

## **Appendix C: Adopting Resolution**

RESOLUTION NO. 6715

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ARCADIA, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (SCH #2009081034), ADOPTING ENVIRONMENTAL FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS AND ADOPTING THE PROPOSED ARCADIA GENERAL PLAN UPDATE

WHEREAS, the City of Arcadia (the "City") desires to comprehensively revise the Arcadia General Plan to respond to changing conditions in the City and the region, as well as to revisit the vision of the City for its future (hereinafter referred to as either the "Project" or the "General Plan Update"); and

WHEREAS, the City formed a General Plan Advisory Committee that articulated the vision for the City; reviewed the existing land uses in the City; identified areas that should be preserved and areas that could transition over time; discussed needed citywide improvements; proposed various programs and measures to implement citywide goals; and recommended overall changes to the goals, approaches, and strategies in the 1996 General Plan, including the development of a new Land Use Policy Map; and

WHEREAS, a draft Arcadia General Plan was developed that included the following ten chapters: (1) Introduction; (2) Land Use and Community Design Element; (3) Economic Development Element; (4) Circulation and Infrastructure Element; (5) Housing Element; (6) Resource Sustainability Element; (7) Parks, Recreation, and Community Resources Element; (8) Safety Element; (9) Noise Element; and (10) Implementation Plan; and

WHEREAS, pursuant to section 21067 of the Public Resources Code, and section 15367 of the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), the City of Arcadia is the lead agency for the proposed General Plan Update; and

WHEREAS, in compliance with the Public Resources Code, the City prepared a Draft Environmental Impact Report (the "Draft EIR") to analyze the potential environmental effects of the Project; and

WHEREAS, the City solicited comments, including details about the scope and content of the environmental information, as well as potential feasible mitigation measures, from responsible agencies, trustee agencies, and the public, in a Notice of Preparation ("NOP") the EIR for the Project, which was filed on August 10, 2009 and circulated for a period of 30 days pursuant to State CEQA Guidelines sections 15082, subdivision (a) and 15375; and

WHEREAS, approximately 11 written comment letters were received by the City in response to the NOP, which assisted the City in expanding the issues and alternatives for analysis in the Draft EIR; and

WHEREAS, pursuant to Public Resources Code section 21083.9 and State CEQA Guidelines 15082(c) and 15083, the City held a public scoping meeting on August 27, 2009, to solicit public comments on the EIR for the General Plan Update; and

WHEREAS, the Draft EIR was completed and released for public review on July 19, 2010 and the City initiated a 45-day public comment period by filing a Notice of Completion and Availability with the State Office of Planning and Research and the Los Angeles County Clerk; and

WHEREAS, pursuant to Public Resources Code section 21092, the City also provided a Notice of Completion and Availability to all organizations and individuals who had previously requested such notice, and published the Notice of Completion and Availability on July 19, 2010, in the Pasadena Star News, a newspaper of general circulation in the Project area; and

WHEREAS, during the 45-day comment period, the City consulted with and requested comments from all responsible and trustee agencies, other regulatory agencies and other interested parties pursuant to State CEQA Guidelines section 15086; and

WHEREAS, all potential significant adverse environmental impacts of the proposed General Plan Update were sufficiently analyzed in the Draft EIR; and

WHEREAS, during the official public review period for the Draft EIR, the City received fourteen (14) written comment letters; and

WHEREAS, on September 28, 2010 the City released the Final EIR, which consists of written responses to all comment letters received by the City during the official public review period and errata to the Draft EIR; and

WHEREAS, pursuant to Public Resources Code section 21092.5, the City provided copies of the written responses to all commenting public agencies; and

WHEREAS, the "EIR" consists of the Final EIR and the Draft EIR (as modified by the Final EIR); and

WHEREAS, all potentially significant adverse environmental impacts were sufficiently analyzed in the EIR; and

WHEREAS, the City is not revising the proposed General Plan Update based on comments received; and

WHEREAS, as contained herein, the City has endeavored in good faith to set forth the basis for its decision on the General Plan Update; and

WHEREAS, all requirements of the Public Resources Code and the State CEQA Guidelines have been satisfied in the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project, as well as feasible mitigation measures, have been adequately evaluated; and

WHEREAS, the EIR prepared in connection with the Project sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the Project's potential environmental impacts and a range of feasible alternatives capable of eliminating or reducing these effects in accordance with the Public Resources Code and the State CEQA Guidelines; and

WHEREAS, all of the findings and conclusions made by the City Council pursuant to this Resolution are based upon oral and written evidence presented to it as a whole and not based solely on the information provided in this Resolution; and

WHEREAS, environmental impacts identified in the EIR that the City finds will either have no impact or are less than significant and do not require mitigation are described in Section II below; and

WHEREAS, the environmental impacts identified in the EIR as potentially significant but which the City finds can be mitigated to a less than significant level through the implementation of standard conditions of approval ("Standard Conditions"), goals, policies and implementation actions in the proposed General Plan Update ("Project Design Features"), and/or Mitigation Measures identified in the Mitigation Monitoring and Reporting Program are described in Section III below; and

WHEREAS, environmental impacts identified in the EIR as potentially significant but which the City finds cannot be mitigated to a level of less than significant, despite the imposition of all feasible Standard Conditions, Project Design Features, and Mitigation Measures identified in the EIR, are described in Section IV below; and

WHEREAS, the significant and less than significant cumulative environmental impacts of the Project identified in the EIR are described in Section V below; and

WHEREAS, significant irreversible environmental changes identified in the EIR are described in Section VI below; and

WHEREAS, growth-inducing impacts identified in the EIR are described in Section VII below; and

WHEREAS, alternatives to the Project that might eliminate or reduce significant environmental impacts are described in Section VIII below; and

WHEREAS, the City Council has determined that the benefits of the General Plan Update outweigh its potential significant effects, and the basis for that determination is set forth in the Statement of Overriding Considerations included in Section IX below; and

WHEREAS, the Mitigation Monitoring and Reporting Program sets forth the mitigation measures to which the City shall bind itself in connection with the Project, is adopted in Section XI below, and is attached hereto as Exhibit "A"; and

WHEREAS, prior to taking action, the City Council has heard, been presented with, reviewed and considered all of the information and data in the administrative record, including the EIR, and all oral and written evidence presented to it during all meetings and hearings; and

WHEREAS, the EIR reflects the independent judgment of the City Council and is deemed adequate for purposes of making decisions on the merits of the proposed General Plan Update; and

WHEREAS, the City has not received any comments or additional information that produced substantial new information requiring recirculation Public Resources Code section 21092.1 and State CEQA Guidelines section 15088.5; and

WHEREAS, on October 26, 2010 the Arcadia Planning Commission conducted a duly noticed public hearing on this Resolution, at which time all persons wishing to testify were heard and the General Plan Update was fully considered; and

WHEREAS, on November 16, 2010 the City Council conducted a duly noticed public hearing on this Resolution, at which time all persons wishing to testify were heard, the City Council considered the Planning Commission's recommendation, and the General Plan Update was fully considered; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF ARCADIA, CALIFORNIA, DOES HEREBY FIND, DETERMINE AND RESOLVE AS FOLLOWS:

**SECTION I**  
**INTRODUCTION**

**A. Project Description**

The proposed General Plan Update is a comprehensive revision of the City's current General Plan document and is intended to respond to changing conditions in the City and the region, as well as to revisit the vision of the City for its future. The General Plan Update was guided by the following principles:

- Balanced Growth and Development
- Connectivity
- Neighborhood Character
- Schools
- Cultural Diversity
- Environmental Sustainability
- City Services
- Changing Housing Needs
- Economic Health
- Preservation of Special Assets

The proposed Arcadia General Plan would establish the planned development patterns and maximum densities and intensities of land uses within the City and its Sphere of Influence. In addition, the General Plan would serve as a policy guide for determining the appropriate physical development and character of the City. The proposed General Plan is organized into the following ten chapters: (1) Introduction; (2) Land Use and Community Design Element; (3) Economic Development Element; (4) Circulation and Infrastructure Element; (5) Housing Element; (6) Resource Sustainability Element; (7) Parks, Recreation, and Community Resources Element; (8) Safety Element; (9) Noise Element; and (10) Implementation Plan.

Each Element contains goals and policies that City government would follow to achieve the vision of its residents, business owners, stakeholders, City staff, and leaders. In addition, the General Plan Update contains a number of plans to implement the General Plan's goals and policies: Land Use Policy Map, Circulation Plan, and Implementation Plan.

The Arcadia General Plan is a policy document that regulates land use and development within the City. The update and revision of this policy document would not lead to direct physical changes in the City or the existing environment, nor would it be accompanied by specific development proposals or projects.

Implementation of the General Plan Land Use Policy Map over the entire planning area (including the City and its Sphere of Influence [SOI]) is projected to potentially result in a net increase of 3,387 dwelling units, approximately 3.5 million square feet of non-residential development, and 9,256 people at the evaluated maximum buildout. Public and infrastructure projects would also be constructed throughout the City.

## B. Legal Requirements

Public Resources Code section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the

significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

Pursuant to section 15091 of the State CEQA Guidelines, the City may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the City makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which will avoid or substantially lessen the significant environmental impact as identified in the EIR; or
2. Such changes or alterations are within the responsibility and jurisdiction of a public agency other than the City, and such changes have been adopted by such other agency, or can and should be adopted by such other agency; or
3. Specific economic, social, legal or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

Notably, Public Resources Code section 21002 requires an agency to "substantially lessen or avoid" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoided, satisfy section 21002's mandate. (Laurel Hills Homeowners Association v. City Council (1978) 83 Cal.App.3d 515, 521 ("CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"); Las Virgenes Homeowners Federation, Inc. v. County of Los Angeles (1986) 177 Cal. App. 3d 300, 309 ("[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible").)

The Public Resources Code requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts. An agency need not, however, adopt infeasible mitigation measures or alternatives. (State CEQA Guidelines, § 15091, subds. (a), (b).) Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." State CEQA Guidelines section 15091 adds "legal" considerations as another indicia of feasibility. (See also Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 565.) Project objectives also inform the determination of "feasibility." (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401, 417.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Id.*; see also Sequoia Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 715.)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (Leonoff v. Monterey County Board of Supervisors (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project’s environmental alternatives is not required; rather, the requirement is that sufficient information be produced “to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” Outside agencies (including courts) are not to “impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken.” (Residents Ad Hoc Stadium Com. v. Board of Trustees (1979) 89 Cal.App.3d 274, 287.)

#### **C. Summary of Environmental Findings**

As more fully explained below, the City Council has determined that based on all of the evidence presented, including, but not limited to: the EIR, written and oral testimony given at meetings and hearings, and submission of comments from the public, organizations and regulatory agencies, and the responses prepared to the public comments, the following environmental impacts associated with the proposed General Plan Update are:

##### **1. No Impact or Less Than Significant Impacts that Do Not Require Mitigation**

- Scenic Vistas; Scenic Highways; Visual Character and Quality; Light and Glare; Cumulative Aesthetics
- Important Farmland; Existing Zoning or Williamson Contract; Forest Land and Timberland; Conversion of Forestland; Conversion of Farmland; Cumulative Agriculture and Forest Resources
- Operational Stationary Sources; Operational Local CO Impacts; Objectionable Odors; Cumulative Objectionable Odors
- Riparian Habitat and Wetlands; Wildlife Movement; Tree Preservation Policies; Habitat Conservation Plan or Natural Community Conservation Plan
- Human Remains; Cumulative Cultural Resources
- Seismic Hazards; Soil Erosion; Geologic Hazards and Expansive Soils; Cumulative Geology and Soils
- Transport, Use, and Disposal of Hazardous Materials; Accidental Release of Hazardous Materials; Hazardous Emissions or Hazardous Materials Near Schools; Known Hazardous Materials Sites; Airport and Airstrip Hazards; Emergency Response; Wildland Fires; Cumulative Hazards and Hazardous Materials

- Water Quality and Waste Discharge Standards; Groundwater; Drainage and Erosion; Flood Hazards; Dam Inundation and Mudflows; Cumulative Hydrology and Water Quality
- Division of Established Communities; Plan Consistency; Conflict with Habitat Conservation Plan; Cumulative Land Use and Planning
- Mineral Resources; Cumulative Mineral Resources
- Airport and Airstrip Noise
- Population Growth; Displacement of Housing and People; Cumulative Population and Housing
- Fire Protection and Emergency Medical Services; Police Protection and Law Enforcement Services; School Services; Library Services; Other Public Facilities; Cumulative Public Services
- Increased Use of Parks; New Recreational Facilities; Park Services; Cumulative Parks and Recreation
- Consistency with the Congestion Management Plan; Air Traffic Patterns; Traffic Hazards; Emergency Access; Alternative Transportation; Cumulative Consistency with the Congestion Management Plan; Cumulative Air Traffic Patterns; Cumulative Traffic Hazards; Cumulative Emergency Access; Cumulative Alternative Transportation
- Water Supply; Wastewater Treatment and Infrastructure; Solid Waste Disposal; Electricity, Natural Gas, and Communications Infrastructure; Cumulative Utility and Service Systems
- Consistency with GHG Reduction Plan, Policy or Regulation

## **2. Potentially Significant Impacts That Can be Avoided or Reduced to a Less Than Significant Level Through Implementation of Mitigation Measures**

- Sensitive Receptors and Construction Related-Emissions
- Sensitive Species; Cumulative Biological Resources
- Historical Resources; Archaeological Resources; Paleontological Resources
- Septic Tank Limitations
- Surface Runoff and Storm Drain Facilities
- Construction (Short-Term) Noise; Groundborne Vibration; Operational Railroad Noise and Impacts to Noise Sensitive Uses
- Water and Wastewater Distribution Infrastructure

## **3. Potentially Significant and Cannot be Avoided or Reduced to a Less Than Significant Level:**

- Air Quality Management Plan Consistency; Violate Air Quality Standards; Impacts of Operational Emissions on Sensitive Receptors; Cumulative Air Quality Management Plan Consistency; Cumulative Construction-related (Short-Term) Emissions; Cumulative Operational (Long-Term) Emissions; Cumulative Impacts on Sensitive Receptors from TACs
- Operational (Long-Term) Traffic Noise; Cumulative Off-Site Traffic Noise
- Circulation System Performance; Cumulative Circulation System Performance

- Conflict with GHG Reduction Plan, Policy or Regulation; Cumulative GHG Emissions

This document contains the findings required under the California Environmental Quality Act ("CEQA") (Public Resources Code, §§ 21000 et seq.) and the State CEQA Guidelines. (California Code of Regulations, title 14, §§15000 et seq.)

Public Resources Code section 21081.6 requires the City to prepare and adopt a Mitigation Monitoring and Reporting Program for any project for which mitigation measures have been imposed to assure compliance with the adopted mitigation measures. The City adopts a Mitigation Monitoring and Reporting Program for the proposed General Plan Update in Section XI of this Resolution.

No comments made in the public hearings conducted by the Planning Commission or City Council or any additional information submitted to the City has produced any substantial new information requiring recirculation or additional environmental review of the Final EIR under CEQA because no new significant environmental impacts were identified, no substantial increase in the severity of any environmental impacts would occur, and no feasible mitigation measures or Project alternatives as defined in State CEQA Guidelines section 15088.5 were rejected.

## **SECTION II**

### **FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION**

Section 15091 of the State CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as have "no impact" or a "less than significant" impact. Nevertheless, these findings fully account for all resource areas, including resource areas that were identified in the EIR to have either no impact or a less than significant impact on the environment. The City Council hereby finds that the proposed General Plan Update would either have no impact or a less than significant impact in the following resource areas:

#### **A. Aesthetics**

1. **Scenic Vistas (Threshold 4.1a):** The proposed General Plan Update would have a less than significant impact on scenic vistas. Impacts on scenic views of the hillsides and the San Gabriel Mountains would be less than significant with adherence to the goals and policies set forth in the General Plan Update, as well as other City regulations related to hillside land development. (EIR pp. 4.1-11 to 12.)

2. **Scenic Highways (Threshold 4.1b):** The proposed General Plan Update would have no impact on scenic highways. There are no scenic highways in and near the City, which may be impacted by future development. (EIR p. 4.1-12.)

**3. Visual Character and Quality (Threshold 4.1c):** The proposed General Plan Update would have a less than significant impact on the visual character and quality of the site and its surroundings. Changes in the City's visual character would be less than significant with adherence to the proposed goals, policies, and implementation actions set forth in the General Plan Update and with compliance with the City's Architectural Design Guidelines, Zoning Regulations and development standards, and Municipal Code requirements. (EIR pp. 4.1-12 to 14.)

**4. Light and Glare (Threshold 4.1d):** The proposed General Plan Update would have a less than significant impact regarding the creation of new sources of substantial light or glare that would adversely affect day or nighttime views in the area. The introduction of new sources of light and glare would be less than significant with compliance with the City's Municipal Code standards for exterior lighting. (EIR pp. 4.1-14 to 15.)

## **B. Agriculture and Forest Resources**

**1. Important Farmland (Threshold 4.2a):** The proposed General Plan Update would have no impact on this resource and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use. Future development under the General Plan Update would have no impact on designated Farmlands. (EIR p. 4.2-3.)

**2. Existing Zoning or Williamson Contract (Threshold 4.2b):** The proposed General Plan Update would not conflict with existing zoning for agricultural use or a Williamson Act contract. The City does not have an agricultural zone and there are no Williamson Act contracts within the City of Arcadia or its SOI. (EIR p. 4.2-3.)

**3. Forest Land and Timberland (Threshold 4.2c):** The proposed General Plan Update would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The General Plan Update does not propose future development or redevelopment on forest lands within the Angeles National Forest. (EIR p. 4.2-3.)

