



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

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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
Total		3,214
Source: Southern California Association of Governments (SCAG). 2021. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-proposed-final-allocation-plan.pdf?1614911196 (accessed November 2023).		

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.¹

Population

¹ 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 2022.² 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 2045.³ 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 20,686.⁴ 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 2045.⁵ 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.⁶ 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).⁷ The California DOF reports that as of January 2023 there are not any mobile homes in the City.⁸

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.⁹ The Arcadia GP is the City's vision for 25 years and beyond.¹⁰ 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

² 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).

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

⁴ 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).

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

⁶ 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).

⁷ Ibid.

⁸ Ibid.

⁹ City of Arcadia. 2022. *General Plan*. https://www.arcadiaca.gov/shape/development_services_department/planning_zoning/general_plan.php#outer-708 (accessed November 2023).

¹⁰ Ibid.

vitality.¹¹ 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. https://cms9files.revize.com/arcadia/Land%20Use%20Element%20Update%20Final.pdf (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.**

¹¹ 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.
Source: City of Arcadia. (2023). <i>Chapter 1 Development Code</i> . https://library.municode.com/ca/arcadia/codes/code_of_ordinances?nodeId=ARTIXDIUSLA_CH1DECO_DIV2ZOALUSDEST_S9102.03COINZO (accessed November 2023).	

2.2 Project Description

The City of Arcadia 6th 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 6th 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

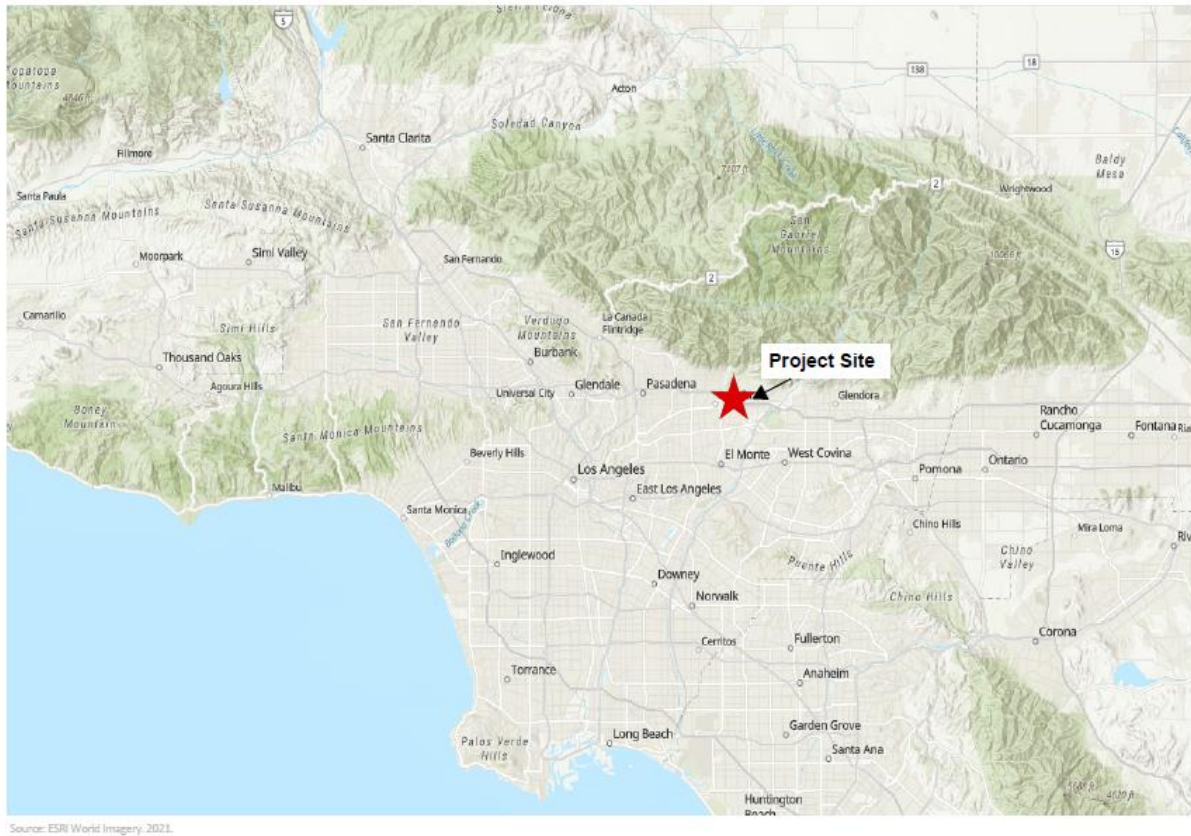
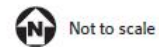


