rock drills and blasting equipment) would not be anticipated for construction of typical residential developments. Typical construction equipment generates maximum noise levels at 50 feet from the noise source ranging between 80 dBA for backhoes and loading trucks, to 85-90 dBA for graders and excavators, as shown in **Table 8, Maximum Noise Levels Generated by Construction Equipment** below.

**Table 8: Maximum Noise Levels Generated by Construction Equipment**

Equipment	Acoustical Use Factor	L <sub>max</sub> at 50 Feet (dBA)	L <sub>max</sub> at 100 Feet (dBA)
Concrete Saw	20	90	84
Crane	16	81	75
Concrete Mixer Truck	40	79	73
Backhoe	40	78	72
Dozer	40	82	76
Excavator	40	81	75
Forklift	40	78	72
Paver	50	77	71
Roller	20	80	74
Tractor	40	84	78
Water Truck	40	80	74
Grader	40	85	79

Equipment	Acoustical Use Factor	L <sub>max</sub> at 50 Feet (dBA)	L <sub>max</sub> at 100 Feet (dBA)
General Industrial Equipment	50	85	79
Notes: 1. dBA: A-weighted decibels; L <sub>max</sub> : maximum noise level. 2. The 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 Transit Administration, <i>Transit Noise and Vibration Impact Assessment Manual</i> , 2020.			

In general, construction noise can vary substantially from day to day, depending on the level of activity and the specific type of equipment in operation. Additionally, construction activities associated with future housing development facilitated by the HEU is anticipated to occur in incremental phases over time based on market demand, economic, and planning considerations. As a result, construction-related noise would not be concentrated in any one particular area of the City.

All future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and be required to comply with the Arcadia MC Chapter 6, Noise Regulation. Construction associated with future housing development facilitated by the HEU would be required to comply with the Arcadia MC §4610.3 (Noise Limits) and adhere to Arcadia GP Goal N-1 and Policies N-1,1 through N-1.5 would reduce any potential impacts with regard to noise to less than significant.

For some future housing developments, such as those near sensitive noise receptors, the City may choose to require conditions of approval to include measures under its development review process such as temporary sound barriers and shielding to reduce potential noise impacts on sensitive receptors. For example, acoustically designed enclosures and buildings can provide up to approximately 50 dBA of noise reduction, depending on the noise abatement treatments implemented. The Arcadia Noise Ordinance exempts construction noise that occurs between the hours of 7:00 AM and 7:00 PM on any day except Sundays and major holidays.

**Operations Noise.** The project would not result in direct housing construction but would facilitate future housing development throughout the City. Future housing development facilitated by the HEU would result in additional housing, people, pets, and automobiles in the City. Noise would be generated by stationary operation-related sources, such as heating, ventilation, and air conditioning (HVAC) units, tankless water heaters, generators, lawn maintenance equipment, and swimming pool pumps. All future housing development facilitated by the HEU may be subject to discretionary permits and environmental review under CEQA and would be required to demonstrate compliance with Arcadia MC Chapter 6.

Noise is also likely to occur from line sources, such as motor vehicle traffic. Future housing development facilitated by the HEU would result in increased traffic volumes on local city roadways, thereby increasing cumulative noise levels. Given the City's largely developed nature, new housing development would not be expected to significantly increase traffic volume on local

roadways. Additional average daily trips (ADT) from future housing development facilitated by the HEU would need to more than double current ADT for there to be a discernable difference in noise levels (i.e., more than 3 dBA increase). Furthermore, most of the identified focus areas are within previously developed portions of the City already generating traffic volumes and mobile noises. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process. Compliance with Arcadia MC Chapter 6 would ensure future construction and operations related noise impacts would be less than significant.

***b. Generate excessive ground borne vibration or ground borne noise levels?***

**Less Than Significant Impact.** The project would not result in direct housing construction but would facilitate future housing development throughout the City. Construction activities associated with future housing development facilitated by the HEU could result in varying degrees of groundborne vibration impacts from heavy equipment operations, depending on the construction procedure and equipment used. Construction equipment operations would generate vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of 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, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

As previously discussed, the Project does not include physical alterations to the City. If proposed buildout were to occur, the additional allowable residential density at the candidate housing sites would remain within the expected population growth of the City and Region (See **Section 14: Population and Housing**). The increase in density is not anticipated to change the overall impact of growth in the City compared to what was assumed in the Arcadia GP and SCAG's Connect SoCal RTP/SCS. Any future development within the candidate housing sites would be subject to the City's standard development review process, including compliance with the City's GP, compliance with the municipal code, and site-specific CEQA review. Therefore, impacts are 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?*

**Less Than Significant Impact.** Currently, there are no airports within the City of Arcadia. As previously discussed, the closest airport to Arcadia is the El Monte Airport, which is located approximately 1.25 miles to the south of the City boundary. Per the Arcadia GP EIR, aircraft operations at this airport are audible at the southern section of the City, and flyovers at low levels are audible over the City of Arcadia. Future housing development within the Live Oak Corridor and the Arcadia Golf Course would be subject to the City's development review process on a case-by-case basis, which may include discretionary permit review and approval and environmental review under CEQA. The HEU is a policy document and does not directly involve housing construction. The HEU would not contain policies that would conflict with airport land use plans nor would it promote development near any airports. Therefore, less than significant impact related to exposing people to excessive as a result of airport land use would occur.

## XIV. Population and Housing

Would the Project:

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

**Less Than Significant Impact.** The HEU is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development on candidate housing sites throughout the City and would not directly induce any population growth. To meet the City's RHNA allocation of 3,214 units, the HEU identifies a series of implementing actions to increase the City's housing capacity that would induce some planned population growth in the City. As a component of Statewide housing legislation, any housing growth associated with the Project would be in accordance with State-level regulation and would therefore not be considered unplanned.

Any future housing development facilitated by the HEU would occur in urbanized locations near existing infrastructure (roads, utilities) and served by fire and other emergency responders. As shown in **Table 7**, the City has identified the total potential housing development capacity of approximately 7,222 housing units. As previously noted, because the Project does not propose physical alterations, direct population growth would not be induced solely due to the Project's implementation.

**Table 9, Population Increase from Housing Element** below summarizes the projected population growth associated with the implementation of the Project and future buildout of the City's proposed 7,222 candidate housing units.

**Table 9: Population Increase from Housing Element**

Definition	6 <sup>th</sup> Cycle Housing Element
Number of RHNA Allocation Units	3,214
Number of Potential Candidate Housing Units	7,222
Existing Capacity including ADUs	2,386
New Housing Units	4,836
Persons per household ( <i>Department of Finance, 2020</i> )	2.86
Population ( <i>Department of Finance, 2020</i> )	57,820
Total Population Forecast with HEU	71,651
Forecasted Population Increase with HEU	13,831
Population Growth Forecast by Percentage with HEU	24%
2035 Development Capacity of 2010 Arcadia GP (Maximum Buildout)	61,995
Unplanned Additional Population Growth Forecast from 2035 Maximum Buildout with HEU	9,656
Population Growth Forecast (2020-2035) percentage without HEU	7.2%
Population Growth Forecast (2020-2035) by Percentage with HEU	15.6%

Total Forecasted SCAG Population 2045	62,200
Total Forecasted SCAG Population 2045 with HEU	76,031
SCAG 2045 Population Growth Forecast Percentage with HEU	22.2%

As shown in **Table 9**, future development facilitated by the Project would therefore enable the development of a total of 7,222 additional housing units within the City. When multiplied by the Department of Finance (2020) average persons per household of 2.86, the 7,222 housing units facilitated by the HEU would generate an approximately 13,831-person population increase within the City. When combined with the 2020 total population of 57,820 persons, the City would potential grow to a total population of approximately 71,651 during this HEU planning period. This would create an approximate 24 percent increase in the 2020 population. However, the Arcadia GP EIR discussed the projected maximum population growth within the City in 2035 and estimated the maximum buildout to be approximately 61,995 persons.<sup>33</sup> The proposed candidate housing sites are predominantly situated in urbanized and developed areas in the City within existing land use and zoning designations, consistent with the Arcadia GP and were evaluated as part of the total planned population and housing growth in the GP. Therefore, the HEU would result in an increase of approximately 9,656 persons or 15.6 percent in unplanned population increase.

Without implementation of the Project, the City is anticipated to experience a population increase of approximately 7.2 percent to the projected 2035 maximum buildout population, as shown in **Table 9**. The HEU would result in a significant impact if it would “induce substantial unplanned population growth in an area.” While the HEU could potentially increase the population forecast by 15.6 percent, this increase would not be considered substantial as the growth would occur over an extended period and the HEU is intended to help the City meet its RHNA allocation. Future housing development facilitated by the HEU is intended to be dispersed throughout the community in areas suited for residential development. As previously discussed, future housing development facilitated by the HEU would occur incrementally through 2029, based on market conditions and other constraints.

The implementation of the HEU would potentially increase the City’s projected population estimated by the SCAG RTP/SCS. The SCAG RTP/SCS anticipates the City’s population to be 62,200 people by 2045. With the inclusion of the Project this number will be increased by 22.2 percent to reach a total of 76,031 people. As with other projections, this number is a conservative estimate based on the development of the entire set of candidate sites.

It is noted that the Project would facilitate development of affordable housing units, in accordance with State law. The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed within the City that meet these household income categories, including those working in local retail/commercial service businesses, hotels,

<sup>33</sup> City of Arcadia. *2010 General Plan Environmental Impact Report Section 4.12 – Population and Housing*. Available at <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Population.pdf>. Accessed November 2021.

caregivers, property caretakers, and public occupations. Therefore, job availability would not be readily affected by the implementation of the Project and would not lead to unexpected population growth.

As a component of Statewide housing legislation, any housing growth and population growth associated with the Project would be in accordance with State-level regulation and would therefore not be considered unplanned. Additionally, future housing development facilitated by the HEU would occur in urbanized locations near existing utilities and service systems, and areas already served by public services (e.g., police and fire protection, and other emergency responders).

Future housing development would be subject to discretionary permits and would be assessed on a case-by-case basis for potential effects concerning population growth. Additionally, future housing development would be subject to compliance with all Federal, State, and local requirements for minimizing growth-related impacts. Local requirements include those Stated in the Arcadia GP and Arcadia MC.

As discussed throughout this IS/ND, all future housing development facilitated by the HEU would be subject to the City's development review process, which may include environmental review under CEQA, and would be assessed on a project-by-project basis for potential effects concerning population growth. Additionally, future housing development would be subject to compliance with all federal, State, and local requirements for minimizing growth-related impacts. Therefore, the HEU would not induce substantial unplanned population growth in the City directly or indirectly, a less than significant impact would occur.

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

**Less Than significant Impact.** Senate Bill (SB) 166 (2017) requires a City or County to ensure that its Housing Element inventory can accommodate its share of the regional housing need throughout the planning period. It prohibits a City or County from reducing, requiring, or permitting the reduction of the residential density to a lower residential density than what was utilized by the HCD for certification of the Housing Element, unless the City or County makes written findings supported by substantial evidence that the reduction is consistent with the adopted General Plan, including the Housing Element. The City has identified sites which can meet the 1,672 unit low and very-low income RHNA need and can also accommodate a three percent buffer for those income categories, as demonstrated in **Table 7**. The City understands that should a "No Net Loss" scenario occur during the 2021-2029 planning period and they will be required to identify additional sites to accommodate any shortfall of capacity should that scenario occur. Therefore, the HEU's potential impacts, including from future development facilitated by the HEU, concerning displacement of existing people or housing, and need to construct replacement housing elsewhere would be less than significant.



## XV. Public Services

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Would the Project:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 Project is a policy document and would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the Project would increase demand for fire protection services over time. Fire protection services are provided by the Arcadia Fire Department. The Arcadia Fire Department would continue to provide services to the future housing developments facilitated by the Project.

Future development in the Arcadia Golf Course would incrementally increase the demand for fire protection services to area. However, the proposed golf course site is already being serviced by existing infrastructure (e.g., roads and utilities) and already served by the Arcadia Fire Department.

All future housing development facilitated by the HEU would be subject to development review process, which may include review pursuant to CEQA, and be required to comply with GP Goal S-5 and Policies S-5.1 through S-5.12 and to adhere to the 2019 California Fire Code and Arcadia MC §3122.7 (Fire Code). Future projects would also be subject to impact fees and tax revenue will be generated from their development. These sources of revenue will support public goods, like fire protection services, to continue and improve. Future projects will also incorporate fire preventative designs and will provide access for emergency services. The Project's impact on fire protection is anticipated to be less than significant.

- b. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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 City receives police protection services through the Arcadia Police Department. Future residential-based Projects may slightly increase demand of protective services, but it is not expected to negatively impact the ability of the police department to provide services to the City. Similar to fire services, the identified focus areas are in urbanized locations near existing infrastructure (e.g., roads and utilities) and would be located near areas already served by the Arcadia Police Department.

As well, the addition of future development will pay development fees, as well as continued tax revenue that will support public services, such as the police officers, facilities, and supplies. All future housing development facilitated by the HEU would be subject to development review process, which may include review pursuant to CEQA, and be required to comply with GP Goal S-5 and Policies S-5.1 through S-5.12. Therefore, the Housing Element would result in a less than significant impact on police protective services.

***c. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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?***

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU and the resulting unplanned population growth of approximately 13,205 persons and could generate student population growth in Arcadia Unified School District (AUSD). The student population growth would increase the demand for school services. Any future housing development facilitated by the HEU would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new residential projects to offset the cost of new development. Because the construction of new school facilities to serve the future housing development facilitated by the HEU is not included in the Project, no physical impacts in this regard. Less than significant impact is anticipated to concerning construction of school facilities.

***d. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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?***

**Less Than Significant Impact.** Please refer to Section XVI: Recreation below.

***e. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical 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?***

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. Future housing development facilitated by the HEU and the resulting unplanned population growth of approximately 13,205 and would incrementally increase the demand for library facilities. Any future housing development facilitated by the HEU would occur in urbanized locations near existing facilities

that currently provide service to these areas. Therefore, it is anticipated that the increased demand would not be substantial or such that it would warrant construction of a new facility.

Although future Projects may increase demands on library facilities, demand would be at least partially offset by funding generated by development fees and by tax revenue of higher numbers of residents. Therefore, the HEU would not result in substantial adverse physical impacts associated with the provision of new library facilities. Impacts would be less than significant.

## XVI. Recreation

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Would the Project:

***a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**Less than Significant Impact.** The Project is a policy document and would not directly impact recreation for the City of Arcadia. Future residential projects may induce increased demand of parks and other recreational facilities. It is possible that future developments will include the construction of additional recreational facilities and developer-produced parks, but it is presently unknown until future housing projects are proposed. Future development facilitated by the Project would be required to pay development impact fees and any tax revenue generated will benefit the funding for parks and facilities to offset potential increases in demand.