**4. Conversion of Forest Land (Threshold 4.2d):** The proposed General Plan Update would not result in the loss of forest land or conversion of forest land to non-forest land. Future residential development near the Angeles National Forest would not conflict with or obstruct implementation of the Forest Plan or lead to the loss of forest land or the conversion of forest land. (EIR p. 4.2-4.)

**5. Conversion of Farmland (Threshold 4.2e):** The proposed General Plan Update would not involve other changes in the existing environment, which due to their location or nature, would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Future development pursuant to the General Plan Update would have no impact on agricultural use or forests, nor would it lead to the conversion of agricultural land or forest land to other uses. (EIR p. 4.2-4.)

## C. Air Quality

1. **Operational Stationary Sources (Threshold 4.3d):** The proposed General Plan Update would result in less than significant impacts with regard to operational emissions from stationary sources. Stationary sources of TAC emissions in the City would have to comply with SCAQMD rules and regulations regarding new stationary sources. As part of SCAQMD's new stationary source review, SCAQMD would determine if TACs would be emitted. If SCAQMD determines that TACs would be emitted, SCAQMD would determine the MACT (maximum achievable control technology) or BACT (best available control technology) to impose on the project to reduce emissions. If the SCAQMD determines that even after imposing the MACT or BACT emissions would be significant, SCAQMD would deny the permit to the stationary source. Consequently, the current regulatory scheme would sufficiently mitigate any potentially significant operational emissions impacts from stationary sources and no additional mitigation is necessary. Therefore, operational stationary source emissions would be less than significant. (EIR p. 4.3-24.)

2. **Operational Local CO Impacts (Threshold 4.3d):** The proposed General Plan Update would result in less than significant impacts with regard to operation local CO hotspot impacts. Future peak hour traffic volumes at intersections within the City of Arcadia would be less than those included in the AQMP modeling analysis. Thus, CO concentrations at major intersections in the City due to future development would also be lower. No CO hotspots would occur. (EIR pp. 4.3-26 to 4.3-27.)

3. **Objectionable Odors (Threshold 4.3e):** The proposed General Plan Update would have a less than significant impact with regard to the creation of objectionable odors affecting a substantial number of people. The proposed General Plan Update does not propose the development of agricultural or industrial land uses that are major odor sources. Therefore, land use conflicts between major odor sources and sensitive receptors are not expected to occur in the City. (EIR p. 4.3-27.)

Moreover, exhaust odors from diesel engines, as well as emissions associated with asphalt paving and the application of architectural coatings may be considered offensive to some individuals. Similarly, diesel-fueled locomotives traveling along the rail lines in the City and diesel-fueled trucks traveling on local roadways would produce associated diesel exhaust fumes. However, because odors associated with diesel fumes and other minor sources would be temporary and would disperse rapidly with distance from the source, construction generated and mobile-source odors would not result in the frequent exposure of receptors to objectionable odor emissions. The City has adopted performance standards for odors to prevent exposure of adjacent land uses to objectionable odors. Implementation of existing solid waste regulations would also reduce odors from on-site wastes and trash. Compliance with these Standard Conditions would prevent existing and future stationary sources from adversely affecting nearby developments. (EIR pp. 4.3-27 to 28.)

## D. Biological Resources

**1. Riparian Habitat and Wetlands (Thresholds 4.4b and 4.4c):** The proposed General Plan Update would have a less than significant impact on riparian habitat and Federally protected wetlands. Future infrastructure projects or flood control maintenance could impact drainages, resulting in potential disturbance of jurisdictional features subject to CDFG or USFWS regulations and permits that may be present in these drainage channels. In accordance with existing regulations, prior to any impacts to biological resources under the jurisdiction of the USACE, the CDFG, or the RWQCB, appropriate permits would have to be obtained from these resource agencies. These permits would identify necessary mitigation to reduce disturbance impacts and require appropriate replacement habitat in order to ensure no net loss in biological resource values. Compliance with the permit requirements would prevent any significant adverse impacts to wetlands and riparian communities. Implementation Action 6-14 also requires compliance with the FESA, the CESA, and the CWA to avoid impacts to water quality and riparian resources. Therefore, impacts to jurisdictional resources to be less than significant. (EIR p. 4.4-20.)

**2. Wildlife Movement (Threshold 4.4d):** The proposed General Plan Update would have a less than significant impact on the movement of any native or migratory fish or wildlife species, established native resident or migratory wildlife corridors, and native wildlife nursery sites. The General Plan Update would permit Residential Estate development in the foothills on existing vacant land, adjacent to the Angeles National Forest, and in the vacant areas of the San Gabriel Mountains to the north, which are used for wildlife movement. However, development is restricted in this area and the majority of the steep hillsides would be preserved as open space, allowing continued wildlife movement. Compliance with Goals LU-5 and RS-8 and supporting policies in the General Plan Update would assist in the preservation of the natural environment in the City's northern end, reducing potential impacts to wildlife movement. Impacts would be less than significant. (EIR p. 4.4-20 to 21.)

**3. Tree Preservation Policies (Threshold 4.4e):** The proposed General Plan Update would have a less than significant impact on the City's Tree Preservation Policies. While future development pursuant to the General Plan Update may lead to the removal of trees, the City's Oak Tree Regulations protect Engelmann oaks, coast live oaks, and other oak trees. Also, the City has a Comprehensive Tree Management Program for the protection of street trees and the implementation of the Street Tree Master Plan. Goal PR-3 and supporting policies and Implementation Action 7-8 call for the protection of trees and the urban forest in the City. Compliance with these goals, policies, implementation action, and Standard Conditions would minimize the removal, cutting, or damage to a City-owned tree or shrub on any public property and protect oak trees in the City, with individual development projects complying with local policies or ordinances protecting biological resources, including trees. Impacts would be less than significant. (EIR p. 4.4-21.)

**4. Habitat Conservation Plan or Natural Community Conservation Plan (Threshold 4.4f):** The proposed General Plan Update would have no impact on an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation Plan. There are no adopted, approved, or proposed Habitat Conservation Plans; Natural Community Conservation Plans; or other approved local, regional, or State habitat conservation plans that cover habitats located within the City of Arcadia. There would, therefore, be no conflict with any such provisions with adoption of the General Plan Update or with future development pursuant to the General Plan Update. (EIR p. 4.4-21.)

**E. Cultural Resources**

**1. Human Remains (Threshold 4.6d):** The proposed General Plan Update would result in less than significant impacts to human remains. The potential to encounter unknown burials and disturbance or destruction of burial remains would be less than significant with compliance with Implementation Action 6-12 and existing regulations that mandate the process in the event human remains are discovered. (EIR p. 4.5-19.)

**F. Geology and Soils**

**1. Seismic Hazards (Threshold 4.6a):**

**Surface Rupture:** Implementation of the proposed General Plan Update would result in less than significant surface rupture hazards in the City. The Raymond, Sierra Madre, and Puente Hills faults pose the most substantial threat related to surface rupture for the City. However, existing regulations prevent development over a fault trace or protect structures and infrastructure from surface rupture hazards. Implementation of policies in the Safety Element of the proposed General Plan Update would further reduce surface rupture hazards in the City. (EIR pp. 4.6-15 to 16.)

**Seismic Ground Shaking:** Implementation of the proposed General Plan Update would result in less than significant seismic ground shaking hazards in the City. Future development pursuant to the General Plan Update would be subject to ground shaking hazard during earthquake events. Compliance with seismic design criteria in the California Building Code (CBC) would allow these structures to withstand seismic ground shaking to an acceptable degree and prevent hazards to persons and property. Future developments at the northern end of the City where there are sites with steep terrain or where ridgetops or fill slopes are present may be exposed to ridgeline spreading and deformation of fill slopes from strong seismic shaking. Site-specific geologic investigations would identify these hazards and provide appropriate construction recommendations. Goal and policies in the Safety Element and implementation actions would further reduce ground shaking hazards in the City to less than significant levels. (EIR pp. 4.6-16 to 19.)

**Ground Failure and Liquefaction:** Implementation of the proposed General Plan Update would result in less than significant ground failure and liquefaction hazards in the City. Areas susceptible to liquefaction have been identified north of the Raymond fault, along Santa Anita Wash, and in the southern section of the City. Future development pursuant to the General Plan Update in these areas would be exposed to liquefaction hazards. However, the CBC and the City's Building Regulations provide the appropriate building design criteria needed to protect the structural integrity of structures and infrastructure against liquefaction. The City requires the preparation of a geotechnical investigation and compliance with the Seismic Hazards Mapping Act to identify geologic and seismic hazards and to develop appropriate mitigation measures prior to permitting by local jurisdictions. Liquefaction hazards would be less than significant. (EIR pp. 4.6-19 to 20.)

**Landslides:** Implementation of the proposed General Plan Update would result in less than significant landslide hazards in the City. New residential development on vacant lots at the northern end of the City would be exposed to landslide hazards. Compliance with the CBC and the City's Building Regulations would provide for the structural integrity of homes that may be built in this area. Site-specific geologic investigations would identify these hazards and provide appropriate construction recommendations. Goals and policies in the Safety Element of the General Plan Update call for minimizing the potential for loss of life, physical injury, and property damage resulting from earthquakes and geologic hazards. Thus, impacts associated with landslide hazards would be less than significant. (EIR pp. 4.6-20 to 21.)

**2. Soil Erosion (Threshold 4.6b):** The proposed General Plan Update would have a less than significant impact on soil erosion and the loss of topsoil. Future development would lead to ground disturbance, including grading and excavations, which may be subject to wind or water erosion. Erosion control measures are required by the City's Zoning Regulations and Building Regulations, especially for cut and fill slopes in the Residential Mountainous Single-Family Zone. In addition, future development projects are required to implement erosion control Best Management Practices (BMPs), in compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Impacts relating to erosion would be temporary and less than significant. (EIR p. 4.6-21.)

**3. Geologic Hazards and Expansive Soils (Thresholds 4.6c and 4.6d):** The proposed General Plan Update would result in less than significant geologic hazards and would result in less than significant impacts to soil properties in the City. Future development would be exposed to geologic hazards, which include slope instability (landslides, mudslides, and debris flows), poor geotechnical/soils engineering properties (expansive, collapsible, and corrosive soils), shallow groundwater, flooding from tsunami and seiche, and subsidence. The CBC and the City's Building Regulations provide the appropriate building design criteria needed to protect the structural integrity of structures and infrastructure against subsidence and soil settlement. The City requires the preparation of a geotechnical investigation for individual developments to identify and mitigate geologic hazards. General Plan goals and policies would also reduce hazards. Impacts would be less than significant. (EIR pp. 4.6-21 to 24.)

## **G. Hazards and Hazardous Materials**

### **1. Transport, Use, and Disposal of Hazardous Materials (Threshold 4.7a):**

Implementation of the proposed General Plan Update would have less than significant impacts related to the transportation, use, and disposal of hazardous materials. Impacts associated with the routine transport, use, or disposal of hazardous materials in the City would be less than significant with compliance with existing hazardous material regulations and the goals, policies, and implementation actions in the proposed General Plan Update. (EIR pp. 4.7-18 to 19.)

### **2. Accidental Release of Hazardous Materials (Threshold 4.7b):**

Implementation of the proposed General Plan Update would have less than significant impacts related to the accidental release of hazardous materials. Future development may include industrial and commercial uses that would utilize large quantities of hazardous materials. However, these users would be subject to various State and federal regulations on storage, use, handling, transport, or disposal of hazardous materials and hazardous wastes. Compliance with pertinent regulations would avoid the creation of a significant hazard to the public and would reduce the potential for the release of hazardous materials into the environment. (EIR p. 4.7-19 to 20.)

### **3. Hazardous Emissions or Hazardous Materials Near Schools (Threshold 4.7c):**

Implementation of the proposed General Plan Update would have less than significant impacts related to siting hazardous emissions or hazardous materials near schools. With implementation of the standard conditions and implementation actions in the proposed General Plan Update, impacts related to exposure of school-aged children to hazardous emissions, materials, substances, or wastes would be less than significant. (EIR p. 4.7-20.)

### **4. Known Hazardous Materials Sites (Threshold 4.7d):**

The proposed General Plan Update would have a less than significant impact with regard to known hazardous materials sites. With implementation of the standard conditions and implementation actions in the proposed General Plan Update, impacts related to the presence and/or potential redevelopment of known hazardous materials sites would be less than significant. (EIR p. 4.7-21.)

### **5. Airport and Airstrip Hazards (Thresholds 4.7e and 4.7f):**

The proposed General Plan Update would have less than significant impacts with regard to airport and airstrip hazards. Compliance with Federal Aviation Administration (FAA) regulations would avoid hazards to people residing or working near the El Monte Airport. Impacts related to aircraft operations at the El Monte Airport would be less than significant. (EIR p. 4.7-21.) There are no private airstrips in the City. Therefore, no hazards from airstrips would occur. (EIR p. 4.7-22.)

### **6. Emergency Response (Threshold 4.7g):**

The proposed General Plan Update would have less than significant impacts with regard to emergency response. Future development would not physically interfere with an adopted emergency response plan or emergency evacuation plan. With implementation of standard conditions and

the goals and policies in the Safety Element of the proposed General Plan Update, impacts related to emergency response and evacuation would be less than significant. (EIR p. 4.7-22.)

**7. Wildland Fires (Threshold 4.7h):** The proposed General Plan Update would have less than significant impacts with regard to exposure of people or structures to significant risk of loss, injury, or death involving wildland fires. Impacts related to wildland fires would be less than significant with implementation of the California Fire Plan, City building regulations, and Natural Hazard Mitigation Plan. (EIR p. 4.7-23.)

#### **H. Hydrology and Water Quality**

**1. Water Quality and Waste Discharge Standards (Thresholds 4.8a and 4.8f):** Implementation of the proposed General Plan Update would have less than significant impacts on water quality and waste discharge standards.

**Construction Impacts:** Impacts related to the generation of storm water pollutants during construction would be reduced to less than significant levels with the implementation of erosion control measures required under the City's Municipal Code and compliance with the NPDES Construction General Permit through implementation of a Storm Water Pollution Prevention Plan. (EIR pp. 4.8-17 to 18.)

**Operational Impacts:** Storm water pollutants that could be generated by the operation of future development pursuant to the General Plan Update and public and infrastructure projects in the City would be reduced to less than significant levels with the implementation of a Standard Urban Stormwater Mitigation Plan (SUSMP) required under the NPDES. Goals and supporting policies in the Safety Element of the General Plan Update, as well as supporting implementation actions, would further reduce water quality impacts. (EIR pp. 4.8-18 to 19.)

**2. Groundwater (Threshold 4.8b):** Implementation of the proposed General Plan Update would have less than significant impacts on groundwater recharge and groundwater supplies.

**Groundwater Recharge:** Future development pursuant to the General Plan Update would not significantly interfere with or prevent groundwater recharge, since the Peck Road Recharge Basin would be retained as open space under the proposed Land Use Policy Map. (EIR p. 4.8-19.)

**Groundwater Supplies:** Groundwater supplies are expected to be available to meet the water demands in the City to the year 2035. Impacts on groundwater would be less than significant. (EIR pp. 4.8-20 to 21.)

**3. Drainage and Erosion (Thresholds 4.8c and 4.9d):** Implementation of the proposed General Plan Update would have less than significant impacts on drainage and erosion. Impacts related to the alteration of drainage patterns or the course of a stream or river, in a manner which would result in substantial erosion or siltation, would

be less than significant with the implementation of erosion control measures required under the City's Municipal Code and the NPDES. (EIR pp. 4.8-21 to 22.)

**4. Flood Hazards (Thresholds 4.8g and 4.8h):** Implementation of the proposed General Plan Update would have less than significant impacts on flood hazards. The City of Arcadia is not located within the 100-year flood hazard area, as mapped by FEMA. Future development pursuant to the General Plan Update, including housing or other structures, would not be exposed to flood hazards. Structures that would be built as part of future development would not impede or redirect flood flows. Impacts would be less than significant. (EIR p. 4.8-23.)

**5. Dam Inundation and Mudflows (Thresholds 4.8i and 4.8j):** Implementation of the proposed General Plan Update would have less than significant impacts on dam inundation and mudflows. The City is located outside tsunami inundation areas. While the City is located within the inundation area of several dams and there are reservoirs in the City that pose inundation and seiche hazards, compliance with the City's Floodplain Management Regulations, seismic design regulations, and emergency action plans for dams would reduce these hazards. The mudflow hazards at the hillside areas of the City would be less than significant with the implementation of erosion control measures, erosion control planting or other protective devices required in the City's Zoning and Building Regulations. Coupled with the continued operation and maintenance of upstream dams and debris basins, mudflow hazards in the City would be reduced to less than significant levels. (EIR pp. 4.8-24 to 26.)

## I. Land Use and Planning

**1. Division of Established Communities (Threshold 4.9a):** Implementation of the proposed General Plan Update would have less than significant impacts with regard to the division of established communities. The proposed Land Use Policy Map reflects the majority of existing residential land uses in the City. Thus, no division of existing, established residential communities is expected with implementation of the General Plan Update. Also, future development would be confined to scattered vacant lands throughout the City. The individual development of these small, infill lots would reflect the surrounding land uses and would not lead to the division of established neighborhoods. (EIR p. 4.9-18)

**2. Plan Consistency (Threshold 4.9b):** Implementation of the proposed General Plan Update would have less than significant impacts with regard to plan consistency.

**Arcadia General Plan:** Approval and implementation of the General Plan Update would result in a comprehensive update of the current Arcadia General Plan, with a significant majority of the existing goals and policy direction remaining in place. Since the General Plan Update would restate the City's vision for its future, conflict with the current General Plan is not of issue and no impact would result. (EIR p. 4.9-19.)