EXHIBIT 1: Regional Map
Arcadia 6th Cycle HEU, City of Arcadia



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Exhibit 2: Local Vicinity Map

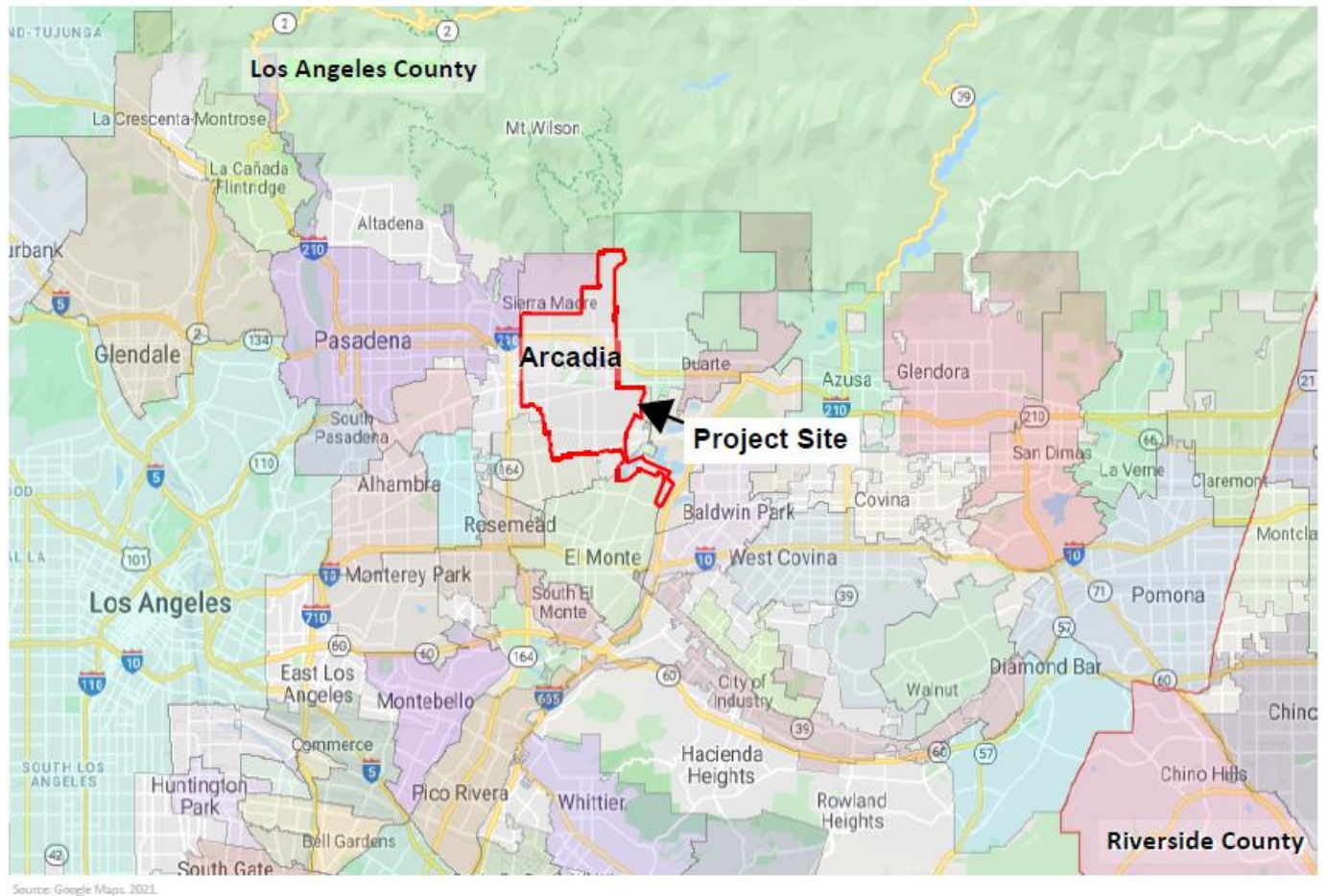


EXHIBIT 2: Vicinity Map
Arcadia 6th Cycle HEU, City of Arcadia



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Exhibit 3: Housing Element Update Sites – All