The City of Arcadia offers a variety of recreational parks and facilities. Arcadia has mini-park/pocket parks, neighborhood parks, community parks joint use parks and facilities, and County parks and facilities. As of Arcadia's 2010 General Plan, Arcadia has a total of 32 parks, excluding 7 recreational facilities. Arcadia has a standard ratio of 2.43 acres of parks per 1,000 residents. This ratio is used for park dedication and fee requirements. The built-out nature of Arcadia's environment makes it challenging to find opportunities for more recreational facilities. According to the recommendations from the National Recreation and Parks Association (NRPA), a park should cover a ¼ to ½ mile service area radius. Arcadia satisfies this recommendation in most cases.<sup>34</sup>

Additionally, the HEU's candidate housing sites are dispersed throughout the community to minimize the potential for adverse changes in the neighborhood character and reduce the potential for adverse impacts on recreation amenities. Adherence to mandatory discretionary permit requirements and regulations for providing recreation would support the City's goals for providing sufficient recreation opportunities for residents. For these reasons, the HEU and future housing development facilitated by the HEU would not result in substantial physical deterioration of existing neighborhood or regional parks. Therefore, impacts would be less than significant.

***b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

**Less than Significant.** See answer (a) above. The HEU would not lead to direct impacts, but future projects that may necessitate the expansion of recreational facilities would be required to undergo environmental review and comply with any applicable discretionary actions related to

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<sup>34</sup> City of Arcadia. (2010). City of Arcadia General Plan. Pages 7-4 through 7-15. Retrieved from: [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_zoning/general\\_plan.php#outer-446](https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-446) Accessed October 12, 2021

the expansion of recreational facilities. As the Project does not directly propose the creation, modification, or removal of recreational facilities, a less than significant impact is anticipated.

## XVII. Transportation

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Would the Project:

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

**Less Than Significant Impact.** The Project is a policy document and not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Further, the HEU does not include any goals, policies, or implementation programs that would conflict with plans or other regulations that address the circulation system. Future development projects would be reviewed on a case-by-case basis to ensure consistency with applicable regulations that address the circulation system.

Bus services are provided to the City via the Los Angeles County Metropolitan Transportation Authority (LACMTA), a public agency that provides services to Los Angeles County. The LACMTA provides six (6) bus routes and four (4) Foothill Transit routes, which primarily serve the commercial areas and corridors in the City. In addition, the City also operates Arcadia Transit, which provides a curb-to-curb service in response to individual travel requests. The service is open to the general public and operates to all destinations within the City limits and give (5) designated medical facilities located beyond the City limits.<sup>35</sup> The Metro Gold Line provides light rail transit services from downtown Los Angeles to the City Azusa, with a stop in the City of Arcadia. The Metro Gold Line currently plans to extend the services from Azusa to Pomona, which is expected to be completed in 2025. Implementation of the Project would not conflict with the service capacity of these transportation providers.

All future housing development facilitated by the HEU would be subject to City's development review process, which may include environmental review under CEQA, and comply with applicable General Plan, Municipal Code, policies/standards concerning public transit and pedestrian facilities. This includes policies and regulations required to improve public access and safety for people who walk and bike, and improve the transportation system, as applicable. Future housing development on the candidate housing sites would be required to adhere to all State requirements for consistency with transportation plans.

The City's review process would examine project compatibilities with the surrounding areas. Conditions of approvals may include requirements for street improvements and dedications and traffic circulation. As a result, future housing development on the candidate housing sites facilitated by the HEU would not conflict with an adopted program, plan, ordinance, or policy

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<sup>35</sup> City of Arcadia. 2010 General Plan EIR. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Development%20Services/eir/Transportation.pdf>, Accessed November 2021.

addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant.

***b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?***

**Less Than Significant Impact.** Senate Bill 743 (SB 743) was approved by the California legislature in September 2013. SB 743 requires changes to California Environmental Quality Act (CEQA), specifically directing the Governor’s Office of Planning and Research (OPR) to develop alternative metrics to the use of vehicular “level of service” (LOS) for evaluating transportation projects. OPR has prepared a technical advisory (“OPR Technical Advisory”) for evaluating transportation impacts in CEQA and has recommended that Vehicle Miles Traveled (VMT) replace LOS as the primary measure of transportation impacts. The Natural Resources Agency has adopted updates to CEQA Guidelines to incorporate SB 743 that requires use of VMT for the purposes of determining a significant transportation impact under CEQA.

CEQA Guidelines Section 15064.3(a) states that VMT is the most appropriate measure of transportation impacts. As such, Section 15064.3(b) provides criteria for analyzing transportation impacts. The proposed candidate housing sites could potentially result in increased traffic compared to existing conditions. Trips generated as a result of increased density or new development under the HEU have the potential to increase vehicle miles traveled (VMT) within the City. However, a majority of the proposed candidate housing sites are within urban and developed areas with existing roadways, public transit services, and infrastructures and therefore would not be expected to result in an increase in VMT. Further, future housing development in some areas of the City would provide more housing closer to employment and commercial areas, further increasing opportunities to reduce VMT and increase the ease of walking, cycling, and using public transit.

The HEU would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. The candidate housing sites are dispersed throughout the City to reduce the potential for adverse environmental impacts. The intent is to reduce impacts by placing housing near public transportation and recreation opportunities and away from environmentally sensitive resources. Future development projects would be reviewed on a case-by-case basis to ensure consistency with application regulations that address the circulation system, including Vehicle Miles Travelled (VMT).

All future housing development facilitated by the HEU would be required to adhere to all State and local requirements for avoiding significant impacts related to VMT. Any traffic demand measures required for mitigation would be required to comply with Arcadia GP Goals CI-11, CI-2, and CI-5, which encourage the maintenance of efficient roadway capacities and minimization of traffic hazards near residential uses. A less than significant is anticipated in this regard.

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

**Less than Significant Impact.** The Project would not result in direct housing construction but would facilitate future housing development throughout the City. Because future housing development facilitated by the HEU would occur on mostly developed properties use existing roadways that are connected and adjacent to the existing transportation network, hazards due to a geometric design feature or incompatible uses are not anticipated. All future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and be evaluated at the project-level for its potential to increase hazards due to a geometric design feature and to verify compliance with City development requirements within the Arcadia MC.

Future housing development facilitated by the HEU would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access; and would be required to adhere to all State and local requirements for avoiding construction and operations impacts related to design and incompatible uses. As a result, future housing development facilitated by the HEU would not substantially increase hazards due to design features or incompatible uses. Therefore, impacts would be less than significant.

***d. Result in inadequate emergency access?***

**Less Than Significant Impact.** The project would not result in direct housing construction but would facilitate future housing development throughout the City. Because future housing development facilitated by the HEU would occur on mostly developed properties, it is not anticipated that future housing development would result in inadequate emergency access. Additionally, all future housing development facilitated by the HEU would be subject to the City's development review process and required to demonstrate consistency with the Arcadia GP and Arcadia MC.

The City has adopted the California Fire Code (CFC) under Arcadia MC §3122.11. The CFC sets standards for road dimension, design, grades, and other fire safety features. Additionally, more stringent CBC standards also apply regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Future housing development would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access. Thus, compliance with the Arcadia MC would ensure adequate access issues, including emergency access. As a result, future housing development facilitated by the HEU would not result in inadequate emergency access. Therefore, impacts would be less than significant.

## XVIII. Tribal Cultural Resources

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Would the Project:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

**Less Than Significant with Mitigation.** Pursuant to Government Code §21080.3.2(b) and §21074(a)(1)(A) -(B) (AB 52] the City has provided formal notification to California Native American tribal representatives that have previously requested notification from the City regarding projects within the geographic area traditionally and culturally affiliated with tribe(s). Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC §21074. To determine whether there are sensitive or sacred Native American resources on or near that site that could be affected by the HEU, the City also requested the NAHC to perform a Sacred Lands File (SLF) search. The NAHC utilizes the United State Geological Survey (USGS) Geologic Maps as reference for the search. On June 1, 2021, the City received the negative result of the Sacred Lands File (SFL) from the Native American Heritage Commission (NAHC). On June 10, 2021, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18. No responses were received from any of the California Native American tribe representatives regarding AB 52 and SB 18.

## XIX. Utilities and Service Systems

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Would the Project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater 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 is the sole provider of water and provides water services to over 50,000 people. The City owns and operates its water distribution system through the Public works Services Department. The Project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would be located in developed areas of the City where water infrastructure already exists. Further, most of the candidate housing sites are developed and include existing connections to the District's system. Accordingly, future housing development facilitated by the HEU is not anticipated to require or result in the relocation or construction of new or expanded water facilities that could cause significant environmental effects. Notwithstanding, all future housing development facilitated by the HEU would be subject to environmental review under CEQA, the City's development review process, and required to adhere to General Plan policies and Arcadia MC regulations. A less than significant impact would occur. Water supply is further discussed in impact discussion (b) below.

### ***Wastewater***

Future projects may be required to implement a Water Pollution Prevention Program (SWPPP) to ensure that water quality is not degraded and so that storm water flowing from the site would not exceed wastewater treatment requirements. The Santa Ana Regional Water Quality Control Board (RWQCB) also has requirements. Wastewater from the City is treated by the Whittier Narrows Water Reclamation Plant (WNWRP), the San Jose Creek Water Reclamation Plant (SJCWRP), and the Joint Water Pollution Control Plant (JWPCP), however, the percentage breakdown between these three plants in treating the City's wastewater is unknown. The Los Angeles County Sanitation Districts (LACSD) estimates approximately 69 gallons of wastewater is generated per person per day within LACSD's service area. Based on a 2020 population of 53,998 within the City, the estimated amount of wastewater collected within the City's service area is approximately 3.7 million gallons (MG) per day (or approximately 4,200 AFY).<sup>36</sup> The City is

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<sup>36</sup> City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 6-40 through 6-41. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

expected to be able to accommodate future projects, such as those proposed under the Project. Impacts are less than significant. Wastewater capacity is further discussed in impact (c) below.

### ***Dry Utilities***

Southern California Edison (SCE) provides electricity and Southern California Gas Company (SoCal Gas) services gas utilities. Telecommunications service is provided by AT&T.<sup>37</sup> The project would not result in direct housing construction but would facilitate future housing development throughout the City. The housing development facilitated by the HUE would increase the demands for dry utilities. However, the candidate housing sites are located in developed areas of the City that are already served by electric power, natural gas, and telecommunications facilities. Further, most of the candidate housing sites are developed and connect to existing dry utility infrastructure. While future development facilitated by the HEU would increase population within the City and increase service demand, growth projections are consistent with regional and local plans used to guide infrastructure development. All future housing development facilitated by the HEU would be required to meet the mandatory requirements under the City's various programs aimed at ensuring adequate supplies and service infrastructure are available to serve the development. A less than significant impact would occur.

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

**Less Than Significant Impact.** According to the 2021 City of Arcadia Urban Water Management Plan (UWMP), the City's per capita water usage rate is approximately 230 gallons per day (gpd).<sup>38</sup> The Project would therefore generate a demand of 3,992,800 gpd or approximately 4,428 acre-feet (AF) of water per year (AFY). This would constitute approximately 32 percent of the current water demand of 13,935 AF.<sup>39</sup> During dry years, City is able to source water from the Raymond Basin Area and the Main Basin Area. As well, the City's diverse water supply (imported water, surface water, and groundwater) is anticipated to provide an adequate water supply through 5 dry years.<sup>40</sup> Because the Project is a required component of Statewide planning efforts, the increased water demands, and supply would be increased as a result. Notwithstanding, all future housing development facilitated by the HEU would be subject to environmental review under

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<sup>37</sup> City of Arcadia. (2010). *Arcadia General Plan Update Draft Program EIR*. Page 4.16-1. Retrieved from: [https://www.arcadiaca.gov/shape/development\\_services\\_department/planning\\_\\_\\_zoning/general\\_plan.php#outer-708](https://www.arcadiaca.gov/shape/development_services_department/planning___zoning/general_plan.php#outer-708)

<sup>38</sup> City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 4-13. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

<sup>39</sup> City of Arcadia. (2020). *City of Arcadia 2020 Urban Water Management Plan*. Retrieved from: <https://www.arcadiaca.gov/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> Accessed October 12, 2021

<sup>40</sup> City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 7-6. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

CEQA, the City's development review process, and required to adhere to General Plan policies and Arcadia MC regulations. A less than significant impact would occur.

### ***Stormwater***

Implementation of future projects will likely require the construction of storm drainages to tie into existing stormwater drainage facilities within existing rights-of-way. Water discharged from the site will not negatively affect off-site or downstream flows. See Hydrology and Water Quality Impact (a) for further discussion. Impacts are to be considered less than significant.

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

**Less Than Significant Impact.** The City is served by the Whittier Narrows Water Reclamation Plant (WNWRP), the San Jose Creek Water Reclamation Plant (SJCWRP), and the Joint Water Pollution Control Plant (JWPCP), however, the percentage breakdown between these three plants in treating the City's wastewater is unknown. LACSD estimates approximately 69 gallons of wastewater is generated per person per day within LACSD's service area. Based on a 2020 population of 53,998 within the City, the estimated amount of wastewater collected within the City's service area is approximately 3.7 million gallons (MG) per day (or approximately 4,200 AFY).<sup>41</sup>

Future housing development under the HEU would be subject to discretionary permits and required to adhere to all federal, State, and local requirements related to wastewater treatment during construction and operations, including the City's Sewer System guidelines (Arcadia MC Chapter 4) and required construction permits. Considering these requirements, and the available capacity discussed above, the project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No new expansions of infrastructure facilities are required, and impacts would be less than significant. No direct physical impact to the environment would occur.

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

**Less Than Significant Impact.** Trash and recycling services are provided by multiple companies within the City. Solid waste generated during construction activities typically includes demolition of existing on-site structures, vegetation clearing, and grading would generate solid waste. Such waste would be source separated on-site for reuse, recycling, or proper disposal. The nearest

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<sup>41</sup> City of Arcadia. (2021). *Final 2020 Urban Water Management Plan*. Page 6-40 through 6-41. Retrieved from: <https://cms9files.revize.com/arcadia/Shape%20Arcadia/Public%20Works%20Services%20Department/Water%20&%20Sewer%20Services/Final%202020%20UWMP.pdf> (Accessed November 10, 2021)

landfill to the City is the Puente Hills Landfill and Materials Recovery Facility (MRF). However, this facility is currently closed. The next nearest facility is the Scholl Canyon Landfill, approximately 6.9 miles west of the City.

Under the Project, it is not expected that future projects will lead to inadequate landfill capacity at the Scholl Canyon Landfill, which has a daily capacity of 3,400 tons per day. The landfill has the capacity for 58.9 million cubic yards and has an operational life through 2030.<sup>42</sup> Solid waste generated at future housing developments facilitated by the HEU would represent a nominal increase in disposal rates. Existing landfill capacity would be sufficient to serve future development within the City.

Further, AB 341 requires Cities and Counties to implement recycling programs, reduce refuse at the source, and compost waste to achieve the established 75 percent diversion of solid waste from landfills. Waste disposal is handled by multiple franchised waste haulers within the City. For future development, the City, in conjunction with those approved waste haulers, would perform outreach, education and monitoring pursuant to this regulation.

Future housing development facilitated by the HEU would be subject to the City's development review process, which may include discretionary permit review and approval; as well as environmental review under CEQA, and be required to adhere to all federal, State, and local requirements for solid waste reduction and recycling. Considering these requirements, the HEU implementation would not generate solid waste in excess of State or local standards, or in excess of local infrastructure's capacity. Therefore, impacts would be less than significant.

***e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?***

**Less Than Significant Impact.** State, County, and local agencies with regulatory authority related to solid waste include the California Department of Resources Recycling and Recovery (CalRecycle) and the City. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), Section 4.408 of the CalGreen Code, and SB 341, which requires multi-family residential development and commercial uses to implement recycling programs.