**Other Local Plans and Zoning Regulations:** The proposed General Plan would not conflict with the Downtown Arcadia Central Redevelopment Plan, the Regional Transportation Plan, or the Compass Growth Vision. While the proposed General plan is not consistent with the City's Zoning Regulations; however, Implementation Action 2-1 calls for focused updates of the Zoning Regulations to make them consistent with the General Plan Update. This would prevent conflicts and impacts would be less than significant. (EIR pp. 4.9-19 to 25.)

**Land Use Compatibility:** Future development would be located near different land uses at the City's boundaries. The provision of setbacks, maximum lot coverage, floor area ratio, walls and other development standards that would prevent land use incompatibility with abutting developments would prevent any significant adverse impacts. (EIR pp. 4.9-25 to 26.)

**3. Conflict with Habitat Conservation Plan (Threshold 4.9c):** The proposed General Plan Update would have no impacts on a Habitat Conservation Plan. Since no habitat conservation plan or natural community conservation plan has been adopted for the undeveloped areas of the City, no impact related to these plans would occur. (EIR p. 4.9-27.)

**J. Mineral Resources**

**1. Mineral Resources (Thresholds 4.10a and 4.10b):** Implementation of the proposed General Plan Update would have a less than significant impact on the availability and loss of mineral resources. Mining operations at the Rodeffer Quarry site have been completed and reclamation of the site is being conducted in accordance with existing regulations under the Surface Mining and Reclamation Act (SMARA) and the City's Municipal Code. No mining operations are expected in other areas of the City identified to contain aggregate resources due to the existing flood control and groundwater recharge functions of the Santa Anita Wash and the Peck Road Spreading Basin. Compliance with goals and policies in the Resource Sustainability Element of the proposed General Plan Update would facilitate the reclamation of mined lands; support aggregate production; minimize impacts of mining operations on land uses in the City; and prevent the loss of availability of regionally or locally significant aggregate resources. Impacts would be less than significant. (EIR p. 4.10-4 to 5.)

**K. Noise**

**1. Airport and Airstrip Noise (Thresholds 4.12e and 4.12f):** Implementation of the proposed General Plan Update would have less than significant airport and airstrip noise impacts. The noise contours for the El Monte Airport show that the 65-dBA CNEL noise contour is located entirely in the City of El Monte. While aircraft noise may be audible intermittently throughout the City of Arcadia, aircraft noise would not result in a significant adverse impact. (EIR p. 4.11-30.)

L. **Population, Housing, and Employment**

1. **Population Growth (Threshold 4.12a):** Implementation of the proposed General Plan Update would result in less than significant impacts with regard to population growth.

**Population and Growth Projections:** The evaluated maximum buildout of the General Update would result in a total population of approximately 67,597 residents, with a net increase of 3,387 units in the City and its SOI. Non-residential development within the City and SOI at buildout could generate as many as 29,753 total jobs, with an increase of 8,559 jobs over existing conditions. The increase in the employment base of the City and SOI is expected to have beneficial impacts on local residents who want to be employed near their places of residence and on the City's tax base. Also, these estimates do not exceed SCAG's 2035 projections for the City. Thus, impacts related to growth projections would be less than significant. (EIR pp. 4.12-13 to 17.)

**Housing Stock:** The indirect impacts related to the demand for goods and services created by the increase in residents in the City would be considered less than significant due to the availability of existing and future commercial developments in the area. Demand for housing would be met by of existing and future residential developments. Housing Element goals and policies address the provision of adequate housing for existing and future residents in the City. Implementation of the City's housing programs would provide capacity to meet future housing needs of the local population. Impacts associated with increases in housing stock would be less than significant. (EIR pp. 4.12-16 to 17.)

**Infrastructure:** The proposed General Plan Update calls for the construction and improvement of roadways and utility infrastructure systems in the City. The City is almost entirely serviced by existing infrastructure; therefore, the vast majority of planned improvements would be improvements to existing infrastructure systems, rather than the extension of new systems into vacant areas. No inducement in population growth due to roadway or infrastructure improvements is expected from the General Plan Update. (EIR p. 4.12-17.)

**Jobs-Housing Balance:** The City is working toward providing more job opportunities in Arcadia, as proposed in the Economic Development Element. Buildout of the City pursuant to the proposed Land Use Policy Map would lead to a housing stock of 22,535 units and an employment base of 29,753 jobs. This translates to a jobs-housing ratio of 1.32, which is consistent with SCAG projections. Potential impacts related to the jobs-housing balance would be less than significant. (EIR p. 4.12-17.)

2. **Displacement of Housing and People (Thresholds 4.12b and 4.12c):** The proposed General Plan Update would result in less than significant impacts with regard to the displacement of housing and people. The General Plan Update calls for the preservation of the City's residential neighborhoods. Thus, the majority of residential developments in the City are expected to remain in place, with limited recycling. Public and private redevelopment actions could result in the temporary removal of housing

units, particularly where the revised Land Use Policy Map allows for higher densities. However, higher intensity residential uses built at the same sites would create opportunities for additional housing. Compliance with existing State housing regulations (California Relocation Assistance Act and California Community Redevelopment Law) would reduce displacement impacts. Impacts related to the displacement of housing or people would be less than significant. (EIR p. 4.12-18.)

## M. Public Services

### 1. **Fire Protection and Emergency Medical Services (Threshold 4.12a):**

Implementation of the proposed General Plan Update would have less than significant impacts on fire protection and emergency medical services. Future development pursuant to the General Plan Update would increase the demand for fire protection services. Increases in Arcadia Fire Department staffing and resources would be needed to serve the City at buildout. As part of the plan check process and inspections, development in the City must comply with the California Fire Code and Fire Department regulations to reduce fire hazards and facilitate emergency response. Implementation of the goals, policies, and implementation actions in the proposed General Plan Update would prevent significant impacts to fire protection services. (EIR pp. 4.13-17 to 19.)

### 2. **Police Protection and Law Enforcement Services (Threshold 4.12a):**

Implementation of the proposed General Plan Update would have less than significant impacts on police protection and law enforcement services. Future development pursuant to the General Plan Update would increase the demand for the police protection services. The Arcadia Police Department has indicated that increases in the current staffing and equipment levels would be needed at buildout of the City. Development projects in the City are reviewed by a police captain or police lieutenant during the site and building plan check process to determine the needs for crime prevention, such as installation of lighting systems, emergency notification systems, or crime prevention through environmental design. This review would prevent or deter crime and the demand for police protection services. Impacts on police protection services from future development pursuant to the General Plan Update would be less than significant. (EIR pp. 4.13-19 to 20.)

### 3. **School Services (Threshold 4.12a):** Implementation of the proposed

General Plan Update would have less than significant impacts on school services. Approximately 1,575 school-age children requiring school services would be generated by new housing development in the City and SOI or a total of 11,426 students residing in the City at buildout of the General Plan Update. As allowed under the School Facilities Act, school districts serving the City and its SOI assess school impact fees based on the floor area of new dwelling units and non-residential developments. These fees are used to fund school services and facilities needed to provide the necessary school services. Payment of statutory school fees by individual developments would mitigate impacts on schools to less than significant levels. (EIR pp. 4.13-20 to 22.)

**4. Library Services (Threshold 4.12a):** Implementation of the proposed General Plan Update would have less than significant impacts on library services. Area residents would generate a demand for library services and increase utilization of the Arcadia Public Library and the Live Oak Branch of the County Library System. Implementation of General Plan Update goals, policies, and implementation actions would improve library services in the City. Impacts to library services would be less than significant. (EIR pp. 4.13-22 to 23.)

**5. Other Public Facilities (Threshold 4.12a):** Implementation of the proposed General Plan Update would have less than significant impacts on the provision of other public facilities. Governmental and City services provided by the City of Arcadia within its jurisdictional boundaries would be available to existing and future uses, and include local governance; implementation of City regulations and ordinances (issuance of permits and code enforcement actions); and maintenance of public improvements, such as streets, water systems, sewer systems, and storm drain systems. Existing service programs would provide these facilities and services to future development and impacts would be less than significant. (EIR p. 4.13-23.)

## **N. Parks and Recreation**

**1. Increased Use of Parks (Threshold 4.14a):** Implementation of the proposed General Plan Update would result in less than significant impacts with regard to the increased use of parks. Future residents are expected to create a demand for parks and recreational facilities and are likely to use both existing and planned parks and recreational facilities in the City, as well as parks in the surrounding area. Improvement and expansion of existing parks and facilities in the City would be made through implementation of the City's Parks and Recreation Master Plan, payment of Park Facilities Impact Fees by new residential development, and the provision of on-site open space and recreational facilities by multi-family residential developments. These improvements would reduce the use and accompanying deterioration that may occur on existing park facilities due to the increase in the City's resident population. Parks, Recreation, and Community Resources Element goals, policies, and implementation actions would also improve parks and recreational facilities in the City. Impacts would be less than significant. (EIR p. 4.14-10.)

**2. New Recreational Facilities (Threshold 4.14b):** Implementation of the proposed General Plan Update would result in less than significant impacts with regard to new recreational facilities. New parks that would be developed in conjunction with future residential developments would meet the demand for recreational facilities by future residents of the City. Using the City's parkland standard of 2.43 acres per 1,000 residents, approximately 22.5 acres of new parkland would be needed by the estimated 9,256 future residents of the City. Payment of park impact fees by new residential developments and expansion and provision of on-site common open space and recreational areas/amenities by multi-family developments would provide new parks and recreational facilities in the City to meet standards. Implementation Action 7-5, Recreation Facility Development in Underserved Areas, would lead to the development

of new recreation facilities in underserved areas of the City. Impacts would be less than significant. (EIR pp. 4.14-11 to 12.)

**3. Park Services (Threshold 4.13a):** Implementation of the proposed General Plan Update would have a less than significant impact on the provision of park services. Goals and policies in the Land Use and Community Design Element and the Parks, Recreation, and Community Resources Element are intended to improve access to and the availability of parks and recreational facilities to existing and future developments in the City. The construction and operational impacts associated with the provision of new or expanded park facilities would be less than significant. (EIR p. 4.14-12.)

## O. Transportation

**1. Consistency with the Congestion Management Plan (Threshold 4.15b):** Implementation of the proposed General Plan Update would result in less than significant impacts with regard to the consistency between the General Plan Update and the Los Angeles County Congestion Management Plan. The Los Angeles County Congestion Management Program (CMP) includes the I-210 and I-605 Freeways and Rosemead Boulevard (State Route 19) in its Highway and Roadway System. The I-605 Freeway is located outside the City and Rosemead Boulevard defines the western boundary of the City's SOI. Freeways are outside the jurisdiction of the City and forecasting for the freeway system is outside the scope of a City's General Plan. The traffic forecasts for the Arcadia General Plan are based on the SCAG 2008 Regional Transportation Plan (RTP) forecasts; thus, they are consistent with the SCAG process and included within it. The projected buildup of the City in the proposed General Plan Update would be less than SCAG's 2035 projections for the City's population, which were used in the development of the RTP. Future developments in the City pursuant to the proposed General Plan Update and other public projects would need to comply with the CMP requirements for TIAs, including mitigation of impacts to achieve roadway and intersection operations at LOS D or better (the City's more stringent standard versus the CMP's LOS E standard). Thus, impacts on the CMP would be less than significant. (EIR pp. 4.15-29 to 30.)

**2. Air Traffic Patterns (Threshold 4.15c):** Implementation of the proposed General Plan Update would have less than significant impacts on air traffic patterns. Future development pursuant to the proposed General Plan Update and public and infrastructure projects in the City would not be directly served by air transportation and would not affect air traffic volumes at the El Monte Airport. Impacts on air traffic patterns would be less than significant. (EIR p. 4.15-30.)

**3. Traffic Hazards (Threshold 4.15d):** Implementation of the proposed General Plan Update would have less than significant impacts with regard to traffic hazards. Construction activities and increases in vehicle trips on local roadways due to future development pursuant to the proposed General Plan Update and public and infrastructure projects would increase the potential for traffic accidents. However, roadway improvements would have to be made in accordance with the City's Master Plan of Roadways and the Transportation Master Plan, the City's roadway standards,

the Greenbook, and the California Manual for Uniform Traffic Control Devices (MUTCD). Compliance with these guidelines would allow City roadways to (1) accommodate vehicles and traffic volumes; (2) separate vehicle and pedestrian traffic; and (3) provide clear zones to prevent traffic accidents. City implementation of the ADA Sidewalk Transition Plan and Pavement Management Plan would also improve pedestrian amenities and reduce the potential for conflicts with vehicular traffic. Thus, impacts related to traffic hazards would be less than significant. (EIR pp. 4.15-30 to 31.)

**4. Emergency Access (Threshold 4.15e):** Implementation of the proposed General Plan Update would have less than significant impacts on emergency access. No major change to the existing roadway system serving the City is proposed, aside from restriping segments of Colorado Boulevard, Santa Anita Avenue, and Santa Clara Avenue. Thus, no significant adverse impacts to emergency access would occur. Access to individual development sites would be made available through existing or planned roadways, as required under the City's Subdivision Code. Compliance with existing regulations (City's roadway standards, Fire Code, Greenbook, and MUTCD) would reduce impacts related to emergency response or evacuation to less than significant levels. (EIR p. 4.15-31.)

**5. Alternative Transportation (Threshold 4.15f):** Implementation of the proposed General Plan Update would have a less than significant impact on alternative transportation. Future development pursuant to the General Plan Update and public and infrastructure projects could increase the use of alternative transportation systems in the City. The proposed General Plan Update promotes the use of alternative transportation systems through a Transit Corridors Plan, Bicycle Plan, mixed-use developments, and pedestrian accommodations. The goals and policies in the Circulation and Infrastructure Element are intended to implement the overarching principle of Connectivity that would both directly and indirectly influence circulation and transportation in the City as future development occurs and demand for bus transit, rail transit, bike lanes, and sidewalks increase. Beneficial impacts on alternative transportation systems would occur with the General Plan Update. Thus, impacts would be less than significant. (EIR pp. 4.15-31 to 33.)

## **P. Utilities and Service Systems**

**1. Water Supply (Threshold 4.16d):** Implementation of the proposed General Plan Update would have less than significant impacts on the water supply. Future development pursuant to the General Plan Update would generate a demand for water that would require increased pumping of groundwater resources or imported water use. Total water demands in the City are projected to increase from approximately 18,720 acre-feet per year (afy) (current) to approximately 19,428 afy at buildout. The Water Supply Assessment prepared for the General Plan Update indicates that there are adequate groundwater supplies to meet future demand during a normal, single-dry or multiple-dry years. In addition to groundwater supplies, the City may utilize imported water from the Upper District. The other water companies serving the outlying areas of the City have also indicated their abilities to provide continuous and reliable water service to those portions of the City Arcadia within their respective service areas.

Compliance with the goals, policies and implementation actions in the proposed General Plan and existing water conservation regulations would reduce impacts to less than significant levels. (EIR pp. 4.16-26 to 29.)

**2. Wastewater Treatment and Infrastructure (Thresholds 4.16a and 4.16e):** Implementation of the proposed General Plan Update would result in less than significant impacts to wastewater treatment and infrastructure.

**Wastewater Treatment Requirements:** Residential wastewater does not require levels of treatment that would exceed LARWQCB NPDES treatment requirements; however, some industrial, manufacturing, and/or commercial uses may generate wastewater requiring additional treatment. Compliance with LACSD requirements for service connections would prevent any significant adverse impacts on wastewater treatment requirements. (EIR p. 4.16-30.)

**Wastewater Treatment Capacity:** Approximately 1.94 million gallons per day (mgd) of additional wastewater would be generated by the increase in development in the City and its SOI at buildout. There are approximately 46.9 mgd of remaining capacity at the 3 water reclamation plants serving the City. The incremental increase of 1.94 mgd from the City would represent approximately 4.1 percent of the current available capacity. With payment of LACSD connection fees, impacts would be less than significant. (EIR pp. 4.16-30 to 31.)

**3. Solid Waste Disposal (Thresholds 4.17f and 4.16g):** Implementation of the General Plan Update would result in less than significant impacts to solid waste disposal. The evaluated maximum buildout of the General Plan Update would result in a net increase in solid waste generation by approximately 73 tons per day (tpd). The Puente Hills Landfill has a daily remaining capacity of approximately 3,850 tpd. The net daily increase in solid waste disposal with buildout of the General Plan Update of 73 tpd would represent approximately 1.9 percent of the Puente Hills Landfill's remaining daily permitted capacity. Compliance with the City's solid waste reduction and recycling measures and goals, policies and implementation actions in the proposed General Plan would further reduce impacts to less than significant levels. (EIR pp. 4.16-31 to 33.)

**4. Electricity, Natural Gas, and Communications Infrastructure (Thresholds 4.16h and 4.16i):** Implementation of the proposed General Plan Update would result in less than significant impacts to electricity, natural gas, and communications infrastructure.

**Electricity and Natural Gas:** Future development pursuant to the General Plan Update and public projects in the City would generate a demand for electricity and natural gas, which would be provided by SCE and Sempra Utilities, respectively. Implementation of the General Plan Update would result in an additional demands estimated at 83.4 million kilowatt hours per year (kWh/yr) of electricity and 29.2 million cubic feet of natural gas. Compliance with the existing energy conservation regulations and goals, policies and implementation actions in the proposed General Plan Update would reduce impacts to less than significant levels. (EIR pp. 4.16-33 to 35.)

**Telecommunications Systems and Services:** Future development pursuant to the General Plan Update and public projects in the City would generate a demand for telecommunication systems and services, which would be provided by AT&T or its competitors (for telephone services) and by Time Warner and Champion Broadband (for cable services). Compliance with existing regulations would allow for the construction of communications infrastructure according to set standards and would prevent the creation of significant environmental impacts. (EIR p. 4.16-35.)