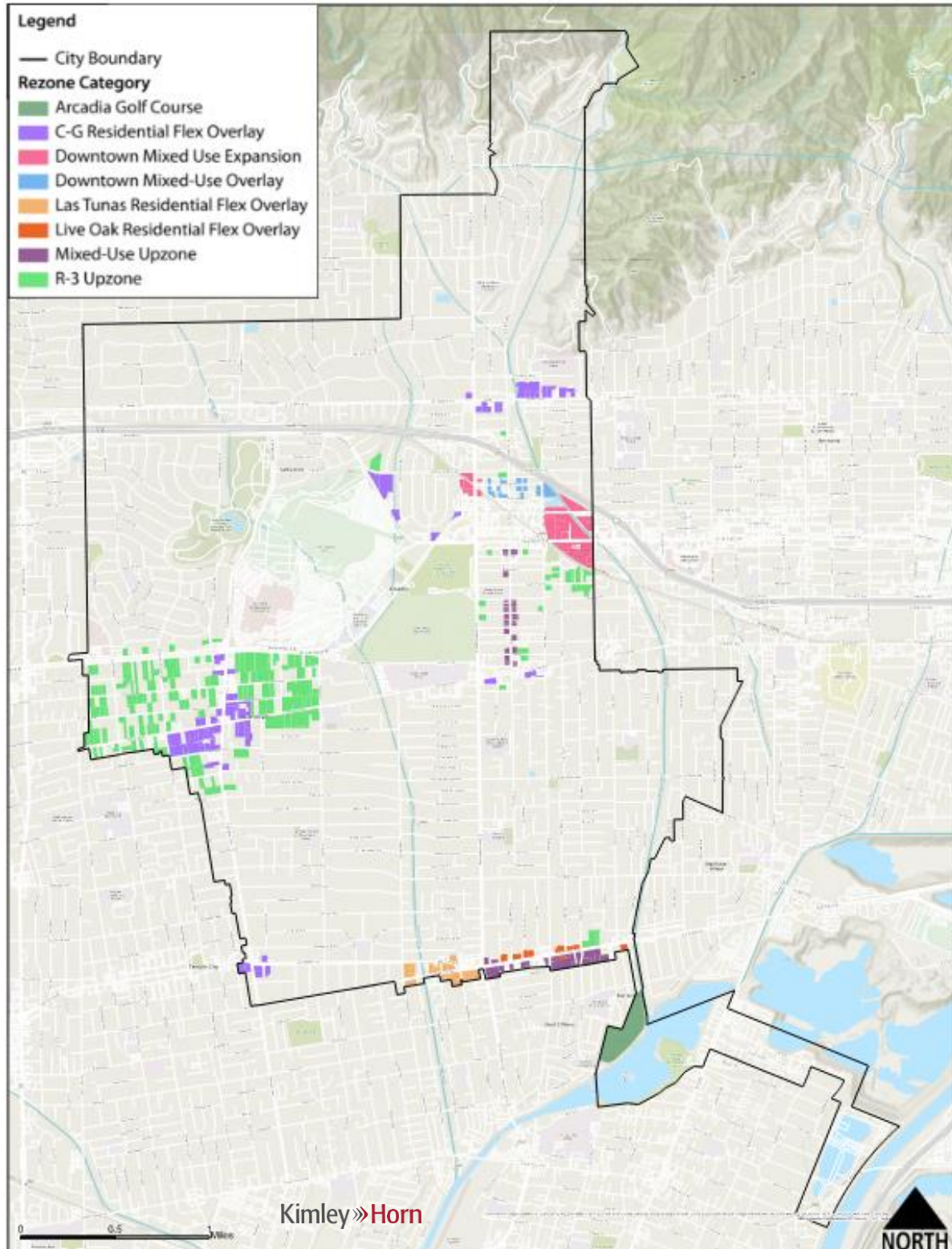


Exhibit 5: Housing Element Update Sites – West