The Integrated Waste Management Act, which requires every City and County in the State to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, identifies how each jurisdiction will meet the State's mandatory waste diversion goal of 50 percent by and after the year 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341.

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<sup>42</sup> CalRecycle. (2011). SWIS Facility/Site Activity Details Scholl Canyon Landfill (19-AA-0012). Retrieved from: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3531?siteID=1000> Accessed October 12, 2021

The 2019 CalGreen Code Section 4.408 requires preparation of a Construction Waste Management Plan that outlines ways in which the contractor would recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition debris. As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. During the construction phase of future housing development, projects would comply with the CalGreen Code through the recycling and reuse of at least 65 percent of the nonhazardous construction and demolition debris from the project site. No conflict with statutes and regulations related to solid waste would occur.

## XX. Wildfire

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Would the Project:

***a. Substantially impair an adopted emergency response plan or emergency evacuation plan?***

**Less Than Significant Impact.** Undeveloped Areas are more likely to be high fire risk areas. Infill development will be proposed and prioritized through the housing element. These areas are in developed areas which reduces risk for wildland fire in the wildland urban interface. It is unlikely that emergency services traveling from the city to undeveloped areas and edges of the city will be impeded by construction activities or increased traffic created as a result of residential development under the housing element.

According to CalFire Fire Hazard Severity Zone Map<sup>43</sup>, most candidate housing sites, except those in the northernmost portion of the City, are not within a State responsibility area or a Very High Fire Hazard Severity Zone. However, future developments facilitated by the Project would be required to continue assessing potential fire risks associated with their individual developments. The established permitting process will assist future developers in further identifying any potential construction barriers or obstructions in the rights of way and paths for emergency access. Future developments may require the creation of a traffic control plan which will mitigate any concerns related to impeding emergency access. Fire prevention measures are also included in Goal S-3 of the Arcadia GP.

Furthermore, future development facilitated by the HEU would be subject to discretionary permits and required to meet the mandatory requirements related to the prevention of wildfire impacts. All future housing development would be required to comply with e CFC and CBC. As a result, HEU implementation would not substantially impair an adopted local or county-wide emergency response or evacuation plan. Therefore, impacts would be less than significant.

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

**Less Than Significant Impact.** To further minimize risk from wildfire, future development on the candidate housing sites in high hazard severity zones are required to adhere to the 2019 California Fire Code, Title 24, Part 9, §304.1.2, which States the following:

- “Any person that owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-covered lands, brush covered lands,

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<sup>43</sup> California Department of Forestry and Fire Protection, California Fire Hazard Severity Zone Viewer Available at: <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>, Accessed February 5, 2021.

or grass-covered lands, or any land which is covered with flammable material, shall at all times do all of the following:"

- Maintain around and adjacent to such building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This section does not apply to single specimens of trees, ornamental shrubbery, or similar plants which are used as ground cover, if they do not form a means of rapidly transmitting fire from the native growth to any building or structure.
- Maintain around and adjacent to any such building or structure additional fire protection or firebreak made by removing all bush, flammable vegetation, or combustible growth which is located from 30 feet to 100 feet from such building or structure or to the property line, whichever is nearer, as may be required by the enforcing agency if he finds that, because of extra hazardous conditions, a firebreak of only 30 feet around such building or structure is not sufficient to provide reasonable fire safety. Grass and other vegetation located more than 30 feet from such building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion.
- Remove that portion of any tree which extends within 10 feet of the outlet of any chimney or stovepipe.
- Cut and remove all dead or dying portions of trees located adjacent to or overhanging any building.
- Maintain the roof of any structure free of leaves, needles, or other dead vegetative growth.
- Provide and maintain at all times a screen over the outlet of every chimney or stovepipe that is attached to any fireplace, stove, or other device that burns any solid or liquid fuel. The screen shall be constructed of nonflammable material with openings of not more than 0.5 inch in size.
- Hazardous vegetation and fuels around all applicable buildings and structures shall be maintained in accordance with applicable regulations.<sup>44</sup>

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<sup>44</sup> California Office of Administrative Law (2019). *2019 California Fire Code, Title 24, Part 9, §304.1.2*. Retrieved from <https://codes.iccsafe.org/content/CFC2019P4/chapter-3-general-requirements>. Accessed on August 25, 20201.

Future development facilitated by the Project would be required to adhere to all applicable fire prevention requirements and regulations, including California Fire Code requirement and would result in less than significant impacts.

***c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction but would facilitate future housing development. The need for installation and maintenance of new infrastructure (such as roads, fuel breaks, emergency water resources, power lines, or other utilities) would be evaluated as part of the discretionary development permit review process. It is anticipated that future housing development facilitated by the Project would be served by the extension of existing utility infrastructure located primarily in existing rights-of-way, because of the predominately developed nature of the City. Through compliance with applicable development regulations in the case of future development, impacts are anticipated to be less than significant, and no mitigation is required.

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

**Less Than Significant Impact.** As previously noted, the project would not result in direct housing construction, but would facilitate future housing development. According to the California Geological Survey, The City does not contain any areas identified as having a severe potential for landslides.<sup>45</sup> As well, as Stated in Geology and Soils Impact (a)(iv), The Project candidate housing focus areas are relatively flat and not within an area susceptible to landslides. Adherence to State and City codes, and emergency and evacuation plans set by the City and the County of San Bernardino would prevent impacts to people or structures from risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

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<sup>45</sup> California Geological Survey, Geologic Hazards Data and Maps Data Viewer. Available at <https://maps.conservation.ca.gov/geologichazards/>. Accessed October 12, 2021

## XXI. Mandatory Findings of Significance

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Would the Project:

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

**Less Than Significant Impact.** On the basis of the foregoing analysis, the proposed project does not have the potential to significantly 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 or 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. All future housing development facilitated by the HEU would be subject to the City's development review process and required to adhere to all federal, State, and local requirements. The HEU would not result in any direct environmental impacts that would 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. Impacts are less than significant.

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

**Less than Significant Impact.** State CEQA Guidelines §15065(a)(3) defines "cumulatively considerable as times when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." This document provides a programmatic analysis of the effects of the proposed HEU and the future housing development facilitated by its implementation.

The project would not result in direct housing construction but would facilitate and provide a policy framework for future housing development throughout the City. Future housing development facilitated by the HEU would occur as market conditions allow and at the discretion of the individual property owners; be subject to the City's development review process; be

subject to environmental review under CEQA; and does not propose changes to current land use designations and zoning. Based on these factors, and since all future housing development facilitated by the HEU would be subject to the City's development review process, the project would not result in environmental effects, which are individually limited, but cumulatively considerable.

***c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

**Less Than Significant Impact.** There are no known substantial adverse effects on human beings that would be caused by the proposed project. The project would facilitate future housing development throughout the City but would not result in direct housing construction. The HEU provides capacity for future housing development consistent with State Housing law. The candidate housing sites are dispersed throughout the community to minimize the potential for adverse environmental impacts. The provision of additional housing in the City is intended to create adequate housing availability at all income levels. The creation of more economically and socially diversified housing choices is a goal of the HEU and is intended to provide new housing opportunities for low-income households. Implementation of the HEU would provide additional housing options for a variety of income levels, as allocated by RHNA.

## XXII. References

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August 25, 2021

**CITY OF ARCADIA 6<sup>TH</sup> CYCLE HOUSING ELEMENT UPDATE – INVENTORY OF CANDIDATE HOUSING SITES**

Multiple candidate sites were identified throughout the City which were found to be suitable to accommodate future development in order to meet the City’s Regional Housing Needs Assessment (RHNA) allocation. These candidate sites are chosen based on their ability to accommodate very low, low, moderate, and above moderate income housing sites.

ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
15	5773-010-901	DMU	DMU	No	0	0.36	No	64	N/A	Pipeline Project	N/A	139	0	0	139
19	5773-010-007	CBD	C 1.0	No	0	0.51	Yes	64	N/A	Pipeline Project	N/A				
3	5773-010-008	CBD	C 1.0	No	0	0.14	No	64	N/A	Pipeline Project	N/A				
4	5773-010-018	DMU	DMU	No	0	0.18	No	64	N/A	Pipeline Project	N/A				
6	5773-010-019	DMU	DMU	No	0	0.18	No	64	N/A	Pipeline Project	N/A				
7	5773-010-020	DMU	DMU	No	0	0.19	No	64	N/A	Pipeline Project	N/A				
26	5776-001-012	C-G	C	No	0	2.821949019	Yes	0	N/A	Pipeline Project	N/A	80	0	80	0
17	5775-022-032	DMU	DMU	Yes	0	0.38	No	64	N/A	Pipeline Project	N/A	22	0	0	22
21	5783-002-013	R-3	HDR	No	1	0.68	Yes	24	N/A	Pipeline Project	N/A	12	0	0	13

ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
20	5788-020-015	R-2	MDR	No	0	0.66	Yes	12	N/A	Pipeline Project	N/A	33	0	0	33
25	5788-020-029	R-2	MDR	No	0	2.23	Yes	12	N/A	Pipeline Project	N/A				
10	8573-024-005	MU	MU	Yes	0	0.21	No	24	N/A	Pipeline Project	N/A	12	0	0	12
9	8573-024-006	MU	MU	Yes	0	0.20	No	24	N/A	Pipeline Project	N/A				
1	5775-025-033	CBD	C 1.0	No	2	0.05	No	64	N/A	Pipeline Project	N/A	157	0	0	157
2	5775-025-034	CBD	C 1.0	No	0	0.11	No	64	N/A	Pipeline Project	N/A				
11	5775-025-038	CBD	C 1.0	No	1	0.22	No	64	N/A	Pipeline Project	N/A				
12	5775-025-032	CBD	C 1.0	No	0	0.23	No	64	N/A	Pipeline Project	N/A				
16	5775-025-031	CBD	C 1.0	No	0	0.37	No	64	N/A	Pipeline Project	N/A				
22	5775-025-029	CBD	C 1.0	No	0	1.14	Yes	64	N/A	Pipeline Project	N/A				
23	5775-025-037	DMU	DMU	No	0	1.67	Yes	64	N/A	Pipeline Project	N/A				
13	5772-002-001	R-3	HDR	No	4	0.34	No	24	N/A	Pipeline Project	N/A	2	0	0	6
8	5779-012-030	R-3	HDR	No	2	0.19	No	24	N/A	Pipeline Project	N/A	2	0	0	4
5	5779-010-010	R-3	HDR	No	1	0.18	No	24	N/A	Pipeline Project	N/A	2	0	0	3
18	5778-010-017	R-3	HDR	No	2	0.48	No	24	40	Pipeline Project	N/A	9	0	0	10

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
14	5779-019-007	R-2	MDR	No	3	0.36	No	12	N/A	Pipeline Project	N/A	1	0	0	8
24	5773-006-036	DMU	DMU	No	0	2.18	Yes	64	80	Pipeline Project	N/A	319	26	0	293
27	5777-038-012	C-G	C	No	0	4.78	Yes	0	30	Pipeline Project	N/A	297	0	0	297
28	5777-038-014	C-G	C	No	0	6.74	Yes	0	30	Pipeline Project	N/A				
29	5773-014-037	CBD	C 1.0	No	2	0.51	Yes	64	N/A	Propensity	32	30	8	3	19
30	5773-007-038	DMU	DMU	No	2	0.51	Yes	64	N/A	Propensity	32	30	8	3	19
31	5773-013-034	CBD	C 1.0	No	0	0.52	Yes	64	N/A	Propensity	32	32	8	3	21
32	5773-012-023	DMU	DMU	No	0	0.54	Yes	64	N/A	Propensity	34	34	9	3	22
33	5773-011-062	DMU	DMU	No	0	0.54	Yes	64	N/A	Propensity	34	34	9	3	22
34	5773-006-053	DMU	DMU	No	0	0.57	Yes	64	N/A	Propensity	36	36	9	4	23
35	5773-014-038	CBD	C 1.0	No	0	0.58	Yes	64	N/A	Propensity	36	36	9	4	23

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
36	5773-013-018	CBD	C 1.0	No	0	0.58	Yes	64	N/A	Propensity	<b>37</b>	37	9	4	24
37	5773-012-022	CBD	C 1.0	No	0	0.59	Yes	64	N/A	Propensity	<b>37</b>	<b>37</b>	9	4	24
38	5775-022-035	DMU	DMU	No	0	0.61	Yes	64	N/A	Propensity	<b>38</b>	38	10	4	24
39	5775-022-031	DMU	DMU	No	1	0.62	Yes	64	N/A	Propensity	<b>39</b>	<b>38</b>	10	4	24
40	5773-006-907	DMU	DMU	No	0	0.66	Yes	64	N/A	Propensity	<b>42</b>	42	11	4	27
41	5773-006-065	DMU	C 1.0	No	0	0.72	Yes	64	N/A	Propensity	<b>46</b>	<b>46</b>	12	5	29
42	5773-007-036	DMU	DMU	No	0	0.73	Yes	64	N/A	Propensity	<b>46</b>	46	12	5	29
43	5773-006-067	DMU	DMU	No	0	0.74	Yes	64	N/A	Propensity	<b>47</b>	<b>47</b>	12	5	30
44	5773-006-929	DMU	DMU	No	0	0.79	Yes	64	N/A	Propensity	<b>50</b>	50	13	5	32

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
45	5775-022-805	DMU	DMU	No	0	0.87	Yes	64	N/A	Propensity	<b>55</b>	<b>55</b>	14	6	35
46	5773-007-033	DMU	DMU	No	0	0.90	Yes	64	N/A	Propensity	<b>57</b>	57	14	6	37
47	5773-006-068	DMU	DMU	No	0	0.94	Yes	64	N/A	Propensity	<b>60</b>	<b>60</b>	15	6	39
49	5773-014-051	CBD	C 1.0	No	1	1.15	Yes	64	N/A	Propensity	<b>73</b>	72	18	7	47
50	5773-006-064	DMU	DMU	No	0	1.22	Yes	64	N/A	Propensity	<b>77</b>	<b>77</b>	19	8	50
51	5773-011-036	DMU	DMU	No	0	1.22	Yes	64	N/A	Propensity	<b>77</b>	77	19	8	50
52	5773-012-901	DMU	DMU	No	0	1.26	Yes	64	N/A	Propensity	<b>80</b>	<b>80</b>	20	8	52
332	5773-005-034	C-G	C 1.0	Yes	0	0.52	Yes	0	64	Focus Area	<b>33</b>	33	8	3	22
333	5775-022-049	SP-AP	C 1.0	No	0	0.55	Yes		64	Focus Area	<b>35</b>	<b>35</b>	9	4	22
334	5773-015-053	C-G	C	No	0	0.63	Yes	0	64	Focus Area	<b>40</b>	40	10	4	26
335	5775-022-047	SP-AP	C 1.0	No	0	0.68	Yes		64	Focus Area	<b>43</b>	<b>43</b>	11	4	28

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
336	5773-015-054	C-G	C	No	0	0.75	Yes	0	64	Focus Area	48	48	12	5	31
337	5773-015-049	C-G	C	No	0	0.76	Yes	0	64	Focus Area	48	48	12	5	31
338	5773-008-014	C-G	C	No	0	0.81	Yes	0	64	Focus Area	52	52	13	5	34
339	5773-008-013	C-G	C	No	0	0.83	Yes	0	64	Focus Area	52	52	13	5	34
340	5773-009-065	C-G	C	No	0	0.89	Yes	0	64	Focus Area	57	57	14	6	37
341	5775-022-045	C-G	C 1.0	No	0	0.93	Yes	0	64	Focus Area	59	59	15	6	38
342	5773-008-012	C-G	C	Yes	0	0.96	Yes	0	64	Focus Area	61	61	15	6	40
343	5775-022-046	C-M	C 1.0	No	0	0.98	Yes	0	64	Focus Area	62	62	16	6	40