**Q. Greenhouse Gas Emissions**

**1. Conflict with GHG Reduction Plan, Policy, or Regulation (Threshold**

**4.17b):** Implementation of the proposed General Plan Update would result in less than significant impacts with regard to conflicts with applicable a GHG Reduction Plan, Policy, or Regulation. With the City largely built out, the proposed General Plan Update focuses future development along major transportation/transit corridors, promotes mixed use development in the City, intensifies the development intensity allowed in the downtown area, and calls for high density residential and commercial uses near the proposed Gold Line transit station. Thus, the proposed General Plan Update is consistent with GHG reduction programs that would reduce automobile use; locate high density development near transit stations; and promote the use of alternative transportation systems. With the transition of existing land uses into mixed use projects and into high density and intensity uses, GHG emissions Citywide would decrease over existing levels. Thus, the proposed General Plan Update would not conflict with a GHG reduction plan, policy or regulation. Impacts would be less than significant. (EIR p. 4.17-23 to 24.)

**SECTION III**

**FINDINGS REGARDING ENVIRONMENTAL IMPACTS  
MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

The City Council finds that the following environmental impacts identified in the EIR are potentially significant but can be mitigated to a less than significant level. The potentially significant impacts and the mitigation measures which would reduce them to a less than significant level are set out in the EIR and are summarized as follows:

**A. Air Quality**

**1. Sensitive Receptors and Construction Related-Emissions (Threshold**

**4.3d):** The proposed Project would result in construction activities in the City that would generate pollutants that may impact sensitive receptors.

Finding: The Standard Condition and Mitigation Measure outlined below would reduce to a less than significant level the Project's generation of pollutants during construction that may impact sensitive receptors. The Standard Conditions and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially

significant impact of generating pollutants during construction that may impact sensitive receptors as identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Condition: Compliance with Standard Condition 4.3-1 would reduce the amount of fugitive dust re-entrained into the atmosphere and therefore decreases the amount of particular matter that may impact sensitive receptors. Standard Condition 4.3-1 requires that construction activities implement measures to reduce the amount of fugitive dust that is re-entrained into the atmosphere from unpaved areas, parking lots, and construction sites, in accordance with South Coast Air Quality Management District (SCAQMD) Rule 403. (EIR p. 4.3-17.)

Mitigation Measure: Implementation of Mitigation Measure 4.3-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.3-1 states that the City shall require construction projects that are subject to discretionary approval to implement the following measures to reduce exhaust emissions from construction equipment:

1. Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas/diesel-powered electric generators and equipment.
2. Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).
3. To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions.
4. On-site equipment shall not be left idling when not in use.
5. Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors.

Rationale: Construction-related activities would result in short-term emissions of diesel particulate matter (PM) from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing); paving; application of architectural coatings; and other miscellaneous activities. The potential cancer risk from the inhalation of diesel PM outweighs the potential for all other health impacts.

Because (1) the use of off-road heavy-duty diesel equipment would be temporary during construction activities and would combine with the highly dispersive properties of diesel PM; (2) further reductions in exhaust emissions would occur through regulations; and (3) construction-related activities would be short-term, incremental through time, and would occur at scattered locations throughout the City, construction-related toxic air contaminant (TAC) emissions would not expose sensitive receptors to substantial concentrations of TACs. It is also important to note that compliance with Standard Condition 4.3-1, which requires compliance with the construction dust mitigation requirements of the South Coast Air Quality Management District (SCAQMD), and

equipment exhaust mitigation (MM 4.3-1) would reduce particulate matter emissions and diesel PM exposure of nearby land uses. (EIR p. 4.3-24.) Impacts would be less than significant after mitigation.

**B. Biological Resources**

**1. Sensitive Species (Threshold 4.4a):** Future development and implementation of the General Plan Update would lead to the disturbance of sensitive plant and animal species found in the City.

**Finding:** The Standard Condition, Project Design Features, and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to sensitive species. The Standard Condition, Project Design Features, and Mitigation Measures reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to sensitive species identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

**Standard Condition:** Standard Condition 4.4-1 requires that a qualified biologist conduct nesting bird surveys in areas with suitable habitat prior to all construction or site preparation activities that would occur during the nesting and breeding season of native birds. Compliance with this Standard Condition would reduce potential impacts to sensitive bird species found in the City.

**Project Design Features:** Goals LU-5 and RS-8 of the General Plan Update require that detailed biological studies for foothill properties be prepared prior to any development. Those same goals also require that appropriate mitigation for significant impacts to natural resources. By providing for additional detailed site-specific study for foothill properties, the City would ensure that development of areas of the City marked by potentially sensitive habitats is fully evaluated.

For all new development proposed adjacent to sensitive habitats the City would require adequate buffers, setbacks and other protections to avoid direct and indirect impacts to these sensitive areas. (Implementation Action 6-13.)

**Mitigation Measure:** Implementation of Mitigation Measure 4.4-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.4-1 requires that prior to the development of vacant and undeveloped areas, a qualified biologist, under the direction from the City, shall determine whether a habitat assessment is required to assess site potential to support any special status plant or wildlife species. If potentially suitable habitat is present for any special status species, then the City shall direct appropriate focused surveys to be performed to determine the presence or absence of special status species. If any special status species is identified on the site, then appropriate avoidance and/or mitigation measures shall be implemented, as approved by the resource agencies, and subject to the necessary permits under the FESA, the CESA, the California Fish and Game Code, and other applicable regulations.

**Rationale:** The proposed Land Use Policy Map in the General Plan Update would designate the Peck Road County Park and the Santa Anita Wash open space areas (along with linear segments of Arcadia, Sierra Madre, and Santa Anita Washes) as Open Space-Resource Protection areas, and would designate other City parks as Open Space-Outdoor Recreation areas. This change in land use designation from Public to Open Space would allow for the indefinite retention of these open space areas and for the protection of any biological resources occurring there. There is limited vacant land in the City, and the majority of these vacant lands are infill lots that have been previously developed or are highly disturbed. Thus, they are unlikely to contain sensitive species. However, they would still be subject to a biological assessment if existing plant and animal habitats would be disturbed or removed as part of future development or public and infrastructure projects in the City (MM-4.4-1). (EIR pp. 4.4-18 to 19.)

Several large, vacant parcels at the northern end of the City contain scrub vegetation and may serve as habitat for sensitive species. Future development on these parcels may result in the loss of existing natural habitat areas and may impact special status plant and/or wildlife species potentially occurring on these properties. (EIR p. 4.4-19.)

Adverse impacts to sensitive species that may occur in areas proposed for development, construction, or other ground disturbance would be reduced to a less than significant level with the implementation of MM 4.4-1, which calls for a biological survey for sensitive species and appropriate avoidance and/or mitigation measures. Furthermore, General Plan Update Goals LU-5 and RS-8 and supporting policies also require detailed biological studies for foothill properties prior to any development, in addition to appropriate mitigation for significant impacts to natural resources. Implementation Action 6-13 calls for habitat protection and Implementation Action 6-14 requires compliance with the FESA, the CESA, and the CWA. Conduct of nesting bird surveys would reduce adverse impacts to nesting birds to a less than significant level by minimizing disturbance to nesting birds during construction through seasonal avoidance or pre-construction surveys and avoidance of designated active nesting areas. Impacts to sensitive species and nesting birds would need to be addressed in detailed biological studies if development or other habitat alteration is proposed. Compliance with the conditions or mitigation measures identified in individual permits from resource agencies would prevent any significant adverse impacts. (EIR pp. 4.4-18 to 20.)

## C. Cultural Resources

1. **Historical Resources (Threshold 4.6a):** Redevelopment of parcels to enable a different or more intensive use of a site could result in the demolition or alteration of historic resources in the City.

**Finding:** The Standard Condition, Project Design Features, and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to historical resources. The Standard Condition, Project Design Features, and Mitigation Measure reflect changes or alterations that the City has required, or

incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to historical resources identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Condition: Standard Condition 4.5-1 requires that all development projects in the City comply with CEQA and the State CEQA Guidelines as they relate to historical resources. The State CEQA Guidelines provide specific guidance regarding the types of resources that qualify as historical resources and what types of impacts to historical resources are considered significant. If a development project is determined to have a significant impact on an historical resource, that impact must be mitigated, to the extent feasible, according to the Public Resources Code. Implementation of this Standard Condition 4.5-1 would ensure that impacts to historical resources are fully evaluated and mitigated prior to undertaking development projects. (EIR p. 4.5-17.)

Project Design Features: The General Plan Update contains three policies to retain and demonstrate proper stewardship to historical resources in the City. Policy PR-9.4 encourages the preservation of the Santa Anita Park and its grandstand. Policy PR-9.5 requires the identification of historic sites, structures, and neighborhoods, and other resources through a Historic Resource Inventory. Policy PR-9.6 states that the City will explore the establishment of a Cultural Heritage Ordinance. Each of these policies demonstrates the City's commitment to inventory and protect historical resources in the City. (EIR pp. 4.5-15 to 17.)

Implementation Action 6-11 requires cultural resource assessments for any proposed development that may impact a known historical site that is 50 years or older. The assessment shall identify the significance of the resource, based on guidance provided in the California Register of Historical Resources and other applicable sources. Assessment reports will direct avoidance of impacts and preservation of significant resources in place, where feasible. Implementation Action 7-14 requires that the City maintain an up-to-date inventory of historically significant structures. Implementation Action 6-11 and 7-14 would ensure that historical resources in the City are inventoried and that any impacts to such resources are evaluated and mitigated. (EIR pp. 4.5-15 to 17.)

Mitigation Measures: Implementation of Mitigation Measure 4.5-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measures 4.5-1 requires that prior to the issuance of demolition permits that may affect structures 50 years of age or older, a qualified architectural historian shall conduct an assessment to determine the significance of the structure(s) and/or site(s). Project applicants/developers shall ensure that, to the maximum extent possible, direct or indirect impacts to any known properties that are deemed eligible for inclusion in the NRHP, the CRHR, or a local designation be avoided and/or preserved consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Should avoidance and/or preservation not be a feasible option, a qualified architectural historian shall develop a mitigation program that may include, but not be limited to, formal documentation of the structure using historical narrative and photographic documentation, facade preservation, and/or monumentation.

Properties are not equally significant, and some retain more significance than others. Therefore, prior to development decisions, a qualified architectural historian shall be retained to evaluate the circumstance regarding the property and planned development and to make management decisions regarding documentation of the property. (EIR pp. 4.5-15 to 17.)

Rationale: Six properties in the City are included or are eligible for inclusion into the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Landmarks, and California Points of Historical Interest. In addition, the majority of residential buildings in the City were built between 1920 and 1960. As such, many of the homes and buildings constructed in Arcadia are already or will soon be 50 years old. Alteration, rehabilitation, or redevelopment of older structures could potentially result in significant adverse impacts on historic resources. (EIR pp. 4.5-15 to 16.)

General Plan Update goals and policies would serve to encourage the evaluation and preservation of historically significant structures and resources. In addition, Implementation Action 6-11 requires cultural resources assessments for any proposed development that may impact a known or potential archaeological or paleontological site, or a historical site that is 50 years old or older. Specifically, the assessments shall identify the significance of the resource, based on the guidance provided in the CRHR and other applicable sources. Assessment reports will direct avoidance of impacts and preservation of significant resources in place, where feasible. Implementation of these goals, policies, and implementation action would promote the preservation of important cultural resources in the City. (EIR p. 4.5-16.)

For resources determined to be culturally significant through Policy PR-9.5 and Implementation Action 7-14, adherence to the Secretary of Interior's Standards would protect the historical significance of a structure and prevent adverse impacts. In addition, the environmental review of individual projects would lead to the mitigation of their impacts on cultural resources. Policy PR-9.6 directs the City to explore the establishment of a Cultural Heritage Ordinance. Prior to the adoption of this ordinance, redevelopment and public and infrastructure projects in the City would have had the potential to involve the demolition, rehabilitation, expansion, and/or alteration of structures that are historically significant. However, actions that do not trigger CEQA review such as non-discretionary permits for demolition, rehabilitation, expansion, and/or alteration would not be afforded the same protection. With implementation of MM 4.5-1, impacts to historic resources would be reduced to less than significant levels. (EIR p. 4.5-17.) Cumulative impacts would be less than significant after mitigation. (EIR p. 4.5-20.)

**2. Archaeological Resources (Threshold 4.6b):** Future development could affect archaeological resources in the City.

Finding: The Standard Condition, Project Design Features, and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to archaeological resources. The Standard Condition, Project Design Features,

and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to archaeological resources identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Condition: Standard Condition 4.5-1 requires that all development projects in the City comply with CEQA and the State CEQA Guidelines as they relate to historical resources. The State CEQA Guidelines provide specific guidance regarding the types of resources that qualify as historical resources and what types of impacts to historical resources are considered significant. If a development project is determined to have a significant impact on an historical resource, that impact must be mitigated, to the extent feasible, according to the Public Resources Code. Implementation of this Standard Condition 4.5-1 would ensure that impacts to historical resources are fully evaluated and mitigated prior to undertaking development projects. (EIR p. 4.5-18.)

Project Design Features: Implementation Action 6-11 requires archeological resource assessments for any proposed development that may impact a known archaeological site that is 50 years or older. The assessment shall identify the significance of the resource, based on guidance provided in the California Register of Historical Resources and other applicable sources. Assessment reports will direct avoidance of impacts and preservation of significant resources in place, where feasible. Implementation Action 6-12 requires an archaeological monitor on-site during any construction activities on properties containing potential archaeological resources. Implementation Action 6-11 and 6-12 would ensure that any impacts to archaeological resources in the City are evaluated and mitigated.

Mitigation Measure: Implementation of Mitigation Measure 4.5-2 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measures 4.5-2 requires that projects that would be located on undeveloped parcels or near known cultural resources shall implement the following:

1. A Phase 1 study shall be undertaken to evaluate the current conditions of a project site. The study shall consist of (1) an initial records search including records, maps, and literature housed at the Archaeological Information Center located at California State University, Fullerton; (2) a Sacred Lands check with the NAHC and initial scoping with interested Indian Tribes and individuals identified by the NAHC; (3) a pedestrian field survey by a qualified Archaeologist to determine the presence or absence of surficial artifactual material and/or the potential for buried resources; and (4) a technical report describing the study and offering management recommendations for potential further investigation.
2. If archaeological sites are discovered as a result of the Phase I study, a Phase II evaluation of the significance of any prehistoric material that is present shall be undertaken. The evaluation shall include further archival research, ethnographic research, and subsurface testing/excavation to determine the site's horizontal and vertical extent, the density and diversity of cultural material, and the site's overall integrity. The evaluation shall include a technical report

describing the findings and offering management recommendations for sites determined to be significant. Non-significant resources would require no further study.

3. If the Phase II evaluative study indicates that a significant site is present, the qualified Archaeologist shall determine appropriate actions, in cooperation with the City of Arcadia, for preservation and/or data recovery of the resource. Preservation in place is the preferred manner of mitigation, as provided in CCR Section 15126.5(b)(3). This could include (1) avoidance of resources; (2) incorporation of resources into open space; (3) capping the resource with chemically stable sediments; and/or (4) deeding the resource into a permanent conservation easement. To the extent that a resource cannot be preserved in place, a Phase III data recovery excavation shall be completed to recover the resource's scientifically consequential information. A technical report shall be completed that adheres to the OHP's Archaeological Resources Management Report (ARMR) guidelines.

4. Monitoring of ground-disturbing activities shall be undertaken by a qualified Archaeologist as a final mitigation measure in areas that contain or are sensitive for the presence of cultural resources.

Rationale: There is one archaeological site that has been recorded in the City. Excavation and ground-disturbing activities on and near this archaeological site have the potential to adversely affect the resources at this site and/or to unearth previously unknown archeological resources. Also, the presence of archaeological resources on undeveloped sites in the City has not been determined. Thus, future development on undeveloped sites has the potential to disturb or destroy archaeological resources that may be present on these sites, which would be a significant impact. (EIR p. 4.5-18.)

Implementation Action 6-11 requires cultural resources assessments for any proposed development that may impact a known or potential archaeological or paleontological site, or a historical site that is 50 years old or older. Implementation Action 6-12 requires monitoring for areas with the potential to contain archaeological resources. These implementation actions would prevent adverse impacts on the archaeological site near the I-210 Freeway and archaeological sites that may be discovered during ground-disturbing and excavation activities associated with the construction of future development pursuant to the General Plan Update. Compliance with CEQA, the CEQA Guidelines, and the CRHR for the protection of cultural resources would also reduce impacts. (EIR p. 4.5-18.)

In addition, MM 4.5-2 requires individual projects to comply with a process that begins with a Phase I cultural resources study and continues, as applicable for each project, through in-place preservation or data recovery of any resources encountered, and requires archaeological monitoring of ground disturbing activities in areas determined to be sensitive for archaeological resources. With implementation of General Plan Update goals, policies, and implementation actions related to archaeological resources, CEQA, CRHR and MM 4.5-2, there would be less than

significant impacts related to the potential disturbance or destruction of archaeological resources. (EIR p. 4.5-18.) Cumulative impacts would be less than significant after mitigation. (EIR p. 4.5-20.)

**3. Paleontological Resources (Threshold 4.6c):** Future development could affect paleontological resources in the City.

**Finding:** The Project Design Feature and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to paleontological resources. The Project Design Feature and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to paleontological resources identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

**Project Design Feature:** Implementation Action 6-11 requires cultural resource assessments for any proposed development that may impact a known or potential archaeological or paleontological site. (EIR pp. 4.5-18 to 19.)