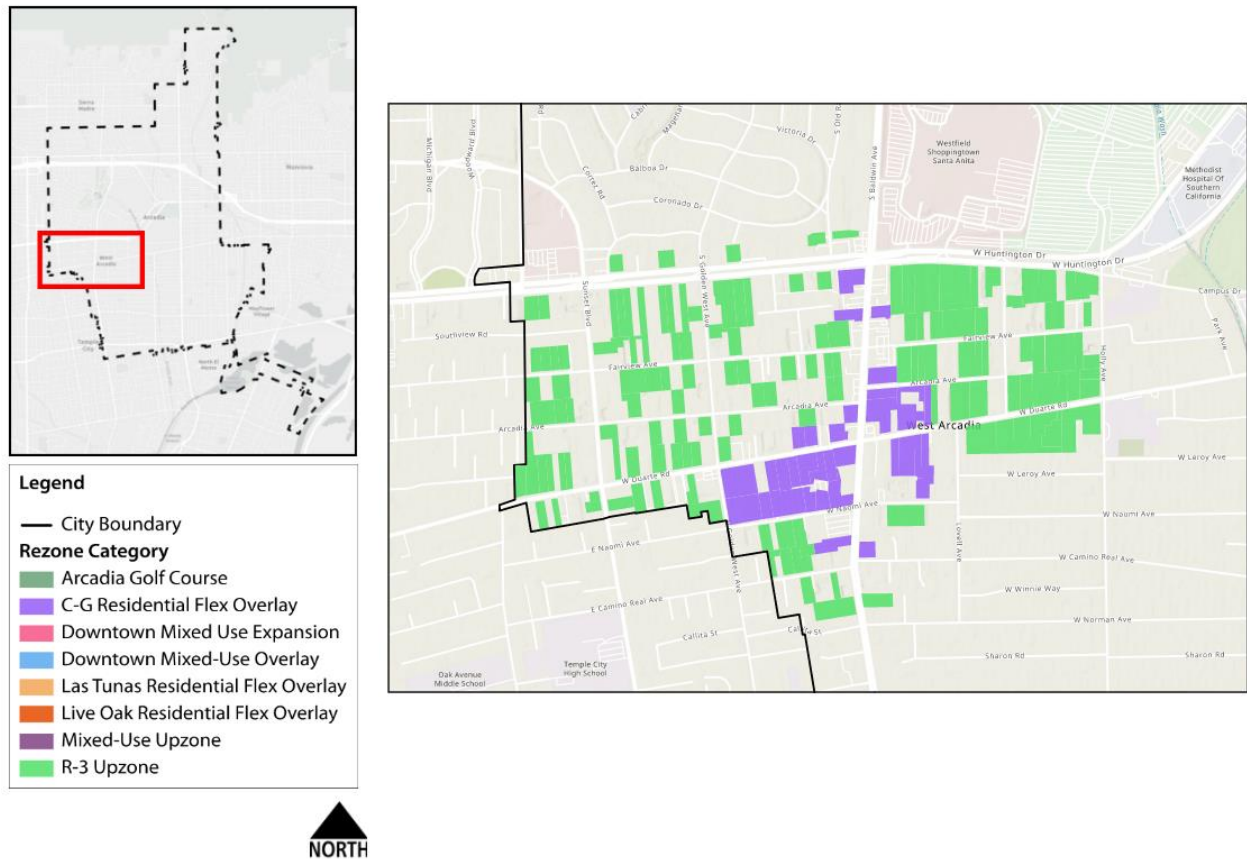


Exhibit 6: Housing Element Update Sites – South

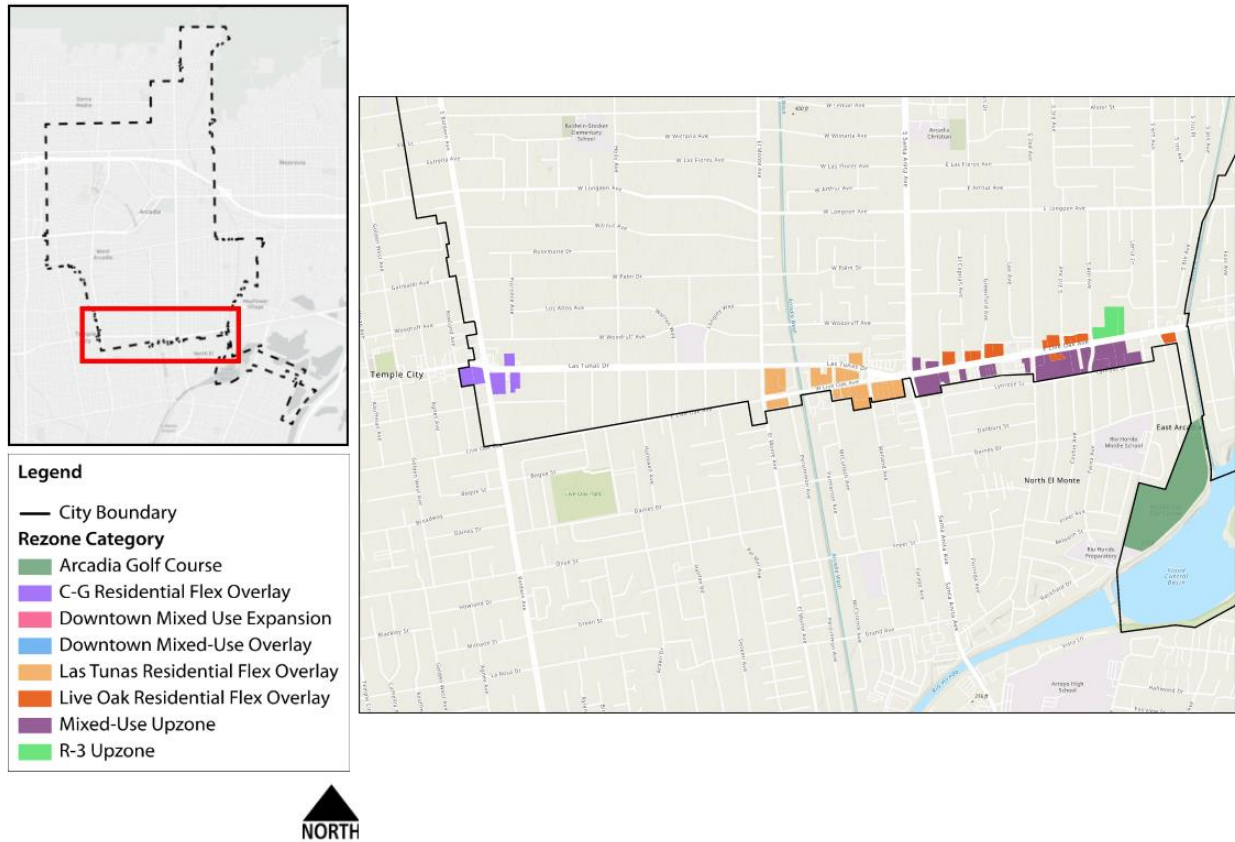