**Appendix A**

ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
345	5773-015-052	C-G	C	No	0	1.21	Yes	0	64	Focus Area	<b>77</b>	77	19	8	50
346	5773-009-070	C-G	C	No	0	1.34	Yes	0	64	Focus Area	<b>85</b>	<b>85</b>	21	9	55
347	5773-009-081	C-G	C	No	0	1.35	Yes	0	64	Focus Area	<b>86</b>	86	22	9	55
348	5773-009-080	C-G	C	No	0	1.65	Yes	0	64	Focus Area	<b>105</b>	<b>105</b>	26	11	68
349	5773-009-062	C-G	C	No	0	2.07	Yes	0	64	Focus Area	<b>132</b>	132	33	13	86
350	5773-015-026	C-G	C	No	0	2.24	Yes	0	64	Focus Area	<b>143</b>	<b>143</b>	36	14	93
351	5773-008-011	C-G	C	No	0	2.34	Yes	0	64	Focus Area	<b>149</b>	149	37	15	97
352	5773-009-064	C-G	C	No	0	3.23	Yes	0	64	Focus Area	<b>206</b>	<b>206</b>	52	21	133

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
353	5773-009-082	C-G	C	No	0	3.74	Yes	0	64	Focus Area	<b>239</b>	239	60	24	155
354	5773-009-069	C-G	C	No	0	3.75	Yes	0	64	Focus Area	<b>239</b>	<b>239</b>	60	24	155
355	5773-015-055	C-G	C	No	0	5.18	Yes	0	64	Focus Area	<b>331</b>	331	83	33	215
392	5775-022-012	C-M	C 1.0	No	0	0.08	No	0	64	Focus Area	<b>5</b>	<b>5</b>	1	1	3
400	5773-002-059	C-G	C 1.0	No	0	0.17	No	0	64	Focus Area	<b>10</b>	10	3	1	6
426	5775-022-003	C-M	C 1.0	No	0	0.19	No	0	64	Focus Area	<b>12</b>	<b>12</b>	3	1	8
430	5773-005-033	C-M	C 1.0	No	0	0.21	No	0	64	Focus Area	<b>13</b>	13	3	1	9
433	5775-022-042	C-M	C 1.0	No	0	0.26	No	0	64	Focus Area	<b>16</b>	<b>16</b>	4	2	10

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
436	5773-002-058	C-G	C 1.0	No	0	0.35	No	0	64	Focus Area	<b>22</b>	22	6	2	14
442	5775-022-026	C-G	C 1.0	No	0	0.39	No	0	64	Focus Area	<b>24</b>	<b>24</b>	6	2	16
444	5775-022-048	SP-AP	C 1.0	No	1	0.43	No	0	64	Focus Area	<b>27</b>	26	7	3	16
330	5773-004-028	C-M	C	No	0	0.52	Yes	0	64	Focus Area	<b>33</b>	<b>33</b>	8	3	22
331	5773-008-003	C-M	C	No	0	2.16	Yes	0	64	Focus Area	<b>138</b>	138	35	14	89
391	5773-004-021	C-M	C	No	0	0.06	No	0	64	Focus Area	<b>3</b>	<b>3</b>	1	0	2
393	5773-004-801	C-M	C	No	0	0.10	No	0	64	Focus Area	<b>6</b>	6	2	1	3
394	5773-004-022	C-M	C	No	1	0.12	No	0	64	Focus Area	<b>7</b>	<b>6</b>	2	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
395	5773-004-023	DMU	DMU	No	0	0.14	No	64	64	Focus Area	8	8	2	1	5
396	5773-004-029	DMU	DMU	No	0	0.14	No	64	64	Focus Area	9	9	2	1	6
397	5773-004-025	DMU	DMU	No	0	0.15	No	64	64	Focus Area	9	9	2	1	6
398	5773-004-803	C-M	C	No	0	0.15	No	0	64	Focus Area	9	9	2	1	6
399	5773-005-010	DMU	DMU	No	0	0.16	No	64	64	Focus Area	10	10	3	1	6
401	5773-004-015	C-M	C	No	1	0.17	No	0	64	Focus Area	10	9	2	1	6
402	5773-005-009	DMU	DMU	No	0	0.17	No	64	64	Focus Area	10	10	3	1	6
403	5773-004-808	C-M	C	No	0	0.17	No	0	64	Focus Area	11	11	3	1	7

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
404	5773-005-008	DMU	DMU	No	0	0.17	No	64	64	Focus Area	11	11	3	1	7
405	5773-005-011	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
406	5773-004-013	C-M	C	No	1	0.18	No	0	64	Focus Area	11	10	3	1	6
407	5773-004-018	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
408	5773-004-002	DMU	DMU	No	0	0.18	No	64	64	Focus Area	11	11	3	1	7
409	5773-004-014	C-M	C	No	2	0.18	No	0	64	Focus Area	11	9	2	1	6
410	5773-005-014	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
411	5773-005-015	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7

**Appendix A**

ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
412	5773-005-016	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
413	5773-005-007	DMU	DMU	Yes	0	0.18	No	64	64	Focus Area	11	11	3	1	7
414	5773-004-010	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
415	5773-004-008	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
416	5773-004-807	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
417	5773-004-012	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
418	5773-004-005	C-M	C	No	6	0.18	No	0	64	Focus Area	11	5	1	1	3
419	5773-004-003	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
420	5773-005-004	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
421	5773-005-025	C-M	C	No	0	0.18	No	0	64	Focus Area	11	11	3	1	7
422	5773-004-001	DMU	DMU	No	0	0.19	No	64	64	Focus Area	11	11	3	1	7
423	5773-004-004	C-M	C	No	0	0.19	No	0	64	Focus Area	11	11	3	1	7
424	5773-004-024	DMU	DMU	No	0	0.19	No	64	64	Focus Area	11	11	3	1	7
425	5773-004-011	C-M	C	No	1	0.19	No	0	64	Focus Area	12	11	3	1	7
427	5773-004-802	C-M	C	No	0	0.19	No	0	64	Focus Area	12	12	3	1	8
428	5773-004-009	C-M	C	No	4	0.20	No	0	64	Focus Area	12	8	2	1	5

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
429	5773-005-020	C-M	C	No	0	0.21	No	0	64	Focus Area	<b>13</b>	13	3	1	9
431	5773-005-021	C-M	C	No	0	0.21	No	0	64	Focus Area	<b>13</b>	<b>13</b>	3	1	9
432	5773-005-031	C-M	C	No	0	0.26	No	0	64	Focus Area	<b>16</b>	16	4	2	10
434	5773-005-032	C-M	C	No	0	0.29	No	0	64	Focus Area	<b>18</b>	<b>18</b>	5	2	11
435	5773-005-006	DMU	DMU	No	0	0.34	No	64	64	Focus Area	<b>21</b>	21	5	2	14
437	5773-004-027	C-M	C	No	0	0.35	No	0	64	Focus Area	<b>22</b>	<b>22</b>	6	2	14
438	5773-005-023	C-M	C	No	0	0.36	No	0	64	Focus Area	<b>22</b>	22	6	2	14
439	5773-005-024	C-M	C	No	0	0.36	No	0	64	Focus Area	<b>23</b>	<b>23</b>	6	2	15

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
440	5773-005-005	C-M	C	No	0	0.37	No	0	64	Focus Area	<b>23</b>	23	6	2	15
441	5773-004-026	C-M	C	No	0	0.38	No	0	64	Focus Area	<b>24</b>	<b>24</b>	6	2	16
443	5773-004-811	C-M	C	No	0	0.42	No	0	64	Focus Area	<b>27</b>	27	7	3	17
445	5773-004-810	C-M	C	No	0	0.45	No	0	64	Focus Area	<b>28</b>	<b>28</b>	7	3	18
773	5773-002-004	C-M	C	No	0	0.17	No	0	64		<b>11</b>	<b>11</b>	3	1	7
774	5773-002-005	C-M	C	No	0	0.17	No	0	64		<b>11</b>	<b>11</b>	3	1	7
775	5773-002-006	C-M	C	No	7	0.17	No	0	64		<b>11</b>	<b>4</b>	1	0	3
776	5773-002-009	C-M	C	No	7	0.17	No	0	64		<b>11</b>	<b>4</b>	1	0	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
777	5773-002-010	C-M	C	No	4	0.17	No	0	64		11	7	2	1	4
778	5773-002-011	C-M	C	No	4	0.17	No	0	64		11	7	2	1	4
779	5773-002-012	C-M	C	No	0	0.17	No	0	64		11	11	3	1	7
780	5773-002-013	C-M	C	No	7	0.17	No	0	64		11	4	1	0	3
781	5773-002-017	C-M	C	No	2	0.17	No	0	64		11	9	2	1	6
782	5773-002-035	C-M	C	No	0	0.50	No	0	64		31	31	8	3	20
783	5773-002-052	C-M	C	No	0	0.35	No	0	64		22	22	6	2	14
784	5773-003-003	C-M	C	No	1	0.16	No	0	64		10	9	2	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
785	5773-003-004	C-M	C	No	0	0.17	No	0	64		10	10	3	1	6
786	5773-003-005	C-M	C	No	0	0.18	No	0	64		11	11	3	1	7
787	5773-003-009	C-M	C	No	0	0.18	No	0	64		11	11	3	1	7
788	5773-003-012	C-M	C	No	3	0.18	No	0	64		11	8	2	1	5
789	5773-003-013	C-M	C	No	1	0.18	No	0	64		11	10	3	1	6
790	5773-003-014	C-M	C	No	0	0.18	No	0	64		11	11	3	1	7
791	5773-003-015	C-M	C	No	1	0.18	No	0	64		11	10	3	1	6
792	5773-003-016	C-M	C	No	2	0.16	No	0	64		9	7	2	1	4

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
793	5773-003-029	C-M	C	No	0	0.16	No	0	64		9	9	2	1	6
794	5773-003-034	C-M	C	No	0	0.19	No	0	64		11	11	3	1	7
795	5773-003-035	C-M	C	No	0	0.20	No	0	64		13	13	3	1	9
796	5773-003-036	C-M	C	No	0	0.54	No	0	64		34	34	9	3	22
797	5773-003-037	C-M	C	No	0	0.35	No	0	64		22	22	6	2	14
356	8573-024-030	MU	MU	No	0	0.51	Yes	24	40	Focus Area	20	20	5	2	13
357	5773-019-025	MU	MU	No	0	0.54	Yes	24	40	Focus Area	21	21	5	2	14
358	8573-023-009	MU	MU	No	0	0.56	Yes	24	40	Focus Area	22	22	6	2	14

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359	5779-009-068	MU	MU	No	0	0.56	Yes	24	40	Focus Area	<b>22</b>	<b>22</b>	6	2	14
360	5789-028-024	MU	MU	No	0	0.56	Yes	24	40	Focus Area	<b>22</b>	22	6	2	14
361	5779-017-027	MU	MU	No	0	0.59	Yes	24	40	Focus Area	<b>23</b>	<b>23</b>	6	2	15
362	8572-002-005	MU	MU	No	0	0.97	Yes	24	40	Focus Area	<b>38</b>	38	10	4	24
363	8572-001-022	MU	MU	No	0	0.99	Yes	24	40	Focus Area	<b>39</b>	<b>39</b>	10	4	25
364	8572-002-900	MU	MU	No	0	1.05	Yes	24	40	Focus Area	<b>42</b>	42	11	4	27
365	8572-001-027	MU	MU	No	1	1.10	Yes	24	40	Focus Area	<b>44</b>	<b>43</b>	11	4	28
366	8572-001-029	MU	MU	No	0	1.36	Yes	24	40	Focus Area	<b>54</b>	54	14	5	35

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368	8572-001-030	MU	MU	No	0	1.97	Yes	24	40	Focus Area	<b>78</b>	<b>78</b>	20	8	50
369	8573-023-020	MU	MU	No	0	2.55	Yes	24	40	Focus Area	<b>101</b>	101	25	10	66
370	8572-002-010	MU	MU	No	0	3.94	Yes	24	40	Focus Area	<b>157</b>	<b>157</b>	39	16	102
450	5773-017-004	MU	MU	No	0	0.08	No	40	40	Focus Area	<b>3</b>	3	1	0	2
451	5779-010-003	MU	MU	No	0	0.08	No	40	40	Focus Area	<b>3</b>	<b>3</b>	1	0	2
452	5773-018-014	MU	MU	No	0	0.08	No	40	40	Focus Area	<b>3</b>	3	1	0	2
453	5779-013-011	MU	MU	No	0	0.09	No	40	40	Focus Area	<b>3</b>	<b>3</b>	1	0	2
454	5779-013-010	MU	MU	No	0	0.09	No	40	40	Focus Area	<b>3</b>	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
455	5773-017-003	MU	MU	No	0	0.09	No	40	40	Focus Area	3	3	1	0	2
456	5773-019-009	MU	MU	No	0	0.09	No	40	40	Focus Area	3	3	1	0	2
457	5779-010-002	MU	MU	No	0	0.10	No	40	40	Focus Area	3	3	1	0	2
458	5773-018-015	MU	MU	No	0	0.10	No	40	40	Focus Area	4	4	1	0	3
459	5773-017-002	MU	MU	No	0	0.10	No	40	40	Focus Area	4	4	1	0	3
460	5779-013-012	MU	MU	No	0	0.12	No	40	40	Focus Area	4	4	1	0	3
461	5779-014-021	MU	MU	No	1	0.14	No	40	40	Focus Area	5	4	1	0	3
462	5779-013-072	MU	MU	No	0	0.14	No	40	40	Focus Area	5	5	1	1	3
463	5779-016-004	MU	MU	No	0	0.14	No	40	40	Focus Area	5	5	1	1	3

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464	5779-016-005	MU	MU	No	0	0.14	No	40	40	Focus Area	5	5	1	1	3
466	5773-020-035	MU	MU	No	0	0.14	No	40	40	Focus Area	5	5	1	1	3
467	5779-014-018	MU	MU	No	0	0.14	No	40	40	Focus Area	5	5	1	1	3
469	5789-028-029	MU	MU	No	0	0.15	No	40	40	Focus Area	5	5	1	1	3
473	5779-003-001	MU	MU	No	0	0.15	No	40	40	Focus Area	5	5	1	1	3
475	5773-017-090	MU	MU	No	0	0.15	No	40	40	Focus Area	6	6	2	1	3
477	5779-014-020	MU	MU	No	1	0.15	No	40	40	Focus Area	6	5	1	1	3
478	5779-014-019	MU	MU	No	1	0.15	No	40	40	Focus Area	6	5	1	1	3
479	5779-003-035	MU	MU	No	0	0.15	No	40	40	Focus Area	6	6	2	1	3
480	5779-017-023	MU	MU	Yes	0	0.15	No	40	40	Focus Area	6	6	2	1	3
482	5773-020-001	MU	MU	No	0	0.15	No	40	40	Focus Area	6	6	2	1	3