**Mitigation Measure:** Implementation of Mitigation Measure 4.5-3 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.5-3 states that future development and public and infrastructure projects that would excavate into Older Quaternary Alluvium deposits shall implement the following:

1. An archival records search shall be undertaken at the NHMLAC to determine the depositional environment within the project area and to evaluate the likelihood of fossils being present.
2. A field survey shall be undertaken prior to ground-disturbing activities in areas of potential but unknown sensitivity to evaluate the site for the presence of significant fossil resources and establish the need for paleontological salvage and/or monitoring.
3. If significant fossils are discovered as a result of a field survey or during monitoring operations, a qualified Paleontologist shall determine appropriate actions, in cooperation with the City of Arcadia, for the preservation and/or salvage of the resource.
4. Any monitoring activities shall be accomplished by a qualified Paleontologist so that fossils discovered during grading can be scientifically and efficiently recovered and preserved.
5. A qualified Paleontologist shall prepare collected specimens to a point of identification and place the prepared fossils in the appropriate institution for permanent curation.

6. Upon completion of recovery and curation, all studies and actions shall be described in a paleontological technical report prepared by a qualified Paleontologist.

**Rationale:** Future development that would be located at the northern section of the City (in areas underlain by Older Quaternary Alluvium deposits) has the potential to encounter, disturb, destroy, or adversely impact unknown paleontological resources. While this area is largely developed with urban land uses and sites may be overlain by artificial fill, excavation activities that extend into native soils could potentially uncover paleontological resources. (EIR p. 4.5-19.)

Implementation Action 6-11 in the General Plan Update requires cultural resources assessments for any proposed development that may impact a known or potential archaeological or paleontological site. MM 4.5-3 requires monitoring by a qualified paleontologist where ground-disturbing activities associated with individual projects would extend into Older Quaternary Alluvium deposits, as well as the recovery and recordation, if necessary, of any paleontological resources encountered. Implementation Action 6-11 and MM 4.5-3 would reduce potential impacts to paleontological resources to less than significant levels. (EIR p. 4.5-19.) Cumulative impacts would be less than significant after mitigation. (EIR p. 4.5-20.)

#### **D. Geology and Soils**

1. **Septic Tank Limitations:** Soils in the City pose septic tank limitations to future development.

**Finding:** The Standard Conditions and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to septic tank systems. The Standard Conditions and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to septic tank systems identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

**Standard Conditions:** Standard Condition 4.6-7 requires all future development to connect to the public sewer system where existing sewer lines are available, in accordance with the California Plumbing Code. Standard Condition 4.6-8 requires all future development to comply with the California Plumbing Code standards for design and construction of water and sewer systems, storm drains and recycled water systems in buildings. Implementation of Standard Conditions 4.6-7 and 4.6-8 would reduce the number of private septic tank systems in the City and in turn reduce impacts related to operation or decommissioning of septic systems to less than significant levels. (EIR p. 4.6-24.)

**Mitigation Measure:** Implementation of Mitigation Measure 4.6-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measures 4.6-1 states that future development at the northern edge of the City (generally north/northwest of Canyon Road) shall provide for the extension of

sewer lines to serve the proposed project in order to avoid hazards associated with soils incapable of supporting septic tank systems.

Rationale: The vast majority of the City is served by the public sewer system. Future development would be required to connect to the public sewer system where existing sewer lines are available, as required under the California Plumbing Code (SC 4.6-7). While the majority of the City is served by the public sewer system, there are septic tanks that remain. Redevelopment of a site with a septic tank would require abandonment of the septic tank and connection to the public sewer system under the California Plumbing Code. (EIR p. 4.6-24.)

Compliance with Order No. R4-2004-0146 of the LARWQCB is required to regulate the type of discharge; surface overflows; disposal of wastes in geologically unstable areas; odors; and groundwater pollution, including annual inspections, connection to public sewer system within six months of availability, and monitoring. The regulations protect shallow groundwater and adjacent water bodies. (EIR p. 4.6-24.)

Hanford and Tujunga-Soboba soils that underlie the majority of the City do not have severe limitations for use of septic tank filter fields. However, Vista-Amargosa soils have severe limitations for shallow excavation and as septic tank filter fields. Therefore, future development that would occur at the northern end of the City underlain by Vista Amargosa soils could not be adequately served by septic systems. Since there are no sewer lines at the northern edge of the City and on-site soils could not support septic systems, future development in the area generally north/northwest of Canyon Road would need to include extension of sewer lines to the development sites (MM 4.6-1). Compliance with existing regulations and MM 4.6-1 would reduce impacts related to the operation or decommissioning of septic systems to be less than significant after mitigation. (EIR p. 4.6-24.)

## **E. Hydrology and Water Quality**

**1. Surface Runoff and Storm Drain Facilities (Thresholds 4.8c and 4.16c):** Future development on vacant land would increase runoff volumes and rates and may require the construction of new storm water drainage facilities or the expansion of existing facilities.

Finding: The Standard Conditions and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to surface runoff and storm drain facilities. The Standard Conditions and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to surface runoff and storm drain facilities identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Conditions: Standard Condition 4.8-2 requires that all new development comply with the requirements of the Municipal Separate Storm Sewer Systems (MS4) Permit and Waste Discharge Requirements for the County. The MS4 Permit and Waste Discharge requirements require that all new development and

redevelopment prepare a Standard Urban Stormwater Management Plan (“SUSMP”) as part of the development permit process. The SUSMP shall identify post-construction treatment-control best management practices to implement on-site for long-term storm water pollutant mitigation. Implementation of this Standard Condition 4.8-2 would ensure use of best management practices to control surface runoff from new construction and redevelopment. Standard Condition 4.16-1 requires that all future development applications provide an adequate engineering analysis of project-specific impacts to utility infrastructure and identify specific improvements that would eliminate the impacts. (EIR pp. 4.8-22 to 23.)

**Mitigation Measure:** Implementation of Mitigation Measure 4.16-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.16-1 states that prior to approval of development applications that could have an impact on existing water, sewer, or storm drain infrastructure capacities, as determined by the City Engineer, the project applicant/developer shall be required to determine project impacts on each system. If water, sewer, and/or storm drain infrastructure improvements are required in order to serve the proposed project, then appropriate mitigation shall be provided in the analysis and shall be incorporated into site development plans, subject to review and approval by the City Engineer. If infrastructure improvements outside the jurisdiction of the City of Arcadia are required, including improvements to trunk sewer lines owned by the Sanitation Districts of Los Angeles County, the needed improvements, or fair share payments in lieu of infrastructure improvements, shall be completed to the satisfaction of the appropriate jurisdictions.

**Rationale:** Because only one percent of the land available for development within the City is vacant, development pursuant to the General Plan Update would only slightly increase the amount of impervious surface areas in the City. To guard against significant impacts related to storm drain infrastructure, MM 4.16-1 requires the City to mandate that all future development applications provide an adequate engineering analysis of project-specific impacts to utility infrastructure and identify specific improvements that would eliminate the impacts. Safety Element and Circulation and Infrastructure Element goals, policies and implementation actions, and standard conditions would also minimize regional and localized flood hazards. Impacts would be less than significant after mitigation. (EIR pp. 4.8-22 to 23.)

## **F. Noise**

**1. Construction (Short-Term) Noise (Thresholds 4.11a, c, and d):** Future development under the proposed General Plan Update would generate noise from short-term construction activities.

**Finding:** The Standard Conditions, Project Design Features, and Mitigation Measure outlined below would reduce to a less than significant level the Project's short-term construction noise impacts. The Standard Conditions, Project Design Features, and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially

significant short-term construction noise impacts identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Conditions: Standard Condition 4.11-1 limits construction-related activities to occur only between the hours of 7:00 AM to 7:00 PM, Monday through Saturday, unless otherwise permitted by the Development Services Department. In addition, construction is prohibited on Sundays and major holidays. Standard Condition 4.11-2 requires future development in the City to comply with exterior noise level standards set forth in the City's Noise Ordinance. Standard Condition 4.11-3 requires that residential structures be constructed such that interior CNEL with windows closed shall not exceed 45 dBA in any habitable room. (EIR pp. 4.11-19 to 21.)

Project Design Features: General Plan Policy N-3.2 encourages industrial and commercial activities to restrict their receiving operations to daytime periods in order to limit the intrusion of point-source noise within residential neighborhoods and on noise-sensitive land uses. In addition, General Plan Policy N-1.2 requires consideration of noise impacts as part of the development review process in order to effectively incorporate noise considerations into land use planning decisions related to residential and other noise-sensitive land uses. (EIR pp. 4.11-19 to 21.)

Mitigation Measure: Implementation of Mitigation Measure 4.11-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.11-1 states that prior to issuance of discretionary permits for construction activities, project applicants/developers shall submit evidence to the Director of Development Services that the following noise reduction measures are stated as requirements on the construction plans and specifications:

- During all excavation and grading, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors.
- When feasible, the construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise sensitive receptors during all project construction.
- The construction contractor shall limit all construction-related activities that would result in high noise levels, according to the construction hours set forth in the Municipal Code.
- The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.

Rationale: The proposed General Plan Update would facilitate the completion of various construction projects at numerous locations throughout the City. These projects have the potential to occur in any zoned area, including residential, commercial/office,

industrial, and mixed-use areas. Because different construction stages involve different pieces of equipment and may involve only localized portions of a site, each stage of construction can result in different noise levels being generated, depending on the relative distance to sensitive receptors. Future projects have the potential to produce short-term construction noise levels that violate the City's noise standards. However, compliance with the Noise Ordinance and City Noise Standards and implementation of Mitigation Measure (MM) 4.11-1, construction noise impacts would be reduced to a less than significant level after mitigation. (EIR pp. 4.11-19 to 21.)

**2. Groundborne Vibration (Threshold 4.11b):** Future development under the proposed General Plan Update would generate vibration impacts.

Finding: The Standard Condition, Project Design Feature, and Mitigation Measure outlined below would reduce to a less than significant level groundborne vibration impacts associated with the proposed Project. The Standard Condition, Project Design Feature, and Mitigation Measure reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant groundborne vibration impacts identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Condition: Standard Condition 4.11-4 requires future development in the City to comply with the City's vibration standards set forth in *Arcadia Municipal Code*, Title 3, Section 9266.3.9. (EIR p. 4.11-21.) Implementation of this Standard Condition would reduce impacts to a less than significant level.

Project Design Feature: In order to reduce noise from transportation sources, General Plan Policy N-2.5 states that the City would enforce truck routes established in the Circulation and Infrastructure Element and the Municipal Code. (EIR p. 4.11-21.) Implementation of this Project Design Feature would reduce impacts to a less than significant level.

Mitigation Measure: Implementation of Mitigation Measure 4.11-4 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.11-4 states that prior to the issuance of a grading permit for projects that have a potential to generate groundborne vibration (e.g., use of pile drivers, rock drills, and pavement breakers) or be exposed to vibration from off-site sources, the City shall require applicants for development projects that would be located adjacent to any developed/occupied sensitive local receptors or for proposed residential projects to submit a construction-related vibration mitigation plan to the City for review and approval. The mitigation plan shall depict the location of the construction equipment and activities and how the vibration from this equipment and activity would be mitigated during construction of the project.

Rationale: Groundborne vibration generated by construction projects is usually highest during pile driving, soil compacting, jack-hammering, and demolition-related activities. The effects of groundborne vibration are generally limited to movement of building floors, rattling of windows and objects, and rumbling sounds, resulting in

annoyance. In general, groundborne vibration associated with transportation and construction activities attenuates rapidly with distance from the source. Vibration may be noticeable for short periods during construction, but it would be temporary and periodic and would not be excessive; vibration would not be a significant impact. (EIR p. 4.11-21.)

Policy N-2.5 would establish truck routes in accordance with the Circulation and Infrastructure Element and the Arcadia Municipal Code. Compliance with the City's vibration standards would also reduce vibration impacts on adjacent land uses. In addition, MM 4.11-4 would minimize vibration impacts to on-site land uses to the maximum extent feasible. With mitigation, vibration impacts would be less than significant. (EIR p. 4.11-21.)

**3. Operational Railroad Noise and Impacts to Noise Sensitive Uses (Thresholds 4.11a, b, and c):** Implementation of the proposed Project would result in potentially significant railroad noise impacts and impacts to noise sensitive uses.

Finding: The Standard Conditions, Project Design Feature, and Mitigation Measures outlined below would reduce to a less than significant level the operational railroad noise impacts and impacts to noise sensitive uses. The Standard Conditions, Project Design Feature, and Mitigation Measures reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant operational railroad noise impacts and potentially significant impacts to noise sensitive uses identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Conditions: Standard Condition 4.11-2 requires future development in the City to comply with exterior noise level standards set forth in the City's Noise Ordinance. Standard Condition 4.11-3 requires that residential structures be constructed such that interior CNEL with windows closed shall not exceed 45 dBA in any habitable room. Implementation of these Standard Conditions would reduce noise impacts on future developments from train operations. (EIR p. 4.11-28.)

Project Design Feature: Policy N-2.6 calls for the coordination with the LACMTA with regard to design and operation of the Gold Line tracks, crossings, and station area use approaches in order to minimize noise impacts associated with train operations on the community, particularly construction of the Santa Anita Avenue crossing as a grade-separated crossing. Implementation of this Project Design Feature would reduce noise impacts associated with future train operations. (EIR p. 4.11-28.)

Mitigation Measures: Implementation of Mitigation Measures 4.11-2 and 4.11-3 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.11-2 states that prior to the issuance of discretionary permits for residential development in areas with existing high levels of ambient noise (i.e., along major roadways and the railroad tracks), a detailed acoustical study using architectural plans shall be prepared by a qualified Acoustical Consultant and submitted to the Development Services Department for residential structures. This

report shall describe and quantify the noise sources impacting the building(s), the amount of outdoor-to-indoor noise reduction provided in the architectural plans, and any upgrades required to meet the City's interior noise standards (45 CNEL for residences). The measures described in the report shall be incorporated into the architectural plans for the buildings and implemented with building construction.

Mitigation Measures 4.11-3 states that for proposed commercial and industrial land uses that would generate stationary noise near noise sensitive receptors, a detailed noise assessment shall be prepared by a qualified Acoustical Consultant prior to the issuance of building permits. The assessment shall utilize noise data provided by the manufacturer(s) of the equipment utilized by the project or noise measurements from substantially similar equipment to project noise levels at the noise-sensitive uses (on- and off site). Compliance with the City's noise standards for residences shall be demonstrated and any measures required to meet the noise standards shall be described and incorporated into the building plans for the project. These measures may include, but not be limited to, selection of quiet models, construction of barriers, equipment enclosures, and placement of the equipment. Project applicants/developers shall submit evidence to the Director of Planning Development that the following noise reduction measures are stated as requirements on the construction plans and specifications:

- Require preparation of a noise analysis for all proposed commercial and industrial projects to be located adjacent to an existing noise-sensitive use, including but not limited to residential areas, schools, and hospitals.
- Design the construction of new commercial and industrial uses adjacent to noise-sensitive uses with noise mitigation measures to reduce the noise impacts associated with truck deliveries and stationary equipment, such as pumps, compressors, and air conditioning units.
- Require that all loading facilities be located and designed to minimize the potential noise impacts to adjacent noise sensitive uses.

Rationale: The Metro Light Rail Gold Line (Gold Line Phase II) would be extended from Pasadena to Montclair, into and through Arcadia. Noise associated with this rail transit system would include general rail activities, a public announcement system, and bus/locomotive idling. While noise barriers may exist in some locations in relation to past freight train activities, any future rail activities on the proposed Gold Line extension are expected to cause a significant noise impact to any existing noise-sensitive land uses due to the lack of existing freight train or light rail operations. The Noise Element in the proposed General Plan Update contains goals and policies that would reduce noise impacts in the City. Implementation actions are also included to reduce noise impacts on sensitive receptors and comply with City regulations and noise standards. In addition, implementation of MM 4.11-2 would reduce the exposure of future noise sensitive uses to train noise. (EIR pp. 4.11-28 to 29.)

Noise impacts associated with bus stops include peak noise levels generated by bus brakes, shifting gears, and engine noise during bus acceleration from the bus stop. Buses are equivalent to heavy trucks in terms of noise generation. Whether conditions or changes in bus service have a detrimental impact depends on the ambient noise level at the particular location. In other words, bus stops located near noise-sensitive uses create greater noise impacts when they occur at minor streets. However, most bus and truck routes within the City are along major roads. For any future developments in the vicinity of the bus routes, a detailed noise impact analysis would be required to accurately assess the potential impacts associated with bus activities (MM 4.11-2) and to require compliance with the City's exterior and interior noise standards. This would reduce impacts to less than significant levels. (EIR p. 4.11-29.)

Noise impacts associated with commercial/industrial areas include, but are not limited to, noise generated by loading dock operations, trucks entering and leaving commercial and industrial districts, and mechanical equipment (such as fans, motors, and compressors) located inside and outside the buildings. The introduction of mixed-uses along residential and commercial corridors can create potential noise impacts to noise-sensitive uses. Potential noise conflicts can occur when noise-sensitive areas are exposed to these noise sources. Compliance with the Noise Ordinance and the City's Noise Standards and MM 4.11-3 would reduce impacts from stationary sources. (EIR p. 4.11-29.)

The largest single source of commercial noise in the City is the Santa Anita Race Track. Noise-sensitive uses that would be developed in the vicinity of the race track should account for these potential impacts in a project specific noise analysis and potential mitigation measures to reduce expected noise impacts (MM 4.11-2). (EIR p. 4.11-29.)