Exhibit 7: Project Rezone Map – All

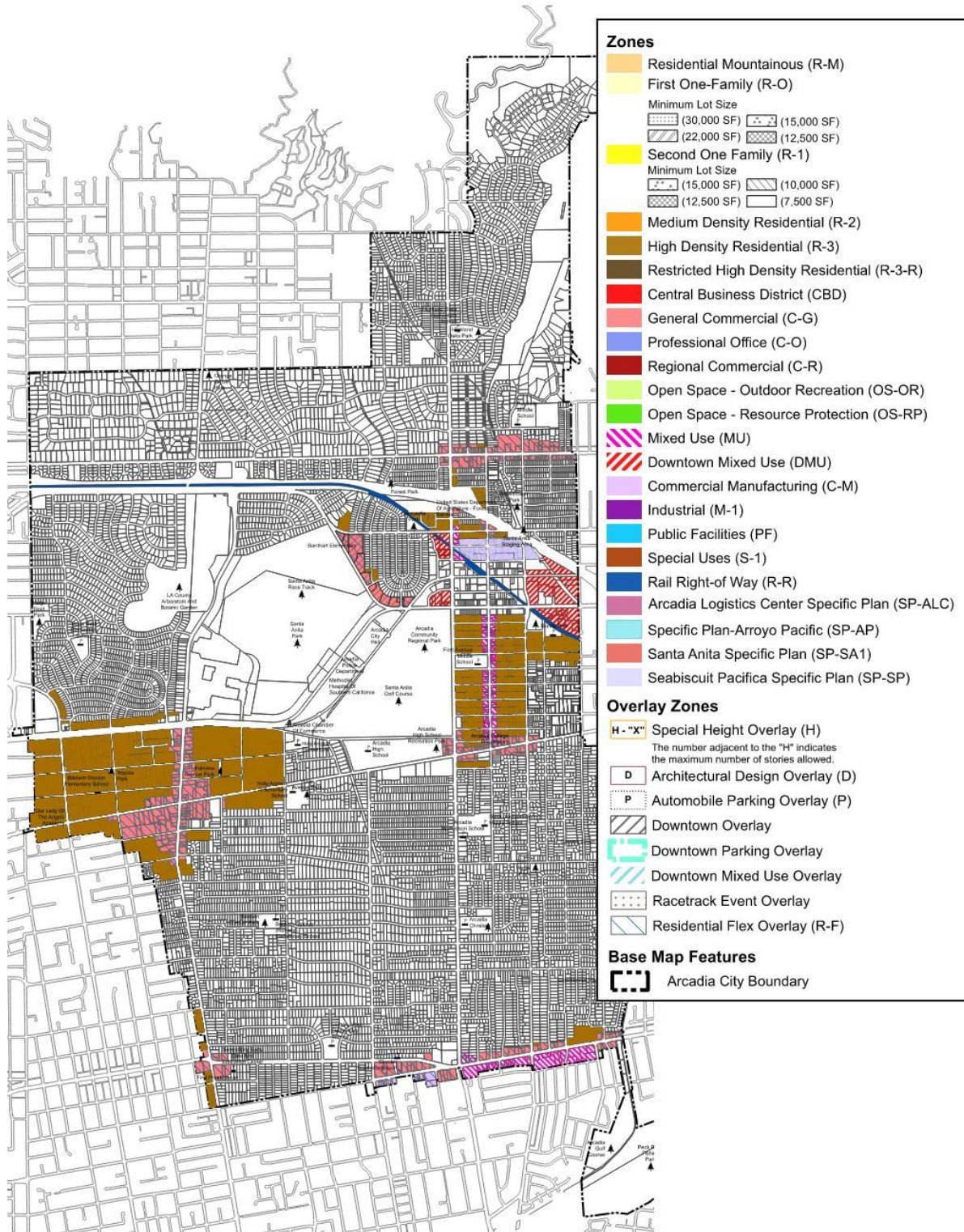