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483	5779-009-035	MU	MU	No	2	0.16	No	40	40	Focus Area	6	4	1	0	3
484	5779-016-006	MU	MU	No	1	0.16	No	40	40	Focus Area	6	5	1	1	3
485	5773-018-016	MU	MU	No	0	0.16	No	40	40	Focus Area	6	6	2	1	3
486	5779-011-014	MU	MU	No	1	0.16	No	40	40	Focus Area	6	5	1	1	3
487	5779-001-015	MU	MU	No	0	0.16	No	40	40	Focus Area	6	6	2	1	3
488	5779-001-020	MU	MU	No	0	0.16	No	40	40	Focus Area	6	6	2	1	3
489	5773-013-015	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
490	5779-003-033	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
491	5779-003-034	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
492	5779-009-036	MU	MU	No	2	0.17	No	40	40	Focus Area	6	4	1	0	3
493	5773-017-033	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
494	5779-003-002	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
495	5779-003-003	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
497	5773-020-003	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
498	5773-020-034	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
499	5779-009-034	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
500	5773-020-002	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3
501	5773-013-017	MU	MU	No	0	0.17	No	40	40	Focus Area	6	6	2	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
502	5779-002-002	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
503	5779-017-024	MU	MU	No	1	0.18	No	40	40	Focus Area	7	6	2	1	3
504	5773-014-001	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
505	5773-019-011	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
506	5779-012-015	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
507	5779-011-016	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
508	5779-012-016	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
509	5779-001-016	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
510	5773-018-012	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
511	5779-011-015	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
512	5773-019-010	MU	MU	No	1	0.18	No	40	40	Focus Area	7	6	2	1	3
513	5779-012-014	MU	MU	No	1	0.18	No	40	40	Focus Area	7	6	2	1	3
514	5779-011-017	MU	MU	No	0	0.18	No	40	40	Focus Area	7	7	2	1	4
515	5779-010-033	MU	MU	No	0	0.19	No	40	40	Focus Area	7	7	2	1	4
516	5779-012-013	MU	MU	No	0	0.19	No	40	40	Focus Area	7	7	2	1	4
517	5773-020-036	MU	MU	No	0	0.19	No	40	40	Focus Area	7	7	2	1	4
518	5773-018-013	MU	MU	No	0	0.19	No	40	40	Focus Area	7	7	2	1	4

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
519	5779-001-017	MU	MU	No	1	0.19	No	40	40	Focus Area	7	6	2	1	3
520	5779-001-019	MU	MU	No	0	0.19	No	40	40	Focus Area	7	7	2	1	4
521	5773-013-016	MU	MU	No	0	0.20	No	40	40	Focus Area	7	7	2	1	4
522	5779-001-018	MU	MU	No	1	0.20	No	40	40	Focus Area	7	6	2	1	3
523	8573-023-002	MU	MU	No	0	0.20	No	40	40	Focus Area	7	7	2	1	4
524	8573-023-001	MU	MU	No	0	0.20	No	40	40	Focus Area	7	7	2	1	4
525	8573-024-003	MU	MU	No	0	0.20	No	40	40	Focus Area	7	7	2	1	4
526	8573-023-006	MU	MU	No	0	0.20	No	40	40	Focus Area	8	8	2	1	5
528	8573-024-004	MU	MU	No	0	0.20	No	40	40	Focus Area	8	8	2	1	5

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
529	8573-024-002	MU	MU	No	0	0.21	No	40	40	Focus Area	8	8	2	1	5
531	8573-023-003	MU	MU	No	0	0.21	No	40	40	Focus Area	8	8	2	1	5
533	5779-016-029	MU	MU	No	1	0.22	No	40	40	Focus Area	8	7	2	1	4
540	5779-016-030	MU	MU	No	0	0.24	No	40	40	Focus Area	9	9	2	1	6
544	5779-014-033	MU	MU	No	0	0.26	No	40	40	Focus Area	10	10	3	1	6
549	5779-010-032	MU	MU	No	1	0.30	No	40	40	Focus Area	12	11	3	1	7
550	5779-010-001	MU	MU	No	0	0.30	No	40	40	Focus Area	12	12	3	1	8
551	5789-028-025	MU	MU	No	0	0.31	No	40	40	Focus Area	12	12	3	1	8
555	5779-002-001	MU	MU	No	0	0.32	No	40	40	Focus Area	12	12	3	1	8

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
556	5773-017-034	MU	MU	No	0	0.33	No	40	40	Focus Area	13	13	3	1	9
557	5789-028-010	MU	MU	No	1	0.34	No	40	40	Focus Area	13	12	3	1	8
559	5779-011-018	MU	MU	No	0	0.34	No	40	40	Focus Area	13	13	3	1	9
560	5779-012-017	MU	MU	No	1	0.35	No	40	40	Focus Area	13	12	3	1	8
561	5773-018-011	MU	MU	No	6	0.35	No	40	40	Focus Area	14	8	2	1	5
567	8573-023-008	MU	MU	No	0	0.39	No	40	40	Focus Area	15	15	4	2	9
568	8572-002-007	MU	MU	No	0	0.39	No	40	40	Focus Area	15	15	4	2	9
569	8573-024-001	MU	MU	No	1	0.40	No	40	40	Focus Area	16	15	4	2	9
570	8573-023-004	MU	MU	No	0	0.40	No	40	40	Focus Area	16	16	4	2	10

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
571	5779-013-061	MU	MU	No	0	0.41	No	40	40	Focus Area	<b>16</b>	<b>16</b>	4	2	10
574	5789-028-012	MU	MU	No	1	0.44	No	40	40	Focus Area	<b>17</b>	16	4	2	10
575	8572-002-001	MU	MU	No	0	0.46	No	40	40	Focus Area	<b>18</b>	<b>18</b>	5	2	11
579	5773-014-002	MU	MU	No	0	0.49	No	40	40	Focus Area	<b>19</b>	19	5	2	12
580	5779-002-110	MU	MU	No	8	0.49	No	40	40	Focus Area	<b>19</b>	<b>11</b>	3	1	7
371	8573-019-900	C-G	C	No	0	0.50	Yes	24	48	Focus Area	<b>24</b>	24	6	2	16
372	8573-019-003	C-G	C	No	0	0.52	Yes	24	48	Focus Area	<b>25</b>	<b>25</b>	6	3	16
373	8573-019-002	C-G	C	No	0	0.53	Yes	24	48	Focus Area	<b>25</b>	25	6	3	16
374	8573-019-001	C-G	C	No	0	0.55	Yes	24	48	Focus Area	<b>26</b>	<b>26</b>	7	3	16

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
375	5788-021-016	C-G	C	No	0	0.67	Yes	24	48	Focus Area	<b>32</b>	32	8	3	21
376	5788-021-017	C-G	C	No	0	0.70	Yes	24	48	Focus Area	<b>33</b>	<b>33</b>	8	3	22
377	5788-022-017	C-G	C	No	0	0.72	Yes	24	48	Focus Area	<b>34</b>	34	9	3	22
378	5788-022-034	C-G	C	No	0	0.81	Yes	24	48	Focus Area	<b>38</b>	<b>38</b>	10	4	24
379	5788-020-052	C-G	C	No	0	0.83	Yes	24	48	Focus Area	<b>39</b>	39	10	4	25
380	8573-015-023	C-M	C/LI	No	0	0.89	Yes	24	48	Focus Area	<b>42</b>	<b>42</b>	11	4	27
381	5788-021-001	C-G	C	No	0	0.94	Yes	24	48	Focus Area	<b>45</b>	45	11	5	29
382	8573-020-056	C-G	C	No	0	0.99	Yes	24	48	Focus Area	<b>47</b>	<b>47</b>	12	5	30

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
383	8573-015-043	C-M	C/LI	No	0	1.39	Yes	24	48	Focus Area	<b>66</b>	66	17	7	42
385	5788-022-016	C-G	C	No	0	2.03	Yes	24	48	Focus Area	<b>97</b>	<b>97</b>	24	10	63
554	8573-013-047	C-M	C/LI	No	0	0.32	No	40	48	Focus Area	<b>15</b>	15	4	2	9
552	5788-021-006	C-G	C	No	0	0.32	No	40	48	Focus Area	<b>15</b>	<b>15</b>	4	2	9
547	8573-010-013	C-M	C/LI	No	0	0.30	No	40	48	Focus Area	<b>14</b>	14	4	1	9
542	8573-001-001	C-M	C/LI	No	0	0.24	No	40	48	Focus Area	<b>11</b>	<b>11</b>	3	1	7
538	8573-013-044	C-M	C/LI	No	0	0.24	No	40	48	Focus Area	<b>11</b>	11	3	1	7
534	5788-021-018	C-G	C	No	0	0.23	No	40	48	Focus Area	<b>11</b>	<b>11</b>	3	1	7

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
535	5788-021-011	C-G	C	No	0	0.23	No	40	48	Focus Area	11	11	3	1	7
465	8573-013-045	C-M	C/LI	No	0	0.14	No	40	48	Focus Area	6	6	2	1	3
468	8573-001-007	C-M	C/LI	No	0	0.14	No	40	48	Focus Area	6	6	2	1	3
470	8573-010-001	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	7	7	2	1	4
471	8573-001-006	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	7	7	2	1	4
472	8573-001-026	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	7	7	2	1	4
474	8573-001-004	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	7	7	2	1	4
476	8573-001-005	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	7	7	2	1	4

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
481	8573-013-048	C-M	C/LI	No	0	0.15	No	40	48	Focus Area	<b>7</b>	7	2	1	4
563	5788-021-003	C-G	C	No	0	0.36	No	40	48	Focus Area	<b>17</b>	<b>17</b>	4	2	11
572	5788-021-012	C-G	C	No	0	0.42	No	40	48	Focus Area	<b>20</b>	20	5	2	13
386	5789-020-042	C-O	C	No	0	0.63	Yes	0	40	Focus Area	<b>25</b>	<b>25</b>	6	3	16
387	8572-010-023	C-G	C	No	0	0.69	Yes	0	40	Focus Area	<b>27</b>	27	7	3	17
388	5789-020-045	C-G	C	No	0	0.70	Yes	0	40	Focus Area	<b>28</b>	<b>28</b>	7	3	18
389	5790-027-001	C-G	C	No	0	0.76	Yes	0	40	Focus Area	<b>30</b>	30	8	3	19
390	5789-021-031	C-O	C	No	0	0.87	Yes	0	40	Focus Area	<b>34</b>	<b>34</b>	9	3	22

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
496	8572-009-002	C-G	C	No	0	0.17	No	24	40	Focus Area	6	6	2	1	3
532	5790-027-030	C-G	C	No	0	0.22	No	24	40	Focus Area	8	8	2	1	5
536	5790-028-033	C-G	C	No	0	0.23	No	24	40	Focus Area	9	9	2	1	6
537	5791-024-016	C-G	C	No	0	0.24	No	24	40	Focus Area	9	9	2	1	6
539	8572-009-003	C-G	C	No	0	0.24	No	24	40	Focus Area	9	9	2	1	6
541	5791-024-048	C-G	C	No	2	0.24	No	24	40	Focus Area	9	7	2	1	4
543	5789-020-040	C-G	C	No	0	0.25	No	24	40	Focus Area	10	10	3	1	6
545	5791-024-012	C-G	C	No	0	0.26	No	24	40	Focus Area	10	10	3	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
546	5790-028-032	C-G	C	No	0	0.27	No	24	40	Focus Area	10	10	3	1	6
548	5789-020-039	C-G	C	No	0	0.30	No	24	40	Focus Area	11	11	3	1	7
553	5789-021-019	C-O	C	No	0	0.32	No	24	40	Focus Area	12	12	3	1	8
558	8572-009-042	C-G	C	No	0	0.34	No	24	40	Focus Area	8	8	2	1	5
562	5790-027-034	C-G	C	Yes	0	0.36	No	24	40	Focus Area	8	8	2	1	5
564	5791-024-057	C-G	C	No	0	0.38	No	24	40	Focus Area	9	9	2	1	6
565	5789-021-018	C-O	C	No	0	0.38	No	24	40	Focus Area	9	9	2	1	6
566	5789-020-033	C-G	C	No	0	0.39	No	24	40	Focus Area	9	9	2	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
573	5790-030-017	C-G	C	No	0	0.43	No	24	40	Focus Area	<b>10</b>	10	3	1	6
576	8572-002-009	MU	MU	No	0	0.46	No	40	40	Focus Area	<b>19</b>	<b>19</b>	5	2	12
577	5789-020-027	C-G	C	No	0	0.48	No	24	40	Focus Area	<b>11</b>	11	3	1	7
578	5789-021-013	C-O	C	No	0	0.49	No	24	40	Focus Area	<b>11</b>	<b>11</b>	3	1	7
581	5790-028-028	C-G	C	No	0	0.50	No	24	40	Focus Area	<b>11</b>	11	3	1	7
254	5383-029-035	C-G	C	No	0	0.51	Yes	0	24	Focus Area	<b>12</b>	<b>12</b>	3	1	8
255	5779-016-031	C-G	C	No	0	0.51	Yes	0	24	Focus Area	<b>12</b>	12	3	1	8
256	8586-001-010	C-G	C	No	0	0.52	Yes	0	24	Focus Area	<b>12</b>	<b>12</b>	3	1	8
257	5773-001-045	C-G	C	No	0	0.53	Yes	0	24	Focus Area	<b>12</b>	12	3	1	8

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
258	5784-006-007	C-G	C	No	0	0.54	Yes	0	24	Focus Area	<b>12</b>	<b>12</b>	3	1	8
259	5778-001-101	C-G	C	No	0	0.55	Yes	0	24	Focus Area	<b>13</b>	13	3	1	9
260	5779-016-034	C-G	C	No	0	0.55	Yes	0	24	Focus Area	<b>13</b>	<b>13</b>	3	1	9
261	5771-021-018	C-G	C	No	0	0.55	Yes	0	24	Focus Area	<b>13</b>	13	3	1	9
262	5771-028-040	C-G	C	No	0	0.56	Yes	0	24	Focus Area	<b>6</b>	<b>6</b>	2	1	3
263	5383-031-025	C-G	C	No	0	0.57	Yes	0	24	Focus Area	<b>13</b>	13	3	1	9
264	5783-010-032	C-G	C	No	0	0.57	Yes	0	24	Focus Area	<b>13</b>	<b>13</b>	3	1	9

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
265	5781-006-048	C-G	C	No	0	0.57	Yes	0	24	Focus Area	<b>13</b>	13	3	1	9
266	5383-038-023	C-G	C	No	0	0.59	Yes	0	24	Focus Area	<b>14</b>	<b>14</b>	4	1	9
267	5383-031-035	C-G	C	No	0	0.59	Yes	0	24	Focus Area	<b>14</b>	14	4	1	9
268	5779-015-030	C-G	C	No	0	0.59	Yes	0	24	Focus Area	<b>14</b>	<b>14</b>	4	1	9
269	5383-031-023	C-G	C	No	0	0.60	Yes	0	24	Focus Area	<b>14</b>	14	4	1	9
270	5779-016-010	C-G	C	No	0	0.61	Yes	0	24	Focus Area	<b>14</b>	<b>14</b>	4	1	9
271	5778-007-011	C-G	C	No	0	0.62	Yes	0	24	Focus Area	<b>14</b>	14	4	1	9
272	5778-014-013	C-G	C	No	0	0.65	Yes	0	24	Focus Area	<b>15</b>	<b>15</b>	4	2	9