Implementation of MMs 4.11-2 and 4.11-3 requiring preparation of project-specific noise impact analyses and adherence to the required mitigation measures identified in the analyses would reduce impacts to less than significant levels after mitigation.

## **G. Utilities and Utility Systems**

**1. Water and Wastewater Distribution Infrastructure (Threshold 4.16b):** Future development would place greater demands on the existing water and sewer system infrastructure of the City.

**Finding:** The Standard Conditions, Project Design Features, and Mitigation Measure outlined below would reduce to a less than significant level the Project's impacts to water and wastewater distribution infrastructure. The Standard Conditions, Project Design Features, and Mitigation Measures reflect changes or alterations that the City has required, or incorporated into, the Project which would avoid or substantially lessen the potentially significant impacts to water and wastewater distribution infrastructure identified in the EIR. (State CEQA Guidelines § 15091(a)(1).)

Standard Conditions: Compliance with the City's standards for water line and wastewater line design and construction (Standard Condition 4.16-1) would allow the provision of necessary infrastructure improvements to adequately serve future development pursuant to the General Plan Update. (EIR pp. 4.16-24 to 25.) Implementation of Standard Condition 4.16-1 would reduce potential impacts from future development to sewer infrastructure improvements to less than significant levels. (EIR p. 4.16-25.)

Project Design Features: Implementation Actions 4-12 (Coordination with Utility Agencies and City Facilities), 4-13 (Infrastructure Master Plan Updates), 4-14 (Inspection and Replacement of Sewer Lines), 6-3 (Conservation Education and Promotion), and 6-4 (Green Building Initiatives) would further reduce impacts related to sewage generation from future development pursuant to the General Plan Update.

Mitigation Measure: Implementation of Mitigation Measure 4.16-1 in the Mitigation Monitoring and Reporting Program would reduce this impact to a less than significant level. Mitigation Measure 4.16-1: Prior to approval of development applications that could have an impact on existing water, sewer, or storm drain infrastructure capacities, as determined by the City Engineer, the project applicant/developer shall be required to determine project impacts on each system. If water, sewer, and/or storm drain infrastructure improvements are required in order to serve the proposed project, then appropriate mitigation shall be provided in the analysis and shall be incorporated into site development plans, subject to review and approval by the City Engineer. If infrastructure improvements outside the jurisdiction of the City of Arcadia are required, including improvements to trunk sewer lines owned by the Sanitation Districts of Los Angeles County, the needed improvements, or fair share payments in lieu of infrastructure improvements, shall be completed to the satisfaction of the appropriate jurisdictions.

Rationale: Future development pursuant to the proposed General Plan Update would require connections to the existing water and sewer infrastructure systems. Implementation of the Water Master Plan and water system improvement projects set forth in the Plan would resolve existing deficiencies and upgrade the water system to adequately serve the needs of future development. However, the size and timing of future development projects could result in the need for water infrastructure improvements prior to the implementation of Capital Improvement Program projects. Therefore, future development has the potential to result in deficiencies if water system upgrades are not completed prior to new development in areas where potential deficiencies have been identified. (EIR pp. 4.16-22 to 24.)

To avoid the creation or exacerbation of water infrastructure deficiencies, MM 4.16-1 requires the City to mandate that all future development applications provide an adequate engineering analysis of project-specific impacts to utility infrastructure and identify specific improvements that would eliminate the impacts. In addition, compliance with the City's standards for water line design and construction would allow the provision of necessary infrastructure improvements to adequately serve future development pursuant to the General Plan Update. (EIR p. 4.16-24.)

Also, there are identified deficiencies to the City's sewer infrastructure that are proposed for improvement under the City's Capital Improvement Program. However, the timing of future development could result in the need for infrastructure improvements prior to the implementation of the Capital Improvement Program projects. Additionally, required improvements may include LACSD-owned lines, for which the City has no authority to implement. LACSD has no current deficiencies in the sewage system that services the City. As additional flows are incrementally generated within the City and LACSD trunk lines approach capacity, construction of relief trunk sewers is scheduled, depending on the availability of project funding. Therefore, future development has the potential to result in sewer infrastructure deficiencies if sewer system upgrades are not completed prior to new development in upstream areas where deficiencies have been identified. (EIR p. 4.16-25.)

In order to prevent future development from creating or exacerbating wastewater infrastructure deficiencies, MM 4.16-1 requires the City to mandate that all future development applications provide an adequate engineering analysis of project-specific impacts to utility infrastructure and identify specific improvements that would eliminate the impacts. In addition, compliance with the City's standards for wastewater line design and construction would require that infrastructure improvements are adequate to serve future development pursuant to the General Plan Update. (EIR p. 4.16-25.)

While the City's sewer system provides wastewater conveyance throughout the City, there are existing septic tanks in Arcadia. These are located at the Santa Anita Park racetrack and other, older developments at the edges of the City. However, septic systems are no longer permissible for new development in the City of Arcadia in accordance with the LARWQCB's Order No. R4 2004-0146 and the Uniform Plumbing Code. Compliance with existing regulations would prevent septic systems to be constructed when sewer lines are available and would require proper abandonment of existing septic systems. (EIR p. 4.16-25.)

Compliance with existing regulations and implementation of MM 4.16-1 would reduce impacts to less than significant levels. (EIR p. 4.16-25.)

## **SECTION IV**

### **FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT FULLY MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT**

Notwithstanding the existing regulations, Standard Conditions that the City imposes on development/construction projects within the City, the specific Project Design Features discussed in the EIR for the Project, and the Mitigation Measures set forth in the Mitigation Monitoring and Reporting Program for the Project, the impacts discussed in this Section IV cannot be fully mitigated to a less than significant level. For each impact that is determined to be significant and unavoidable, a Statement of Overriding Considerations has been prepared for that impact and is set forth in Section IX of this Resolution below.

## A. Air Quality

**1. Air Quality Management Plan Consistency (Threshold 4.3a):** Future development under the proposed General Plan Update would not be consistent with the Air Quality Management Plan (AQMP) due to the potential increase in air pollutants in the South Coast Air Basin.

Finding: The City Council finds that due to existing exceedances of air quality standards in the South Coast Air Basin, no feasible mitigation is available to reduce this impact to a less than significant level and this impact would remain significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the City Council wish to approve the Project.

Rationale: In preparation of the AQMP, the SCAQMD and SCAG relied on population growth projections in the region to forecast, inventory, and allocate regional emissions from land use and development-related sources. According to SCAG projections used in preparation of the AQMP, the population of Arcadia will increase to 63,718 persons in 2030. According to the most recent SCAG projections for the adopted 2008 RTP, the City of Arcadia will have 65,704 residents by 2035. Under the proposed General Plan Update, population within the City could increase to 61,994 persons at buildout. The General Plan Update would not increase population (and thus vehicle miles traveled) beyond that anticipated by SCAG projections. Thus, it would not conflict with the regional SCAG projections. Also, Standard Conditions, Project Design Features, and Mitigation Measures will reduce operational air quality impacts. (EIR pp. 4.3-18 to 19.)

However, the South Coast Air Basin is in nonattainment for O<sub>3</sub>, NO<sub>2</sub>, PM10, and PM2.5 standards and Los Angeles County is in nonattainment for Lead standards. Generation of these pollutants from construction activities and use/occupancies of future development in the City would contribute to existing air quality violations. Thus, future development pursuant to the proposed General Plan Update would result in criteria air pollutants and precursors for which the region is in nonattainment. Additional emissions from future development would contribute to existing air quality violations in the South Coast Air Basin, conflicting with SCAQMD air quality planning efforts. (EIR p. 4.3-19.)

**2. Violate Air Quality Standards (Thresholds 4.3b and 4.3c):** Future development under the proposed General Plan Update would contribute to existing air quality violations, both from short-term construction and long-term emissions, and cumulatively result in an increase of criteria pollutants for which the South Coast Air Basin is in non-attainment of air quality standards.

Finding: The City Council finds that, despite the implementation of all feasible mitigation, this impact remains significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the City Council wish to approve the Project.

Mitigation Measure: Implementation of Mitigation Measures 4.3-1 in the Mitigation Monitoring and Reporting Program would reduce the significance of this impact but not to a less than significant level. Mitigation Measure 4.3-1 provides that the City shall require construction projects that are subject to discretionary approval to implement the following measures to reduce exhaust emissions from construction equipment:

1. Commercial electric power shall be provided to the project site in adequate capacity to avoid or minimize the use of portable gas/diesel-powered electric generators and equipment.
2. Where feasible, equipment requiring the use of fossil fuels (e.g., diesel) shall be replaced or substituted with electrically driven equivalents (provided that they are not run via a portable generator set).
3. To the extent feasible, alternative fuels and emission controls shall be used to further reduce exhaust emissions.
4. On-site equipment shall not be left idling when not in use.
5. Staging areas for heavy-duty construction equipment shall be located as far as possible from sensitive receptors.

Rationale: Short-term construction emissions and long-term mobile source emissions and area source emissions from future development in the City would generate pollutants that would contribute to existing violations of O<sub>3</sub>, NO<sub>2</sub>, PM10, and PM2.5 standards. Compliance with SCAQMD regulations and MM 4.3-1 would reduce exhaust emissions from construction equipment. The General Plan Update includes goals and policies in the Resource Sustainability Element intended to directly and indirectly reduce the generation of air pollutants from existing and future developments in the City. These include public education and regional coordination efforts as well as trip reduction and energy conservation measures. In addition, numerous goals, policies, and implementation programs intend to reduce per-capita VMT through the implementation of mixed-use development and mass transit, pedestrian, and bicycle system improvements. Future development would also need to comply with the City's Traffic Congestion Management regulations, SCAQMD rules for stationary sources and motor vehicle mitigation, and energy conservation regulations. (EIR pp. 4.3-19 to 22.)

However, the City lies in a nonattainment air basin for ozone, PM10 and PM2.5; and future development associated with General Plan implementation would contribute to the continued nonattainment status (EIR p. 4.3-22). Impacts would remain significant after mitigation of construction emissions. Reduction in vehicle emissions and stationary sources from City goal, policies, and programs cannot be quantified and would remain significant and unavoidable.

**3. Impacts of Operational Emissions on Sensitive Receptors (Threshold 4.3d):** Future development under the proposed General Plan Update would generate toxic air contaminants, including diesel exhaust, that may affect sensitive receptors.

**Finding:** The City Council finds that, despite the implementation of all feasible mitigation, this impact remains significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the City Council wish to approve the Project.

**Mitigation Measures:** Implementation of Mitigation Measure 4.3-1 in the Mitigation Monitoring and Reporting Program would reduce the significance of this impact but not to a less than significant level. Mitigation Measure 4.3-2 provides that the City shall require future development that is inconsistent with the recommended buffer distances (siting criteria) in CARB's Land Use Handbook to prepare a site-specific health risk assessment to determine impacts to sensitive receptors. In light of the results of the aforementioned analysis, the City shall implement the following measures to minimize exposure of sensitive receptors and sites to health risks related to air pollution:

1. Encourage site plan designs to provide appropriate set-back and/or design features that reduce TACs at the source;
2. Encourage the applicants for sensitive land uses to incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) in the planning process to minimize the potential impacts to sensitive receptors; and
3. Orient activities involving idling trucks as far away from and downwind of existing or proposed sensitive receptors as feasible.

**Rationale:** Future development pursuant to the proposed General Plan Update could include new or modified sources of TACs that may be located near existing sensitive receptors, and new sensitive receptors could be developed near existing sources of TACs. Emissions of TACs during construction of development envisioned under the General Plan Update (e.g., emissions from heavy-duty diesel equipment) and from operational sources (e.g., emissions from area, stationary and mobile sources) could result in TAC exposure of sensitive receptors. (EIR p. 4.3-23.)

The proposed General Plan Update anticipates construction of light industrial and commercial land uses in the City, which may include stationary sources of TACs, such as dry-cleaning establishments, gasoline-dispensing facilities, and diesel-fueled back-up generators and boilers. These types of stationary sources, in addition to any other stationary sources that may emit TACs, would be subject to applicable SCAQMD rules and regulations. Given compliance with applicable rules and regulations, operation of stationary sources would not result in the exposure of sensitive receptors to TACs at levels exceeding SCAQMD's significance thresholds. (EIR p. 4.3-24.)

The Land Use Policy Map in the proposed General Plan Update includes a mix of land uses, including commercial, light industrial, manufacturing, and residential uses. While vacant lands and focus areas where future development is anticipated are not located near freeways, they could be located near major roadways in the City. Sensitive receptors could be sited within 500 feet of a major roadway, and risk associated with implementation of the General Plan would exceed CARB's (and subsequently the SCAQMD's) recommendation. Implementation of the General Plan Update could also place commercial/industrial land uses near sensitive receptors. Operational activities that require the use of diesel-fueled vehicles for extended periods, such as commercial trucking facilities or delivery/distribution areas, may expose sensitive receptors to diesel PM emissions on a reoccurring basis. Implementation of MM 4.3-2 would reduce the exposure of sensitive receptors to on-road mobile source emissions, but not to a less than significant level. The only measure available to completely mitigate this impact would be the complete separation of emission sources (i.e., diesel vehicles associated with commercial trucking activities at commercial and industrial land uses, rail operations, and stationary sources) by over 1,000 feet from all sensitive receptors in the City, which is not feasible. Therefore, no feasible mitigation is available to reduce the impact to a less than significant level. (EIR pp. 4.3-24 to 26.)

Cumulative increases in pollutant emissions from construction and operation of future developments under the General Plan Update would contribute to existing air quality violations and exposure of sensitive receptors to pollutants. (EIR pp. 4.3-28 to 29.) Impacts would remain significant after mitigation.

## B. Noise

**1. Operational (Long-Term) Traffic Noise (Thresholds 4.11a, 4.11b, and 4.11c):** Increases in traffic from future development and future rail operations would expose existing and future developments in the City to high noise levels. Existing noise levels in the City exceed standards and future development would incrementally contribute to this exceedance.

Finding: The City Council finds that, despite the implementation of all feasible Project Design Features, this impact remains significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the City Council wish to approve the Project.

Project Design Features: In order to reduce impacts from transportation sources, the General Plan Update contains the following policies:

1. Policy N-2.1: Enforce State Motor Vehicle Code noise standards for cars, trucks, and motorcycles, and coordinate enforcement with the California Highway Patrol and County of Los Angeles Sheriff's Department.
2. Policy N-2.2: Continue to work with and lobby Metro to fund gap closure of the I-210 sound walls between Baldwin and Santa Anita Avenues.

3. Policy N-2.3: Consider using roadway sound attenuation techniques for resurfacing projects that use “quiet” pavement or noise-reducing rubberized asphalt.
4. Policy N-2.4: Consider the noise impacts on adjacent residential uses associated with establishing stop signs or other traffic control or traffic calming devices.
5. Policy N-2.5: Enforce truck routes established in the Circulation and Infrastructure Element and the Municipal Code.
6. Policy N-2.6: Work with Metro to provide that the design and operation of the Gold Line tracks, crossings, and station area use approaches that would minimize noise impacts associated with train operations on the community. In particular, construct the Santa Anita Avenue crossing as a grade-separated crossing.

Rationale: Mobile sources generate noise impacts in the City and the primary source of noise is vehicular traffic. The comparison of community noise equivalent level (CNEL) at 100 feet of the centerlines of major streets and freeways in the City indicates that the existing baseline noise levels range from 62.0 to 87.3 dBA CNEL at 100 feet from the street centerline, while the Year 2035 conditions show noise levels would range from 62.2 to 87.3 dBA CNEL 100 feet from the street centerlines. In Year 2035, noise levels are projected to increase from baseline conditions by up to 1.5 dBA CNEL. None of the roadway segments would experience a noise increase that exceeds 3.0 dB over existing noise levels. These noise increases would also occur incrementally through time and would not be discernible. However, existing or future sensitive noise receptors along roadways that would have noise levels greater than 65 dBA CNEL would be exposed to noise levels exceeding the City’s exterior standards of 65 to 70 dBA CNEL. Depending on the building construction, interior noise levels at these sensitive receptors may also exceed standards. (EIR pp. 4.11-22 to 27.)

A number of goals and policies in the Noise Element address noise control and would reduce noise impacts on existing and future developments. A number of implementation actions are also proposed to reduce noise from transportation sources and impacts on sensitive receptors. However, continued exposure of noise-sensitive receptors to existing high noise levels along major roadways are expected to remain. (EIR pp. 4.11-27 to 28.) Also, traffic noise impacts of future development pursuant to the proposed General Plan Update on noise-sensitive receptors would be significant due to the contribution of future development to these noise standard violations. (EIR pp. 4.11-27 to 28.) This impact would be significant and unavoidable.

Future development in the City and the surrounding area would generate noise impacts from construction, vehicle trips, and stationary sources. Noise level increases in the region would contribute to existing high noise levels that would impact existing or future sensitive noise receptors along major roadways. Thus, while traffic noise increases would be less than the 3 dBA, existing violations of City noise standards

would be exacerbated, and the cumulative off-site traffic noise impacts would be significant. (EIR pp. 4.11-30 to 31.)

## C. Transportation

**1. Circulation System Performance (Threshold 4.15a):** Future development would lead to increases in traffic volumes on City roadways that would exceed City standards along Foothill Boulevard and Santa Anita Avenue.

Finding: The City Council finds that, despite the implementation of all feasible Standard Conditions and Project Design Features this impact remains significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the City Council wish to approve the Project.