Exhibit 8: Project Rezone Map – East

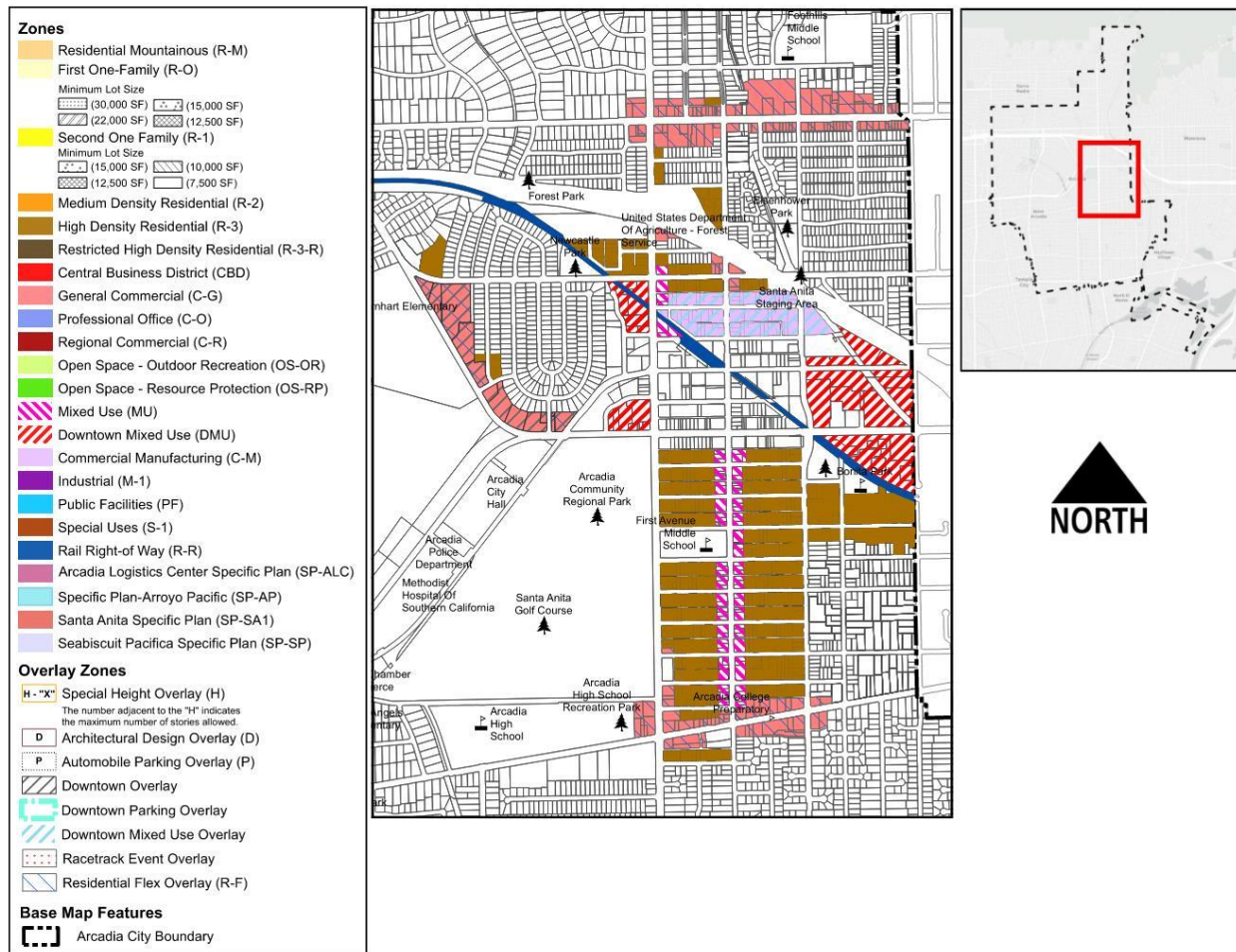


Exhibit 9: Project