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
273	5778-014-021	C-G	C	No	0	0.65	Yes	0	24	Focus Area	15	15	4	2	9
274	5771-021-017	C-G	C	No	0	0.67	Yes	0	24	Focus Area	16	16	4	2	10
275	5770-009-026	C-G	C	No	0	0.68	Yes	0	24	Focus Area	16	16	4	2	10
276	5772-001-007	C-G	C	No	0	0.69	Yes	0	24	Focus Area	16	16	4	2	10
277	5775-011-030	C-G	C 1.0	No	0	0.69	Yes	0	24	Focus Area	16	16	4	2	10
278	5778-001-103	C-G	C	No	0	0.69	Yes	0	24	Focus Area	16	16	4	2	10
279	5775-021-037	C-G	C 1.0	No	0	0.69	Yes	0	24	Focus Area	16	16	4	2	10
280	5787-024-036	C-G	C	No	0	0.70	Yes	0	24	Focus Area	16	16	4	2	10

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
281	5772-001-006	C-G	C	No	0	0.71	Yes	0	24	Focus Area	17	17	4	2	11
282	5783-008-045	C-G	C	No	0	0.71	Yes	0	24	Focus Area	17	17	4	2	11
283	5783-008-030	C-G	C	Yes	0	0.73	Yes	0	24	Focus Area	17	17	4	2	11
284	5772-001-022	C-G	C	No	0	0.73	Yes	0	24	Focus Area	17	17	4	2	11
285	5784-001-020	C-G	C	No	0	0.75	Yes	0	24	Focus Area	18	18	5	2	11
286	5383-035-019	C-G	C	No	0	0.75	Yes	0	24	Focus Area	18	18	5	2	11
287	5778-007-014	C-G	C	No	0	0.76	Yes	0	24	Focus Area	18	18	5	2	11
288	5783-008-031	C-G	C	No	0	0.77	Yes	0	24	Focus Area	18	18	5	2	11

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
289	5383-035-035	C-G	C	No	0	0.78	Yes	0	24	Focus Area	<b>18</b>	18	5	2	11
290	5383-035-028	C-G	C	No	0	0.83	Yes	0	24	Focus Area	<b>19</b>	<b>19</b>	5	2	12
291	5778-007-001	C-G	C	No	0	0.83	Yes	0	24	Focus Area	<b>20</b>	20	5	2	13
292	5783-008-049	C-G	C	No	0	0.85	Yes	0	24	Focus Area	<b>20</b>	<b>20</b>	5	2	13
293	5383-035-034	C-G	C	No	0	0.86	Yes	0	24	Focus Area	<b>20</b>	20	5	2	13
294	5784-003-027	C-G	C	No	0	0.88	Yes	0	24	Focus Area	<b>21</b>	<b>21</b>	5	2	14
295	5383-035-031	C-G	C	No	0	0.90	Yes	0	24	Focus Area	<b>21</b>	21	5	2	14
296	5784-003-025	C-G	C	No	0	0.90	Yes	0	24	Focus Area	<b>21</b>	<b>21</b>	5	2	14
297	5383-035-030	C-G	C	No	0	0.92	Yes	0	24	Focus Area	<b>22</b>	22	6	2	14

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
298	5783-013-032	C-G	C	No	0	0.93	Yes	0	24	Focus Area	<b>22</b>	<b>22</b>	6	2	14
299	5383-035-026	C-G	C	No	0	0.94	Yes	0	24	Focus Area	<b>22</b>	22	6	2	14
300	8587-033-021	C-G	C	No	0	0.95	Yes	0	24	Focus Area	<b>22</b>	<b>22</b>	6	2	14
301	8586-001-027	C-G	C	No	0	0.95	Yes	0	24	Focus Area	<b>22</b>	22	6	2	14
302	5771-028-024	C-G	C	No	0	0.97	Yes	0	24	Focus Area	<b>23</b>	<b>23</b>	6	2	15
303	5771-028-037	C-G	C	No	0	1.06	Yes	0	24	Focus Area	<b>25</b>	25	6	3	16
304	5775-023-015	C-G	C 1.0	No	0	1.07	Yes	0	24	Focus Area	<b>25</b>	<b>25</b>	6	3	16
305	5383-035-025	C-G	C	No	0	1.13	Yes	0	24	Focus Area	<b>27</b>	27	7	3	17

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
306	5383-038-021	C-G	C	No	0	1.17	Yes	0	24	Focus Area	<b>28</b>	<b>28</b>	7	3	18
307	5775-011-002	C-G	C 1.0	No	0	1.22	Yes	0	24	Focus Area	<b>29</b>	29	7	3	19
308	5781-005-002	C-G	C	No	0	1.23	Yes	0	24	Focus Area	<b>29</b>	<b>29</b>	7	3	19
309	5383-031-034	C-G	C	No	0	1.25	Yes	0	24	Focus Area	<b>30</b>	30	8	3	19
310	8587-033-020	C-G	C	No	0	1.28	Yes	0	24	Focus Area	<b>30</b>	<b>30</b>	8	3	19
311	5771-028-053	C-G	C	No	0	1.29	Yes	0	24	Focus Area	<b>30</b>	30	8	3	19
312	5771-028-038	C-G	C	No	0	1.29	Yes	0	24	Focus Area	<b>30</b>	<b>30</b>	8	3	19
313	5775-011-032	C-G	C 1.0	No	0	1.31	Yes	0	24	Focus Area	<b>31</b>	31	8	3	20

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314	5781-006-049	C-G	C	No	0	1.31	Yes	0	24	Focus Area	<b>31</b>	<b>31</b>	8	3	20
315	5778-006-010	C-G	C	No	0	1.35	Yes	0	24	Focus Area	<b>32</b>	32	8	3	21
316	5772-001-028	C-G	C	No	0	1.40	Yes	0	24	Focus Area	<b>33</b>	<b>33</b>	8	3	22
317	5383-035-029	C-G	C	No	0	1.40	Yes	0	24	Focus Area	<b>33</b>	33	8	3	22
318	5383-038-027	C-G	C	No	0	1.42	Yes	0	24	Focus Area	<b>34</b>	<b>34</b>	9	3	22
319	5783-010-056	C-G	C	No	0	1.53	Yes	0	24	Focus Area	<b>36</b>	36	9	4	23
320	8586-001-009	C-G	C	No	0	1.65	Yes	0	24	Focus Area	<b>39</b>	<b>39</b>	10	4	25
321	5784-003-026	C-G	C	No	0	1.74	Yes	0	24	Focus Area	<b>41</b>	41	10	4	27

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
322	5784-003-043	C-G	C	No	0	1.97	Yes	0	24	Focus Area	<b>47</b>	<b>47</b>	12	5	30
323	5778-007-029	C-G	C	No	0	2.22	Yes	0	24	Focus Area	<b>53</b>	53	13	5	35
324	5383-035-024	C-G	C	No	0	2.43	Yes	0	24	Focus Area	<b>58</b>	<b>58</b>	15	6	37
325	5778-007-010	C-G	C	No	0	2.45	Yes	0	24	Focus Area	<b>58</b>	58	15	6	37
326	5383-035-014	C-G	C	No	0	2.55	Yes	0	24	Focus Area	<b>61</b>	<b>61</b>	15	6	40
327	5383-035-015	C-G	C	No	0	2.91	Yes	0	24	Focus Area	<b>69</b>	69	17	7	45
328	5775-011-016	C-G	C 1.0	No	0	4.90	Yes	0	24	Focus Area	<b>117</b>	<b>117</b>	29	12	76
329	5771-021-029	C-G	C	No	0	5.20	Yes	0	24	Focus Area	<b>124</b>	124	31	12	81

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
53	5783-006-018	R-3	HDR	No	9	0.50	Yes	24	32	R-3 Upzone	16	7	2	1	4
54	5779-005-043	R-3	HDR	No	12	0.50	Yes	24	32	R-3 Upzone	16	4	1	0	3
55	5379-028-021	R-3	HDR	No	12	0.50	Yes	24	32	R-3 Upzone	16	4	1	0	3
57	5772-005-001	R-3	HDR	No	0	0.50	Yes	24	32	R-3 Upzone	16	16	4	2	10
58	5773-016-091	R-3	HDR	No	7	0.51	Yes	24	32	R-3 Upzone	16	9	2	1	6
59	5383-029-038	R-3	HDR	No	0	0.51	Yes	24	32	R-3 Upzone	16	16	4	2	10
60	5382-001-042	R-3	HDR	No	7	0.52	Yes	24	32	R-3 Upzone	16	9	2	1	6
69	5379-022-112	R-3	HDR	No	8	0.54	Yes	24	32	R-3 Upzone	17	9	2	1	6
70	5779-003-066	R-3	HDR	No	6	0.54	Yes	24	32	R-3 Upzone	17	11	3	1	7
71	5773-013-058	R-3	HDR	No	11	0.54	Yes	24	32	R-3 Upzone	17	6	2	1	3
72	5773-014-050	R-3	HDR	No	10	0.55	Yes	24	32	R-3 Upzone	17	7	2	1	4
74	5778-015-018	R-3	HDR	No	11	0.56	Yes	24	32	R-3 Upzone	17	6	2	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
75	5777-028-015	R-3	HDR	No	12	0.56	Yes	24	32	R-3 Upzone	<b>17</b>	<b>5</b>	1	1	3
76	5379-029-084	R-3	HDR	No	10	0.56	Yes	24	32	R-3 Upzone	<b>17</b>	7	2	1	4
78	5783-006-063	R-3	HDR	No	10	0.56	Yes	24	32	R-3 Upzone	<b>18</b>	<b>8</b>	2	1	5
79	5783-001-046	R-3	HDR	No	10	0.57	Yes	24	32	R-3 Upzone	<b>18</b>	8	2	1	5
80	5778-002-064	R-3	HDR	No	12	0.57	Yes	24	32	R-3 Upzone	<b>18</b>	<b>6</b>	2	1	3
82	5773-016-172	R-3	HDR	No	8	0.57	Yes	24	32	R-3 Upzone	<b>18</b>	10	3	1	6
83	5781-005-031	R-3	HDR	No	10	0.57	Yes	24	32	R-3 Upzone	<b>18</b>	<b>8</b>	2	1	5
84	5383-033-011	R-3	HDR	No	5	0.58	Yes	24	32	R-3 Upzone	<b>18</b>	13	3	1	9
85	5773-016-118	R-3	HDR	No	7	0.58	Yes	24	32	R-3 Upzone	<b>18</b>	<b>11</b>	3	1	7
86	5783-012-066	R-3	HDR	No	8	0.58	Yes	24	32	R-3 Upzone	<b>18</b>	10	3	1	6
87	5778-011-052	R-3	HDR	No	10	0.58	Yes	24	32	R-3 Upzone	<b>18</b>	<b>8</b>	2	1	5
88	5783-011-126	R-3	HDR	No	12	0.59	Yes	24	32	R-3 Upzone	<b>18</b>	6	2	1	3
89	5783-011-035	R-3	HDR	No	4	0.59	Yes	24	32	R-3 Upzone	<b>18</b>	<b>14</b>	4	1	9

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
90	5783-011-134	R-3	HDR	No	8	0.59	Yes	24	32	R-3 Upzone	18	10	3	1	6
91	5783-011-081	R-3	HDR	No	13	0.59	Yes	24	32	R-3 Upzone	18	5	1	1	3
92	5783-007-089	R-3	HDR	No	6	0.60	Yes	24	32	R-3 Upzone	19	13	3	1	9
93	5773-016-125	R-3	HDR	No	7	0.60	Yes	24	32	R-3 Upzone	19	12	3	1	8
94	5777-029-056	R-3	HDR	No	11	0.60	Yes	24	32	R-3 Upzone	19	8	2	1	5
95	5783-007-057	R-3	HDR	No	10	0.60	Yes	24	32	R-3 Upzone	19	9	2	1	6
96	5773-016-107	R-3	HDR	No	7	0.61	Yes	24	32	R-3 Upzone	19	12	3	1	8
97	5773-016-180	R-3	HDR	No	8	0.61	Yes	24	32	R-3 Upzone	19	11	3	1	7
99	5783-004-040	R-3	HDR	No	12	0.62	Yes	24	32	R-3 Upzone	19	7	2	1	4
100	5779-004-029	R-3	HDR	No	12	0.62	Yes	24	32	R-3 Upzone	19	7	2	1	4
101	5778-009-026	R-3	HDR	No	12	0.64	Yes	24	32	R-3 Upzone	20	8	2	1	5
102	5783-006-098	R-3	HDR	No	12	0.64	Yes	24	32	R-3 Upzone	20	8	2	1	5
104	5777-035-040	R-3	HDR	No	13	0.65	Yes	24	32	R-3 Upzone	20	7	2	1	4

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
105	5773-016-155	R-3	HDR	No	10	0.65	Yes	24	32	R-3 Upzone	<b>20</b>	<b>10</b>	3	1	6
107	5783-002-034	R-3	HDR	No	13	0.66	Yes	24	32	R-3 Upzone	<b>21</b>	8	2	1	5
109	5778-006-003	R-3	HDR	No	14	0.66	Yes	24	32	R-3 Upzone	<b>21</b>	<b>7</b>	2	1	4
110	5778-005-012	R-3	HDR	No	2	0.66	Yes	24	32	R-3 Upzone	<b>21</b>	19	5	2	12
111	5783-002-105	R-3	HDR	No	8	0.66	Yes	24	32	R-3 Upzone	<b>21</b>	<b>13</b>	3	1	9
112	5778-006-002	R-3	HDR	No	15	0.66	Yes	24	32	R-3 Upzone	<b>21</b>	6	2	1	3
113	5778-005-013	R-3	HDR	No	1	0.67	Yes	24	32	R-3 Upzone	<b>21</b>	<b>20</b>	5	2	13
115	5379-022-018	R-3	HDR	No	12	0.67	Yes	24	32	R-3 Upzone	<b>21</b>	9	2	1	6
116	5379-022-023	R-3	HDR	No	16	0.67	Yes	24	32	R-3 Upzone	<b>21</b>	<b>5</b>	1	1	3
118	5379-022-125	R-3	HDR	No	12	0.67	Yes	24	32	R-3 Upzone	<b>21</b>	9	2	1	6
119	5778-010-040	R-3	HDR	No	12	0.68	Yes	24	32	R-3 Upzone	<b>21</b>	<b>9</b>	2	1	6
120	5783-002-096	R-3	HDR	No	14	0.68	Yes	24	32	R-3 Upzone	<b>21</b>	7	2	1	4
121	5379-029-034	R-3	HDR	No	11	0.68	Yes	24	32	R-3 Upzone	<b>21</b>	<b>10</b>	3	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
122	5379-029-073	R-3	HDR	No	15	0.69	Yes	24	32	R-3 Upzone	<b>22</b>	7	2	1	4
123	5779-016-026	R-3	HDR	No	0	0.70	Yes	24	32	R-3 Upzone	<b>22</b>	<b>22</b>	6	2	14
126	5777-030-031	R-3	HDR	No	14	0.71	Yes	24	32	R-3 Upzone	<b>22</b>	8	2	1	5
127	5778-009-024	R-3	HDR	No	12	0.72	Yes	24	32	R-3 Upzone	<b>23</b>	<b>11</b>	3	1	7
128	5779-005-060	R-3	HDR	No	16	0.72	Yes	24	32	R-3 Upzone	<b>23</b>	7	2	1	4
129	5783-010-044	R-3	HDR	No	11	0.72	Yes	24	32	R-3 Upzone	<b>23</b>	<b>12</b>	3	1	8
130	5783-010-021	R-3	HDR	No	13	0.72	Yes	24	32	R-3 Upzone	<b>23</b>	10	3	1	6
131	5379-037-036	R-3	HDR	No	14	0.73	Yes	24	32	R-3 Upzone	<b>23</b>	<b>9</b>	2	1	6
132	5779-001-079	R-3	HDR	No	16	0.73	Yes	24	32	R-3 Upzone	<b>23</b>	7	2	1	4
133	5779-011-063	R-3	HDR	No	15	0.73	Yes	24	32	R-3 Upzone	<b>23</b>	<b>8</b>	2	1	5
135	5379-029-057	R-3	HDR	No	17	0.74	Yes	24	32	R-3 Upzone	<b>23</b>	6	2	1	3
136	5382-001-067	R-3	HDR	No	1	0.75	Yes	24	32	R-3 Upzone	<b>23</b>	<b>22</b>	6	2	14
137	5778-007-025	R-3	HDR	No	8	0.75	Yes	24	32	R-3 Upzone	<b>23</b>	15	4	2	9