Standard Conditions: Standard Condition 4.15-1 requires that future development pay development impact fees under the City's Transportation Impact Fee Program to help fund intersection and roadway improvements in the City. Standard Condition 4.15-2 requires that future development improve perimeter and on-site roadways in accordance with the City's roadway standards under *Arcadia Municipal Code*, Article IX, Chapter 1, Parts 1 and 2. Standard Condition 4.15-6 requires that new non-residential development comply with the City's Traffic Congestion Management regulations, which require non-residential development to provide transportation demand management and trip reduction measures, such as display/kiosk for transportation information, preferential parking space for carpool/vanpool vehicles, bike racks, loading/unloading zones, bus stop improvements, designated pathways, and convenient access for bicyclists. Implementation of these Standard Conditions would contribute to the reduction of impacts to the performance of the circulation system but not to less than significant levels. (EIR p. 4.15-28.)

Project Design Features: Goal CI-1 of the General Plan is to establish an efficient roadway system that serves all of Arcadia, supports all transportation modes, and balances the roadway system with planned land uses. Goal CI-2 is to maximize operational efficiency of the street system. Implementation of these Project Design Features would contribute to the reduction of impacts to the performance of the circulation system but not to less than significant levels. (EIR p. 4.15-28.)

Implementation Actions 2-5 (Downtown Planning Efforts), 3-7 (Redevelopment Agency's Five-Year Implementation Plan), 4-1 (Achieve Consistency in Roadway Rights-of-Way), 4-2 (Complete Streets), and 4-13 (Infrastructure Master Plan Updates) would contribute to the reduction of impacts to the performance of the circulation system but not to less than significant levels. (EIR p. 4.15-28.)

Rationale: There are no opportunities to widen Foothill Boulevard and Santa Anita Avenue without obtaining additional right-of-way, which would involve the demolition of adjacent buildings or demolition of existing streetscape and landscaping. Also, these roadways carry regional traffic as well as local Arcadia traffic, so solutions are not entirely within the control of the City of Arcadia. (EIR p. 4.15-27.)

The City's street system is well established, and no new streets or major street widening are planned in the future. However, there are some street enhancements and other circulation system improvements proposed in the General Plan Update. These include street restriping, enhanced intersections and traffic signal system upgrades. (EIR pp. 4.15-21 to 22.)

Future development under the proposed General Plan Update and public and infrastructure projects in the City would generate new vehicle trips that could add to existing traffic volumes on roadways, intersections, and freeways in and near the City. Increases in traffic volumes on City streets were projected to year 2035 at anticipated buildout of the City under the proposed Arcadia General Plan Update. The LOS calculations for the AM peak hour show that the majority of roadway segments in the City are forecasted to continue to operate at LOS D or better in 2035, except for the following segments that would operate at LOS E:

- Westbound Foothill Boulevard between Fifth Avenue and Second Avenue;
- Westbound Live Oak Avenue between Second Avenue and Santa Anita Avenue; and
- Northbound Santa Anita Avenue between Camino Real and Duarte Road.

The Foothill Boulevard segment currently operates at LOS E and would continue to operate at LOS E in the future with implementation of the General Plan Update. The Live Oak Avenue segment is located in designated commercial district (Live Oak Avenue), where LOS E is acceptable per Policy CI-1.3. However, the northbound segment of Santa Anita Avenue between Camino Real and Duarte Road would operate at LOS E, exceeding the City standard. Impacts on Foothill Boulevard between Fifth and Second Avenues and Santa Anita Avenue between Camino Real and Duarte Road are considered significant.

The LOS calculations for the PM peak hour also show that the majority of roadway segments in the City are forecasted to continue to operate at LOS D or better, except for three segments:

- Eastbound Santa Clara Street between Huntington Drive and Santa Anita Avenue;
- Northbound Holly Avenue between Duarte Road and Huntington Drive; and
- Eastbound Foothill Boulevard between Fifth Avenue and Second Avenue.

Santa Clara Street is located in a designated commercial district (Downtown), and Holly Avenue is located adjacent to the Santa Anita Race Track, where LOS E is acceptable per Policy CI-1.3. Eastbound Foothill Boulevard between Fifth Avenue and Second Avenue would operate at LOS F during the PM peak hour and this is considered a significant traffic impact. This segment of Foothill Boulevard currently operates at LOS F and would continue to operate at LOS F in the future. While no

change in LOS would occur, existing operations on this segment of Foothill Boulevard are below City standards, and future development would contribute to future traffic volumes on this roadway segment.

It is possible in the longer term that the projected traffic volumes and levels of service may not be reached, in that enhanced intersections may improve the LOS or traffic level increases may be less due to lower increases in regional traffic and/or greater use of transit, walking, and bicycling. Implementation of an advanced traffic control (Implementation Actions 4-6 and 4-7) could also increase the roadway capacity and improve the LOS. However, the traffic benefits of these improvements cannot be quantified and impacts are expected to be significant at the following roadway segments:

- Northbound Santa Anita Avenue between Camino Real and Duarte Road (LOS E during AM peak hour);
- Westbound Foothill Boulevard between Second Avenue and Fifth Avenue (LOS E during AM peak hour); and
- Eastbound Foothill Boulevard between Second Avenue and Fifth Avenue (LOS F during PM peak hour).

The proposed Circulation and Infrastructure Element in the General Plan Update addresses the transportation needs of the City. Goals, policies and implementation actions in the proposed General Plan would accommodate future transportation demands and provide greater opportunities for the use of alternative transportation. Trip reduction measures that would be implemented by individual developments; individual project traffic impact mitigation; and payment of traffic impact fees would allow for improvements to the City's roadway network. However, traffic impacts would remain significant and unavoidable. (EIR pp. 4.15-23 to 28.)

Future development pursuant to the General Plan Update, public and infrastructure projects, and future growth and development in the rest of the region would increase the number of vehicle trips to, through, and from the City and within the region. Based on regional traffic forecasts, SCAG has identified regional transportation improvements to meet the transportation and circulation needs of the region in its RTP and RTIP. Additional freeway travel lanes, expanded transit services, rapid bus transit expansion, high-speed rail service, dedicated truck lanes, and other projects are planned and accounted for in the travel forecasts. Planned local roadway improvements and implementation of the City's ITS Master Plan has also been incorporated into the model to project future traffic volumes. Since significant adverse impacts would occur on roadway segments in the City, buildup of the City and projected growth in the region would have cumulative adverse impacts on traffic and street system capacity. Cumulative impacts would be significant and unavoidable. (EIR pp. 4.15-33 to 34.)

#### D. Greenhouse Gas Emissions (GHG)

##### 1. **Conflict with GHG Reduction Plan, Policy or Regulation (Threshold**

**4.17b):** Future development pursuant to the proposed General Plan Update would generate GHG emissions.

Finding: The City Council finds that, despite the implementation of all feasible Project Design Features and Mitigation Measures, this impact remains significant and unavoidable. Consequently, a Statement of Overriding Considerations would be necessary should the Agency Board wish to approve the Project.

Project Design Features: Policies RS-2.1 through RS-2.3 are intended to further the General Plan Update Goal RS-2 of reducing Arcadia's carbon footprint in compliance with SB 375 and AB 32. Policy RS-2.1 is to cooperate with the state to implement AB 32. Policy RS-2.2 is to reduce per capita greenhouse gas emissions to 15% below 2005 levels by 2020, and total municipal greenhouse gas emissions to 15% below 2005 levels by 2020. Policy RS-2.3 is to participate in regional strategies and plan to implement SB 375, and in particular, use the legislatively authorized incentives to encourage infill and transit-oriented development. (EIR pp. 4.17-23 to 24.)

Policies RS-3.1 through RS-3.3 are intended to further the General Plan Update goal of promoting and utilizing clean forms of transportation to reduce Arcadia's carbon footprint. Policy RS-3.1 is to develop a City fleet that, to the extent feasible, uses clean, alternative fuel and consists of energy-efficient vehicles. Policy RS-3.2 is to incorporate energy-efficient vehicles into the City's transit system. Policy RS-3.3 is to educate residents on methods of sustainable driving techniques such as: reducing excessive speeding, preventing car idling, regular car maintenance for maximizing fuel efficiency, and carpooling. (Draft General Plan page 4.17-24.)

Goal RS-5 is to use wise and creative energy that incorporates new technologies for energy generation and new approaches to energy conservation. To achieve this Goal, the General Plan Update includes Policy RS-5.16, which is to set an example in the design and operation of new civic buildings by implementing LEED or similar building standards. Further, the General Plan Update contains Policy RS-5.17, which is to investigate providing incentives for LEED or equivalent for new and/or retrofitted private commercial and industrial buildings. (Draft General Plan page 4.17-24.)

Goal CI-4 in the Circulation and Infrastructure Element is to provide a connected, balanced, and integrated bicycle and pedestrian network that provides viable alternatives to use of the car. Policy CI-4.1 is to develop and maintain the citywide bicycle network of off-street bike paths, on-street bike lanes, and bike streets. Policy CI-4.2 is to establish bike hubs at key transit and commercial nodes. Policy CI-4.5 is to develop and implement a comprehensive pedestrian circulation plan. Policy CI-4.13 requires new and major renovations of office, industrial, and institutional developments to provide secure off-street bicycle parking, and encourage such developments to provide bicycle facilities, such as showers and changing rooms. (EIR p. 4.17-24.)

Implementation of the foregoing Project Design Features would contribute to the reduction of greenhouse gas emissions but not to a less than significant level.

Mitigation Measures: Implementation of Mitigation Measures 4.17-1 through 4.17-3 would contribute to the reduction of greenhouse gas emissions impacts and the conflicts with GHG reduction plans but not to a less than significant level.

MM 4.17-1: The City shall actively encourage the development and maintenance of mixed uses, particularly in the Mixed Use and Downtown Mixed Use areas, by maintaining a list of sites available for mixed use and infill development and making the list available to developers. The City shall establish developer incentives to encourage well-designed, mixed use and infill development projects in these areas.

MM 4.17-2: The City shall encourage future development and major renovation projects to achieve LEED certification, and/or other green certifications. The City shall investigate the potential to offer density bonus incentives on residential projects that achieve LEED certification, and other green certifications and ratings.

MM 4.17-3: The City shall consider and evaluate the applicability of the policies contained in the California Attorney General's Sustainability and General Plans: Examples of Policies to Address Climate Change California Attorney General's Office 1/22/10 and the California Air Pollution Control Officers Association's (CAPCOA's) Model Policies for Greenhouse Gas Emissions in General Plans June 2009.

Rationale: GHG emissions would result from construction activities associated with long-term implementation of land use policies in the proposed General Plan Update. The primary source of GHG emissions generated by construction activities is from use of diesel-powered construction equipment and other combustion sources (i.e., generators, worker vehicles, materials delivery, and other sources). In general, site preparation including demolition, grading, and excavation represent the construction activities that would result in the highest levels of GHG emissions. GHGs would not only be emitted by on-site construction equipment but also from off-site haul trucks and construction workers traveling to and from the site. (EIR p. 4.17-21.)

With implementation of the proposed General Plan Update, CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> emissions are expected to increase as a result of future development in the City and a corresponding increase in the number of daily trips and vehicle miles traveled (VMT). The GHG emission analysis conducted for the General Plan Update compared CO<sub>2</sub> equivalent GHG emissions between existing conditions and buildout (year 2035), and found that implementation of the proposed General Plan Update would result in a net increase of approximately 553,736.21 MTCO<sub>2</sub>e/yr at buildout of the City. (EIR p. 4.17-21.)

Since annual GHG emissions under buildout of the City are projected to increase the existing emissions, the proposed General Plan Update would contribute to global warming. By generating increased GHG emissions, future development that occurs in accordance with the proposed General Plan throughout the City of Arcadia would

incrementally contribute to the adverse economic, public health, natural resources, and other environmental impacts that are projected to occur in California and throughout the world as a result of global warming. (EIR p. 4.17-22.)

The proposed Land Use Policy Map and goals, policies, and implementation actions that would reduce VMT through the implementation of mixed-use developments and increased development intensity around the Gold Line station, and through Citywide pedestrian and bicycle system improvements would reduce GHG emissions. Goals and policies in the Resource Sustainability Element call for reductions in GHG emissions from future development. Implementation actions in the proposed General Plan Update and existing regulations would also reduce GHG emissions associated with energy and water generation and waste disposal. (EIR p. 4.17-22.)

MMs 4.17-1 to 4.17-3 would further reduce the GHG emissions from the City. However, the current state of the science also precludes the quantification of the GHG emission reduction that could occur with the implementation of these mitigation measures. Because a majority of the GHG emissions in the City will originate from mobile sources (i.e., traffic), and most of the measures described are aimed at reducing emissions from non-mobile sources, it is concluded that implementation of the proposed General Plan Update would still result in a net increase in GHG emissions. Therefore, this impact would be significant and unavoidable. (EIR p. 4.17-23.) The assessment of GHGs is inherently cumulative because global warming is a global phenomenon. Therefore, GHG impacts would also be cumulatively significant. (EIR p. 4.17-24.)

## **SECTION V**

### **FINDINGS REGARDING CUMULATIVE ENVIRONMENTAL IMPACTS**

Pursuant to section 15130(a) of the State CEQA Guidelines, cumulative impacts of a project shall be discussed when they are “cumulatively considerable,” as defined in section 15065(a)(3) of the State CEQA Guidelines. Cumulatively considerable “means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (State CEQA Guidelines § 15065(a)(3).)

Section 4.0 of the EIR assesses cumulative impacts for each applicable environmental issue, and does so to a degree that reflects each impact’s severity and likelihood of occurrence. The EIR assesses the overall environmental effects of the proposed Project at a program level of detail and the overall cumulative effects of development in accordance with the land use designations in the proposed General Plan Update.

Notwithstanding the Standard Conditions that the City imposes on development/construction projects within the City, the specific Project Design Features discussed in the EIR for the Project, the various implementation actions outlined in the General Plan Update, and the Mitigation Measures set forth in the Mitigation Monitoring and Reporting Program for the Project, some of the Project’s cumulative impacts discussed in this Section V cannot be fully mitigated to a less than significant level. For

each impact that is determined to be significant and unavoidable, a Statement of Overriding Considerations has been prepared for that impact and is set forth in Section IX below.

**A. Aesthetics**

1. **Scenic Vistas.** Regarding hillside viewsheds, the General Plan Update includes a continuing land use designation of Residential Estate (up to two dwelling units per acre) in the hillside area encompassing the northernmost extent of the City. Although a covenant has been recorded that limits the development in this area, future growth could include construction of homes on a portion of this hillside area. Other hillside developments in adjacent cities would lead to increasing encroachment into the undeveloped hillsides. However, the Angeles National Forest is located north of the City of Arcadia and adjacent cities, which would limit the hillside development that may occur on the mountainsides. Additionally, most hillside communities have stringent development standards for projects in hillside areas. Development performed in compliance with the General Plan Update goals and policies related to hillside development (Goal LU-5 and associated policies), as well as compliance with all Municipal Code requirements (SC 4.1-1) would reduce cumulative impacts to views of the San Gabriel Mountains to less than significant levels. (EIR pp. 4.1-15 to 16.)

2. **Scenic Highways.** No Impact. (EIR p. 4.1-12.)

3. **Visual Character.** As such, land use development within the focus areas would lead to visual changes within the City of Arcadia that could be cumulatively considerable when assessed in combination with growth and development in adjacent jurisdictions that would be visible by residents and visitors traveling between Arcadia and surrounding cities. However, this growth and development may not necessarily be considered adverse to the visual character of the area, since the project area is largely developed and limited new development is expected. (EIR p. 4.1-15.)

4. **Light and Glare.** Existing sources of light and glare in the City and surrounding area generate ambient lighting levels that define nighttime light intensities. With limited development in the City and the surrounding area, coupled with the City's policies to limit light spillover (SC 4.1-1), buildout under of the General Plan Update would not incrementally contribute to a significant cumulative impact to light and glare in the region. There would be a less than significant cumulative impact related to light and glare, and no mitigation is required. (EIR p. 4.1-16.)

**B. Agriculture and Forest Resources**

The San Gabriel Mountains and the San Gabriel Valley do not support agricultural uses for commercial production. Thus, future development in the City of Arcadia and in the surrounding cities and unincorporated County areas within the San Gabriel Valley would not lead to a cumulatively considerable conversion of farmland to urban uses. No development is expected to occur in the Angeles National Forest located north of the City and the San Gabriel Valley that is not in compliance with the

Forest Plan, since this forest is under the jurisdiction of the USFS and proposed for preservation. No cumulative impacts on farmlands, forest lands, timberland, agricultural operations, crop production, or conflicts with agricultural zones or Williamson Act contracts would occur with the General Plan Update. (EIR pp. 4.2-4 to 5.)

### C. Air Quality

1. **Air Quality Management Plan Consistency.** While the proposed General Plan Update would not conflict with the assumptions used in the development of the AQMP, emissions from construction and long-term operations of future development in the City could increase the frequency or severity of existing regional air quality violations of ozone, NOx, PM10, and PM2.5 levels or cause/contribute to new violations, resulting in a delay in the timely attainment of air quality standards. Thus, it would not be consistent with the AQMP. As with other developments in the San Gabriel Valley, Los Angeles County and the SoCAB, new development projects would generate emissions that would contribute to existing regional air quality violations. This is a significant cumulative impact. (EIR p. 4.3-28.)

2. **Construction-related (Short-Term) Emissions.** Construction activities in the City would contribute to a cumulatively considerable net increase in regional and local emissions of VOC, NOx, PM10, or PM2.5. Also, there could be a direct long-term impact resulting from emissions of VOC, NOx, PM2.5, and PM10 that would exceed the SCAQMD CEQA Significance Thresholds. Implementation of the Standard Conditions and MMs would reduce emissions future development pursuant to the proposed General Plan Update but would still contribute to existing clean air standard violations. Thus, the proposed General Plan Update would result in a cumulatively considerable increase in pollutant levels in the SoCAB when added to other construction emissions in the San Gabriel Valley and the region. No project specific mitigation is feasible to reduce these emissions so as to readily meet clean air standards in the SoCAB. Since impacts from the proposed General Plan Update would be significant and unavoidable, its contribution to a cumulative impact would also be significant and unavoidable. (EIR p. 4.3-28.)