Rezone Map – West

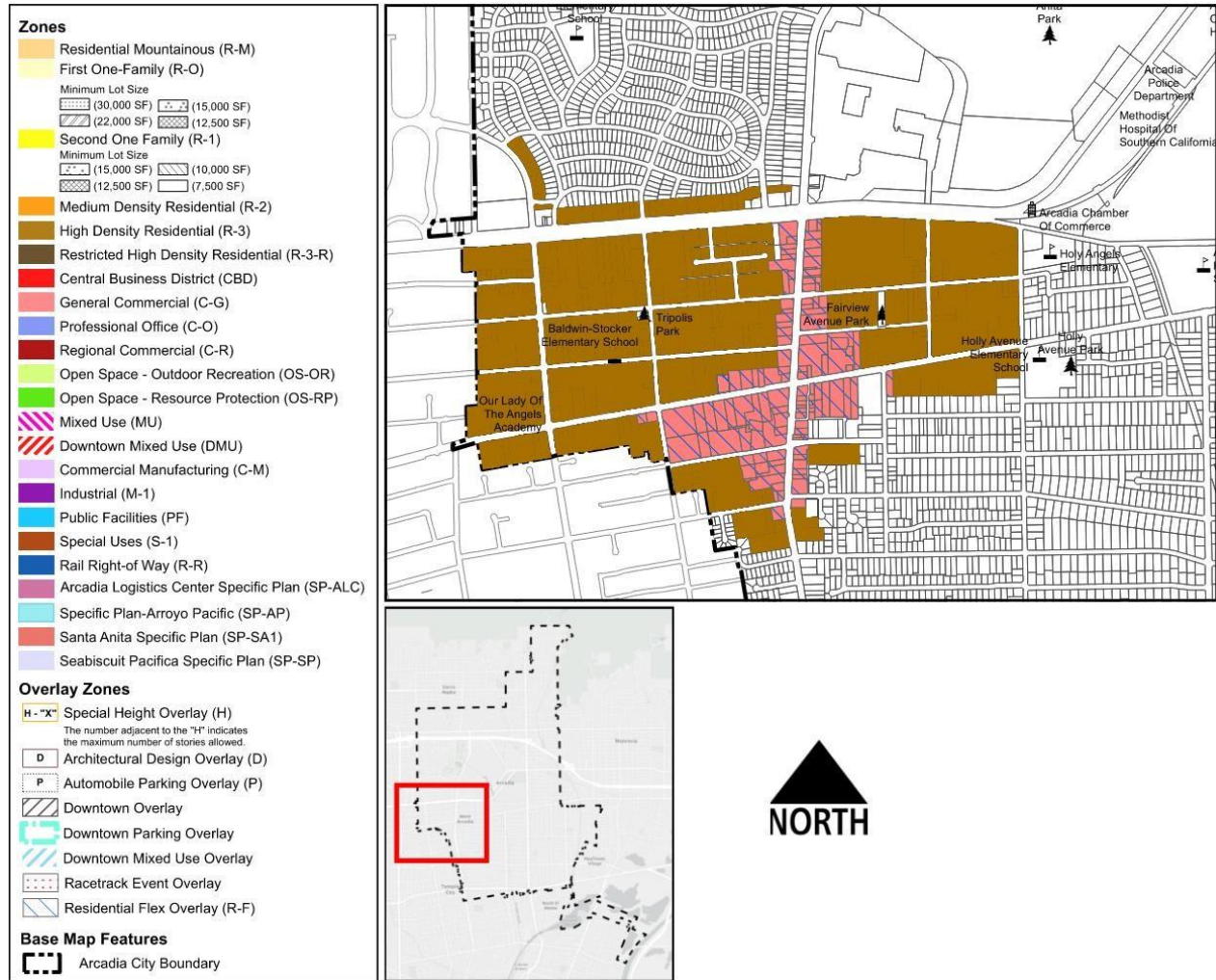
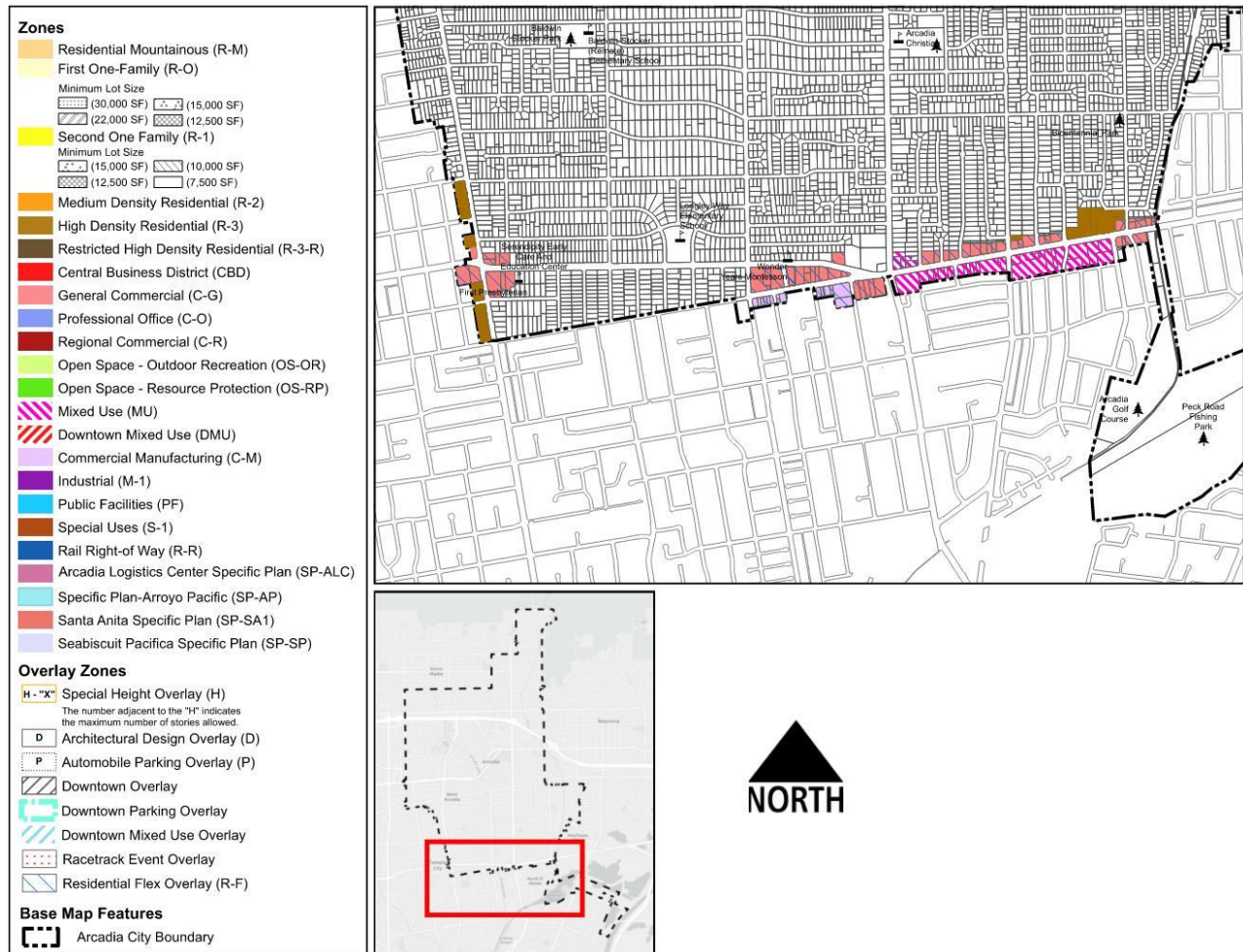