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
138	5783-005-052	R-3	HDR	No	15	0.76	Yes	24	32	R-3 Upzone	24	9	2	1	6
139	5382-002-058	R-3	HDR	No	14	0.77	Yes	24	32	R-3 Upzone	24	10	3	1	6
140	5383-002-005	R-3	HDR	No	14	0.77	Yes	24	32	R-3 Upzone	24	10	3	1	6
141	5783-011-098	R-3	HDR	No	16	0.77	Yes	24	32	R-3 Upzone	24	8	2	1	5
142	5777-035-027	R-3	HDR	No	20	0.80	Yes	24	32	R-3 Upzone	25	5	1	1	3
143	5773-016-070	R-3	HDR	No	20	0.81	Yes	24	32	R-3 Upzone	25	5	1	1	3
144	5773-002-051	R-3	HDR	No	16	0.82	Yes	24	32	R-3 Upzone	26	10	3	1	6
145	5783-002-049	R-3	HDR	No	14	0.83	Yes	24	32	R-3 Upzone	26	12	3	1	8
146	5778-015-011	R-3	HDR	No	11	0.83	Yes	24	32	R-3 Upzone	26	15	4	2	9
148	5783-002-129	R-3	HDR	No	18	0.83	Yes	24	32	R-3 Upzone	26	8	2	1	5
149	5383-001-090	R-3	HDR	No	10	0.84	Yes	24	32	R-3 Upzone	26	16	4	2	10
151	5778-003-015	R-3	HDR	No	21	0.84	Yes	24	32	R-3 Upzone	26	5	1	1	3
152	5383-001-079	R-3	HDR	No	16	0.85	Yes	24	32	R-3 Upzone	27	11	3	1	7

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
154	5783-008-043	R-3	HDR	No	12	0.86	Yes	24	32	R-3 Upzone	<b>27</b>	15	4	2	9
155	5778-010-023	R-3	HDR	No	14	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>13</b>	3	1	9
156	5783-014-077	R-3	HDR	No	16	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	11	3	1	7
157	5783-004-058	R-3	HDR	No	16	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>11</b>	3	1	7
158	5783-013-048	R-3	HDR	No	10	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	17	4	2	11
159	5783-014-007	R-3	HDR	No	21	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>6</b>	2	1	3
160	5783-014-033	R-3	HDR	No	16	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	11	3	1	7
161	5379-028-024	R-3	HDR	No	18	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>9</b>	2	1	6
162	5783-004-026	R-3	HDR	No	20	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	7	2	1	4
163	5783-002-068	R-3	HDR	No	17	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>10</b>	3	1	6
164	5783-005-077	R-3	HDR	No	18	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	9	2	1	6
165	5783-014-105	R-3	HDR	No	18	0.87	Yes	24	32	R-3 Upzone	<b>27</b>	<b>9</b>	2	1	6
166	5383-034-046	R-3	HDR	No	18	0.88	Yes	24	32	R-3 Upzone	<b>28</b>	10	3	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
167	5383-033-048	R-3	HDR	No	19	0.89	Yes	24	32	R-3 Upzone	<b>28</b>	<b>9</b>	2	1	6
168	5383-029-058	R-3	HDR	No	18	0.89	Yes	24	32	R-3 Upzone	<b>28</b>	10	3	1	6
169	5783-001-074	R-3	HDR	No	10	0.91	Yes	24	32	R-3 Upzone	<b>28</b>	<b>18</b>	5	2	11
170	5778-010-109	R-3	HDR	No	18	0.93	Yes	24	32	R-3 Upzone	<b>29</b>	11	3	1	7
172	5790-030-012	R-3	HDR	No	21	0.96	Yes	24	32	R-3 Upzone	<b>30</b>	<b>9</b>	2	1	6
173	5778-002-009	R-3	HDR	No	20	0.97	Yes	24	32	R-3 Upzone	<b>31</b>	11	3	1	7
175	5783-007-022	R-3	HDR	No	21	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	<b>10</b>	3	1	6
176	5783-007-010	R-3	HDR	No	23	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	8	2	1	5
179	5783-007-046	R-3	HDR	No	14	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	<b>17</b>	4	2	11
180	5383-001-062	R-3	HDR	No	18	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	13	3	1	9
181	5783-007-021	R-3	HDR	No	24	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	<b>7</b>	2	1	4
182	5783-007-024	R-3	HDR	No	20	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	11	3	1	7
183	5783-009-010	R-3	HDR	No	22	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	<b>9</b>	2	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
184	5379-022-021	R-3	HDR	No	12	0.98	Yes	24	32	R-3 Upzone	<b>31</b>	19	5	2	12
185	5783-006-014	R-3	HDR	No	20	1.00	Yes	24	32	R-3 Upzone	<b>31</b>	<b>11</b>	3	1	7
186	5783-012-057	R-3	HDR	No	20	1.01	Yes	24	32	R-3 Upzone	<b>32</b>	12	3	1	8
187	5379-037-001	R-3	HDR	No	26	1.03	Yes	24	32	R-3 Upzone	<b>32</b>	<b>6</b>	2	1	3
188	5778-004-011	R-3	HDR	No	22	1.03	Yes	24	32	R-3 Upzone	<b>32</b>	10	3	1	6
189	5778-002-051	R-3	HDR	No	18	1.04	Yes	24	32	R-3 Upzone	<b>33</b>	<b>15</b>	4	2	9
190	5783-003-042	R-3	HDR	No	20	1.05	Yes	24	32	R-3 Upzone	<b>33</b>	13	3	1	9
192	5778-009-093	R-3	HDR	No	21	1.06	Yes	24	32	R-3 Upzone	<b>33</b>	<b>12</b>	3	1	8
193	5783-014-036	R-3	HDR	No	21	1.06	Yes	24	32	R-3 Upzone	<b>33</b>	12	3	1	8
194	5379-028-001	R-3	HDR	No	23	1.07	Yes	24	32	R-3 Upzone	<b>34</b>	<b>11</b>	3	1	7
195	5379-021-003	R-3	HDR	No	18	1.08	Yes	24	32	R-3 Upzone	<b>34</b>	16	4	2	10
196	5783-001-021	R-3	HDR	No	24	1.09	Yes	24	32	R-3 Upzone	<b>34</b>	<b>10</b>	3	1	6
197	5778-003-040	R-3	HDR	No	21	1.10	Yes	24	32	R-3 Upzone	<b>35</b>	14	4	1	9

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
198	5779-017-029	R-3	HDR	No	0	1.11	Yes	24	32	R-3 Upzone	<b>35</b>	<b>35</b>	9	4	22
200	5783-002-050	R-3	HDR	No	25	1.11	Yes	24	32	R-3 Upzone	<b>35</b>	10	3	1	6
201	5778-009-025	R-3	HDR	No	23	1.12	Yes	24	32	R-3 Upzone	<b>35</b>	<b>12</b>	3	1	8
202	5783-004-078	R-3	HDR	No	20	1.12	Yes	24	32	R-3 Upzone	<b>35</b>	15	4	2	9
203	5383-031-096	R-3	HDR	No	26	1.13	Yes	24	32	R-3 Upzone	<b>36</b>	<b>10</b>	3	1	6
204	5783-006-082	R-3	HDR	No	14	1.15	Yes	24	32	R-3 Upzone	<b>36</b>	22	6	2	14
206	5785-001-001	R-3	HDR	No	32	1.21	Yes	24	32	R-3 Upzone	<b>38</b>	<b>6</b>	2	1	3
207	5379-028-052	R-3	HDR	No	25	1.23	Yes	24	32	R-3 Upzone	<b>39</b>	14	4	1	9
208	5778-010-087	R-3	HDR	No	30	1.27	Yes	24	32	R-3 Upzone	<b>40</b>	<b>10</b>	3	1	6
209	5778-009-144	R-3	HDR	No	27	1.28	Yes	24	32	R-3 Upzone	<b>41</b>	14	4	1	9
210	5778-009-117	R-3	HDR	No	24	1.29	Yes	24	32	R-3 Upzone	<b>41</b>	<b>17</b>	4	2	11
211	5778-006-045	R-3	HDR	No	34	1.33	Yes	24	32	R-3 Upzone	<b>42</b>	8	2	1	5
212	5773-016-142	R-3	HDR	No	16	1.33	Yes	24	32	R-3 Upzone	<b>42</b>	<b>26</b>	7	3	16

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
213	5383-031-068	R-3	HDR	No	30	1.34	Yes	24	32	R-3 Upzone	<b>42</b>	12	3	1	8
214	5783-007-018	R-3	HDR	No	34	1.36	Yes	24	32	R-3 Upzone	<b>43</b>	9	2	1	6
215	5383-031-113	R-3	HDR	No	15	1.36	Yes	24	32	R-3 Upzone	<b>43</b>	28	7	3	18
216	5379-022-094	R-3	HDR	No	28	1.38	Yes	24	32	R-3 Upzone	<b>44</b>	<b>16</b>	4	2	10
217	5784-007-032	R-3	HDR	No	25	1.44	Yes	24	32	R-3 Upzone	<b>46</b>	21	5	2	14
221	5783-009-009	R-3	HDR	No	31	1.47	Yes	24	32	R-3 Upzone	<b>47</b>	<b>16</b>	4	2	10
222	5778-006-004	R-3	HDR	No	44	1.51	Yes	24	32	R-3 Upzone	<b>48</b>	4	1	0	3
223	5778-011-084	R-3	HDR	No	32	1.55	Yes	24	32	R-3 Upzone	<b>49</b>	<b>17</b>	4	2	11
224	5778-015-024	R-3	HDR	No	0	1.58	Yes	24	32	R-3 Upzone	<b>50</b>	50	13	5	32
225	5383-002-068	R-3	HDR	No	30	1.58	Yes	24	32	R-3 Upzone	<b>50</b>	<b>20</b>	5	2	13
226	5783-013-091	R-3	HDR	No	22	1.60	Yes	24	32	R-3 Upzone	<b>51</b>	29	7	3	19
227	5778-011-126	R-3	HDR	No	30	1.66	Yes	24	32	R-3 Upzone	<b>53</b>	<b>23</b>	6	2	15
228	5778-011-161	R-3	HDR	No	32	1.67	Yes	24	32	R-3 Upzone	<b>53</b>	21	5	2	14

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
229	5379-028-084	R-3	HDR	No	32	1.67	Yes	24	32	R-3 Upzone	<b>53</b>	<b>21</b>	5	2	14
230	5778-001-170	R-3	HDR	No	34	1.69	Yes	24	32	R-3 Upzone	<b>54</b>	20	5	2	13
231	5778-001-134	R-3	HDR	No	30	1.70	Yes	24	32	R-3 Upzone	<b>54</b>	<b>24</b>	6	2	16
232	5783-003-063	R-3	HDR	No	20	1.74	Yes	24	32	R-3 Upzone	<b>55</b>	35	9	4	22
233	5784-006-008	R-3	HDR	No	40	1.78	Yes	24	32	R-3 Upzone	<b>56</b>	<b>16</b>	4	2	10
234	5778-005-055	R-3	HDR	No	40	1.78	Yes	24	32	R-3 Upzone	<b>57</b>	17	4	2	11
235	5784-006-004	R-3	HDR	No	38	1.79	Yes	24	32	R-3 Upzone	<b>57</b>	<b>19</b>	5	2	12
236	5779-005-080	R-3	HDR	No	20	1.81	Yes	24	32	R-3 Upzone	<b>57</b>	37	9	4	24
237	5778-008-003	R-3	HDR	No	28	1.88	Yes	24	32	R-3 Upzone	<b>60</b>	<b>32</b>	8	3	21
238	5778-008-060	R-3	HDR	No	44	2.10	Yes	24	32	R-3 Upzone	<b>67</b>	23	6	2	15
239	5383-029-028	R-3	HDR	No	0	2.17	Yes	24	32	R-3 Upzone	<b>69</b>	<b>69</b>	17	7	45
240	5784-007-051	R-3	HDR	No	25	2.20	Yes	24	32	R-3 Upzone	<b>70</b>	45	11	5	29
243	5784-001-077	R-3	HDR	No	26	2.29	Yes	24	32	R-3 Upzone	<b>73</b>	<b>47</b>	12	5	30