3. **Operational (Long-Term) Emissions.** Future development pursuant to the proposed General Plan Update would result in significant and unavoidable long-term regional air quality impacts. Operational emissions attributable to the proposed General Plan Update, along with emissions from other reasonably foreseeable future projects associated with growth and development in the San Gabriel Valley and the SoCAB, would continue to contribute to long-term increases in pollutant emissions that would exacerbate existing and projected nonattainment conditions. Thus, the proposed General Plan Update would have a significant and unavoidable cumulative air quality impact. (EIR p. 4.3-28.)

4. **Sensitive Receptors.** Future development pursuant to the proposed General Plan Update would not create CO hotspots but may locate TACs near sensitive receptors. Compliance with Standard Conditions would reduce impacts but exposure to TACs from on-road mobile sources cannot be mitigated and would remain significant.

Thus, the proposed General Plan Update would have significant impacts on sensitive receptors, which would be cumulative when considered together with the introduction of new on-road mobile sources from future growth and development throughout the Valley and SoCAB. Thus, the cumulative impacts of the proposed General Plan Update on sensitive receptors in the San Gabriel Valley are considered significant. (EIR p. 4.3-28 to 4.3-29.)

**5. Objectionable Odors.** Future development pursuant to the proposed General Plan Update would not create objectionable odors or expose users to objectionable odors with implementation of Standard Conditions 4.3-2 and 4.16-5. Thus, the proposed General Plan Update would not contribute to cumulative odor impacts. (EIR p. 4.3-29.)

#### **D. Biological Resources**

The cumulative impacts on biological resources are evaluated based on the potential impacts of growth and development in the City and in the San Gabriel Valley. Future development pursuant to the General Plan Update could contribute to the cumulative changes in plant and animal habitats in the San Gabriel Valley due to increasing urbanization and population growth in the region. (EIR p. 4.4-21.)

Development on disturbed lands and developed areas, which are likely to support non-native species or disturbed habitats, are less likely to have adverse impacts on sensitive plant and animal species. Development on vacant and undeveloped lands that contain suitable habitat that may support sensitive species would be required to conduct biological surveys for sensitive animal species, including nesting birds, and for sensitive habitat or wildlife corridors. The disturbance or destruction of sensitive or protected species on a site would require a Section 10 or Section 7 consultation and coordination with the USFWS, the CDFG, the RWQCB, and other resource agencies, and would require on-site preservation or off-site mitigation, as stated by existing regulations. (EIR pp. 4.4-21 to 22.)

In addition, sensitive habitats such as wetland areas, streams and channels, and riparian habitats would also need to be preserved through on-site or off-site mitigation. The biological surveys and requisite mitigation would be made in coordination with the CDFG, the USFWS, the USACE, and the RWQCB, as necessary (MM 4.4-1, Standard Conditions 4.4-1, and 4.4-2). Thus, while changes in the biological diversity of the San Gabriel Valley could occur with future growth and development, programs and regulations are in place that would reduce cumulative impacts on sensitive biological resources. (EIR p. 4.3-22.)

Anticipated future development within the City would have a less than significant adverse cumulative impact on wildlife movement due to the extent of existing development and resulting restrictions on wildlife movement opportunities. Compliance with the City's Oak Tree Regulations in SC 4.4-3 would result in anticipated future development within the City to have a less than significant adverse cumulative impact on protected tree resources. (EIR p. 4.3-22.)

There is no adopted habitat conservation plan or natural community conservation plan for the City or surrounding area. Thus, no conflict with a habitat conservation plan or natural community conservation plan is expected with the proposed General Plan Update or with future growth and development in the San Gabriel Valley. (EIR p. 4.3-22.)

Because potentially significant impacts to biological resources resulting from future development pursuant to the General Plan Update would be less than significant with implementation of the Standard Conditions and relevant goals, policies, and implementation actions in the General Plan Update, future development is not expected to significantly contribute to cumulative impacts to biological resources. (EIR p. 4.3-22.)

## **E. Cultural Resources**

Although a project, in conjunction with the effects of past projects, other current projects, and probable future projects, could potentially result in the disturbance of prehistoric archaeological resource sites and paleontological resources throughout the region, the City requires the mitigation of impacts to these resources (i.e., MMs 4.5-2 through 4.5-3). Therefore, despite the site-specific nature of the resources, the mitigation identified for use in the event that unknown or undocumented resources were discovered would reduce the potential for cumulative impacts. As a result, anticipated development on a project site would not contribute to a significant cumulative impact. (EIR p. 4.5-20.)

**1. Historical Resources.** Development pursuant to the General Plan Update has the potential to disturb or destroy historical resources associated with the City's history and local culture. Historic structures that may be altered or demolished in and near the City would affect the cultural significance of an individual site or the structure, as well as incrementally diminish the City's historical context. Similarly, growth and development in the San Gabriel Valley may involve demolition of older structures that may be important to the valley's history. Implementation of historic preservation ordinances by individual cities would preserve sites and structures of local importance. Compliance with SC 4.5-1 would lead to assessment of the historical significance of on-site structures and the preservation of significant resources. However, demolition or alterations that do not follow the Secretary of the Interior's Standards would lead to the cumulative loss of historic resources in the Valley. Implementation of MM 4.5-1 by the City of Arcadia would prevent significant adverse impacts on historical resources in the City and avoid a cumulative contribution to the loss of historical resources. (EIR p. 4.5-20.)

**2. Archaeological Resources.** Vacant areas would be subject to grading and excavation as part of future development. While these vacant parcels are found on scattered sites and at the northern end of the City, they may contain archaeological resources that could be damaged by development. Growth and development in the San Gabriel Valley would also lead to new development on vacant and undeveloped lots. Compliance with SC 4.5-1 would require a pedestrian survey that would be conducted

prior to development. This would provide early identification of on-site cultural resources and the preservation of significant resources. However, future development and public and infrastructure projects not subject to CEQA could adversely affect in-situ archaeological resources. Cumulative impacts on archaeological resources may occur. However, implementation of MM 4.5-2 would prevent significant adverse impacts on archaeological resources in the City and thus, would avoid a cumulative contribution to the loss of archaeological resources in the Valley. (EIR p. 4.5-20.)

**3. Paleontological Resources.** Developments that would disturb native soils or where no previous development has occurred have the potential to disturb or destroy unknown paleontological resources. The extent or significance of these resources cannot be determined until discovery during surveys and evaluation or excavation of native soils. Mitigation on a case-by-case basis would reduce impacts. Implementation of MM 4.5-3 would prevent significant adverse impacts on paleontological resources in the City and would avoid its cumulative contribution to the loss of paleontological resources in the Valley. (EIR p. 4.5-20.)

**4. Human Remains.** Compliance with SC 4.5-2 related to the disposition of human remains discovered during excavation or grading would prevent significant adverse impacts. Cumulative impacts on human remains would be less than significant. (EIR p. 4.5-20.)

#### **F. Geology and Soils**

Geology and soils impacts are generally site specific and there is typically little, if any, cumulative relationship between the development of individual projects on separate sites. As such, one development would not alter geologic events or soil features/characteristics (such as groundshaking, seismic intensity, or soil expansion) at another site, nor change geologic conditions or hazards at off-site locations. (EIR p. 4.6-24.)

However, geological and seismic conditions are regional in nature and affect large areas, rather than individual parcels. Therefore, future development pursuant to the General Plan Update, as well as development within the San Gabriel Valley, would be subject to geologic hazards including development potentially affected by faults, ground shaking, surface rupture, liquefaction, landslides, subsidence, soil collapse, expansive soils, and other geologic issues. (EIR p. 4.6-25.)

Compliance with applicable State and local regulations would be required of all development within the San Gabriel Valley. Individual projects would be designed and built in accordance with applicable standards in the CBC and the individual building regulations of local jurisdictions, including pertinent seismic design criteria. Site-specific geologic hazards would be addressed by the geotechnical investigation required by individual cities and the County for each development proposal. Geologic investigations would identify the geologic and seismic characteristics on a site and provide guidelines for engineering design and construction to provide for the structural integrity of proposed development. Compliance with applicable State and local regulations and

standard engineering practices related to seismic and geologic hazard reductions would prevent significant adverse impacts associated with geologic hazards and impacts associated with the General Plan Update would not be cumulatively considerable. (EIR p. 4.6-25.)

Development projects in the San Gabriel Valley would connect to the public sewer system where available but may utilize septic tanks or alternative wastewater disposal systems in areas without sewer service. Compliance with the Los Angeles RWQCB regulations and the California Plumbing Code would prevent hazards associated with soils incapable of supporting septic systems. Therefore, compliance with applicable State and local regulations and standard engineering practices related to septic hazard reductions would prevent significant adverse impacts. Impacts associated with the General Plan Update would not be cumulatively considerable. (EIR p. 4.6-25.)

#### **G. Hazards and Hazardous Materials**

The cumulative impacts related to hazards and hazardous materials are analyzed within the San Gabriel Valley (Valley). Existing developments in the Valley pose risks to public health and safety, as they relate to the use, storage, handling, generation, transport, and disposal of hazardous materials. Future development in the City and in the rest of the San Gabriel Valley would increase these risks as more facilities or operations utilize hazardous materials; are located near airports; and are developed in hillside areas with very high fire hazard severity. (EIR p. 4.7-23.)

Existing regulations for a variety of activities and uses relate to the protection of public health and safety at all levels of government. Future development projects in the Valley would also need to be made part of emergency planning efforts for natural or manmade disasters that may occur in the area. Compliance of individual projects with pertinent regulations would preserve public health and safety and would prevent hazards to existing and future developments. Thus, future growth and development in the Valley are not expected to present significant risks to public health and safety. (EIR p. 4.7-23.)

Hazardous material explosions or contamination may potentially occur with future commercial and industrial developments that would handle these materials in large quantities. State, federal, regional, and County agencies are responsible for regulating hazardous materials use, storage, handling, generation, transport, and disposal throughout the Valley. Monitoring and enforcement by the Los Angeles County Fire Department, as the CUPA, would monitor compliance with existing regulations. (EIR p. 4.7-23.)

Future growth and development would also be subject to review and approval by the Arcadia Fire Department, other jurisdictional fire departments/agencies, and the County Fire Department for fire safety and preparedness, as well as the provision of adequate emergency access and evacuation. Compliance with pertinent requirements of the fire agencies would prevent the creation of fire hazards and would reduce wildland fire hazards. Impacts are expected to be less than significant. (EIR p. 4.7-23.)

Compliance with FAR Part 77 (SC 4.7-10) and review of development by the ALUC (SC 4.7-14) would also prevent obstructions to aircraft navigation and would reduce hazards to future growth and development from aircraft operations in and near the San Gabriel Valley. (EIR p. 4.7-24.)

Compliance by individual developments and facilities with existing health and safety regulations outlined in this section would prevent the creation of health risks and public safety hazards. Therefore, no cumulative adverse impacts are expected. (EIR p. 4.7-24.)

#### **H. Hydrology and Water Quality**

1. **Water Quality.** Cumulative hydrology and water impacts are considered in the Los Angeles River Watershed, where the City of Arcadia is located. Future development within the Los Angeles River Watershed, which includes the majority of Los Angeles County, would generate new sources for urban pollutants, which could impact water quality. However, construction activities throughout Los Angeles County are required to conduct all construction activities of one acre or more in compliance with the NPDES Construction General Permit, which would prevent short-term construction activities from resulting in significant water quality impacts. (EIR p. 4.8-26.)

Cities in the County have adopted programs for long-term storm water pollution mitigation through the requirement for SUSMPs for individual developments. WDRs also impose guidelines for individual developments that may lead to discharges into the storm drain system or surface water bodies. These regulations implement the Basin Plan for the Los Angeles region and help meet the established water quality objectives for both groundwater and surface water bodies. (EIR p. 4.8-26.)

Also, the Rio Hondo has a 142-square-mile watershed and the Los Angeles River has an 824-square-mile watershed. Runoff originating within the City and its Sphere of influence (12.36 square miles) represents a minor proportion (8.7 percent of the Rio Hondo and 1.5 percent of the Los Angeles River) of the total runoff volume when compared to the water volumes handled by the Rio Hondo and the Los Angeles River. Runoff from future development activity would generate a minor amount of the total runoff from the City. Therefore, no cumulative adverse impacts related to water quality would occur. (EIR p. 4.8-26.)

2. **Groundwater.** Increases in the resident population and intensity of development in the watershed would translate to a greater demand for water and increased pumping of the groundwater basins, as well as greater use of imported water sources. Individual developments would coordinate with the water service providers to allow service providers to provide water service in a timely and adequate manner. The Water Service Providers' groundwater supplies are controlled by the Main San Gabriel Basin Watermaster and the Raymond Basin Management Board, who are responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basins and extraction limits and amounts. Continued management of the groundwater basins would prevent overdraft conditions, water quality problems, and

other impacts on groundwater resources in the watershed. Therefore, no cumulative adverse impacts related to groundwater recharge or supplies would occur. (EIR pp. 4.8-26 to 27.)

**3. Hydrology.** Future growth and development within the watershed would increase impermeable surfaces and decrease water percolation areas. Increase in impervious surfaces would increase storm water volumes and flow rates in local and regional drainage channels. However, all development within Los Angeles County is subject to development in compliance with SUSMP and local municipal code standards for reducing storm drain capacity impacts. Storm drain infrastructure is incrementally improved with project-specific design plans that are subject to the review and approval of local jurisdiction. Project-specific design and utility improvements would prevent negative impacts to regional drainage channel capacity. Therefore, no cumulative adverse impacts related to flood hazards or inadequate storm drainage would occur. (EIR p. 4.8-27.)

**4. Dam and Reservoir Facilities.** Several dams at the foothills of the San Gabriel Mountains pose inundation hazards in the event of dam failure. Failure of any dam could affect existing and future developments within identified inundation areas within the watershed. The potential for property damage and personal injury is reduced by the construction of dams in accordance with State and federal dam safety regulations and the preparation of emergency action plans for individual dams, which include warning, evacuation, and post-disaster actions. Cumulative impacts from dam inundation would be less than significant. (EIR p. 4.8-27.)

The hazards associated with a tsunami are confined to the shoreline and coastal areas of Los Angeles County and the General Plan Update would not be exposed or would add to this hazard. Seiche hazards would affect local areas downstream of a water body or reservoir and would not create cumulative impacts. Future development on steep hillside areas within the watershed may be exposed to potential mudflow hazards. The debris basins that have been constructed by the Los Angeles County Department of Public Works at the foothills of the San Gabriel Mountains are expected to reduce storm water flows and debris volumes, preventing mudflow hazards. Therefore, no cumulative adverse impacts related to water retention facilities would occur. (EIR p. 4.8-27.)

## **I. Land Use and Planning**

Growth and development in the City of Arcadia and surrounding jurisdictions would be accompanied by changes in existing land uses throughout the San Gabriel Valley and the region. New development on vacant areas and underutilized lots would lead to an intensification of housing development and commercial and industrial land uses, as well as public and institutional uses, throughout the area. (EIR p. 4.9-27.)

SCAG estimates an increase in housing stock of the San Gabriel Valley to 685,034 units and in the County to 4,003,501 units by 2035. In addition, approximately 890,626 jobs in the valley and 5,041,172 jobs countywide would be found within

commercial, industrial, public, institutional, and infrastructure development projects by 2035 (SCAG 2008b). (EIR p. 4.9-27.)

Increasing urbanization and development in the valley and the County are indicative of the ongoing growth and development in the City and the region, as urbanization increases and vacant lands are replaced with more urban land uses and as underutilized lots are redeveloped into uses that are more intensive. (EIR p. 4.9-27.)

The General Plan Update would not divide established communities or result in the introduction of incompatible uses in the area, provided compliance with the City's development standards and applicable regulations. New development is generally evaluated for consistency with the local jurisdiction's land use policies, including the General Plan and Zoning Code. (EIR p. 4.9-27.)

Each proposed development project would be subject to the City's jurisdictional development review process and, if discretionary actions are needed, would be subject to evaluation for potential environmental impacts as required by CEQA. This review process would address potential land use compatibility issues and planning policy conflicts. Future growth and development in the City of Arcadia and the surrounding area would proceed in accordance with applicable General Plans and Zoning Ordinances. As part of permit processing, the development plan review processes for new development would analyze a project for conformity to applicable land use plans and policies, and within the context of existing and planned developments relative to the environmental goals, objectives, and policies of the applicable General Plan. Projects requiring General Plan Amendments or Zone Changes/Variances would need to show consistency with the goals of the applicable General Plan and purposes of the Zoning Code, and thus are not expected to lead to land use incompatibilities or conflicts. (EIR p. 4.9-27.)

Planned infrastructure and public facilities would provide the necessary facilities and services to existing and future developments. Thus, these projects would complement the private development projects planned for the Valley. The cumulative land use impacts of growth and development in the San Gabriel Valley would be less than significant. (EIR p. 4.9-28.)

The potential conservation areas are located in the areas designated by the proposed Arcadia Land Use Policy Map as Open Space – Resource Protection or Open Space – Outdoor Recreation areas, where no development would occur. The City also has an Oak Tree Preservation Ordinance. Thus, future development pursuant to the General Plan Update would not contribute to cumulative impacts within and near the potential Oak Woodland conservation areas. There is no HCP or NCCP in or near the City of Arcadia with which future development may conflict and result in cumulative adverse impacts. (EIR p. 4.9-28.)