Exhibit 10: Project Rezone Map – South



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.¹² 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 policies. 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.¹³ 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.¹⁴ Therefore, no new or more severe impacts would occur in this regard. No new mitigation measures are required for issues related to aesthetics.

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

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

¹⁴ 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.¹⁵ 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.¹⁶ The Project would remain consistent with the Approved IS/ND in this regard.

¹⁵ 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).

¹⁶ 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 (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.¹⁷ 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.¹⁸ There are also no designated forest lands or timberlands in the City.¹⁹ 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.

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

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

¹⁹ 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_x), Carbon Monoxide (CO), Sulfur Oxides (SO_x), Particulate Matter with a diameter of 10 microns or less (PM₁₀), and Particulate Matter with a diameter of 2.5 microns or less (PM_{2.5}) 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 §9107.03.070²⁰ 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

²⁰ 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 (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.²¹ 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.

²¹ 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 Hillsides, 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 Hillsides 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.²² 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

²² 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.²³ 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.

²³ 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.²⁴ 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

²⁴ 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.²⁵ 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.

²⁵ 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.²⁶ 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.²⁷ 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

²⁶ 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).

²⁷ 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 (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.²⁸ 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.

²⁸ 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.²⁹ 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.³⁰ 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.³¹ Therefore, future housing development facilitated by the HEU in these areas would be required to comply with the height limitations in the FAR Part 77.³² 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.

²⁹ 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).

³⁰ 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).

³¹ Ibid.

³² 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 §9103.07³³ 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.

³³ 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 (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.³⁴ 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)

³⁴ 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.³⁵ 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.

³⁵ 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.³⁶ 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.

³⁶ 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.³⁷ 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%

³⁷ City of Arcadia. 2022. City of Arcadia 6th Cycle Housing Element Update Technical Background Report. Page A-2. Retrieved from: 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 the 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).³⁸ 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.³⁹ 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.⁴⁰ 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.

³⁸ 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).

³⁹ Ibid, Page 4-5.

⁴⁰ 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 2030.⁴¹ 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,

⁴¹ 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.⁴² 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

⁴² 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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