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
244	5783-009-073	R-3	HDR	No	42	2.36	Yes	24	32	R-3 Upzone	<b>75</b>	33	8	3	22
245	5778-009-072	R-3	HDR	No	46	2.44	Yes	24	32	R-3 Upzone	<b>78</b>	<b>32</b>	8	3	21
246	5784-006-009	R-3	HDR	No	0	2.54	Yes	24	32	R-3 Upzone	<b>81</b>	81	20	8	53
247	5778-004-059	R-3	HDR	No	44	2.58	Yes	24	32	R-3 Upzone	<b>82</b>	<b>38</b>	10	4	24
248	5775-012-025	R-3	HDR	No	54	2.65	Yes	24	32	R-3 Upzone	<b>84</b>	30	8	3	19
249	5790-030-053	R-3	HDR	No	60	2.83	Yes	24	32	R-3 Upzone	<b>90</b>	<b>30</b>	8	3	19
250	5778-010-086	R-3	HDR	No	45	3.18	Yes	24	32	R-3 Upzone	<b>101</b>	56	14	6	36
251	5778-001-098	R-3	HDR	No	74	3.42	Yes	24	32	R-3 Upzone	<b>109</b>	<b>35</b>	9	4	22
252	5784-007-021	R-3	HDR	No	0	3.60	Yes	24	32	R-3 Upzone	<b>115</b>	115	29	12	74
253	5778-003-130	R-3	HDR	No	90	4.18	Yes	24	32	R-3 Upzone	<b>133</b>	43	11	4	28
582	5779-014-054	R-3	HDR	No	2	0.16	No	24	32		<b>5</b>	3	1	0	2
583	5778-010-115	R-3	HDR	No	2	0.16	No	24	32		<b>5</b>	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
584	5783-014-080	R-3	HDR	No	2	0.16	No	24	32		5	3	1	0	2
585	5779-013-060	R-3	HDR	No	2	0.16	No	24	32		5	3	1	0	2
586	5779-013-071	R-3	HDR	No	2	0.16	No	24	32		5	3	1	0	2
587	5779-013-048	R-3	HDR	No	2	0.16	No	24	32		5	3	1	0	2
588	5773-016-159	R-3	HDR	No	2	0.16	No	24	32		5	3	1	0	2
589	5778-010-121	R-3	HDR	Yes	1	0.17	No	24	32		5	4	1	0	3
590	5778-010-129	R-3	HDR	Yes	1	0.17	No	24	32		5	4	1	0	3
591	5379-022-144	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
592	5783-006-085	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
593	5773-002-057	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
594	5779-017-039	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
595	5779-016-056	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
596	5779-016-062	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
597	5779-017-034	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
598	5779-017-037	R-3	HDR	No	2	0.17	No	24	32		5	3	1	0	2
599	5783-003-066	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
600	5783-001-076	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
601	5783-001-088	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
602	5783-001-036	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
603	5779-017-032	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
604	5773-014-055	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
605	5779-001-038	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
606	5779-001-087	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
607	5779-001-053	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
608	5779-002-071	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
609	5779-011-098	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
610	5779-011-084	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
611	5773-018-051	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
612	5779-001-041	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
613	5779-003-069	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
614	5779-010-063	R-3	HDR	No	1	0.18	No	24	32		5	4	1	0	3
615	5779-003-010	R-3	HDR	No	1	0.18	No	24	32		5	4	1	0	3
616	5779-011-087	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
617	5779-003-076	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
618	5773-018-053	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
619	5779-009-070	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
620	5779-009-045	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
621	5779-009-077	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
622	5779-009-039	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
623	5779-009-057	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
624	5779-002-073	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
625	5783-003-069	R-3	HDR	No	2	0.18	No	24	32		5	3	1	0	2
626	5773-013-037	R-3	HDR	No	2	0.19	No	24	32		5	3	1	0	2
627	5773-017-071	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
628	5773-017-088	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
629	5779-012-046	R-3	HDR	No	2	0.19	No	24	32		6	4	1	0	3
630	5779-012-083	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
631	5779-012-079	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
632	5779-012-068	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
633	5779-009-061	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
634	5779-012-086	R-3	HDR	No	3	0.19	No	24	32		6	3	1	0	2
635	5773-016-144	R-3	HDR	No	2	0.20	No	24	32		6	4	1	0	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
636	5783-009-101	R-3	HDR	No	2	0.20	No	24	32		6	4	1	0	3
637	5773-016-183	R-3	HDR	No	2	0.20	No	24	32		6	4	1	0	3
638	8587-033-025	R-3	HDR	No	3	0.20	No	24	32		6	3	1	0	2
639	5778-010-118	R-3	HDR	No	2	0.20	No	24	32		6	4	1	0	3
640	5779-003-073	R-3	HDR	No	3	0.20	No	24	32		6	3	1	0	2
641	5783-007-077	R-3	HDR	No	2	0.21	No	24	32		6	4	1	0	3
642	5773-016-078	R-3	HDR	No	3	0.22	No	24	32		6	3	1	0	2
643	5783-005-116	R-3	HDR	No	3	0.22	No	24	32		6	3	1	0	2
644	5772-006-033	R-3	HDR	No	2	0.22	No	24	32		6	4	1	0	3
645	5773-016-043	R-3	HDR	No	3	0.22	No	24	32		7	4	1	0	3
646	5778-010-112	R-3	HDR	No	3	0.23	No	24	32		7	4	1	0	3
647	5783-009-109	R-3	HDR	No	4	0.23	No	24	32		7	3	1	0	2
648	5778-005-062	R-3	HDR	No	4	0.24	No	24	32		7	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
649	5773-016-163	R-3	HDR	No	3	0.24	No	24	32		7	4	1	0	3
650	5778-015-049	R-3	HDR	No	2	0.24	No	24	32		7	5	1	1	3
651	5778-011-088	R-3	HDR	No	4	0.24	No	24	32		7	3	1	0	2
652	5777-030-035	R-3	HDR	No	3	0.24	No	24	32		7	4	1	0	3
653	5778-011-175	R-3	HDR	No	4	0.25	No	24	32		7	3	1	0	2
654	5772-003-029	R-3	HDR	No	4	0.25	No	24	32		7	3	1	0	2
655	5385-029-055	R-3	HDR	No	2	0.26	No	24	32		8	6	2	1	3
656	5773-016-050	R-3	HDR	No	4	0.27	No	24	32		8	4	1	0	3
657	5773-017-067	R-3	HDR	No	3	0.28	No	24	32		8	5	1	1	3
658	5779-016-048	R-3	HDR	No	3	0.28	No	24	32		9	6	2	1	3
659	5778-010-127	R-3	HDR	Yes	6	0.28	No	24	32		9	3	1	0	2
660	5379-029-104	R-3	HDR	No	4	0.29	No	24	32		9	5	1	1	3
661	5779-005-101	R-3	HDR	No	5	0.29	No	24	32		9	4	1	0	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
662	5783-011-101	R-3	HDR	No	3	0.30	No	24	32		9	6	2	1	3
663	5783-014-112	R-3	HDR	No	6	0.30	No	24	32		9	3	1	0	2
664	5773-016-083	R-3	HDR	No	4	0.30	No	24	32		9	5	1	1	3
665	5779-003-059	R-3	HDR	No	4	0.30	No	24	32		9	5	1	1	3
666	5773-020-049	R-3	HDR	No	2	0.31	No	24	32		9	7	2	1	4
667	5775-011-036	R-3	HDR	No	4	0.31	No	24	32		9	5	1	1	3
668	5779-003-084	R-3	HDR	No	4	0.31	No	24	32		9	5	1	1	3
669	5783-006-033	R-3	HDR	No	3	0.31	No	24	32		10	7	2	1	4
670	5783-005-128	R-3	HDR	No	6	0.32	No	24	32		10	4	1	0	3
671	5379-022-131	R-3	HDR	No	6	0.34	No	24	32		10	4	1	0	3
672	5783-006-054	R-3	HDR	No	4	0.34	No	24	32		10	6	2	1	3
673	5773-016-111	R-3	HDR	No	4	0.34	No	24	32		10	6	2	1	3
674	5783-013-054	R-3	HDR	No	5	0.35	No	24	32		11	6	2	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
675	5778-011-095	R-3	HDR	No	4	0.35	No	24	32		11	7	2	1	4
676	5783-009-105	R-3	HDR	No	4	0.35	No	24	32		11	7	2	1	4
677	5779-016-053	R-3	HDR	No	4	0.35	No	24	32		11	7	2	1	4
678	5379-028-097	R-3	HDR	No	7	0.35	No	24	32		11	4	1	0	3
679	5779-004-043	R-3	HDR	No	4	0.35	No	24	32		11	7	2	1	4
680	5783-005-133	R-3	HDR	No	4	0.35	No	24	32		11	7	2	1	4
681	5773-014-064	R-3	HDR	No	6	0.36	No	24	32		11	5	1	1	3
682	5778-011-183	R-3	HDR	No	8	0.36	No	24	32		11	3	1	0	2
683	5783-010-065	R-3	HDR	No	8	0.36	No	24	32		11	3	1	0	2
684	5783-010-055	R-3	HDR	No	6	0.36	No	24	32		11	5	1	1	3
685	5783-010-070	R-3	HDR	No	4	0.36	No	24	32		11	7	2	1	4
686	5779-011-095	R-3	HDR	No	8	0.36	No	24	32		11	3	1	0	2
687	5779-011-081	R-3	HDR	No	8	0.36	No	24	32		11	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
688	5773-019-071	R-3	HDR	No	5	0.36	No	24	32		11	6	2	1	3
689	5779-001-084	R-3	HDR	No	5	0.36	No	24	32		11	6	2	1	3
690	5779-003-054	R-3	HDR	No	8	0.36	No	24	32		11	3	1	0	2
691	5779-010-055	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
692	5779-010-073	R-3	HDR	No	6	0.37	No	24	32		11	5	1	1	3
693	5783-005-113	R-3	HDR	No	7	0.37	No	24	32		11	4	1	0	3
694	5779-002-092	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
695	5779-010-080	R-3	HDR	No	6	0.37	No	24	32		11	5	1	1	3
696	5779-001-062	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
697	5779-010-060	R-3	HDR	No	4	0.37	No	24	32		11	7	2	1	4
698	5779-003-046	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
699	5779-011-072	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
700	5773-018-043	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
701	5779-002-069	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
702	5773-018-049	R-3	HDR	No	5	0.37	No	24	32		11	6	2	1	3
703	5773-020-059	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
704	5773-020-046	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
705	5779-012-064	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
706	5779-012-055	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
707	5773-013-046	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
708	5379-037-070	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
709	5779-002-083	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
710	5773-018-063	R-3	HDR	No	8	0.37	No	24	32		11	3	1	0	2
711	5783-005-093	R-3	HDR	No	7	0.37	No	24	32		11	4	1	0	3
712	5379-028-105	R-3	HDR	No	7	0.37	No	24	32		11	4	1	0	3
713	5783-005-084	R-3	HDR	No	6	0.37	No	24	32		11	5	1	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
714	5784-001-086	R-3	HDR	No	7	0.38	No	24	32		12	5	1	1	3
715	5778-008-068	R-3	HDR	No	7	0.38	No	24	32		12	5	1	1	3
716	5779-012-075	R-3	HDR	No	6	0.39	No	24	32		12	6	2	1	3
717	5379-029-090	R-3	HDR	No	5	0.39	No	24	32		12	7	2	1	4
718	5779-009-067	R-3	HDR	No	5	0.39	No	24	32		12	7	2	1	4
719	5779-009-054	R-3	HDR	No	8	0.39	No	24	32		12	4	1	0	3
720	5783-009-099	R-3	HDR	No	5	0.39	No	24	32		12	7	2	1	4
721	5783-005-121	R-3	HDR	No	4	0.39	No	24	32		12	8	2	1	5
722	5382-001-066	R-3	HDR	No	7	0.39	No	24	32		12	5	1	1	3
723	5385-029-050	R-3	HDR	No	8	0.40	No	24	32		12	4	1	0	3
724	5379-028-112	R-3	HDR	No	6	0.40	No	24	32		12	6	2	1	3
725	5783-007-072	R-3	HDR	No	5	0.40	No	24	32		12	7	2	1	4
726	8587-034-030	R-3	HDR	No	4	0.40	No	24	32		12	8	2	1	5

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727	5783-005-059	R-3	HDR	No	7	0.40	No	24	32		12	5	1	1	3
728	5383-002-101	R-3	HDR	No	8	0.41	No	24	32		13	5	1	1	3
729	5383-034-062	R-3	HDR	No	8	0.41	No	24	32		13	5	1	1	3
730	5783-011-139	R-3	HDR	No	4	0.41	No	24	32		13	9	2	1	6
731	5783-014-060	R-3	HDR	No	6	0.41	No	24	32		13	7	2	1	4
732	5783-008-058	R-3	HDR	No	8	0.41	No	24	32		13	5	1	1	3
733	5779-015-039	R-3	HDR	No	8	0.41	No	24	32		13	5	1	1	3
734	5383-002-108	R-3	HDR	No	6	0.41	No	24	32		13	7	2	1	4
735	5383-002-078	R-3	HDR	No	7	0.41	No	24	32		13	6	2	1	3
736	5778-015-046	R-3	HDR	No	5	0.42	No	24	32		13	8	2	1	5
737	5783-003-077	R-3	HDR	No	8	0.42	No	24	32		13	5	1	1	3
738	5379-029-040	R-3	HDR	No	4	0.42	No	24	32		13	9	2	1	6
739	5779-017-048	R-3	HDR	No	8	0.42	No	24	32		13	5	1	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
740	5773-016-098	R-3	HDR	No	5	0.43	No	24	32		13	8	2	1	5
741	5783-002-078	R-3	HDR	No	9	0.43	No	24	32		13	4	1	0	3
742	5778-003-137	R-3	HDR	No	6	0.43	No	24	32		13	7	2	1	4
743	5783-014-043	R-3	HDR	No	6	0.43	No	24	32		13	7	2	1	4
744	5783-011-068	R-3	HDR	No	9	0.43	No	24	32		13	4	1	0	3
745	5379-029-099	R-3	HDR	No	8	0.43	No	24	32		13	5	1	1	3
746	5783-006-043	R-3	HDR	No	7	0.43	No	24	32		13	6	2	1	3
747	5383-034-027	R-3	HDR	No	6	0.43	No	24	32		13	7	2	1	4
748	5783-014-086	R-3	HDR	No	6	0.43	No	24	32		13	7	2	1	4
749	5783-012-036	R-3	HDR	No	8	0.44	No	24	32		13	5	1	1	3
750	5783-001-031	R-3	HDR	No	8	0.44	No	24	32		13	5	1	1	3
751	5379-022-141	R-3	HDR	No	9	0.44	No	24	32		13	4	1	0	3
752	5783-001-085	R-3	HDR	No	8	0.44	No	24	32		13	5	1	1	3

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
753	5783-010-075	R-3	HDR	No	5	0.44	No	24	32		14	9	2	1	6
754	5778-008-016	R-3	HDR	No	6	0.44	No	24	32		14	8	2	1	5
755	5379-022-104	R-3	HDR	No	7	0.44	No	24	32		14	7	2	1	4
756	5783-001-056	R-3	HDR	No	9	0.44	No	24	32		14	5	1	1	3
757	5779-014-043	R-3	HDR	No	8	0.44	No	24	32		14	6	2	1	3
758	5383-002-085	R-3	HDR	No	6	0.44	No	24	32		14	8	2	1	5
759	5773-001-063	R-3	HDR	No	6	0.44	No	24	32		14	8	2	1	5
760	5778-015-035	R-3	HDR	No	11	0.45	No	24	32		14	3	1	0	2
761	5379-028-090	R-3	HDR	No	6	0.46	No	24	32		14	8	2	1	5
762	5783-013-067	R-3	HDR	No	9	0.46	No	24	32		14	5	1	1	3
763	5779-013-037	R-3	HDR	No	10	0.47	No	24	32		14	4	1	0	3
764	5783-014-053	R-3	HDR	No	9	0.47	No	24	32		15	6	2	1	3
765	5383-031-120	R-3	HDR	No	6	0.48	No	24	32		15	9	2	1	6

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ID	APN	Existing Zoning	Existing General Plan Land Use	Vacancy	Existing Units	Gross Acreage	HCD Sizing Criteria	Existing Zone Density (Assumed)	Rezoned Density (Assumed)	Inventory Category	Potential Rezoned Unit Yield	Assumed Net Yield	LVL	Mod	Above Mod
766	5779-013-045	R-3	HDR	No	8	0.48	No	24	32		15	7	2	1	4
767	5785-001-116	R-3	HDR	No	9	0.49	No	24	32		15	6	2	1	3
768	5778-002-026	R-3	HDR	No	10	0.49	No	24	32		15	5	1	1	3
769	5783-002-111	R-3	HDR	No	5	0.49	No	24	32		15	10	3	1	6
770	5783-006-062	R-3	HDR	No	6	0.50	No	24	32		15	9	2	1	6
771	5778-015-041	R-3	HDR	No	5	0.50	No	24	32		15	10	3	1	6
772	8571-011-904	OS-OR	OS-OR	No	0	25.86	No	N/A	N/A		192	192	48	72	72
26	5776-001-012	C-G	C	No	0	2.821949019	Yes	0	N/A	Pipeline Project	N/A	80	0	80	0

